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United States Department of Agriculture
Economic Research Service
1400 Independence Avenue, SW
Washington, DC 20250-1800

Submitted via Regulations.gov

Re: Request for Information, ERS-2026-0001

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to respond to the request for information on the Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture.

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture (SDA) in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs, including food safety, plant and animal disease prevention, nutrition, grain inspection and fostering the economic vitality of our farms and rural communities. Our members promote, regulate and otherwise serve the American agricultural and food sectors. In fulfilling these duties, states depend on accurate, timely, and trusted USDA data products. Therefore, USDA's statistical data and reports are critically important to both state departments of agriculture for developing sound policy and regulations, as well as to the producers, businesses and communities they serve.

NASDA has also partnered with the National Agricultural Statistics Service (NASS) for 54 years to support the collection of vital agricultural data nationwide. Individual states have partnered with NASS for even longer, establishing mutual interest agreements before NASDA's partnership officially began. Throughout this longstanding partnership, we have ensured that USDA statistics reflect on-the-ground agricultural realities. In 2025, in coordination with NASS and other USDA leadership, NASDA accelerated efforts to expand its role in supporting USDA data collection and producer engagement by modernizing the cooperative agreement. These actions underscore NASDA's commitment to ensuring that USDA's statistical programs remain transparent, methodologically rigorous, producer-informed and capable of delivering accurate and timely information that supports sound decision-making across the agri-food supply chain, while upholding USDA's robust commitments to data confidentiality and privacy for all respondents.

Addressing these challenges requires not only maintaining the capacity and resources necessary for USDA's statistical programs but also stronger partnerships that enhance outreach, trust, and data usability. NASDA is uniquely positioned to support these efforts through its longstanding cooperative agreement with NASS and its nationwide network of state departments of agriculture. While SDA serve as regulators, NASDA itself is a non-regulatory, producer-trusted partner that can help increase participation in USDA surveys by working with organizations trusted by farmers and ranchers, thereby reinforcing engagement and improving response rates. In addition, NASDA can enhance the

accessibility and practical application of NASS data by developing user-friendly dashboards and tools that help stakeholders interpret and use the data more easily. As NASS data are used more frequently and by a broader set of stakeholders, their value becomes clearer to producers, further encouraging participation and enhancing the overall quality and credibility of USDA data.

Given NASDA's dual role in supporting USDA data collection and representing SDA that rely on these data to fulfill their state responsibilities, we are well-positioned to offer practical, constructive input in response to this request in the following pages. USDA's statistical efforts remain the global benchmark for agricultural data, and we see significant benefits in maintaining this status.

Data Products and Data Sets

The following questions relate to official agricultural statistics produced through data collected from surveys, censuses, and other sources published by ERS and NASS.

1. Which NASS or ERS data (e.g., releases, reports, datasets) are most valuable to your work, and why?

USDA data products that demonstrate the current state of agricultural production at the state or county level are critically important to state departments of agriculture. Reports such as the World Agricultural Supply & Demand Estimates (WASDE), Crop Progress, and Cattle Inventory, along with county-level datasets available through NASS Quick Stats, help SDA monitor production trends, respond to emerging issues affecting producers, and inform state-level policy decisions. These data are frequently used to understand shifts in acreage, yields, herd size, and regional production patterns, and they provide an objective foundation for communicating with producers, policymakers, and industry stakeholders.

Another key data product for the agricultural and food industries is ERS commodity and food price outlook reports. The monthly and quarterly situation-and-outlook reports for major commodity sectors (livestock, dairy, grains, oilseeds, cotton, sugar, fresh produce) are used extensively by food manufacturers for procurement planning, by retailers for pricing strategy, and by federal programs (school nutrition, SNAP) for budget forecasting. These insights allow states to accurately gauge the state of their state's food supply and demand.

