

UNITED STATES DEPARTMENT OF AGRICULTURE
Acreage/Crop Reporting Streamlining Initiative
OMB NUMBER: 0563-0084

Terms of Clearance:

In accordance with 5 CFR 1320, the information collection is approved. The agency is encouraged to continue conducting usability testing of the instruments and consultations with stakeholders to improve the web-based tool, reduce costs, and encourage a seamless transition. Any changes that are made to the form of interaction (except for adding content) may be submitted for approval as a non-material change to the collection.

The agency must also ensure that the burden currently approved for this collection in other packages is removed from those packages. They must also provide a summary of the estimated net change in burden as soon as possible, but no later than the due date for the agency submission for the ICB.

Implementation of ACRSI will be conducted in phases. In the fall of 2011, ACRSI Phase 1 collected applicable information from producers in Dickenson, Marion, McPherson and Saline Counties in Kansas. These counties were selected based on their commonality of historical crop reporting, high percentage of producers participating in both RMA and FSA programs and the high level of interest of the private agricultural service industry (precision-ag and farm management) in the pilot. The effectiveness and lessons learned from implementing ACRSI Phase 1 in the four Kansas counties were used to identify changes and improvements to the web-based single source reporting system. These changes include moving from an interactive reporting platform that required dynamic interrogation of producer entity, farm record, and other data, to a reporting platform based on a published USDA data standard that agriculture equipment manufacturers and service providers can build acreage reports to fulfill. This is the basis for the design of the ACRSI Phase 2 Pilot.

In the spring of 2015, the ACRSI Phase 2 Pilot will collect applicable information from producers in selected counties in Illinois and Iowa for selected commodities. These counties and commodities were selected based on their commonality of historical crop reporting, high percentage of producers participating in both RMA and FSA programs, and the prevalence of Precision Agriculture. The effectiveness and lessons learned from implementing the ACRSI Phase 2 Pilot in these Illinois and Iowa counties will be the basis for determining specific changes to the next phase of the pilot.

It is envisioned that the pilot will continue to be expanded in phases by geographical area and additional commodities until all counties and commodities that are practical to include are included. It is also envisioned that additional functionality will be added to allow for the submission and sharing of more of the information collected by both agencies, such as production information, thereby further reducing the reporting burden.

Purpose:

To request a three year renewal approval from the Office of Management and Budget of the currently approved package. This collection allows certain information to be collected and utilized by programs approved under OMB 0560-0004 – Report of Acreage for FSA and 0563-0053 – Multiple Peril Crop Insurance for the Risk Management Agency. The Comprehensive Information Management System (CIMS) was expanded to incorporate the ACRSI functions. CIMS provides RMA, FSA, NASS, OIG, other USDA agencies and participating crop insurance companies timely access to a single, centralized storage repository of RMA and FSA producer and program information.

A. Justification

- 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 Acreage/Crop Reporting Streamlining Initiative (ACRSI) is an initiative to improve and streamline the existing information collection activities currently approved by OMB by eliminating or minimizing the duplication of information collected. The improvements and streamlining will reduce the overall burden on the public, USDA employees, and Approved Insurance Providers (AIPs) by eliminating the need for farmers and ranchers to report the same information multiple times and eliminate the need for USDA employees, AIPs and insurance agents to input the same data multiple times, thus reducing USDA administrative and operating costs.

The following statutory and regulatory mandates require the collection of acreage and production information from producers who wish to participate in certain USDA programs.

Section 508(f)(3) of the Federal Crop Insurance Act (7 U.S.C. §1515) requires producers to provide (1) annual records regarding crop acreage, acreage yields, and production for each agricultural commodity insured; and (2) report acreage planted and prevented from planting by the designated acreage reporting date for the crop and location as established by the Federal Crop Insurance Corporation.

7 U.S.C. 7333 (b)(3) specifically requires, for crops and commodities covered by the Noninsured Crop Disaster Assistance Program (NAP), annual reports of acreage planted and prevented from being planted must be reported, as required by the Secretary, by the designated acreage reporting date for the crop and location as established by the Secretary.

The Common Crop Insurance Policy Basic Provisions at 7 CFR 457.8 provide that insured producers must submit an annual acreage for each insured crop in the county on or before the acreage reporting date contained in the Special Provisions, or other date as specified.

7 CFR 1437.7(d) requires that reports of acreage planted or intended but prevented from being planted must be provided to Commodity Credit Corporation (CCC) at the administrative Farm Service Agency (FSA) office for the acreage no later than the date specified by CCC for each crop and location.

