



April 09, 2026

United States Department of Agriculture  
Economic Research Service  
Docket ID ERS-2026-0001

**RE: National Corn Growers Association Comments  
on the Request for Information on Opportunities, Challenges, and Emerging Areas in  
Statistical Data, Analysis, and Research at the U.S. Department of Agriculture**

The National Corn Growers Association (NCGA) offers the following comments on the Request for Information (RFI) on Opportunities, Challenges, and Emerging Areas in Statistical Data, Analysis, and Research at the U.S. Department of Agriculture (USDA). Corn growers appreciate the RFI process led by the Economic Research Service (ERS), National Agricultural Statistical Service (NASS), and the Office of the Chief of Economist (OCE).

NCGA represents 36,000 dues paying members and the interests of the broader community of 500,000 U.S. corn farmers. NCGA and its affiliated associations in 27 states work together to help protect and advance corn growers' interests. As a grassroots association, NCGA and our affiliated state organizations appreciate the opportunity to weigh in on the USDA reports, analysis, and data that impact corn growers every day: in their decision-making on the farm, markets they participate in, and advocating for their needs and opportunities.

**USDA Data Frequency, Scope, and Relevance**

***The following questions are addressed in this section:***

- 4. How often should data and information be released or updated (e.g., annually, quarterly)?*
- 5. What geographic granularity (e.g., national, state, county) for data best supports your work?*
- 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.*



*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?*

*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)?*

NCGA uses both raw data files and written analysis from USDA. The desired frequency of data depends on the dataset or report. In general, the frequency of various reports and datasets that NCGA uses seems appropriate.

As a national organization, NCGA frequently references national level data, but also values state and county granularity for datasets where those are published. NCGA uses non-USDA data to supplement data elements that are not included in NASS or ERS products. NCGA regularly uses commodity futures price data, a provider of trade data that allows for more options in trade between other nations. We have also used a provider of county level data aiming to fill in information for counties that USDA has not published. We also value analysis from academia and private sectors. Most of these public sources also utilize USDA data in some way as a baseline or building block for their analysis, underscoring the need to maintain quality data. One of the main values of USDA data is that it can be considered unbiased and is publicly accessible compared to other providers, especially for survey-type or time-sensitive data (namely crop production). One challenge is that USDA might be slower to release data or respond to market-moving events or trends, though timing is admittedly hindered by USDA's mandated mission to produce a comprehensive national/state/county scope of data on a predetermined schedule.

## **NASS Data-Collection and Reports**

***The following questions are addressed in this section:***

*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)?*

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



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

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

Survey methodology is a very timely and important issue to corn growers across the country. As NASS regularly states, USDA reports are only as good as the data they receive from farmers. As survey response rates have declined over time, improving and re-engaging respondents is critical to the success and accuracy of agricultural data. Any improvements or adjustments to the NASS survey process should take into account both the need for high quality data and what is being asked of the farmer.

Grower delegates to NCGA's Corn Congress regularly review, debate, and update NCGA's federal policy book. NCGA's current policy statements on NASS data include that: *NCGA supports USDA NASS as a source of unbiased data on various aspects of agriculture, encourages farmer completion of surveys and requests: a. NASS re-instate county level crop production and demographic reports; b. NASS to implement new strategies in releasing data in a more accurate and timely manner. c. NASS should utilize RMA and/or FSA data to improve the accuracy of data and to reduce the survey burden on farmers. These policy statements were updated in 2025 and 2026.*

Accordingly, NCGA recommends that NASS evaluate all opportunities to improve the accuracy of its reporting, including utilizing data that farmers are already reporting to other agencies, and the sequencing of this reporting and/or its resulting inclusion in reports that move the markets that heavily impact farmers' bottom lines. Realizing that the process of updating methodology is intensive and will take time, NCGA grower leaders are ready and willing to assist in providing feedback and recommendations on improvements that reduce the survey load on farmers while enhancing data quality as options are explored.

