
# ASA Response to Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture

April 9, 2026

The American Statistical Association appreciates the opportunity to respond to the USDA Request for Information on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research. As the nation's largest professional organization of statisticians, the ASA is committed to upholding the integrity and objectivity of federal statistics, and our comments are guided by the goal of ensuring the National Agricultural Statistics Service and Economic Research Service — 2 of the United States' 13 principal federal statistical agencies — can continue to produce the reliable, objective data essential to America's farmers, ranchers, rural communities, and all of us who rely on a safe, healthy, and affordable food supply, as well as policymakers, industry, and the public. As the two federal statistical agencies in USDA, preserving NASS and ERS capabilities is also essential for meeting the fundamental responsibilities for federal statistical agencies stated in the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act).

**Overview**

In fulfilling its mission to provide timely, accurate and useful statistics in service to U.S. agriculture, NASS prepares more than 400 reports annually covering virtually every aspect of U.S. agriculture. The Census of Agriculture, which is conducted every five years, provides a complete count of U.S. farms and ranches and the people who operate them. Through the Census, NASS produces a plethora of statistics, including information on land use and

ownership, producer characteristics, production practices, and income and expenditures. Thus, NASS is the premier provider of agricultural data for the nation. Producers use the data to inform decisions for planting and selling their crops. The data provide an agricultural foundation for policy makers, agribusinesses, and agricultural researchers. Moreover, national and international agricultural traders rely on these market-moving data and reports.

ERS's mission is to anticipate trends and emerging issues in agriculture, food, the environment, and rural America and to conduct high-quality, objective economic research to inform and enhance public and private decision making. ERS plays a critical role in publishing statistical information and analysis on food, agriculture, natural resources and rural communities that is high quality, objective, and transparent. ERS is valued for setting the gold standard for high-quality research and analysis accompanying its data products.

The greatest need for NASS and ERS is NOT to identify new data products; it is to ensure that funding is sufficient for them to be able to fulfill their mission with the high quality products that are being produced and to restore products that have been terminated. The 54% reduction in NASS staff—from 839 FTEs in FY23 to 389 in FY26— have severely challenged the agency. In January, 2026, NASS had a unusually high revision in its estimates of the number of acres planted to corn in 2025, causing corn futures to plunge and hurting farmers who were already struggling (USDA's reputation suffers after massive revisions in US corn acres | Reuters). NASS's March 2026 Prospective Plantings report had a record-low response rate of 37.6%. These are but two indications that NASS needs more resources to perform the massive data collection, data cleaning, and data analysis required to produce the quality reports for which it has been known.

ERS, which has lost 27% of its staff from FY23 to FY26, has also had critical and uniquely powerful data investments cut or depleted. Primary among these is the Food Security Supplement (FSS) to the Current Population Survey (CPS), the gold standard for measuring food security information. Disinvestments in other important data sources such as administrative records on food assistance programs or the lack of funding for a second National Household Food Acquisition and Purchase survey leave the Federal government without adequate data to monitor how Americans respond to new dietary guidance nor to measure outcomes of key policy changes such as restrictions on which foods can be purchased with benefits from the Supplemental Nutrition Assistance Program. We urge USDA to reinstate the Food Security Supplement (FSS) to the Current Population Survey (CPS) and to make greater investments in shoring up ERS's Consumer Food Data System.[1]

[1] The Consumer Food Data System of the Economic Research Service of the U.S. Department of Agriculture. https://www.ers.usda.gov/topics/food-choices-health/consumer-food-data-system-cfds

1. **Which NASS or ERS data products are most valuable to your work, and how do you use them?**

NASS has two primary programs: the Census of Agriculture and the Agricultural Estimates. Only the **Census of Agriculture** provides detailed information on agricultural production and practices for all types of farms and all livestock and crop commodities for the nation, all states, and all counties. With the 2027 Census of Agriculture rapidly approaching, NASS needs sufficient resources to prepare for and execute it. The Agricultural Estimates program produces the NASS reports, which are focused on the current status of U.S. agriculture. Each report is critical to some segment of the agricultural industry. Although reports have not been eliminated, the recent funding cuts have had a negative impact on the quality of the reports. As an example, the March 2026 Planting Intentions report had the lowest response rate in its history, as noted above. This is due, at least in part, to the reduced numbers of staff members who are devoted to the data collection effort. NASS has well established procedures for data collection, data cleaning, and data analysis. The agency also strives to evolve these processes as new statistical methods and other sources of data become available. Although NASS is continuing to make every effort to produce high quality reports, the resources are simply no longer sufficient. To address agricultural issues that range from a farmer deciding what to plant to what impact crop and livestock numbers will have on international trade requires quality agricultural data, and NASS can only produce those data if sufficient resources are available to do so.