7 CFR 1614 and 11020 specifies the Secretary shall reduce administrative burdens and cost to producers by streamlining and reducing paperwork, forms and other administrative requirements, including through implementation of the Acreage Crop Reporting and Streamlining Initiative.

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.**

The information collected will be the same information currently collected and will be used in the same manner it is currently used.

Producers have been reporting to their FSA Service Center or crop insurance agent, now they will have the opportunity to directly report certain acreage, commodity, production, and other key information directly to USDA thru a web-based single source reporting system or to use their precision-ag systems and farm management information systems to download the information to USDA. This will allow the information to be collected one time from producers.

Information that is reported by producers personally visiting either their insurance agent's office or the FSA Service Center will be shared between agencies. Therefore, producers who elect to not use the web-based single source reporting system or download information from precision-ag systems or farm management information systems may still not be required to personally visit multiple offices to report the same information again.

Once collected, information may also be shared with the Natural Resources Conservation Service and the National Agricultural Statistics Service, if needed.

Implementation of ACRSI will be conducted in phases. In the fall of 2011, ACRSI Phase 1 collected applicable information from producers in Dickenson, Marion, McPherson and Saline Counties in Kansas. These counties were selected based on their commonality of historical crop reporting, high percentage of producers participating in both RMA and FSA programs and the high level of interest of the private agricultural service industry (precision-ag and farm management) in the pilot. The effectiveness and lessons learned from implementing ACRSI Phase 1 in the four Kansas counties were used to identify changes and improvements to the web-based single source reporting system. These changes include moving from an interactive reporting platform that required dynamic interrogation of producer entity, farm record, and other data, to a reporting platform based on a published USDA data standard that ag equipment manufacturers and service providers can build acreage reports to fulfill. This is the basis for the design of the ACRSI Phase 2 Pilot.

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changes to the next phase of the pilot.

It is envisioned that the pilot will continue to be expanded in phases by geographical area and additional commodities until all counties and commodities that are practical to include are included. It is also envisioned that additional functionality will be added to allow for the submission and sharing of more of the information collected by both agencies, such as production information, thereby further reducing the reporting burden.

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.

In the initial pilot, FSA and RMA developed and implemented a web-based single source reporting system that was designed to be accessed directly by the producer to report all applicable information without required intervention by USDA employees, AIPs or insurance agents.

Producers are required to have Level 2 access under USDA's eAuthentication system to access the web-based single source reporting system. Producers not having a Level 2 authority may obtain Level 2 access by registering online and then visiting their FSA Service Center Local Registry Authority to complete the process.

The web-based single source system will authenticate the producer through USDA's eAuthentication system and only allow them to access and report for the FSA Farm Number assigned to their eAuthentication account. The web-based single source system will: 1) have on-screen drop down selection boxes for commodity information; 2) validate that the reported planting date falls within an acceptable range; and 3) validate that reported acres do not exceed the field calculated acres. The web-based single source system will also allow the producer to enter the name and share of other producers sharing in the crop reported. The system will capture the date and time the information was submitted by the producer.

It is envisioned that the pilot will continue to be expanded in phases by geographical area and additional commodities until all counties and commodities that are practical to include are included. It is also envisioned that additional functionality will be added to allow for the submission and sharing of more of the information collected by both agencies, such as production information, thereby further reducing the reporting burden.

The ACRSI is a significant step forward towards the use of existing technologies for the reporting of information directly from the producers, either by the producer entering the data via a web-based system or uploading information from compatible precision-ag and farm management information systems. Currently producers manually report the same information separately to both the FSA County Office and their Insurance Agent. As ACRSI functionality is adopted, producers will be able to report increasing amounts of common information to either one of these channels or a third party, and have that information shared. The intent is that producers, FSA County Offices, and Insurance Agents will experience reduced reporting

burdens, data quality will increase, and data reconciliation efforts will decrease. Any reduction in burden was not measurable from Phase I as we are still in the beginning stages and lessons learned are still being developed. While additional information specific to individual programs may still be required to be obtained from the producer, the ACRSI will provide significant reductions in burden on producers, USDA employees, AIPs and insurance agents.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

FSA and RMA share many common customers. Currently, many of those customers are required to report some of the same commodity, acreage and production information to both agencies. Until this system is fully phased in, there will be duplication within this package and 0563-0053 – Multiple Peril Crop Insurance and 0560-0004 – Report of Acreage.

The ACRSI is an initiative to improve the existing information collection activities, simplify information reporting, reduce the burden on producers, reduce the opportunity for inconsistent data and errors, and eliminate duplication of information collection. The ACRSI is a significant step forward in each agency's commitment to identifying and reducing or eliminating duplication of information reporting by producers.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There are no additional reporting requirements created specifically for small businesses to meet the requirements

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.

