NATIONAL SUSTAINABLE AGRICULTURE COALITION

Scott H. Hutchins, Under Secretary, Research, Education, and Economics Mission Area
Justin R. Benavidez, Chief Economist, Office of the Chief Economist

Re: NSAC Response to RFI On Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture, (FR Docket ERS-2026-0001)

Dear Dr. Hutchins and Dr. Benavidez,

The National Sustainable Agriculture Coalition (NSAC) welcomes the opportunity to submit comments on the opportunities, challenges, and emerging areas in statistical data, analysis, and research produced by the Economic Research Service (ERS), the National Agricultural Statistical Service (NASS), and the Office of the Chief Economist's World Agricultural Outlook Board (OCE-WAOB), as requested in the Request for Information published on February 23, 2026 in the Federal Register, docket number ERS-2026-0001.

The National Sustainable Agriculture Coalition (NSAC) is an alliance of over 170 grassroots organizations that advocates for federal policy to advance the sustainability of agriculture, food systems, natural resources, and rural communities. NSAC members and the farmers they represent use U.S. Department of Agriculture (USDA) data products to make evidenced based policy recommendations, conduct program analysis, and inform farm management decisions. NSAC has a long track record of engaging with National Agricultural Statistics Service (NASS) and Economic Research Service (ERS) data products such as the Census of Agriculture, the Organic Survey, and the Farm Income and Wealth Statistics to inform policy development and provide recommendations on USDA programs that serve our members.

NSAC brings the perspectives of diverse farm types, regions, and production systems that are often under-represented in agricultural data collection and analysis. Sustainable, organic, small, and mid-sized farms and the organizations that serve them have distinct data needs that are not always captured in standard agricultural statistics. USDA data and analysis is a public good and sustainable, organic, small and mid-sized, and other underserved farmers rely on it disproportionately because they lack access to the private data infrastructure available to larger or more well-resourced operations. Any reduction in data collection, analytical capacity, or staffing would fall hardest on these producers and the communities they support.

We thank the Department for this opportunity to provide feedback on valuable data products and our responses to the questions posed in the RFI are summarized below.

Sincerely,

Rebecca L. Schewe, PhD.
Research and Policy Analyst

Nicholas Rossi
Policy Specialist

Data Products and Data Sets

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

NSAC members rely on a core set of NASS and ERS data products to conduct policy analysis, track trends in sustainable agriculture, and support the farmers and communities we serve. The Census of Agriculture is the single most widely used data product among our members, providing foundational national and county-level data on farm structure, production, and demographics that underlies much of our work. Members use the Census to track the growth of organic agriculture, monitor trends in farm size and consolidation, and assess the reach of federal conservation and local food programs.

NSAC and our members rely heavily on the Agricultural Resource Management Survey (ARMS) and its associated reports and data products. ARMS is the only annually updated dataset that allows us to comprehensively analyze economic trends such as farm and off-farm income for subgroups of farmers such as specialty crop producers as well as a comprehensive view of conservation practices.

The Organic Survey is similarly essential to our work. As the only comprehensive federal data source dedicated to organic production, it provides irreplaceable information on organic acreage, sales, and production practices that NSAC and our members use to track the growth of the organic sector and assess program needs and develop recommendations for organic agriculture and research.

The Tenure, Ownership, and Transition of Agricultural Land (TOTAL) survey is essential to NSAC members. As the only comprehensive survey of both operator and non-operator landowners, the TOTAL survey is essential to analyze land prices and ownership trends. Data from the TOTAL survey help NSAC members guide plans for farm succession, opportunities for young and beginning farmers, and keeping land in farming.

Likewise, the Local Food Marketing Practices survey is essential to NSAC members to track trends in local and regional food systems and direct sales.

NSAC members also make regular use of the QuickStats database to access crop- and county-specific statistics, the Cropland Data Layer for land use and conservation analysis, and the National Agroforestry Survey for tracking the adoption of agroforestry practices. ERS's Farm Income and Wealth Statistics provide important context for understanding the economic conditions facing family farmers across different production systems and regions.

Taken together, these products form the evidentiary foundation for sound policy development. They allow us to evaluate with specificity the conditions facing sustainable, organic, and small and mid-sized farmers — and identify solutions to build on or improve these conditions through federal programs and policy.