NASS and ERS reports also provide important nationwide insights into the input costs producers face across a spectrum of commodities. SDA often leverage USDA data to track labor, chemical, and fertilizer costs over time and to support efforts to provide more granular data on those and other inputs. The NASS Agricultural Resource Management Survey (ARMS) is a particularly important tool for collecting data for these reports, along with NASS's Agricultural Chemical Use survey. ERS reports on farm labor costs and demographics have been valuable for contextualizing the nationwide importance of agricultural labor policy reform.

ERS farm income and financial indicator datasets are highly valuable because they provide insights into the broader economic conditions facing producers. ERS projections of net farm income and broader farm financial health help SDAs contextualize production data within the economic realities of the farm sector and better understand how market conditions, policy changes, and cost pressures affect producers across regions and commodities.

2. What gaps exist in the agricultural data produced?

Biobased Products

While USDA broadly tracks estimates of economic scale and employment of biobased product manufacturing through the Biobased Product Report, this sector represents an important emerging source of domestic demand for U.S. agricultural products and would benefit from increased information and transparency. As more detailed NAICS codes are generated through directives from the 2018 Farm Bill, we encourage USDA to provide more data regarding crop usage, production capacity, and other key economic indicators for biobased products.

Consumer Preferences

Understanding tastes and preferences is essential for analyzing the economics of the consumption of designated crops. Consumer-level "scanner" data is available from third-party data providers but comes at a high cost, making it inaccessible to resource-constrained entities such as state departments of agriculture, which are often responsible for the domestic marketing of crops in their states. We recommend that USDA develop consumer-level datasets or reports to help SDA identify common retail trends within their states and regions.

Farm Bankruptcies

NASDA recommends creating a dataset that outlines total farm bankruptcies across all chapters of the U.S. bankruptcy code. While USDA releases datasets that help determine the overall state of farm financial stress, the most commonly used data source to determine aggregate stress is the Administrative Office of the Courts PACER system. This system is outdated and difficult to navigate. Given the importance and sensitivity of this data to the U.S. farming industry, we recommend that USDA issue a regularly scheduled report summarizing this data.

Feral Hogs

A report on the estimated number of feral hogs in certain areas of the U.S. would improve USDA's and SDA's abilities to prevent the introduction of foreign animal diseases. Feral hogs are a major vector of FADs, and without an accurate estimate of feral hog populations, it becomes increasingly difficult to assess the risk they pose to animal and human health. We suggest establishing county-level estimates of feral hog populations in states with significant feral hog populations.

Food Insecurity

NASDA supports the continued production of the USDA Household Food Security report. This report provides important data on food insecurity in the United States and helps guide nutrition programs, education, and interventions at state and local levels. Maintaining this annual report allows policymakers to better understand where needs exist, track changes over time, and make informed decisions to support families and communities.

Industrial Hemp

Since the 2018 Farm Bill authorized commercial hemp production, NASS has published annual hemp production reports, but resource and methodological limitations have constrained its applicability for industrial hemp producers and state regulators. Pending regulatory changes may soon place greater emphasis on industrial hemp grown for grain and fiber purposes, so efforts to provide greater visibility into production practices and market structures would be beneficial.

Precision Agriculture

Understanding the benefits of precision agriculture technology requires data that allows the evaluator to understand field-level effects. In addition, weather-related risk assessment, including the effects of drought, flooding, and extreme temperatures, on yield and therefore profitability, requires granularity well below the county level. Few USDA statistical program provides sub-county resolution on a systematic basis, and we see this as a significant gap in data reporting.

Regenerative Agriculture

The USDA regenerative agriculture pilot program, administered by the Natural Resources Conservation Service, presents a significant opportunity to develop a comprehensive soil-monitoring dataset. By collecting soil samples to assess the outcomes of regenerative agriculture practice adoption, USDA will have a valuable chance to generate aggregated datasets to share with researchers and practitioners who aim to quantify the benefits of regenerative agriculture adoption. USDA's continued commitment to data confidentiality and privacy in this topic and all others is paramount.