NASS and ERS jointly produce the **Agricultural Resource Management Survey (ARMS)**. ARMS is the USDA's primary source of information on income, expenses, production practices, resource use, and economic well-being of America's farms and ranches. The results of this survey give farmers, ranchers, and many others factual insights into many aspects of farming, ranching, and conditions in agricultural communities. ARMS data underlie and are crucial to NASS' ability to publish chemical use statistics. They provide ERS with the ability to estimate net farm income, conduct economic analysis relating to field crop chemical usage, estimate annual costs and returns associated with nine major commodity program crops as well as dairy, hog, and cow-calf production, and compile measures farm business and household financial performance. ARMS data support each agency's estimates of farm production expenditures for the nation and regions. ARMS data support analyses of the farm-level impacts of emerging agricultural innovations in precision agriculture, genetic engineering, and autonomous vehicles.

ARMS data products, when tracked over time, provide invaluable insights on the adoption of innovations, the changes in farm organization, and the adjustments in contracting and

marketing strategies that underlie much of agricultural productivity growth over the last three decades. They also provide deep background for understanding high profile issues related to competition and pricing pressures in agricultural markets and supply chain disruptions, which are increasingly relied upon by policy makers in USDA, other Departments such as DOJ, Congress, farm groups and others.

For over 20 years, researchers in agricultural economics, nutrition, and public health, as well as representatives of agriculture and food retail industries and the general public have utilized the data, research reports, charts and visualizations from the **Consumer Food Data System (CFDS)**, a "portfolio of data resources that measure, from the perspective of the consumer, food and nutrition conditions and the factors that affect those conditions".[2] The CFDS is essential to the mission of USDA because it provides information on trends and behaviors in the final part of the agricultural supply chain—consumer demand, and because it can be used to understand how USDA's significant investments in nutrition guidance and nutrition assistance programs influence consumer behavior and food security. Through the CFDS, ERS-USDA has been at the forefront of U.S. statistical agencies' move toward using commercial data sets (e.g. food store and restaurant directories; retail scanner sales data; proprietary consumer panel data); administrative data from nutrition assistance programs;[3] the cost-saving use of supplements to existing surveys (e.g. the Flexible Consumer Behavior Survey of the National Health and Nutrition Examination Survey and the CPS-FSS); and innovative survey designs that integrate commercial and administrative data with traditional surveys to produce higher quality information more efficiently (e.g. the **National Household Food Acquisition and Purchase Survey (FoodAPS)**).[4]

Each of these data sets have been extensively used to track and monitor trends in consumer behavior, food shopping and spending, diet quality, food waste, the use of food labeling and nutrition guidance, use of food and nutrition assistance programs, and how well USDA meets one of its missions to ensure food security among the population. The data have also been used in analysis to understand how consumers react to food price changes, how the food environment impacts food spending and diet quality, and to evaluate nutrition assistance programs. For example, proprietary data on consumer panels from Circana were used extensively by USDA, the White House, and other Federal agencies to understand changes in

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[2] Larimore, E., M. Prell. M Sweitzer, and J. Variyam. 2018. Improving the Consumer Food Data System. White Paper. Administrative Publication of the Economic Research Service of the U.S. Department of Agriculture.

[3] Census Bureau-USDA Food and Nutrition Service and Economic Research Service SNAP and WIC administrative data collaborative: https://www.ers.usda.gov/topics/food-nutrition-assistance/food-assistance-data-collaborative-research-programs/snap-and-wic-administrative-data.

[4] National Household Food Acquisition and Purchase Survey: https://www.ers.usda.gov/data-products/foodaps-national-household-food-acquisition-and-purchase-survey.

consumer food spending during the COVID-19 pandemic and 2022 infant formula supply chain crisis and continue to be used by policy officials to understand consumer spending through rapidly changing economic and policy conditions. Administrative data are uniquely valuable for understanding how long nutrition assistance participants receive benefits and for improving survey measures of participation so that higher quality policy evaluations can be conducted. FoodAPS, which was conducted in 2012-2013 and was scheduled to be fielded again in 2027, is still the only source of data that adequately provides comprehensive information on food spending and food shopping behaviors of lower income and SNAP and WIC participating households, was used to understand what SNAP households purchase and acquire using their SNAP benefits among other consumer food and nutrition-related behaviors. A panel of the National Academies Committee on National Statistics examined the value of FoodAPS and recommended USDA conduct the survey on a regular basis.[5]

There have been significant cuts to this valuable portfolio of data, which leaves USDA in a weaker position to analyze some of its key policy changes, such as the revised Dietary Guidelines for America and the significant changes to the SNAP program, including state waivers to restrict foods. The largest gap is due to USDA's decision to discontinue the **CPS Food Security Supplement (CPS-FSS)** and that this gap leaves USDA and the research community unable to monitor this key part of USDA's mission nor to fully evaluate the impacts of SNAP program changes.