2. What gaps exist in the agricultural data produced?

NSAC members identified significant gaps in NASS and ERS data collection across several interconnected areas. Addressing these gaps is essential to understanding the full scope of American agriculture and supporting the farmers and farming systems that are growing fastest and facing the greatest transition challenges.

Disaggregated financial analysis: While publicly available versions of the ARMS data and the ERS Farm Income and Wealth Statistics offer a broad overview of farm finances, they are inadequate for studying specific stakeholder groups such as organic farmers, small farms, and specialty crop growers. These farms are an important part of the agricultural economy and system, but the current publicly available data products and tools do not allow detailed analysis of things such as on and off-farm income for these stakeholders, debt load, etc.

ARMS public data products and interfaces provide inadequate ability to disaggregate farm and off-farm income. There are a number of ongoing policy debates concerning adjusted gross income (AGI) caps for farm payment programs and whether waivers should exist for entities that derive a large portion of their income from farm sources. Current publicly available ARMS data products provide only median and/or mean household income information and do not provide information on the distribution of income categories (both on and off farm) for farm households and the ability to disaggregate those distributions by things such as economic class or commodity. Without these capabilities, NSAC members and other stakeholders without access to or capability to utilize micro-data cannot evaluate different policy scenarios.

Likewise, the publicly available ARMS and Census data products provide inadequate information on essential financial features such as crop insurance coverage and loans, particularly for specific populations such as small farms and specialty crop growers. The ARMS tailored reports products do not provide adequate information concerning crop insurance coverage and farm loan history that is disaggregable. ARMS collects this data, but the publicly available data interfaces and products do not make it possible to analyze these important financial data for users without access to secure micro-data.

In particular, existing data products provide inadequate disaggregability related to the Noninsured Crop Disaster Assistance Program (NAP). ERS and NASS make limited use of the administrative data collected by the Risk Management Agency (RMA), which tracks crop insurance and NAP participation, and we encourage NASS to work with RMA to publish detailed and disaggregable data and reports on NAP participation. The most recent detailed ERS reporting on NAP participation was published in 2022, and the crop insurance, market, and disaster scenarios have changed dramatically since that time, warranting a thorough update.

Organic agriculture data: The most consistently cited gap among NSAC members is the insufficient granularity and frequency of organic agriculture data in NASS products. The Census of Agriculture does not currently report commodity-specific organic acreage at the county level, a critical limitation for tracking organic growth and designing effective policy interventions at the state and local level. The Organic Survey, while valuable, compounds this problem by using commodity categories that are

inconsistent with those used in the Census of Agriculture, making direct comparisons between organic and conventional production difficult. Members also noted that tree nuts and tree fruits are aggregated together in both acreage and income categories across NASS products, obscuring important distinctions between these commodity groups. Likewise, ERS and NASS data on organic trade is hampered by inconsistent Harmonized Tariff Schedule (HTS) code alignment between organic imports and exports, making it difficult to accurately track the organic trade balance or assess the competitiveness of domestic organic producers in international markets.

As a result of these limitations, current ERS and NASS data products and reports do not adequately serve the growing organic sector.

Conservation practice implementation and economics: The Census of Agriculture and ARMS capture limited data on the on-farm implementation of specific conservation practices and do not adequately interface with existing Natural Resource Conservation Service (NRCS) program data and other data sources. Greater inclusion of practice-level data in the Census and ARMS — diversified crop rotations, cover cropping, grazing management, conservation tillage, nutrient management, integrated pest management, soil carbon amendments, and agroforestry practices — would significantly improve USDA's ability to track adoption trends across farming systems and regions.

Beyond data collection, NSAC members identified a broader absence of economic and analytical work connecting conservation practice adoption to farm financial outcomes. ERS conducts little analysis of the economics of conservation practices — including the costs and returns of adoption, the financial barriers that prevent uptake, or the long-term impacts on farm viability and resilience. This gap is compounded by the fact that ERS and NASS make limited use of the administrative and program data collected by NRCS, which tracks conservation practice implementation across millions of acres enrolled in programs like the Conservation Stewardship Program and the Environmental Quality Incentives Program. Integrating NRCS program data with NASS survey data and ERS economic analysis would produce a far more complete picture of conservation practice adoption in American agriculture. Comprehensive and consistent analysis of conservation practices would offer a robust evidence base from which to make decisions about or propose changes to federal conservation programs.