Specialty Crops

One of the most identifiable gaps is with specialty crops. Fruits, vegetables, tree nuts, berries, and other specialty crops collectively represent approximately $60 billion in annual farm receipts, nearly 20 percent of total U.S. crop value, yet there are dramatically fewer data products for the specialty crop sector than for row crops and noticeably fewer than for livestock. County-level production data for most specialty crops is available only in census years (5-year cycles). For supply chain and market development, this five-year cadence is inadequate.

Vertically Integrated Farms

Vertically integrated farms have little to no significant USDA data. A growing portion of U.S. agricultural output, especially in the livestock sector, which includes both feed and livestock production, is delivered through production contracts between growers and integrators. USDA statistical programs tend to underrepresent contracted production because their surveys are designed for independent farmers and ranchers. Understanding the economic and financial indicators of contract growing is critical for understanding farm income distribution and financial stress in these supply chains.

3. What new topic areas should USDA prioritize for data products?

We encourage USDA to address all available data gaps given resource constraints. Beyond addressing specific data gaps, we also encourage USDA to prioritize nimble, flexible datasets to enable coverage

of emerging issues. While data granularity is incredibly important, we also recognize that flexible data creates additional value for users. This could mean disaggregation of hyper-specific data, or the ability to generate more ad hoc datasets based on emerging issues.

We encourage USDA to prioritize data products related to topic areas that can be of the greatest benefit to U.S. producers. NASDA supports USDA's 2026 Research & Development priority to "increase profitability for farmers and ranchers." NASDA also encourages USDA to leverage trusted, public-sector networks such as land-grant universities and extension services to maximize the reach of these data products.

4. How often should data and information be released or updated (e.g., annually, quarterly)?

Data should be released as frequently as possible, especially for datasets that could significantly impact markets. Examples of this data include the WASDE, Crop Production Report, Grain Stocks report and Agriculture Prices report, which we believe should continue to be released monthly or if possible, be released more frequently.

Data that is primarily used to address long-term trends should be released quarterly. This includes farm income estimates, farm financial stress indicators, and commodity-specific, long-term outlooks.

Detailed crop and livestock production statistics, acreage and yield summaries, and comprehensive commodity-level statistics should remain on annual cycles, with the understanding that preliminary estimates are released earlier and revised as additional administrative data (FSA certifications, RMA data) becomes available.

The Census of Agriculture should continue to be released every five years to ensure adequate time for data collection and vetting.

5. What geographic granularity (e.g., national, state, county) for data best supports your work?

County-level estimates, coupled with state averages or totals, best support SDA's work. It is critical for states to have the data needed to understand, at a more granular level, the production trends and issues facing their states. Having more granular data helps states determine how best to support producers when regional or local issues affect their farmers and ranchers.

As a trade association, NASDA values facts and figures that are aggregated at the state and national levels. In addition, reports focusing on specific farming regions (i.e., Cotton Belt, Mississippi Delta, Midwestern Plains) help us understand regional trends and inform our advocacy for specific priorities impacting the producers in those areas.

6. Are there NASS or ERS data products, data sets, and other relevant information that are duplicative, outdated, or underutilized? What improvements, changes or consolidations could be made (e.g., more timely, different data collection methods)?

Some NASS survey instruments reflect agricultural structures that have substantially changed. The Small Grains Summary retains detail on rye, oats, and barley that reflect historical crop rotations rather than current production patterns; the attention devoted to these crops in terms of survey design and

release prominence may not be well-calibrated to their current economic significance relative to rapidly growing crops like hemp, cover crops, and organic transitional acreage.

ERS's tobacco and cotton outlook reports, which were valuable in their historical context, cover sectors that have undergone fundamental structural change (tobacco buyout, cotton direct payment elimination) and would benefit from updated analytical frameworks that reflect current market structures rather than those inherited from the commodity program era.

We encourage increased outreach to producers to explain the benefits and usability of the NASS survey portal and, where applicable, its use in other data collection efforts. This portal has been extremely beneficial for producers, but outreach and education about it are still lacking. As response rates drop, outreach and education on this new data reporting method are more critical now than ever.

