

Hopper, Richard - REE-NASS, Washington, DC

From: Andrew Reamer <areamer@gwu.edu>
Sent: Wednesday, April 6, 2022 8:22 PM
To: OMBOfficer - NASS
Cc: Barnes, Kevin - REE-NASS, Washington, DC; Beckler, Daniel - REE-NASS, Washington, DC
Subject: Re: Draft ICR request -- Vegetable Surveys Program (OMB Control No. 0535-0037)

Excellent, Richard, thank you.

Andrew

On Mon, Apr 4, 2022 at 12:20 PM OMBOfficer - NASS <SM.NASS.OMB.Officer@usda.gov> wrote:

Dr. Reamer,

Draft documents for NASS's Information Collection Requests (ICR) are typically not available until literally the day they are provided to the Office of Management and Budget (OMB) and the Federal Register Notice (FRN) providing the 30-day public comment period is submitted for publication. That is the case for the renewal of NASS's Vegetable Surveys Program (OMB No. 0535-0037); we do not have draft documents available. However, we can share that the renewal ICR documents will eventually contain only one change from our existing clearance (available here: https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202008-0535-001). That change will be to integrate New Mexico Chile questions and estimates (funded by a state-level cooperator) into the end of season Fresh vegetable Production, Disposition, and Income Survey. This change will require a modest sample size increase in New Mexico.

Sincerely,

Richard Hopper

Richard Hopper

U.S. Department of Agriculture | National Agricultural Statistics Service

Methodology Division | Standards and Survey Development Methodology Branch

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From: Andrew Reamer <areamer@gwu.edu>
Sent: Sunday, April 3, 2022 1:36 PM
To: OMBOfficer - NASS <SM.NASS.OMB.Officer@usda.gov>
Cc: kevin_barnes@usda.gov
Subject: Re: Draft ICR request -- Vegetable Surveys Program (OMB Control No. 0535-0037)

Thank you, Richard. As you can see from <https://www.aeaweb.org/forum/questions>, as American Economic Association staff I post 60- and 30-day ICRs for economists to know about and comment on. ICRs sent to OMB and available for 30-day comment are not draft ICRs, they are actual, official ICRs. OMB gives agencies the option of making draft ICRs available for comment during the 60-day period as a vehicle for obtaining input in finalizing the ICR submitted to OMB.

Several agencies -- such as the Education Department, the Federal Reserve Board, and the Centers for Disease Control and Prevention -- make each complete draft ICR publically available at the start of the 60-day comment period. Each agency does it in its own way:

- ED posts all the material on Regulations.gov (like <https://www.regulations.gov/docket/ED-2022-SCC-0019/document>).
- The FRB maintains a webpage that carries the information (<https://www.federalreserve.gov/apps/reportforms/review.aspx>).
- The CDC's PRA officer emails me the draft collection instrument and supporting statement within a day of my request.

In other agencies, sending out the draft ICR is up to the program manager. At some agencies, it's often the case that the draft ICR is still being written at the start of the 60-day period. Census Bureau and NSF program managers are good about letting me know the draft ICR is in process and they'll forward it when it's ready, which may be 30 or even 45 days into the 60-day period.

For some ICRs, the program manager will say that while the draft ICR isn't available, there's really no change from three years ago and I should just refer people to the [reginfo.gov](https://www.reginfo.gov) page or the methodology section of the program webpage. The FRN for the Vegetable Surveys Program doesn't indicate if any changes are planned and you are welcome to let me know if that indeed is the case.

Every now and then I receive an email like yours that seems to suggest that I don't really understand the PRA process, I should not expect that a draft ICR will be available for viewing in the 60-day period, and I need to wait for the submission of the ICR to OMB to see the details -- by which time, of course, it's too late to provide detailed input to the agency based on the current, not the prior, ICR.

Therefore, please consider this email as a response to NASS's 60-day notice. For future Vegetable Surveys Program 60-day notices under the Paperwork Reduction Act, I request that NASS do its best to make the draft data collection instrument and draft supporting statement available to requestors, such as myself, who write in response to the FRN, as doing so would be consistent with the letter and the spirit of the PRA. Thanks much for your consideration.

Sincerely,

Andrew

On Sun, Apr 3, 2022 at 12:47 PM OMB officer - NASS <SM.NASS.OMB.Officer@usda.gov> wrote:

Good Morning, Dr. Reamer –

The draft ICR is in progress. When it is ready for public comment, a second Federal Register Notice will be published with a link to view the draft ICR and provide any comments on the details. I imagine that will be published sometime this summer.

The April 1 Federal Register Notice announced NASS' intent to renew the ICR and solicit comment on NASS' plans to renew and/or any considerations NASS should consider for the draft ICR. There is an active ICR for the Vegetable Surveys Program that you can review at this link: https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202008-0535-001

I hope this helps. If you have further questions or comments, feel free to email back. Have a good week.

Richard Hopper

Richard Hopper

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From: Andrew Reamer <areamer@gwu.edu>

Sent: Friday, April 1, 2022 2:47 PM

To: OMBOfficer - NASS <SM.NASS.OMB.Officer@usda.gov>

Cc: kevin_barnes@usda.gov

Subject: [External Email]Draft ICR request -- Vegetable Surveys Program (OMB Control No. 0535-0037)

[External Email]

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Dear Mr. Hopper,

On behalf of the American Economic Association and the Industry Studies Association, I write to request a copy of the draft ICR for the Vegetable Surveys Program (OMB #: 0535-0037), as invited by [today's Federal Register](#). Thank you and we look forward to seeing the materials.

Sincerely,

Andrew Reamer

Research Professor

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