Agroforestry and perennial systems: The National Agroforestry Survey provides a starting point, but data on agroforestry practices remains partial and incomplete across NASS products. Data on emerging and small-acreage tree and shrub crop production is similarly limited in the Census of Agriculture and largely absent in ARMS, leaving a significant blind spot in our understanding of diversified farming systems.

Urban and innovative agricultural production: Section 1672E(b) of Public Law 115-334 (the 2018 Farm Bill) directed a study to supplement the most recent agricultural census in order to quantify the extent to which urban, indoor, and other emerging agricultural production practices were being utilized by domestic producers. However, no standalone study has been implemented to date and no questions have been added to the Census of Agriculture to adequately measure these production techniques. NASS should develop and pilot a set of new questions with elected county committee members and other relevant stakeholders. These questions should capture information regarding a wide variety of urban,

indoor, and other emerging practices, including but not limited to: community gardens and farms located in urban, suburban, and metro areas; rooftop farms and other outdoor vertical production; indoor farms, greenhouses, and vertical operations; hydroponic, aeroponic, and aquaponic facilities.

Local and regional food systems: The Census of Agriculture captures limited information about farms engaged in local and regional food markets. The Local Food Marketing Practices Survey collects valuable additional information related to direct marketing and local food sales such as marketing channels, program participation, and sales. However, publicly available data from the survey has limited disaggregation potential and ERS has produced few plain language publications that are accessible for all stakeholders. We encourage ERS to expand its analysis of this data related to local and regional food systems through summaries and reports that are accessible for stakeholders without access to secure micro-data or analytical expertise. Plain language reports on local and regional food systems would improve utilization of existing NASS data products and ensure accessibility for all stakeholders. Expanding data collection and reporting to provide more detailed reporting on which farms sell through direct marketing channels, which commodities move through local food systems, and the scale of those sales would allow policymakers to more accurately track the growth of local food systems and assess the reach of related federal programs.

We also recommend that this analysis include a provision of the expenditure or circulation of federal nutrition benefits (including use of SNAP EBT and the Special Supplemental Nutrition Program for Women, Infants, and Children, and other nutrition incentive benefits) in local and regional food retail settings including but not limited to at farmers' markets and CSA's. These data should be disaggregated to identify regions where benefits are readily utilized in local and regional markets and where additional support may be needed to increase participation. Likewise, we recommend that ERS utilize data on federal procurement collected by the Agricultural Marketing Service (AMS) to analyze the types of producers and markets served through commodity purchases, providing that data to stakeholders in both raw data products and plain language reports.

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

The USDA, NASS, and ERS should prioritize data products and reports related to organic production and markets, conservation practices including climate adaptation and agroforestry, farmer-participatory research tracking, and local and regional food systems. These topics represent some of the fastest growing segments of American agriculture, yet they remain chronically underrepresented in existing data collection and analysis.

NASS and ERS should prioritize improvements to existing data products and interfaces that increase the ability to analyze specific subpopulations of farms such as small farms, organic farms, and specialty crop growers. ARMS, for example, has significant potential to analyze the economic conditions facing these subpopulations, but only if the ability to disaggregate data by location, farm type, size, and commodity is improved. Improved capacity to report patterns for smaller subsets of farms would allow policymakers and advocates to evaluate whether existing investments and programs are reaching all farms.

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

For USDA NASS and ERS data products to be most useful to inform evidence-based policy development and on-farm decision-making, they should be released at a pace that matches the pace of change in the sector being tracked. For the organic sector, which has seen rapid growth and market changes in recent years, the Organic Survey should be provided on a more frequent cadence, ideally annually. Likewise, the TOTAL survey that tracks farmland values and ownership should be provided more frequently to match the rapid change of pace in land value and ownership.

The regular cadence of the ARMS survey, Farm Income and Wealth reports, and Census of Agriculture is adequate and should be maintained. These products provide essential benchmarks for understanding farm economic conditions and agricultural sector structure and any disruptions to their regular release schedule would significantly undermine their value for policy analysis and farm decision-making.

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

For NASS and ERS data to be most useful for policy, program, and farm-level decisions, they should be available at the county-level, congressional district-level, and watershed-level. County-level data is essential to analyze major changes in the agricultural industry and their geographic variation to identify which regions may be particularly vulnerable or resilient and congressional-district level data informs policy development.