For 30 years, continuously and under presidential administrations from both parties—including the first Trump administration—the CPS-FSS and accompanying annual reports provided the trusted, objective, nonpartisan information necessary for researchers, state and local governments, nonprofit organizations, and policymakers alike to address food insecurity in the U.S. by documenting the incidence of food insecurity across the nation. Collecting and publishing this information with regularity and rigor on an annual basis is a matter of accountability, transparency, and responsible governance, consistent with the intent of the Evidenced Based Policy Act, signed by PresidentTrump in his first Administration. We wholly agree with the Population Association of America, which states in their response to this USDA call, that failing to both collect and publish the results of the gold standard FSS eliminates a critical, irreplaceable set of indicators that measure the health of our economy and the capacity to evaluate the effects of economic and policy changes on food security in this country.[6]

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[5] National Academies of Sciences, Engineering and Medicine. (2020). A Consumer Food Data System for 2030 and Beyond. Washington DC: The National Academies Press. Doi: https://doi.org/10.17226/25657.

[6] U.S. Department of Agriculture Economic Research Service, Supporting Statement For Extension Of Omb Approval Of The Food Security Supplement To The Current Population Survey, Reginfo.gov, 2025 https://www.reginfo.gov/public/do/DownloadDocument?objectID=150543902; Melanie Klein, Beth Jarosz, Ronette Briefel, and Gina Plata-Nino, Threats to Food Security Data: Why the "Redundancy" Claim Doesn't Hold Up - Food Research & Action Center, Food Research & Action Center, 2025 https://frac.org/blog/threats-to-food-security-data-why-the-redundancy-claim-doesnt-hold-up.

The FSS provides several methodological advantages that no other federal dataset replicates:[7]

- Thirty years of continuous time series data, enabling long-term trend analysis.
- Large nationally representative sample sizes, allowing statistically reliable estimates for the national population and for important subgroups of the population. The sample size is large enough to produce estimates at the state level when 3 years of data are pooled together.
- State-level identifiers, enabling geographic analysis and policy evaluation.
- The full 18-item Household Food Security Survey Module, which measures the full severity spectrum of food insecurity, including experiences for both adults and children and to measure and report on the full spectrum of the severity of food insecurity.
- Detailed contextual variables, including food expenditures, minimum necessary food spending, participation in public benefit programs, and use of charitable food assistance.

The FSS Module was developed through extensive research and validation by USDA researchers and collaborators. The module is widely recognized as the gold standard for measuring food insecurity in the United States.[8] Because the FSS includes the full 18-item module and large annual samples, it enables robust national and state-level estimates that are not possible with other datasets.

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

USDA should prioritize restoring the NASS and ERS's capacity to collect, edit, and analyze the data needed to produce the quality reports for which it is known. This is more important than establishing new data products.

USDA should prioritize strengthening the Consumer Food Data System rather than reducing it. Reliable federal statistics are essential for informing policy decisions, evaluating economic conditions, and ensuring accountability in federal programs. For example, USDA has recently approved 22 states' waivers to restrict foods purchased with SNAP benefits. USDA has argued that these restrictions will help ensure taxpayer funds are used on nutritious items that improve the health of participants. The waivers are temporary after which, outcomes of the waivers will be assessed to determine whether extensions will be granted. But USDA has not made

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[7] Kari Williams and Isabel Pastoor, Measuring Food Security with U.S. Federal Data – Use It for Good, Popdata.org, October 10, 2025), https://blog.popdata.org/food-security-data-cps/; Colleen M. Heflin, Michele Ver Ploeg, Elaine Waxman, Not All Measures Are the Same: How Food Access Indicators Differ and Why That Matters, Urban Institute, February 13, 2026, https://www.urban.org/research/publication/not-all-measures-are-same-how-food-access-indicators-differ-and-why-matters.