7. Do you use non-USDA data to supplement data elements or variables of interest that are missing from NASS or ERS products? If yes, please specify which data sets you supplement and why. Do you use non-USDA data as a proxy for data elements that are missing from NASS or ERS products? If yes, please specify why you are using non-USDA data in conjunction with USDA data.

States primarily rely on USDA data to carry out their operations. This is due to resource constraints that limit access to non-public data, and states must ensure that their decision-making is guided by unbiased data. It is uncommon for states to use any private datasets.

NASDA's Foundation maintains a robust research and education program. In our current projects, we are using the following external datasets to supplement USDA data: Administrative Officer of the Courts Public Access to Court Electronic Records (PACER) Data, The Weather Company weather data, NOAA weather station data, CME group crop market data and proprietary food market data collected by NASDA. When relevant and appropriate, we access trade-specific data aggregated by industry, as well. An example of this is the Global Cold Chain Alliance location dataset, which we leverage in projects conducted in conjunction with GCCA that support our mutual goals. In almost all of these cases, we are using these datasets in conjunction with existing USDA data to examine markets, supply indicators, trade opportunities, and challenges facing the agri-food industry.

8. How could ERS and OCE-WAOB improve transparency about data sources, assumptions, or models used in data products?

One of the main advantages of using USDA data is that users can trust its accuracy. Transparency is essential for both scientific integrity and practical purposes, as data users need to evaluate the reliability of USDA estimates when making important decisions. We believe USDA should clearly document model standards, including assumptions, statistical frameworks, data sources, and their roles, revisions to time series, areas of uncertainty, and software used, whenever applicable, for every major report or dataset release. We see this as a brief, supplementary document that should be available as a download with each report or dataset.

Economic Research, Outlook, and Forecasts

The following questions relate to the economic research and outlook reports produced by ERS and the WASDE coordinated by OCE-WAOB.

9. Which ERS or OCE-WAOB research or analytical products (e.g., farm income, situation and outlook reports, ERS research reports, WASDE) are most valuable to your work, and how do you use them?)

The WASDE is arguably the most detailed and influential report in American agriculture. It moves markets and gives policymakers and industry professionals a bird's-eye view of market dynamics and operational shifts in American agriculture. SDA use the WASDE report to identify macro-level supply and demand impacts on their farming and ranching industries.

ERS reports are also incredibly valuable to SDA because they are easily digestible (example). Another critical ERS communication mechanism is the ERS charts of note, which provide a quick snapshot of a wide range of issues, allowing SDA staff to quickly digest complicated research and analysis.

NASS and ERS reports on farm-level production practices, particularly regarding crop input use, labor costs, rental rates, and other production costs, are vital for guiding NASDA staff to potential policy issues.

10. What emerging policy or economic issues should be addressed in ERS or OCE-WAOB economic analysis, outlook, and forecasts?

While there is substantial tracking of biofuel production through reports such as the Grain Crushings and Co-Products Production report, there are likely more opportunities to track and disseminate the important economic impacts of bioenergy and the broader bioeconomy on U.S. agriculture. More detailed analysis of this impact, as well as analysis of coproduction impacts on the agricultural value chain, would be a timely reinforcement of this critical source of domestic demand.

Another area of interest across the country relates to agricultural land-use changes and trends. While USDA ERS publishes the Major Land Use survey data, there is a lag in this publication (the most recent report was published in 2024 and pertains to the 2017 calendar year. Additionally, this data primarily pertains to different types of agricultural land, with limited scope to assess other industrial uses. As conversations around competing uses for agricultural lands continue to drive policy outcomes, it would be valuable to get ERS's objective, nationwide perspective on the issue. In particular, this could be complementary to the robust data USDA already collects and publishes related to land values.

11. When using ERS or OCE-WAOB forecasts or research, are you more likely to use raw data files, written analysis, or both? If you use one product type more than another, why?

SDA are more likely to use written reports or data visualizations, as they often do not have the resources to clean and manipulate data. NASDA is more likely to use raw datasets for policy analysis and research projects. This is due to the need to conduct robust analysis and data integration that support innovative analysis approaches.