For organic sector data, in particular, it is essential that commodity-specific data such as organic acreage be available at the county-level to evaluate growth and change in the organic sector. State-level organic data obscures the significant variation in organic production across counties and prevents the kind of targeted analysis needed to direct technical assistance, design effective policy interventions, and track the impact of federal organic programs.

Likewise for conservation data, county-level and watershed-level granularity is essential because conservation needs and opportunities reflect local natural resource contexts - soils, hydrology, climate, and land use. Data that cannot reflect the county-level variation and watersheds is of limited use for conservation planning and program targeting.

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)?

NASS and ERS data products are an essential public good that require increased investment, not reduction. USDA data is meant to provide the foundation for evidence-based policy and decision-making for all stakeholders across the food and agricultural sphere. To fulfill that mission, NASS and ERS must

adequately provide data products for a wide range of farming systems, sectors, and communities and ensure that no stakeholders are underrepresented.

NSAC and our members are deeply troubled by the termination of both the Agricultural (Farm) Labor Survey and the Household Food Security Reports. Rather than identifying products that are duplicative or expendable, these terminations have eliminated data products that were unique, irreplaceable, and actively used by policymakers, program administrators, and agricultural stakeholders.

The Agricultural Labor Survey was the only federal data source to provide comprehensive estimates of agricultural employment, hours worked, and wages at a regional level. Its quarterly estimates directly informed the Adverse Effect Wage Rate (AEWR) used in the H-2A agricultural visa program. Without the Farm Labor Survey, AEWR estimates will be unable to accurately reflect regional labor market conditions and stakeholders will be unable to accurately measure trends in the agricultural labor market.

The Household Food Security Survey provided the authoritative annual estimates of food insecurity in the United States that policymakers and program administrators rely on to make evidence-based decisions about how to address hunger. Food security researchers and community organizations relied heavily on the Household Food Security Survey to guide their academic and charitable efforts. No comparable independent data source exists to replace it. Its termination leaves a critical gap in our ability to monitor and respond to food insecurity across the country.

The termination of these two data products is not an efficiency measure, it is a loss of irreplaceable public knowledge. It undermines the credibility and non-partisan integrity of USDA data.

NSAC members were unable to identify NASS or ERS data products that are duplicative, outdated, or ready for elimination. In contrast, they identified a number of important gaps in data collection and provision. They also identified a number of key stakeholders that are inadequately represented in NASS and ERS data collection and analysis - organic producers, small and mid-sized farmers, and specialty crop growers, for instance. NSAC members also identified a number of key topics that are inadequately addressed - farm financials, conservation, organics, and food security, for instance. The question facing NASS and ERS should not be what to cut, but how to expand and improve data collection to serve the full range of American agriculture and food systems. We encourage NASS and ERS to invest robustly in the full range of data collection and products and improve the utilization of data products by reducing barriers to access and improving the usability of existing products for all stakeholders.

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?

NSAC members rely on plain language ERS reports because they are accessible and digestible ways for stakeholders to understand trends in agriculture and rural communities without analytical expertise. Among the most valuable reports are the America's Farms and Ranches at a Glance reports, the Farm Income and Wealth Statistics, the America's Diverse Family Farms report, and a number of targeted ERS reports on specific farmer populations including beginning farmers, limited resource farmers, and female farmers and ranchers.

ERS's annual America's Farms and Ranches at a Glance report is among the most valuable reports for NSAC and our members because it is both thorough and accessible. The report provides a regularly updated picture of farm structure and financial conditions in the US and describes farm characteristics across size, revenue, operator occupation, and family versus nonfamily ownership. It is written in a way that is accessible to most readers and does not require advanced analytical training. The 2025 edition's special sections on direct sales and certified and transitioning organic acreage are especially relevant to NSAC's constituencies and represent exactly the kind of analysis we would like to see ERS expand and regularize.

NSAC members also rely heavily on ERS reports that synthesize complex data into accessible, plain language analysis of trends affecting specific farming communities. The America's Diverse Family Farms report, which has not been published since 2021, provided essential information on the well-being of the wide range of farm types and sizes in the US. Its absence is a significant gap that we urge ERS to address. NSAC members similarly rely on Amber Waves for accessible analysis of topics directly relevant to our work, including conservation programs, school food programs, and the conditions facing underserved farm populations. Detailed research reports such as the recent Beginning Farmer and Rancher Operations: Characteristics Associated With Business Survival report are essential for tracking the well-being of beginning farmers and ranchers and informing evidence-based program design and we encourage ERS to provide a wider range of such reports.