[8] Chris Dick and Beth Jarosz, Forsaking Food Security, Dataindex.us, September 25, 2025, https://dataindex.us/newsletter/article/0e1a7dbb-47d1-4019-abb2-c1b7ef6c81f1.

investments in data that could help evaluate these waivers. These waivers are also being implemented at the same time that legislative changes to the SNAP program may result in significant changes in participation, work effort, and food security. Because USDA has cut several key data sources that could be used to understand the impacts of these programs (CPS-FSS, state administrative data collection, FoodAPS), we may never know the impacts of the new rules. The 41 million Americans who depend upon SNAP to meet their food needs and the taxpayers who pay for the benefits deserve rigorous evaluation of program changes–evaluation that should be supported with data investments.

In 2016, NASS and ERS sponsored an ad hoc panel under the auspices of the National Academies of Sciences, Engineering, and Medicine to review, assess, and make recommendations on effective methods for collecting data and reporting information about U.S. agriculture under increasingly complex farm structures. The panel reviewed existing information about the structure of U.S. farms, and how the information is collected, reported, and used. The goal of the panel was to identify best practices for accounting for multi-unit operations and operations that are vertically integrated, both on the farm register and in data collection and estimation, while ensuring sufficient coverage and reliable estimates in the face of increased firm concentration. The resulting report generated several recommendations addressing data collection and increased use of administrative and other nonsurvey data sources. Some, but not all, of those recommendations have been implemented. Additional resources and staffing are essential to ensure others are implemented as well.

Data collection and reporting could be expanded to include more detailed information on the use of advanced technologies, including precision agriculture, autonomous equipment, drones, and more, including the various ways they are being used and how many producers are adopting the technology.

**5. What geographic granularity for data best supports your work?**

ERS and NASS have published state-level ARMS estimates for the 15 most important agricultural states since 2003. These fifteen states (Arkansas, California, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Minnesota, Missouri, Nebraska, North Carolina, Texas, Washington, and Wisconsin) generate 66 percent of total U.S. cash receipts from agricultural production.

ERS uses the state-level estimates to develop US farm sector income estimates. Without state-level ARMS data for the 15 most important agricultural states, ERS cannot release state-level farm income estimates. State Departments of Agriculture frequently cite this information in their annual economic reports.

Moreover, the state-level ARMS data is part of the package of information that the US Bureau of Economic Analysis (BEA) rely on to calculate their State and Local Area personal income data product and GDP by State accounts. BEA regional income and product statistics are used to distribute federal funds to states under a variety of programs (e.g., Medicaid, National School Lunch Program, Rural Business Development and Enterprise Grants, Appalachian Development Highway System, USDA's Water and Waste Disposal Loans and Grants).

Collection of state-level data enables ERS to develop regional commodity cost and return estimates. These estimates are useful for understanding how farmers and ranchers respond to changing prices of agricultural commodities, assessing the impact on farmer and rancher returns of events such as a regional drought or livestock disease outbreak, analyzing how the adoption of technologies affect costs and returns, and estimating how regional costs and returns vary by size and type of farm, and type of business arrangement.

The larger overall sample size used to derive state-specific estimates yields a double dividend and is critical to ERS's ability to conduct more geographic, commodity, and demographic detailed research and analyses to support USDA's program agencies and to address Congressional requests for information on US agriculture.

**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)?**

Both NASS and ERS regularly review data products to ensure they are produced in ways that meet OMB quality and attributes standards for purpose, utility, objectivity, transparency, integrity and accessibility (see ERS Data Product Quality Standards). Both agencies also track use of these products (web visits and data downloads; citation in academic settings; use in federal policymaking, and citations from media and industry). To ensure efforts are not duplicative, NASS and ERS collaborate and coordinate on ARMS survey development, data collection, and reporting.

Contrary to USDA's assertion when it cancelled the CPS-FSS data collection, the household food security data products and the underlying FSS survey are neither duplicative nor outdated.[9] Other surveys fail to capture the quality or scale of data the FSS does.[10] For example, other surveys exclude children, have significantly smaller sample sizes, use shortened food security modules, or lack geographic identifiers. These limitations make the FSS irreplaceable for measuring the prevalence and severity of food insecurity nationally and at the state level.

[9] Klein et al., Threats to Food Security Data: Why the "Redundancy" Claim Doesn't Hold Up - Food Research & Action Center.
[10] Heflin et al., *Not All Measures Are the Same*.