12. How can ERS and OCE-WAOB better tailor the content to your needs?

We encourage OCE-WAOB to adopt a dissemination method similar to ERS charts of note to make their reports (e.g., WASDE) more accessible to non-economic or non-data-science-adept audiences. This could look like a quick-hits section on a website, or a regular, deeper dive into specific commodity outlooks. It can be challenging for non-specialist audiences to digest the robust analysis conducted by the WAOB.

13. How could ERS and OCE-WAOB improve transparency of the data sources, assumptions, methodology, or models used in economic forecasts?

See response to question 8.

Access, Tools, and Outreach

The following questions apply to all the products developed by ERS, NASS, and OCE-WAOB.

14. How do you currently access ERS, NASS, or OCE-WAOB data (e.g., Quick Stats, website, Application Programming Interfaces)? What challenges do you face when accessing data or research? What improvements would you suggest?

The most commonly used interface that SDAs and other agricultural stakeholders have with USDA data is NASS Quick Stats. However, this system is outdated and at times difficult to navigate. We recommend a complete overhaul of the Quick Stats customer-facing interface. This could include built-in data visualization, table generation, or quick data summaries.

Partnering with NASDA through our cooperative agreement to host a dashboard of NASS data would offer significant value by leveraging NASDA's unique position as a trusted, independent partner to both federal agencies and state departments of agriculture. As a non-regulatory organization, NASDA can serve as a neutral, producer-trusted platform for presenting data in a way that is accessible, relevant, and actionable for end users. This trust, combined with NASDA's relationships across all 50 states, positions it well to translate complex data into practical insights for farmers, policymakers, and stakeholders. In addition, NASDA's operational flexibility allows it to be nimbler in developing and refining public-facing, web-based tools—responding quickly to user needs and continuously improving functionality. Together, these strengths would enhance the visibility, usability, and real-world impact of NASS data.

NASDA uses API pulls and FTP bulk file downloads to access this data. This process, while more efficient, requires technical expertise, which limits the availability of data to small and resource-constrained organizations that do not have that expertise on staff.

We also recommend a centralized website that provides access to or shows the locations of all publicly available USDA data. This includes data outside of NASS, ERS, and OCE. We view this as a directory of data resources from FNS, APHIS, NRCS, RD, and other USDA agencies that don't focus on data dissemination.

15. What tools or formats would improve usability of ERS, NASS, and OCE-WAOB products (e.g., dashboards, machine-readable files, visualizations, downloadable tables)?

Every USDA statistical release should be published simultaneously in a machine-readable format (CSV, etc., with a standardized schema) alongside any PDF or HTML narrative. Dashboards and data visualization capabilities would greatly increase the usability of USDA data. Resources like the farm income and wealth statistics interactive interface are incredibly beneficial to users who do not have the expertise to clean and report data. Even this resource is outdated and could benefit greatly from a modern update.

Another benefit would be the continuation of USDA's weekly or monthly announcement of all newly released or updated data. Not every USDA data stakeholder needs this, but for those who regularly track data, a regularly scheduled master list of what is new would greatly benefit accessibility and usability.

16. Are there groups (e.g., beginning farmers, small businesses) that face challenges using ERS, NASS, and OCE-WAOB data and analytical products? How can we improve access?

Many farmers face challenges accessing and interpreting USDA data, making them more susceptible to misinformation. In the age of social media, misinformation is readily accessible, making USDA data critical for countering its spread by bad actors.

The best way to improve the accessibility of data is to ensure communication mechanisms are developed by non-technical users. We believe the best way to accomplish this is through short-form, non-academic communications, and the use of user-facing interactive tools like dashboards and generative functions to create simple tables and charts.

Furthermore, even when these reports or datasets are accessible, they are often not presented with sufficient context or points of reference. An option to view an interpretation guide that defines all terms used in the report, along with more granular historical context beyond what the selected data point was in the previous report, would be very beneficial for new and returning users. In addition, clearly reporting the questions asked of producers is of value to data users. While questionnaires are generally available, a direct link to an example of the questionnaire used to collect the data would be helpful.