ERS's Farm Income and Wealth Statistics are an essential resource for NSAC's members. The comprehensive income and financial data these products provide allows stakeholders to track trends in farm financial health in greater detail. For example, NSAC relies on the Farm Income and Wealth Statistics to inform policy recommendations on the design of federal farm programs such as AGI eligibility thresholds and payment structures. The government payments data within the Farm Income and Wealth Statistics is equally important for program evaluation. Tracking the distribution of federal payments across farm sizes and income levels allows stakeholders to assess whether farm safety net programs are functioning as designed and reaching the farmers who need them most. This improves program transparency and accountability for all stakeholders.

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

NSAC members identified several critical areas where ERS analytical work is absent or inadequate relative to the scale and importance of the issues facing American agriculture. Expanding ERS's research

agenda to cover these topics would improve the credibility and relevance of USDA data products for all stakeholders.

Conservation practice adoption and economics: As noted in our response to Q2, ERS conducts limited economic analysis of conservation practice adoption despite the scale of federal investment in conservation programs. NSAC urges ERS to develop a more robust research agenda on the economics of conservation practices, including the costs and returns of adoption, the financial barriers that prevent farmers from implementing practices, the long-term impacts of conservation practices on farm viability and resilience, and the environmental and economic outcomes achieved by major USDA conservation programs. This kind of economic analysis is essential to evaluating whether federal conservation investment is achieving its intended outcomes and where future resources should be targeted.

Agroforestry and perennial cropping systems: Agroforestry and perennial cropping systems represent rapidly growing strategies for improving the long-term sustainability and resilience of American agriculture, but they remain a very limited part of ERS's research agenda. NSAC urges ERS to develop economic analysis of the costs and returns of agroforestry practices, including silvopasture, alley cropping, forest farming, and riparian forest buffers, as well as the economics of transition from annual row crop production to perennial systems. The environmental, economic, and social benefits of these systems are large and wide-ranging - water quality, soil health, microclimate mitigation, wildlife and beneficial habitat, greater diversity of healthful foods produced - and merit focused NASS attention. Understanding the financial barriers to adoption, the time horizons involved in achieving returns from perennial systems, and the policy interventions that could accelerate adoption is essential to designing evidence-based programs.

Organic transition and the economics of organic agriculture: The organic sector has experienced significant growth in recent years, yet ERS's analytical coverage of organic agriculture remains limited. NSAC urges ERS to develop a sustained research agenda on the economics of organic transition, including the costs and financial risks of the transition period, the availability and adequacy of federal transition support, and the market conditions that affect the viability of organic production across different commodities and regions. More broadly, ERS should conduct and publish plain language reports on economic analysis of the impacts of organic agriculture on farm financial outcomes, land values, labor markets, and the economic vitality of rural communities. This research would provide an essential foundation for evidence-based federal investment in organic transition assistance and the broader organic sector.

Local and regional food systems: Local and regional food systems represent a significant and growing segment of American agriculture, yet ERS's coverage of this sector remains thin. NSAC urges ERS to continue to expand its research and reporting on the economics of local food systems, including the financial performance of farms engaged in direct marketing, the infrastructure and market access challenges facing local food producers, and the economic impacts of local food systems on communities. The 2025 edition of America's Farms and Ranches at a Glance includes a special section describing direct sales, for example, and detailed and accessible analysis such as this should be continued and expanded. ERS should ensure that data on local food system participation and outcomes is collected and published in a form that allows farmers, researchers, and program administrators to independently assess the scale,

reach, and economic significance of local and regional food markets across different regions and farm types. This means providing publicly available raw data in a manner that can be disaggregated for subgroups and geographies, as well as providing more plain language reports for stakeholders.

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?