Frequent feedback from growers is that surveys can be cumbersome, duplicative, and time consuming. Potential improvements and solutions include shortening surveys by reducing the number of questions asked, especially if the same information is requested by other USDA agencies, or prefilling demographic information that changes infrequently to reduce farmer's time spent on repeated entries. Farmers are very busy at certain times of year and may not have the ability to fill out the entirety of lengthy surveys, especially during critical



times at planting and harvest. Surveys should be respectful of farmers' time, energy, and effort. Additionally, grower business information is very sensitive. Careful consideration of whether information is actually needed and how it is collected and protected should be taken into account. NCGA recommends, within sound statistical practice, reconsidering or broadening the scope of farmers that receive surveys or evaluating the parameters of how farmers are selected for surveys, as a portion of grower members say that they have never received a NASS reporting survey. Consideration of how to best utilize valuable USDA and taxpayer resources to result in the highest quality/adequate sample size for reporting would benefit all stakeholders.

### **Building Credibility, Buy-In, Accessibility and Understanding**

***The following questions are addressed in this section:***

*4. 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?*

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

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

*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?*

*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' 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?*

Internationally, USDA data has long been recognized as the standard of public agricultural data and forecasting. It is important for USDA to strive to keep it that way at home and abroad. An important facet of this effort will be to keep 1) farmers responding to and engaged in the data process and 2) ensure that the markets and stakeholders that use this data maintain, and in some cases regain, trust in the credibility and accuracy of USDA's numbers. Aside from ensuring that data is produced in a way that is commanding of these



attributes, USDA should work to increase understanding and transparency, and confidence in their data products. There are simple ways to do this, for examples: growers appreciated USDA staff presence and interaction at Commodity Classic 2026 and NCGA Corn Board members were able to ask questions to NASS and WAOB staff at a recent lockup to help shape recommendations for these comments. Corn growers have questions for USDA about how their survey responses are used, how forecast reports are prepared, and what accountability measures are utilized to avoid errors. Education and outreach by USDA on these topics would go a long way to encouraging farmer participation and rebuilding trust. It also helps farmers see how their responses are used and connect their contributions to the broader reports.

USDA publishes and provides a wealth of information that is sometimes difficult to locate and use. For many policy leaders, decision makers, and the public, the current format of most USDA data makes it difficult for stakeholders who may not have the time or technical knowledge to understand, download, analyze, or present these numbers quickly or easily. There is not a central source for USDA data, often leading a user to jump around to different agency websites, and it's often difficult to find some of the resources that USDA dedicates significant time and effort into creating and maintaining. Removing manual barriers to data (individual spreadsheets by each agency/series) would make data significantly easier to use and find, and interactive dashboards or visualizations of integrated datasets would make it easier to navigate online data collection. NCGA encourages thoughtful consideration of how the user-facing presentation of this data is modernized and streamlined to make use and access easier. Innovation, organization, and visualization of the presentation of data is much appreciated, such as the improvements to the Agricultural Transportation Open Data Platform.

NCGA has previously led grassroots efforts to encourage farmers to fill out NASS surveys. National and state staff have also engaged with statistical agencies, demonstrating our support for improving grower survey response and the relationships, communication, and understanding between industry and USDA. Further ideas on potential collaboration on improvements and outreach would be warranted among and beyond data users.

### **USDA Data is Valuable to NCGA's Mission**

***The following questions are addressed in this section:***

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



*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?*

*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?*

In addition to frequently-updated reports that provide key information for commodity markets and drive farmer decision-making, NCGA relies on USDA data to understand important other trends occurring in the farm economy and communicate them to problem solvers. From understanding declining farm numbers in the Census of Agriculture to understanding farm income estimates, and advocating for the collection of data on mycotoxin-mitigation practices in the ARMS to inform NCGA and corn industry research investments, these reports are central to shaping our organization’s priorities and effectively advocating for grower needs. NCGA staff also regularly utilize the TOTAL report to understand land ownership trends, the ERS Agricultural Baseline to help form scenarios for analysis, regular Crop Progress and Grain Stocks reports to true up market expectations and balance sheets, and drought and weather monitoring tools. We also know that our partners in Congress rely heavily on USDA data to understand price and yield support programs, disaster relief, and crop insurance utilization, among many other issues. In addition to raw data and forecasts, the inclusion of supporting narratives and reports along with these data releases is important to understanding the context of and assumptions made in the production of these numbers.

Additionally, NCGA regularly uses data from AMS (prices, transportation datasets and reports which are difficult to find from other sources, fuel and fertilizer prices reports, etc.) and FAS (PSD, GATS, Export Sales, and GAIN Reports, which are important resources to our trade analysis). Our organization also utilizes FSA and RMA data to understand how growers are managing risk, but would value reports that are more digestible for non-technical experts, especially policy makers.