A guiding principle of the Federal Statistical system is that federal statistical agencies "continually seek to improve and innovate their processes, methods, and statistical products to better measure an ever-changing world… and respond to user demands for more timely and granular information." Needed improvements include additional resources and renewed investments essential for innovations necessary to improve response rates. Enhanced use of administrative data, GIS, Artificial Intelligence (AI), etc. could be employed to reduce respondent burden and maintain the value and quality of the data in the face of declining response rates (especially among big farms).

Our recent report in our project to assess and monitor the health of federal statistics specifically addresses the imperative for federal statistical agencies to innovate in the face of emerging technologies and issues. In it we state that:

> *"Artificial intelligence (AI) illustrates the urgency of this need. Policymakers and the public are seeking reliable data on how AI is reshaping employment by industry, the scale and sources of AI investment… At the same time, as statistical agencies strive to respond to this need, they are exploring ways to responsibly apply AI to improve their own operations and analytical capability.*
>
> *Addressing a comprehensive AI agenda for statistical agency products and operations will require sustained, coordinated effort across the federal statistical system and partnerships with other federal and state agencies and with the private and academic sectors. The system and its partners will need to work together to establish shared definitions of AI applications, identify best practices for collecting and analyzing AI-related data, make databases (agencies' and data providers') AI-ready, and test AI tools for use in official statistics. The administration's America's AI Action Plan (July 2025) includes provisions that could help advance this work."*

**7. Do you use non-USDA data to supplement USDA datasets?**

Analysts frequently use non-USDA datasets to examine specific economic conditions, populations, or policy contexts. However, these datasets are often used *in combination with* USDA data rather than as substitutes, and together, provide more comprehensive analysis and conclusions. For example, USDA data may be linked with geospatial data to study conditions at a more localized level or to give information on production conditions. Often data from other federal statistical agencies, such as labor market data from BLS or population data from Census are combined with USDA data to provide more contextual information or improve measurement. For example, administrative data from SNAP and WIC program participants collected by the Food and Nutrition Service of USDA are shared with the Census Bureau through the Census-FNS-ERS joint project and used in combination with Census Bureau surveys to

strengthen information on program participation and benefit amounts, which are typically underreported in surveys. These administrative records are also valuable to building address lists and counting hard to reach populations in the Decennial Census. Finally, in other cases, USDA data are used as benchmarks to other data collections that may not cover as broad of populations or have as large sample sizes. For example, the CPS-FSS serves as the national benchmark for measuring food insecurity, enabling data users to contextualize findings from other surveys. Without the FSS, it would be significantly more difficult to interpret trends in food insecurity or evaluate policy impacts.

The success of these examples and other opportunities for leveraging and creating synergies with ERS and NASS data in a safe and secure environment make clear the benefits of, and need for, supporting and enhancing the USDA presence within the Federal Statistical System. As Federal Statistical Agencies, ERS and NASS are both represented on the Interagency Council on Statistical Policy (ICSP). ICSP is led by the U.S. Chief Statistician, with the stated mission of "supporting implementation of the U.S. Federal statistical system's vision to operate as a seamless system, working together to provide strategic vision and robust implementation in support of the statistical system's critical longstanding — and expanding — role for supporting evidence-based decision-making." Substantial progress has been made. For example, the creation, and expansion, of Federal Statistical Research Data Centers has been instrumental in increasing access to federal data.

Nonetheless, as we concluded in our 2025 report, "Barriers to data-sharing remain particularly costly. Agencies routinely spend months—or years—negotiating data-sharing agreements. The 2018 Evidence Act requires OMB to issue regulations to streamline such exchanges, but as of December 2025, no draft regulation has been released. These inefficiencies slow statistical production, waste limited resources, and frustrate collaboration across agencies and with researchers." We strongly encourage USDA to work with ICSP to further facilitate data-sharing opportunities.

**9. Which ERS research or analytical products are most valuable to your work, and how do you use them?**

The ERS farm income and finance program measures, forecasts, and explains indicators of economic performance for the U.S. farm sector and farm businesses by resource region and commodity specialization. The program's data and analysis are used by USDA and its stakeholders to inform their perspective on the financial health of the U.S. agricultural economy. ERS's Farm Sector Financial Condition statistics, and the ARMS data underlying them are critical for:

- Timely and accurate information for farm and tax policy for agribusiness decision-makers.
- Designing Farm Policy and informing Farm Bill debates and evidence-based implementation. Because farms are complicated, and the sector is heterogenous – farms vary in scale, location, technology, and weather – detailed information on the breadth of the sector is critical for designing effective and efficient farm programs that spend taxpayers money wisely. Congress, USDA, and others rely on ARMS-based information.
- Accurate information on the wide variation of costs and net returns among farm types and regions.
- Other users include:
    - Input providers. Cash income drives equipment purchases.
    - Lenders & Investors. Reliable, objective data provide critical insights into the risks they face.
    - Extension and farm advisors use the information to provide advice to farmers.
    - Farm groups, such as National Corn Growers, American Soybean Association, National Pork Producers, American Farm Bureau, and others.

