

Supporting Statement A – RMA Organics Price Survey Substantive Change Explanation

A. Justification

This Supporting Statement explains why the RMA Organics Price Survey was not included in the previous renewal of the Organic Survey Information Collection (OMB Control No. 0535-0249). During the renewal, NASS removed the Survey to simplify the submission and because it was unclear whether the RMA Organic Price Survey would continue. The Survey was originally submitted under the hybrid generic clearance (OMB Control No. 0535-0264) due to its voluntary nature.

B. Purpose and Need for the Change

OMB determined that the RMA Organics Price Survey does not meet the criteria for a [Generic Clearance](#) and should instead be submitted as a substantive change under the Organic Survey collection. Submitting the Survey through the generic docket would disrupt the historical continuity needed for future PRA researchers and reviewers. Additionally, the RMA Organics Price Survey has since been reinstated, making it appropriate to incorporate the Survey into the Organic Survey's main collection.

C. Summary of Changes

NASS will re-submit the RMA Organics Price Survey as a substantive change under OMB Control No. 0535-0249. No methodological changes to the Organic Survey are being proposed beyond adding the EPA back into the docket. The change ensures proper PRA tracking and consistency with OMB guidance. The questionnaire updates for the RMA Organics Price Survey include:

- Updating the OMB control number and expiration date
- Revising the survey title to Organics Price Survey
- Removing outdated Floriculture references that were tied to a previously deleted section
- Implementing minor wording edits for clarity

D. Public Comments and 30-Day Notice

The Survey previously underwent a [30-day public comment period](#) when submitted under the hybrid generic docket. OMB advised that a new 30-day period is not required, because the comments received under the generic submission satisfy the PRA requirement. Therefore, this amendment will proceed without an additional public comment period.

E. Impact on Burden

The collection's previously approved burden estimates remain valid. Incorporating the Survey into the Organic Survey docket does not introduce new survey instruments or burden beyond what was already evaluated. Updated burden will be reported in ROCIS only to reflect reassignment of the Survey under the correct control number.

F. Timing and PRA Processing

Upon submission to ROCIS, OMB will override the standard 30-day review period and approve the amendment promptly. NASS will provide this Supporting Statement to OMB prior to submission to ensure alignment and expedite processing.

G. Contacts for Further Information

For additional information about this amendment, please contact:
Brent Chittenden, REE-NASS – brent.chittenden@usda.gov
Struther Van Horn, REE-NASS – struther.vanhorn-ewert@usda.gov