Underscoring the importance of this data, NCGA emphasizes the need to invest in this data and systems. The importance of investment in data and systems spans not only the technical aspects, but also the human contribution and support, such as how these systems respond to feedback, inform leadership, and educate on process and methodology. This sentiment was previously noted in NCGA’s August 26, 2025 public



comments on the USDA Department Reorganization Plan which is reiterated here:

*“Producers rely on a strong and functioning USDA to make decisions with timely and accurate information, allowing farm families to focus on growing their businesses and rural economies. They also rely on research, extension, and unbiased data to continue to innovate and make key production decisions. Throughout the reorganization efforts, we support the goals of improved effectiveness, accountability, and enhanced services to this end....”*

*...For the continued viability of family farms across the country, corn growers also continue to support the maintenance of and investment in institutional knowledge and interagency cooperation of USDA. Farmers and ranchers across the country depend on the knowledgeable and experienced staff of technical experts and policy makers at USDA to understand and communicate producer priorities, inform decision making, and make sure that the needs of the industry have a seat at the table in wider policy discussions. USDA also has a responsibility to update stakeholders including providing technical assistance and maintaining strong lines of communication, including counsel support to the U.S. House of Representatives and U.S. Senate.”*

### **New Areas of Analysis**

***The following questions are addressed in this section:***

*2. What gaps exist in the agricultural data produced?*

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

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

A top priority for corn growers is expanded public data and analysis on input uses, cost drivers, and trends. Particularly in a time of high input costs relative to lower prices across row crops, more timely and current data is needed to help both farmers and policy makers make decisions. More data will also improve market transparency and understanding of underlying factors driving increasingly expensive inputs. NCGA would value seeing increased emphasis and resources devoted to data on producer inputs.

Expansion of the bioeconomy is another chief focus of NCGA. There is a major gap in consistent data and analysis on the economic impact of the U.S. biobased products



industry including evaluating the long-term impacts of policies like clean fuel standards, tax incentives for biomanufacturing, and life cycle analysis of biobased products on agricultural production and profitability. Current data does not accurately reflect the impact traditional uses of corn and other feedstocks, with most of USDA's robust studies of economic impact using data from 2021. Additionally, outdated information does not support emerging industry and limits diversification of demand. Inconsistencies in classification systems, specifically the lack of bioeconomy specific indicators within the North American Industry Classification System (NAICS) codes result in misrepresentation of economic activity tied to biobased products.

USDA should prioritize collecting data products that explicitly measure and track the bioeconomy across the full value chain, from feedstock production to biomanufacturing and end-use markets. This includes data on biobased product demand, feedstock utilization by end use, and the economic contribution of biomanufacturing to the American economy. Quantifying the impact of uses such as sustainable aviation fuel, bioplastics, renewable chemicals, and other new uses helps us to show the potential impact of expanding these domestic markets. NCGA supports increased collaboration and communication among statistical agencies and other arms of USDA, such as ARS and ERS to increase information sharing and amplify usage and communication of public sector research and data.

As USDA and markets move towards recording more granular production data (such as carbon intensity for biofuel feedstocks and value calculations), it will be important to remember how sensitive, valuable, and complicated these records are. NCGA encourages future handling of this data to be done thoughtfully, with consideration of farmer burden and private business sensitivities.

### **Continued Opportunities for Feedback Appreciated**

#### ***The following question is addressed in this section:***

*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?*

NCGA appreciates the opportunity to provide feedback, suggestions, and information about the usage and quality of USDA's data products, as well as highlight the great value of the tools we use most and our appreciation for them. The chance to engage on the issues that farmers feel strongly about, and the products that are built to serve them builds trust, understanding, and ultimately a better product for all users. To this end, corn growers



would welcome more regular and consistent opportunities for growers and industry to engage with USDA's data processes and decision makers, such as the reestablishment of a body similar to the Advisory Committee on Agricultural Statistics, regular grower-leader roundtables, or expanded Data User's meetings.

NCGA, our affiliated state organizations, and grower leaders are all willing to provide additional information and feedback. We look forward to continued communication with ERS, NASS, OCE, the World Agricultural Outlook Board, and other data agencies.

Sincerely,

A handwritten signature in black ink, appearing to read "Jed Bower", written in a cursive style.

Jed Bower

National Corn Growers Association