

Supporting Statement - Part A

**FIELD CROPS PRODUCTION**

OMB No. 0535-0002

**TERMS OF CLEARANCE**

Date 12/20/2007

In accordance with 5 CFR 1320, the information collection is approved for a period of 2 years. During this approval, the agency should work with OMB to address issues of nonresponse bias in these surveys. In the next request for approval, the agency must include, at the very least, a plan and timeline for addressing nonresponse bias.

Aggressive steps have been taken by NASS to help their Field Offices improve sampling methodologies and response rates for all surveys – probability and nonprobability. Some issues addressed to date include:

1. In preparation for the 2007 Census of Agriculture, NASS Field Offices spent a great deal of resources on improvement of our list of farmers. This effort not only improved the quality of our “in-scope” records for these lists of commodities, but also enhanced the quality of control data or sampling information used to classify these operations. These efforts have already provided improvements in response rates and coverage of production areas by commodity.
2. For surveys that have prolonged data collection periods such as our County Estimates Survey, NASS’ standard procedures instruct our Field Offices, at a minimum, to conduct 2 mailings followed by a telephone non-response follow-up. Although this practice is ideal, operations sampled for field crop surveys typically include a disproportionate number of small operations and limited dollars for data collection. For most of these surveys, production statistics are weighted by the respondent’s acreage. For these reasons NASS has historically focused on obtaining responses from the larger producers, ensuring adequate coverage. Regardless, NASS is concerned about the levels of non-response and any potential bias and is researching alternate means for improving response rates.
3. The National Agricultural Statistics Service (NASS) completed their first non-response bias study, for the 2006 Agricultural Resources Management Survey, in calendar year 2008. This study compared ARMS data records to matching Census records providing information on the characteristics of ARMS non-respondents plus provided analyses on the success of current ARMS calibration procedures. Preliminary results have been informative and investigation of non-response bias measures is continuing. NASS views non-response bias analysis as an iterative process, each information collection analysis contributing to the next.

4. NASS releases the new 2007 Census data set on February 4, 2009. With availability of this new census file, NASS intends to analyze the 2008 ARMS data set against the refreshed census file. In addition, plans are underway to identify other eligible NASS surveys (such as surveys included in this docket) to run similar analyses on. It's anticipated that this plan will be implemented in late 2009.
5. The largest collection associated with this docket Fall Agriculture Survey or County Estimates Survey showed nearly a 10 percent improvement in response rates from 2007 to 2008. NASS anticipates continued improvement in response rates for 2009 and beyond as we transition the sample survey to a probability based design. Additionally, significant funds have been targeted for extensive non-response follow-up.
6. The newest data collection for this docket, the Cash Rent Survey was initiated by NASS in the fall of 2008 in response to the Farm Bill. Through increased efforts to implement effective data collection strategies in all NASS Field Offices, the first year response rate for the Cash Rent Survey was 81.0 %.

The following table demonstrates improvements for Field Crops Production (0535-0002) surveys since this information collection was last renewed. Sizeable improvements in response rates are anticipated for the 2009 data collection, due to the samples being drawn from the captured 2007 Census of Agriculture data.

Survey	Response Rate 2008	Response Rate 2007
<b>Alfalfa/Other Grass Seed</b>	89.4%	83.9%
<b>Dry Beans</b>		
Dry Bean Cleaner Survey	90.0%	
Dry Bean Inquiry	69.0%	74.1% (all dry beans)
Dry Bean Seed Inquiry	72.7%	
<b>Mint</b>		
Mint Grower	75.3%	75.5% (all mint)
Mint Dealer	80.0%	
<b>Oilseeds, special</b>	72.9%	71.3%
<b>Sunflower, non-oil</b>	100.0%	100.0%
<b>Potatoes</b>		
Acreage, Production and/or Marketings	73.1%	71.9% (all Irish potatoes)
Acreage and Disposition	76.1%	
Sweetpotatoes	84.8%	79.1%
<b>Sugarbeets</b>	100.0%	94.4%
<b>Sugarcane</b>	100.0%	100.0%
<b>Tobacco</b>	59.3%	59.3%
<b>Wheat and Barley</b>	66.8%	54.0%
<b>County Estimates</b>		
Fall Agricultural Survey (Crops and Livestock - County Estimates)	66.7%	57.1%
<b>Crop Progress and Condition Report (Crop Weather)</b>	59.2%	58.0%
<b>Total (weighted)</b>	<b>67.4%</b>	<b>58.4</b>

(Shaded surveys above were combined into one figure in previous year's docket.)

## A. JUSTIFICATION

This is a request for continuing approval of the NASS Field Crops Production information collection. The changes that were submitted in the Emergency Docket in August 2008 have been incorporated into the program to comply with the 2008 Farm Bill, requiring NASS to collect and publish Cash Rental Rates (for farmland and pastureland) on a county basis when possible.