17. USDA produces a number of products associated with outlook and research output intended to increase the digestibility or access to statistical and research products. How useful are these associated products? These include NASS' Quick Stats tool for accessing data, ERS products like the ERS Farm Income and Wealth Statistics, Agricultural Resource Management Survey (ARMS) data dissemination tool, Amber Waves or Charts of Note, WASDE data visualization, or other documents? What formats or presentation styles work best for your intended purpose?

Quick Stats remains the most utilized USDA data access tool and is widely regarded as an essential resource by agricultural data professionals. Its primary value, enabling flexible multi-dimensional queries across the full NASS database, is unique and irreplaceable. Its primary limitations, API reliability, response time for complex queries, and inconsistent data schemas, are well-known. Quick Stats would benefit from a modern interface redesign, improved API infrastructure, improved speed, and better integration with common, modern data science tools.

These accessible, digestible ERS communications products are highly valued by the media, extension agents, and the general public. Amber Waves articles consistently rank among the most-read USDA publications by non-specialist audiences. Charts of Note provide a rapid, visually accessible window into ERS data that is widely shared on social media. These products should be continued and expanded. ERS should invest in a searchable, tagged archive of Amber Waves articles and Charts of Note that enables users to find content on specific topics without scrolling through publication archives.

The OCE–WAOB WASDE visualization tool is rudimentary relative to the significance of the data it presents. A commodity-specific WASDE dashboard -- showing current balance sheet alongside historical balance sheets, revision history, and comparison to private forecasts -- would be a high-value addition. At a minimum, the WASDE Excel files should be restructured to a machine-readable format with consistent variable names that enable automated ingestion without manual parsing.

18. How do you assess the credibility and relevance of ERS, NASS, and OCE-WAOB data and analytical products compared to other providers (e.g., land-grant or private universities, commercial vendors)?

Among agricultural data users, USDA statistical products are regarded as the authoritative reference. This credibility is an irreplaceable public asset. However, there are vulnerabilities in the current system that threaten USDA's long-term credibility.

The 2025 corn acreage reporting illustrates how large, late revisions can erode trust in USDA estimates. Large swings in crop estimates have material impacts on the economic livelihoods of U.S. farmers and ranchers, regardless of the accuracy of the final estimates. The credibility damage comes not from the final estimate being wrong but from the preliminary estimate being so far from the final that users could not have anticipated the revision.

NASS can further protect and strengthen the credibility of its data by increasing response rates, ensuring results remain accurate, representative, and trusted across the agricultural sector. Achieving this will require strong, coordinated outreach, an area where partnership with NASDA can add significant value. Through its nationwide network of state departments of agriculture and established relationships with producers and agricultural organizations, NASDA is uniquely positioned to reinforce the importance of participation, elevate the visibility of NASS surveys, and clearly communicate the value of the data to producers. By working together, NASS and NASDA can build trust, improve engagement, and support more robust and reliable data collection. It's incredibly important that USDA protect this credibility by minimizing instances, such as the 2025 corn acreage report revisions, that raise doubt. If USDA loses its reputation as the benchmark, private data sources could become the "norm" with which the market aligns. This will create an unfair playing field in the agriculture industry, especially for small and mid-sized producers and agribusinesses that may not have the resources to access private data.

In addition, it's important that USDA consider land-grant universities, especially the cooperative extension service, as force multipliers for increasing access to data products rather than as competitors. Land grants are among the largest users of USDA data and likely the largest communicators of USDA information to farmers and ranchers nationwide.

19. Are there other data or analytical products or reports produced by other parts of USDA that you consider highly valuable, duplicative, or redundant? Are there any improvements that you would suggest to these data or analytical products or reports produced by other parts of USDA?