NSAC members indicated that both raw data files and written analysis products are valuable and serve distinct needs. Stakeholders affiliated with academic institutions or organizations with larger staff capacity are more likely to utilize raw data files directly, as they possess the technical expertise and resources to conduct independent analysis. The majority of NSAC members, however, rely primarily on written analysis products to inform their work. This variation in usage reflects the diversity of organizational capacity across USDA stakeholders. USDA should consider this range of needs when making decisions about data dissemination, ensuring that both raw data and accessible written analysis remain available to serve the full breadth of stakeholders who depend on USDA data to support research, advocacy, and decision-making

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

NSAC members indicated that they want ERS and OCE-WAOB to have a greater focus on diversified, sustainable, and organic farming systems. These systems represent a growing segment of American agriculture, yet current data and analysis products fail to adequately capture their diversity, leaving a critical gap in the evidence base for sound policy and program design. Meaningful and structured engagement with sustainable agriculture organizations in the process of shaping ERS and OCE-WAOB research priorities would help ensure that the full range of American agricultural systems is represented in the federal data infrastructure. Additional content that would be useful for members would be plain language reports on barriers to conservation practice adoption. Accessible analysis on other important agricultural subpopulations — including beginning farmers, historically underserved producers, and small and mid-size operations — is similarly lacking and would fill critical gaps in the federal data infrastructure.

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?

NSAC members most often use QuickStats, but indicated that it was not very intuitive. Members found it difficult to find organic data, and that QuickStats had unclear filters and term definitions. Members also said that ERS, NASS, and OCE-WAOB's complex web interfaces are a barrier for farmer-users.

NSAC members also identified a need for greater disaggregation of ARMS data. More granular data — broken down by farm size, production system, region, and operator demographics — would substantially increase the utility of ARMS for researchers, advocates, and policymakers working on issues that affect diverse segments of the agricultural sector.

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

NSAC members indicated dashboards with querying capability, plain-language summaries, downloadable PDFs, term definitions in QuickStats, and more intuitive filters would improve the usability of ERS, NASS, and OCE-WAOB products. However, there was a significant range in terms of user needs. Researchers within our coalition wanted APIs and raw data, while farmers and advocates want plain language summaries and PDFs.

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?

NSAC members indicated that farmers in general, especially beginning farmers, small-scale operations, diversified operations, organic producers, and other underserved farmers have trouble navigating ERS, NASS, and OCE-WAOB data and products. In addition, members said that USDA staff capacity to help users navigate data products is essential. Recent staffing cuts across USDA have eroded the department's ability to support a broad range of data users.

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)?

USDA data is highly credible and a vital public good. However, the continued credibility of USDA data depends on perceived and real independence from political interference. Recent staffing cuts, restrictions on climate and equity research topics, removal of access to certain USDA data sets, and disruption to data collection schedules have recently undermined confidence in ERS, NASS, and OCE-WAOB data and analytical products among stakeholders. For example, NASS Agricultural Statistics Board Chair Lance Honig recently reported a record-low farmer response rate to the 2026 Prospective Plantings Survey. Reduced confidence in federal agricultural data harms farmers, ranchers, and other stakeholders who depend on it to make sound policy and business decisions. Data revisions and projection adjustments are sometimes necessary and should be made when the evidence warrants them, but the frequency and scale of recent adjustments underscore the importance of preventing data quality problems at the source. Adequate staffing and funding for NASS and ERS, and insulation of their work from political

interference, are the most effective tools available to minimize the need for such corrections and restore confidence in federal agricultural data.

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?

NSAC members recommend listening sessions targeted by region and type of farming system. Also, ensuring a minimum of a 60 day window for any type of public comment or feedback to ERS, NASS, and OCE-WAOB and greater transparency about upcoming data priorities and changes. Members also recommend more proactive outreach to organic and underserved farming communities. NSAC also recommends the reestablishment of the Advisory Committee on Agricultural Statistics. This advisory committee composed of experts and stakeholders served for 63 years to provide recommendations on the collection and analysis of agricultural statistics to ensure that NASS remains aligned with both scientific best practices and stakeholder needs. Reinstating the advisory committee would provide a venue for NASS, ERS, and OCE-WAOB to receive regular and ongoing feedback.

Conclusion

USDA's data infrastructure is a public good that serves farmers, advocates, researchers, and policymakers across the full spectrum of American agriculture. The questions posed in this RFI reflect an important opportunity to strengthen that infrastructure. NSAC urges USDA to expand and improve data collection and analysis to reflect the full diversity of American farming systems, invest in the usability and accessibility of data products for all users, restore and maintain the staffing capacity necessary to collect, analyze, and disseminate high-quality data, and protect the independence and integrity of ERS, NASS, and OCE-WAOB. The farmers, advocates, and communities that depend on federal agricultural data cannot afford a diminished USDA data infrastructure.