There are no changes to the overall methodology, previously approved in December, 2007. However, there have been some improvements made to the sampling scheme in order to improve response rates for the non-probability surveys. Field Offices have also increased the amount of phone and field enumeration of non-respondents to reduce any non-response bias. Field Directors have improved their communications with non-respondents to help encourage them to respond to NASS surveys. Only minor changes have been made to the questionnaires.

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The primary function of the National Agricultural Statistics Service (NASS) is to prepare and issue current State and national estimates of crop and livestock production, value, and disposition. Survey data are collected for selected field crops to set these estimates. NASS conducts probability surveys where possible, as documented in OMB docket No. 0535-0213, the Agricultural Surveys Program. Because of unique field crop characteristics such as concentration of a crop in localized geographical areas or the relative importance of the crop, the use of supplemental follow-on surveys is needed. The surveys in this docket use a combination of mail questionnaires, telephoning, internet, and personal interviews. They are conducted to ensure that there are sufficient samples to provide accurate indications for NASS published estimates.

Commodity-specific surveys for alfalfa/other grass seeds, dry beans, mint, special oilseeds, sunflowers (non-oil), potatoes, sweet potatoes, sugar beets, sugarcane, and tobacco are used in those States where better coverage of localized growing areas is needed. Results are published in the next monthly *Crop Production* release. In some States and with certain commodities, it has proven to be more effective if we include commodity price information, stocks and some processing questions to the production questionnaires. This has helped to reduce the frequency at which individual operators are contacted to collect data.

Variety surveys are conducted in several States to estimate acreage planted by wheat and barley variety. The wheat variety survey is conducted as part of State cooperative agreements. The barley variety survey is conducted in nine States as part of a cooperative agreement with the American Malting Barley Association.

The County Agricultural Production Survey (CAPS) or County Estimates Surveys is conducted each year at the end of the growing season to help estimate field crops acreage harvested and final production at State and county levels. Some States have found it to be more effective if they have two or three different versions of the questionnaire to target particular growers. Some States will target small grain farms (wheat, oats, rye, etc.) in early fall, so that they collect the data, just after harvest to minimize any memory bias. Some States have a livestock questionnaire that is used to collect data from farmers who are predominantly livestock farmers (no significant crop production). At the end of the year States will send out a complete questionnaire to the remainder of their sample, targeting all commodities of interest in their State.

The weekly Crop Progress and Condition Survey, published in *Crop Progress*, provides timely information about the development and condition of crops between issues of the monthly *Crop Production* release. Questions concerning soil moisture content, insect or disease presence, and the stages of crop production are also asked to better inform farmers of conditions in their region as well as other parts of the country.

The annual Cash Rent Survey is conducted of farmers who have rented land historically on a cash basis. These data will be used to satisfy the requirement of the 2008 Farm Bill to publish county level cash rent data for both crop land and pasture land.

General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204. This statute specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collection of statistics ... and shall distribute them among agriculturists."

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Crop forecasts published in the monthly *Crop Production* report and other releases are used by farmers, agribusinesses, and many government agencies in analyzing the nation's production and marketing of field crops and grains. The Secretary of Agriculture uses estimates of crop production to administer farm program legislation and import-export programs.

The weekly crop progress and condition inquiry, published in the *Crop Progress* report every Monday, provides an efficient way for the Department of Agriculture to closely monitor agricultural developments across the country which may affect the nation's food supply. Numerous briefing reports are prepared for the Secretary of Agriculture on crop condition, phenological development, and harvest progress. The reporting of insect and disease damage can put farmers in other areas on alert

to take preventive measures, thus minimizing possible damage. Information on shortages of soil moisture and extremes in temperatures can presage possible affects on yield.

County estimates for field crops are needed by the Farm Service Agency (FSA) and the Risk Management Agency to carry out their respective legislative mandates. Their primary use of the data is to determine average yields by county, used in determining participating farmers' compensation payments. The county-level cash rent survey data enable FSA program payment rates to better reflect market conditions. The information may be similarly useful to Natural Resources Conservation Service (NRCS). The information will also benefit the agricultural sector more generally by enabling the rental market for cropland to operate more competitively.

Variety surveys are used by the Agricultural Research Service, plant breeders, researchers, and growers to determine the acreage by variety and measure acceptance of new varieties. The impact of insect or disease outbreaks can be measured from variety surveys after the tolerance of a particular variety is determined. Varietal data on wheat are used for determining production and available supplies by class. Class data are of great importance to government analysts and exporters in planning the disposition of U.S. wheat crops since exports comprise approximately one-half of total use.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Nearly all of NASS information collections have been converted to Web-based data collection, what NASS calls electronic data reporting or EDR. Some or all of the survey instruments for the following commodities have been converted: dry beans, mint, special oilseeds, potatoes, sugarcane, non-oil sunflower, sweet potatoes, tobacco, and the weekly crop progress and condition report. The conversion of several more of the smaller surveys will be completed this year. The remaining instruments that will not be converted are too infrequent or too impractical to use that mode of data collection. The current proportion of survey responses that employ the Web is about 50.1% for crop progress and about 0.7 % for the overall information collection.