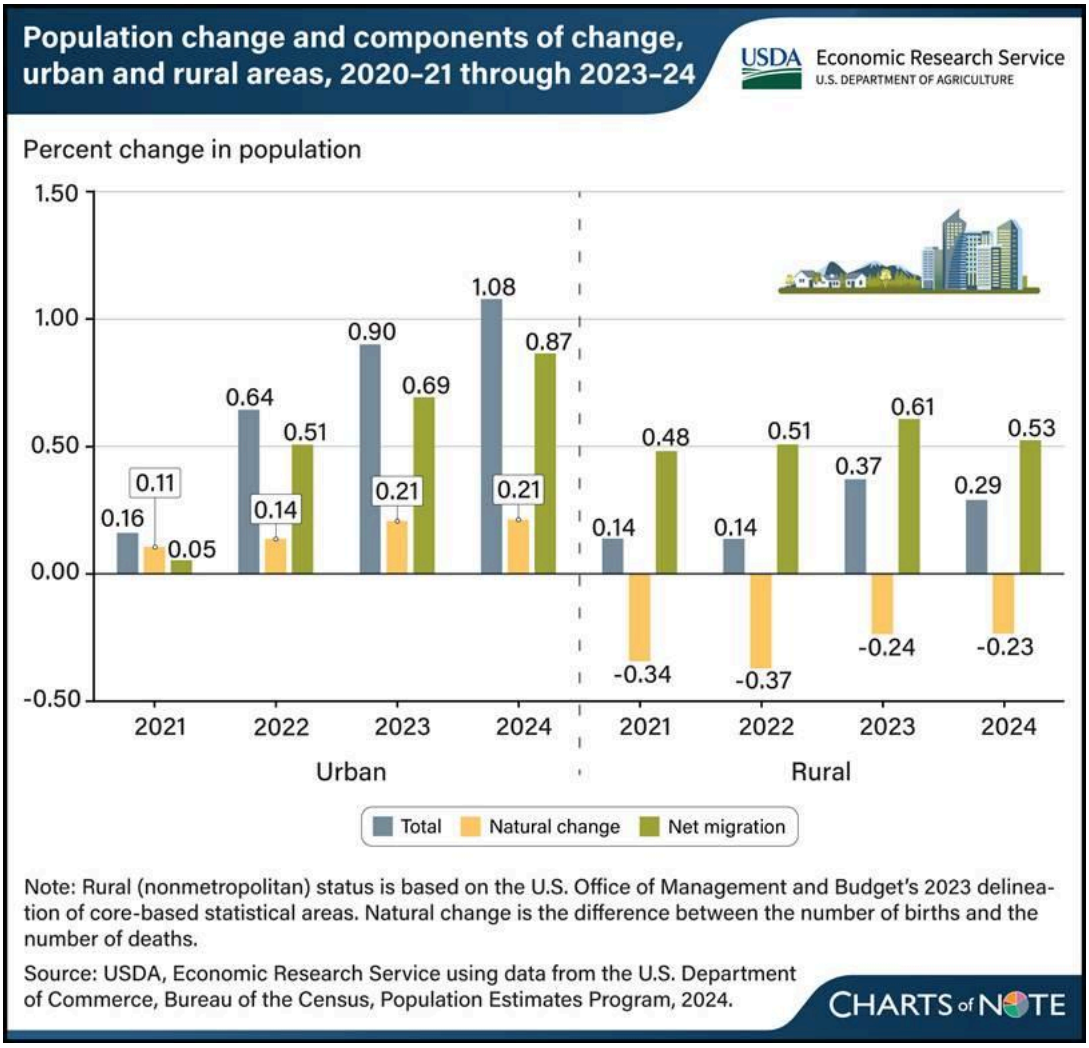
**15. What tools or formats would improve usability of ERS, NASS, and OCE-WAOB *products* (*e.g.,* dashboards, machine-readable files, visualizations, downloadable tables)?**

NASS provides some tables and information summaries that are very helpful to those who want a quick snapshot of the data. However, if a question arises that is not covered in these simple formats, users, especially those who do not regularly immerse themselves in NASS data, often struggle to find what they need. NASS's data are housed in Quick Stats, a relatively old system. A more modern approach to providing agricultural data to the public is needed. A key concern in establishing a new data dissemination system is preserving the privacy of the individuals who have provided their data to NASS. Recent efforts have made some improvements, but users would benefit greatly from a more comprehensive revision, especially approaches based on making the data AI ready. Yet, it takes resources to bring this to fruition.