The Agricultural Marketing Service market news program collects and publishes price data from cash commodity markets, terminal markets, auction markets, and wholesale markets. It is among the most operationally critical USDA data programs for price discovery in non-WASDE commodities. AMS market news data for fruits, vegetables, livestock, and wholesale food products is used daily by buyers, sellers, price reporters, and analysts. AMS's Pesticide Data Program provides the gold standard for sampling and analysis of pesticide residues on food products, creating baselines for both the Environmental Protection Agency's tolerance-setting process and for the Food & Drug Administration's broader pesticide residue monitoring reports. The AMS MARS (Market Reporting System) data is valuable, but its API is less developed than Quick Stats and deserves similar improvements.

In addition to AMS, NASS and ERS both publish price data for some commodities. While each series serves distinct purposes (NASS producer prices, AMS market prices, ERS retail prices), users frequently confuse them or use them interchangeably. Better documentation of the differences among price series and consolidation where series are truly duplicative would improve user understanding and data quality.

The Risk Management Agency publishes actuarial data, yield histories, and indemnity records that are essential for crop insurance research, farm income analysis, and agricultural risk assessment. RMA data is more current and geographically granular than comparable NASS data for insured crops. Greater integration of RMA data with NASS estimation processes and with ERS farm income research would improve the quality of all three programs.

FSA administers commodity support programs, conservation program enrollments and farm operating loans that represent a substantial share of farm income for many operations. FSA administrative data, including program payment records, loan delinquency rates, and CRP enrollment, represent some of the most timely and comprehensive farm-level economic data in existence. ERS and NASS should have better access to FSA administrative data for statistical estimation and research purposes, subject to appropriate confidentiality protections

The Foreign Agricultural Service generates several datasets and reports that are critical to understanding the flow of U.S. agricultural products into foreign markets. Weekly Export Sales Reports provide key insights to export trends across commodities, and the Global Agricultural Trade System (GATS) is an invaluable tool for quantifying the economic impact of agricultural trade across trading partners. While the Global Agricultural Information Network (GAIN) reports are more qualitative than data-driven, they are incredible sources of on-the-ground insights worldwide.

20. What is the best way for ERS, NASS, and OCE-WAOB to receive ongoing feedback on its data and analysis? Are there groups or forums we should engage with more regularly?

Continuous improvement is critical for the sustainability of any major data aggregation and dissemination systems. We appreciate the opportunity to comment on this RFI and to engage with the administration on the importance of non-partisan, unbiased agricultural and food data. While we view this RFI as a step in the right direction, we encourage USDA to continue this dialogue. Particularly, we

suggest the establishment or revamping of the advisory committees or working groups to provide more technical feedback and when applicable, include a producer's perspective:

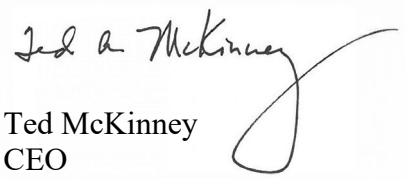
- Methodology Group (commodity traders, analysts, academics)
- Farm Financial Data Working Group (lenders, Farm Credit, Federal Reserve)
- Specialty Crop Data Working Group (producer organizations, processors)
- Geospatial and Remote Sensing Working Group (precision ag, conservation)
- Emerging Data Needs Working Group (urban agriculture, organic, CEA)
- Cross Agency Data Integration Working Group (other USDA sub-agencies, other federal agencies)

We also recommend forming a National Agricultural Data Advisory Committee with representation from the full range of agricultural data user communities: production agriculture, agribusiness, financial services, environmental organizations, state and local government, academic research, and consumer and food policy groups. This committee should hold at a minimum semi-annual public meetings, publish agendas and minutes, and provide a mechanism for user community input between formal meetings.

We also encourage you to continue to engage with NASDA on survey methodologies and innovative approaches to collecting data. Our approximately 1700 enumerators are central to the timely and accurate delivery of agricultural data products. Our enumerators are the primary point of contact with Farmers and Ranchers in the field and have deep expertise on the benefits and potential opportunities for improving data collection.

We appreciate the opportunity to comment and hope to continue engaging and partnering with USDA as you seek to improve the national agricultural data system. If you have any questions about our comments, please contact me or Logan Moss, Logan.Moss@NASDA.org, associate director public policy, NASDA.

Sincerely,



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