The main portal for our on-line surveys is <http://www.agcounts.usda.gov>. Once there, the respondents have to enter the valid survey code and the user ID printed on the label of the questionnaire mailed to them. We do not want anyone other than a selected respondent to access the survey web pages. The address for the crop progress is different, however, because it was the first survey NASS converted to the Web: <http://cpcsweb.nass.usda.gov>.

**4. Describe efforts to identify duplication.**

NASS cooperates with State Departments of Agriculture and land grant universities to conduct agricultural surveys. These surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. Some States have added a few additional questions to their questionnaires to accommodate the needs of their State cooperators and eliminate the need for a separate survey for some of these specialty crops. There is no duplication of questions asked of producers in this docket except for the probability surveys conducted by NASS, which they supplement. In addition, respondent lists are carefully compared to ensure there is no overlap.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

Information requested on surveys included in this docket can be provided with a minimum of difficulty by respondents, generally without having to consult their record books.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Collecting data less frequently would eliminate information needed to keep the U.S. Department of Agriculture abreast of changes at the State and national level. Timing and frequency of the various reports have evolved to meet the needs of Department clients, including producers, agribusinesses, and government agencies, yet minimize burden on the reporting public.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner requiring respondents to report information to the agency more often than quarterly; requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;...**

Survey data are collected weekly and monthly depending on the need for information to keep the U.S. Department of Agriculture abreast of changes at the State and national level.

There are no other special circumstances that would cause the information collection to be conducted in a manner inconsistent with the general information guidelines in 5CFR1320.5.

- 8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The Federal Register Notice soliciting comments was published on October 27, 2008 on pages 63674 - 63675. One public comment was received. It was from the Bureau of Economic Analysis in support of the docket and the work done by NASS.

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Consultations with plant breeders, researchers, growers, industry associations, and other government agencies such as FSA and NRCS are carried out to ensure that data collected reflect all varieties and the proper timing to obtain accurate information.

- 9. Explain any decision to provide any payment or gift to respondents.**

There are no payments or gifts to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

All questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 provide for the confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture must read these regulations and sign a statement of compliance annually.

Additionally, NASS and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA), (Public Law 107-347). CIPSEA supports NASS' pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents; subject to the limitations and penalties described in CIPSEA.

- 11. Provide additional justification for any questions of a sensitive nature.**

There are no questions of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

Average completion time per questionnaire is based on time required for other surveys of similar length. Calculation of burden hours is shown in the table below. Estimated response counts are based on an 80% target response rate and minutes per response shown are the maximum average times for all questionnaires used for the commodity.

Projected Field Crop Production Annual Response Burden Hours for 2009

Survey	Estimated Sample Size	Freq	Estimated Responses				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr	Burden Hours	
<b>Commodity Specific Surveys</b>											
<b>Alfalfa/Other Grass Seed</b>	350	1	280	280	10	47	70	70	2	2	49
<b>Dry Beans</b>											
Dry Bean Cleaner Survey	50	2	40	80	20	27	10	20	2	1	27
Dry Bean Inquiry	7,700	3	6160	18,480	15	4,620	1,540	4,620	2	154	4,774
Dry Bean Seed Inquiry	1,100	3	880	2,640	15	660	220	660	2	22	682
<b>Mint</b>											
Mint Grower	300	1	240	240	10	40	60	60	2	2	42
Mint Dealer	10	1	8	8	15	2	2	2	2	0	2
<b>Oilseeds, special</b>	1,900	1	1520	1,520	10	253	380	380	2	13	266
<b>Sunflower, non-oil</b>	10	3	8	24	10	4	2	6	2	0	4
<b>Potatoes</b>											
Acreage, Production and/or Marketings	4,500	3	3600	10,800	15	2,700	900	2,700	2	90	2,790
Acreage and Disposition	1,800	3	1440	4,320	20	1,440	360	1,080	2	36	1,476
Sweetpotatoes	1,150	1	920	920	10	153	230	230	2	8	161
<b>Sugarbeets</b>	10	4	8	32	25	13	2	8	2	0	14
<b>Sugarcane</b>	20	6	16	96	15	24	4	24	2	1	25
<b>Tobacco</b>	2,200	6	1,760	10,560	10	1,760	440	2,640	2	88	1,848