For years, ERS has created transparent, and sometimes interactive charts and figures, along with mapping tools that are objective and not manipulated.[11] These products include the Charts of Note series,[12] mapping tools like the Food Access Research Atlas[13] and data visualizations like

[11] https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/interactive-charts-and-highlights
[12] Charts of Note: https://www.ers.usda.gov/data-products/charts-of-note.
[13] Food Access Research Atlas: https://www.ers.usda.gov/data-products/food-access-research-atlas.

the International Baseline Projections.[14] These tools and charts bring the data to life, reaching more audiences, through visualizations. For example, the following chart was published on March 31 and was the first chart published by ERS after an unprecedented (almost 4-month) hiatus in the publication of charts.




The chart is easy to understand and provides useful statistical information about population changes in rural areas that is of high interest to community planners, businesses, school districts, and community groups. The chart was drawn from a report released in January entitled Rural America at a Glance and is a valuable component of making the statistical information available to this wide set of stakeholders.

[14] International Baseline Projections: https://public.tableau.com/app/profile/economic.research.service/viz/InternationalBaselineProjections/Internationalbaselinevisualization.

The proof of the impact of ERS's charts, maps, and data visualizations is in the number of people who subscribe to Charts of Note or that visit and interact with mapping tools or visualizations. ERS has been a leader in developing these products and should continue to develop new forms of communication like these.

**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's QuickStats 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?**

NASS reports and fact sheets are useful to some segments of agricultural data users. For any project requiring agricultural data not specifically in the report, users need and want data that can easily be collected from Quick Stats. Although some recent improvements have been made, more is needed. A format that can be pulled into a spreadsheet is most useful.

The remote sensing products that NASS produces are integral to numerous research efforts. For example, the Cropland Data Layer, which is a map of what crops are grown and where they are grown each year, is the foundation of developing a crop mask, a map of where a specific crop such as corn is grown. To develop any model of a crop's yield over a state, region, or the nation, a researcher must know where the crop is being grown; that is, they need that crop's mask. Remote sensing products have been developed that provide insights into the impact disasters, such as floods or fires, have on agricultural output.

ERS's peer-reviewed reports and data products, and the charts, visualizations, and mapping tools developed from reports and data are used by a wide set of stakeholders at all levels of government and by producers, industry, community organizations and the general public. The reports advance knowledge on agriculture, food, rural economic and natural resource policy topics and are heavily cited in academic work. Reports that are descriptive in nature that highlight trends in producer and consumer behaviors, USDA programs, or summarize findings from new data fill gaps that academic researchers have little incentive to fill and that industry does not publish because of their proprietary goals. Finally, reports that provide technical details on data sources or on modeling methods are invaluable for users of these products because they describe methods used to produce the data or models and assess quality and limitations of them and meet the transparency objectives for statistical agencies. ERS's Charts of Note, Amber Waves, data visualizations and mapping tools supplement the reports and data products with the goal of reaching less technical audiences and the general public.

Surveys that include food security questions alongside questions on health, housing, or education are complementary rather than duplicative. These data allow researchers to examine how food security interacts with broader social and economic conditions.

However, these surveys do not contain all the features that make the CPS-FSS the gold standard and so cannot replace the FSS, which serves as the national benchmark dataset for food insecurity prevalence.

The Office of Management and Budget (OMB) approved an extension of the FSS information collection on April 30, 2025, with approval lasting through April 30, 2028. USDA itself acknowledged the uniqueness of the FSS in this recent Information Collection Request approved by the OMB, noting that other surveys "do not provide suitable data for timely and reliable monitoring of the prevalence and severity of food insecurity in the Nation's households and in critical subpopulations."[15] USDA must collaborate with the U.S. Census Bureau to resume this critical information collection that captures irreplaceable food security data.

We urge the USDA to collaborate with the U.S. Census Bureau to reinstate the annual FSS, so USDA has the data to restore the annual HFS report. We also urge USDA to make investments in the CFDS so that the nation has high quality and reliable sources of data to better understand consumers in the food and agricultural supply chain and the impacts of USDAs investments in nutrition assistance programs.