The Agencies would not be able to administer their respective programs in accordance with the applicable statutory/regulatory mandates without collection of the applicable information. In addition, failure to collect the applicable information could result in unearned Federal benefits being issued or producers being denied eligibility to program benefits.

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;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The agency is able to certify compliance with 5 CFR 1320.

8. **If applicable, 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. Specifically address comments received on cost and hour burden.**

The 60 day notice was published on October 31, 2014, at 79 FR 64741-64743. A total of 3 comments were received and reviewed. We summarized and responded to the comments received. See attachment.

Listed below are the System of Records that were amended and published in the federal register on December 11, 2007, Volume 72 Number 237, page 70290-70293. USDA/FCIC-2, Compliance Review Cases; USDA/FCIC-8, List of Ineligible Producers; USDA/FCIC-9, Agent; USDA/FCIC-10, Policyholder; and USDA/FCIC-11, Loss Adjuster.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There are no payments or gifts provided to respondents.

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

Information collected is handled according to established FSA and RMA procedures implementing the Privacy Act, Freedom of Information Act, and OMB Circular A-130, "Responsibilities for Maintenance of Records About Individuals by Federal Agencies."

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency**

considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No data is collected that may be considered sensitive or personal in nature.

12. **Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

See burden grid for estimated number of annual respondents and total burden hours.

FSA and RMA estimates that upon full implementation of ACRSI of the 293,000 total estimated respondents, 263,700 will be able to use the web-based single source reporting system or use their precision-ag systems and farm management information systems to download the information to USDA, and 29,300 will report information by personally visiting one office and having that office share the information with other applicable agencies.

The majority of producers are common to both FSA and RMA and currently report the information to both agencies. However, there are some producers that participate in FSA programs but not RMA programs accounting for the higher average number of annual respondents in OMB 0560-0004 than those in OMB 0563-0053. There are also a few producers that participate in RMA programs but not FSA programs. Accordingly, to estimate the total annual respondents the FSA estimated respondents of 291,500 in OMB 0560-0004 representing all FSA NAP respondents and the majority of RMA respondents, because they participate in programs of both agencies, was added to 1,500 respondents estimated to participate and report information only for RMA programs (291,500 + 1,500 = 293,000).

Upon full implementation of ACRSI, it is expected that a higher percentage of annual respondents will be able to use either the web-based single source reporting system or use their precision-ag systems and farm management information systems to upload the information to USDA, with fewer respondents reporting information by personally visiting both the FSA Service Center and their crop insurance agent office. Therefore, the burden for travel time is based on the lower percent of respondent's personally visiting one office.

The estimated annualized cost to respondents for providing the information is \$11,602,800 (329,625 x \$35.20). The median hourly wage for farmers, ranchers and other agricultural managers is \$35.20 according to the U.S. Department of Labor, Bureau of Labor Statistics May 2013 Occupational Employment Wages 11-9013 report for farmers, ranchers and other agricultural managers.

13. **Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a**

total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There is no start-up/capital or operation/maintenance costs associated with this program.

14. **Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The cost to FSA for form development, printing and distribution is minimal because the form is computer generated. Estimated cost for FSA Service Center employee GS 6/9 is \$2,069,295 (109,313 hours for completion of form X \$18.93 average county employee hourly wage).

RMA does not produce or distribute forms; therefore, there is no cost of producing or distributing forms for RMA. There is also no cost to RMA for the collection of the information from the producer because it is collected by the AIPs through their representatives and agents and covered by the existing Service Reimbursement Agreement.

The implementation costs (includes application development and infrastructure costs) for the Phase 2 ACRSI system is estimated at \$7,000,000. In addition, recurring maintenance costs for CIMS and the Phase 2 ACRSI components is estimated at \$920,000 per year.

15. **Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

There is no change in respondents, responses, or burden hours with this renewal submission.

This pilot is still in the beginning stages as the agency will start Phase 2 in the spring of 2015. It is envisioned that the pilot will continue to be expanded in phases until all counties and commodities are included that are practical. During these phases changes and improvements will be identified in the web-based single source reporting system and will be implemented during the next phase. The agency will not have a complete picture of the total reduction in burden until improvements found in the phases are completed

16. **For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

Neither FSA nor RMA currently intends to publish the information collection. NASS may make available data obtained through ACRSI in its annual reports.

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.**

No approval is being sought to not display OMB approval.

18. **Explain each exception to the certification statement identified in Item 19 of the 83-I.**

This information collection meets the certification requirements of SF-83-I, Item 19.