Survey	Estimated Sample Size	Freq	Estimated Responses				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr	Burden Hours	
<b>Variety Surveys</b>											
<b>Wheat and Barley</b>	14,500	1	11,600	11,600	10	1,933	2,900	2,900	2	97	2,030
<b>County Estimates</b>											
County Agricultural Production Survey (CAPS)	150,000	1	120,000	120,000	25	50,000	30,000	30,000	2	1,000	51,000
Fall Agricultural Survey (Crops and Livestock)	250,000	1	200,000	200,000	20	66,667	50,000	50,000	2	1,667	68,333
<b>Crop Progress and Condition Report (Crop Weather)</b>	4,000	35	3,200	112,000	10	18,667	800	28,000	2	933	19,600
<b>Cash Rent Survey</b>	275,000	1	220,000	220,000	5	18,333	55,000	55,000	2	1,833	20,167
<b>Total</b>	714,600		571,680	713,600		167,343	142,920	178,400		5,947	173,290

Cost to the public for completing the questionnaires is assumed to be comparable to the hourly rate of those requesting the data. The combined reporting for all surveys of 173,290 hours is multiplied by \$24 per hour, for a total cost to the public of \$4,158,960.

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There is no cost burden to respondents.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.**

The total cost to the Federal government to conduct field crop surveys and prepare estimates is approximately \$11.2 million, most of which is staff cost for data collection.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).**

The total burden of 173,290 hours is up 6,421 hours from current inventory of 166,869 hours. This increase is due to several factors; primarily the increase in estimated minutes it takes to complete the County Estimates Surveys (CAPS) questionnaire from 22 minutes to 25 minutes per survey and the increase in the Cash Rent Survey sample size. This was partially offset by a slight decrease in some of the other samples included in this docket, along with reducing the frequency of the crop weather survey from 40 weeks to 35 weeks and the removal of the cash rent questions from the County Estimates Surveys.

For 2009, the Cash Rent questions will be removed from the County Estimates questionnaires and asked only on the stand alone Cash Rent questionnaires. We will leave the cash rent screening question on the County Estimates questionnaires for list building purposes.

Additional information on the methodology changes made for the Cash Rent Survey are included in Supporting Statement – Part B, Item 3.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Questionnaires are returned by mail to the Field Offices (FO's) with phone enumeration of non-respondents in each State. The data are reviewed for reasonableness prior to keying into data processing media for editing and summarization. They are summarized by crop reporting districts and the indications are weighted for the State, based on the relative importance of the commodity in the district. State indications are plotted on time series charts which typically comprise 10 years of survey indications and final estimates. Three primary indicators are obtained for each crop: an identical comparison of current year

acreage to the previous year acreage, acreage as a percent of total farmland, and average yield for respondents reporting.

Crop production estimates are issued from Headquarters in Washington, D.C. in the monthly *Crop Production* reports, the January annual summary, June acreage report, or specialty releases as shown in the table below. Crop progress and condition data are published in the weekly *Crop Progress*. State-funded cooperative survey reports may be released from the individual Field Offices as well as in Headquarters publications. The *Weekly Weather and Crop Bulletin* is prepared in cooperation with the National Weather Service Meteorologists, USDA's Cooperative Extension Service, and World Agricultural Outlook Board.

**2008 Field Crops Production Surveys**

Survey	Data Collection Period	Publication	
		Publication Name	Release Date
Alfalfa/Clover Seed	Jul	FO monthly release	August
Dry Beans	Jun - Nov	<i>Crop Production</i>	12 <sup>th</sup> of month
Mint	Nov	<i>Annual Summary</i>	January
Oilseeds, Special	Oct - Dec	<i>Crop Production</i>	12 <sup>th</sup> of month
Potatoes	Apr - Dec	<i>Crop Production</i>	12 <sup>th</sup> of month
		<i>Potatoes</i>	Sep 20
Sugar beets	Apr, Jun, Nov, Dec	<i>Acreage</i>	end of Jun
Sugarcane	Jun; varies Aug-	<i>Crop Production</i>	12 <sup>th</sup> of month
Sunflower, Non-oil	Mar, Jun, Dec		
Sweet potatoes	Mar, Jun, Dec		
Tobacco	Jun, Aug - Nov	<i>Acreage</i>	end of Jun
		<i>Crop Production</i>	12 <sup>th</sup> of month
Variety Surveys: Barley	Jun	<i>Variety Summaries</i>	mid-Jul
Acreage and Production	varies Aug-Jan	<i>Annual Summary</i>	January
Crop Progress	weekly Apr-Nov	<i>Crop Progress</i>	Mondays

These publications are available on-line immediately after release at [http://www.nass.usda.gov/Publications/Reports\\_By\\_Title/index.asp](http://www.nass.usda.gov/Publications/Reports_By_Title/index.asp). Once there, select first letter of report title from alphabet list and then specific commodity or publication.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

There is no request for approval of non-display of the expiration date.

**18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-I.**

There are no exceptions to the certification statement.

June, 2009 (revised)