**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)?**

As federal statistical agencies, ERS and NASS are subject to government regulations and guidance, and their missions and contributions to the public good rest on the principles of relevance, credibility, trust, independence, and innovation.[16] As such, they set the gold-standard for reliable, objective, nationally representative and comparable data and analysis. Other providers of related products typically rely on, and repurpose USDA data. As such, they can not substitute for USDA data.

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[15] Census Bureau-USDA Food and Nutrition Service and Economic Research Service SNAP and WIC administrative data collaborative: https://www.ers.usda.gov/topics/food-nutrition-assistance/food-assistance-data-collaborative-research-programs/snap-and-wic-administrative-data.

[16] National Academies of Sciences, Engineering, and Medicine. 2025. Principles and Practices for a Federal Statistical Agency: Eighth Edition. Washington, DC: The National Academies Press. https://doi.org/10.17226/27934.

ERS's stakeholder feedback consistently notes unparalleled excellence for: the context and interpretation ERS provides on a wide range of topics critical to the mission of USDA; ERS's objectivity and neutrality; the quality and depth of its research; its reputation as an authoritative source of information; and, deep expertise in key policy and program areas.

**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?**

NASS, ERS and OCE-WAOB have an ongoing feedback loop with other USDA agencies, industry, community-based organizations, state and local governments, researchers and advocates. These contacts are well received, but could increase in frequency and transparency about follow up in response to stakeholder conversations.

NASS staff meet regularly with industry groups and community-based organizations. Its field staff continue to communicate with state and local governments, though the substantial reductions in staff have reduced these efforts. NASS leaders often attend conferences focused on various aspects of the agricultural industry. For NASS researchers, the peer review process is important for ensuring that work meets high scientific and statistical standards. Research on the statistical methods needed to produce NASS reports is rapidly evolving (e.g., how to combine survey and non-survey data to produce the best possible official statistics). NASS researchers need to attend conferences focused on these methods so that they can present and receive feedback on their work and learn what others are doing. This is crucial if NASS is to evolve rapidly enough to continue to meet its mission.

For ERS, the peer review process for products is a critical step for meeting scientific and statistical standards. This process is important for ensuring the scientific quality of the research. ERS staff also regularly meet with other USDA mission areas and other relevant Federal agencies (e.g. EPA, FDA) to discuss information and data needs, develop research projects relevant to their programs and policies, and disseminate findings. Finally, ERS staff present data and research at conferences or other venues that reach professional audiences, industry, state and local governments, and community organizations. These interactions ensure that data and statistical products are relevant, understandable, grounded in reality and can be effective venues to obtain ideas for further inquiry or new data development.

Both NASS and ERS support the federal statistical coordinating activities of the Committee on National Statistics (CNSTAT) of the National Academies of Science, Engineering and Medicine and have sponsored CNSTAT expert panel studies on important statistical measurement and methodological questions. Examples include: ERS sponsored a consensus panel on Improving

Consumer Data for Food and Nutrition Policy Research;[17] ERS and NASS co-sponsored a consensus study on "Data Collection for Complex Farms";[18] NASS sponsored a consensus study on "Improving Crop Estimates by Integrating Multiple Data Sources";[19] and ERS sponsored a CNSTAT workshop on "Rationalizing Rural Area Classifications".[20] Through these interactions with CNSTAT, NASS and ERS are able to obtain objective advice from a consensus of experts in the field that can be used to prioritize and improve measurement, data collection, and model development. Both NASS and ERS should continue to utilize CNSTAT in these capacities and to interact and learn from other federal statistical agencies through CNSTAT convenings.

Questions or comments may be directed to ASA Director of Science Policy Steve Pierson: spierson@amstat.org.

[17] National Academies of Sciences, Engineering, and Medicine. 2020. A Consumer Food Data System for 2030 and Beyond. Washington, DC: The National Academies Press.
[18] National Academies of Sciences, Engineering, and Medicine. 2019. Improving Data Collection and Measurement of Complex Farms. Washington, DC: The National Academies Press.
[19] National Academies of Sciences, Engineering, and Medicine. 2017. Improving Crop Estimates by Integrating Multiple Data Sources. Washington, DC: The National Academies Press.
[20] National Academies of Sciences, Engineering, and Medicine. 2016. Rationalizing Rural Area Classifications for the Economic Research Service: A Workshop Summary. Washington, DC: The National Academies Press.