

GAO

Report to the Honorable
Lane Evans, House of Representatives

October 1987

FARM PROGRAMS

USDA's Wheat Poll— The Results Are Not Reliable



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Resources, Community, and
Economic Development Division

B-226449

October 23, 1987

The Honorable Lane Evans
House of Representatives

Dear Mr. Evans:

In response to your letter of October 3, 1986, and subsequent discussions with your office, we reviewed the design and implementation of the U.S. Department of Agriculture's (USDA) 1986 wheat poll. The Food Security Act of 1985 required that the wheat poll be taken to measure producers' opinions about federal imposition of mandatory production limits on wheat. Within USDA, the Agricultural Stabilization and Conservation Service (ASCS) conducted the poll.

Specifically, we agreed to address the following questions:

- What did the law require the Secretary of Agriculture to do in conducting the poll?
- Was the program for conducting the poll consistent with the provisions and intent of the 1985 act?
- Was the poll administered effectively?
- Were the Secretary of Agriculture's actions and public comments about the poll before its completion consistent with governing legislation?

We also agreed to make observations and recommendations, if merited, that will be helpful to USDA in designing any future polls or referendums that the Congress may require.

Results

In summary, we found that while ASCS conducted the wheat poll within the relatively short time frame required by law, the poll results are not reliable because of weaknesses in the design and administration of the poll. The following summarizes our findings, which are presented in more detail in the appendixes.

Requirements of the Act

The Food Security Act of 1985, enacted on December 23, 1985, required the Secretary of Agriculture to poll a target group of wheat producers no later than July 1, 1986—or within about 6 months—to learn to what extent they favored federally mandated wheat production controls. To be eligible to vote in the poll, the law stated that a producer “. . . must have produced a crop of wheat during at least one of the 1981 through

1985 crop years [year in which a crop is harvested] for wheat on a farm with a wheat crop acreage base¹ of at least 40 acres." Appendix II contains a detailed discussion of the legal requirements placed on the Secretary of Agriculture in conducting the wheat poll.

Program for Conducting the Poll

ASCS complied with the law. While ASCS distributed wheat poll ballots to all wheat producers in 1986, rather than only to the target group, it was in compliance with the law because the ballot included a question asking whether producers were in the target group. ASCS then reported the wheat poll results in accordance with the producers' responses to this particular question. These results are not reliable, however, because ASCS did not verify that producers correctly placed themselves in or out of the target group.

ASCS did not verify that producers correctly classified themselves as being in or out of the target group because it maintained that the definition of the target group contained in the law could not be applied to the years 1981 through 1985. According to ASCS officials, the law provided a technical definition of the target group to be applied to programs to be administered in future years—1986 through 1990. As a result, according to ASCS officials, the definition could not be applied for years before 1986 because the terminology and definitions were different. However, we believe ASCS could have taken an alternative approach that identified a target group that appeared to closely approximate the group indicated in law, verified which producers were in that group, and thereby assured the reliability of its wheat poll results. Further, had ASCS distributed ballots to this alternative target group only, it would have distributed substantially fewer ballots. Appendix III provides a detailed discussion of this issue.

Administration of the Poll

Although ASCS designed the poll and mailed the ballots within the period allowed by law, we do not believe that the poll was effectively administered. Producers' spouses were allowed to vote in some states but not in others, some producers may have voted more than once, and some producers who were not eligible to vote may have voted. These actions may have happened because ASCS

¹The average number of acres planted and considered planted to wheat over the previous 5 years. "Considered planted" includes acreage that a producer was prevented from planting for a program crop as a result of a natural disaster or acreage taken out of production to comply with any acreage reduction program.

- distributed 15 percent of the total wheat poll ballots to both producers and their spouses in some states because of governing state law, but did not distribute ballots to producers' spouses in other states;
- distributed multiple ballots to some producers who farmed in more than one county; and
- erroneously distributed ballots to producers who were not eligible because they did not have the required acreage.

In addition, neither the transmittal letter accompanying the wheat poll ballot nor the ballot was consistent with accepted principles for designing such data collection surveys. The letter did not encourage producers to respond. And the question asking if producers "favored the imposition of mandatory controls" for wheat may have biased the results in favor of such controls because of the wording of the question. ASCS estimated that conducting the poll cost \$2.6 million. Appendix IV provides a more detailed discussion of our evaluation.

The Secretary of Agriculture's Comments

Prior to taking the wheat poll, the Secretary of Agriculture took a strong public stand against mandatory production controls and encouraged producers to vote against them in the wheat poll. Such statements were not prohibited by governing legislation.

By its terms, 18 U.S.C. §1913 (an "anti-lobbying" statute) prohibits, unless expressly authorized by the Congress, the spending of appropriated funds to influence the members of Congress

"... to favor or oppose, by vote or otherwise, any legislation or appropriation by Congress, whether before or after the introduction of any bill or resolution proposing such legislation or appropriation"

The Secretary, in comments attributed to him prior to taking the poll, was not urging producers to influence members of Congress to pass or defeat any legislation. Rather, remarks attributed to him indicate that he was attempting to persuade wheat producers not to vote for production controls.

Further, in announcing the wheat poll results, the Secretary concluded that the response rate was "relatively small" and, therefore, the results were "inconclusive" even though ASCS did not determine a separate response rate for the target group. Nonetheless, our analysis at counties where we did detailed review work showed that the response rate for producers for an alternative target group was within the range of other

recent ASCS elections and referendums that were binding. Appendix V provides more details on our evaluation and analysis of this issue.

Conclusions

We believe that ASCS' design and administration of the wheat poll was not adequate to assure that the wheat poll results were reliable. Because of the weaknesses, the extent that producers targeted by the law favored or opposed mandatory production controls may (or may not) be significantly different from that measured by the poll. There is simply no way to know.

We further believe that unless ASCS takes action to correct the weaknesses that we identified in the administration of the wheat poll, it could experience some of the same problems in administering any future polls or referendums.

Recommendations to the Secretary of Agriculture

To assure that any future polls or referendums that the Secretary of Agriculture may be required to conduct are reliable, we make several recommendations to the Secretary of Agriculture aimed at verifying the target group and assuring consistency in balloting. These are contained on pages 23, 32, and 33.

Comments of USDA and ASCS and Our Evaluation

In its official comments (see app. VII) on a draft of this report, USDA did not comment on the specific findings, conclusions, and recommendations. USDA simply commented that the wheat poll was conducted in conformity with the Food Security Act of 1985 and that the results of the wheat poll were inconclusive.

USDA's comment that the Secretary of Agriculture conducted the wheat poll in conformity with the provisions of the Food Security Act of 1985 is accurate. However, USDA designed and administered the poll in a manner that would produce unreliable results.

In commenting that the results of the poll were inconclusive, the Secretary appears to continue to take the position that the results were inconclusive because of the "relatively small" response rate. However, our report shows that regardless of the size of the response rate, USDA did not design and administer the poll in a manner that would produce reliable results. Therefore, the results had to be inconclusive no matter what the response rate was.

In talking to ASCS representatives about the weaknesses in the design and administration of the wheat poll, they stated that they were trying to meet the deadline and any additional actions would have required more staff time and probably overtime pay.

Although we agree with ASCS representatives that some additional staff time would have been required to have overcome the weaknesses identified in this report, depending on the approach that was used, this additional staff time could have been as little as 20 percent. We believe that the additional investment was essential to ensure reliable results. Without it, the poll yielded results that are of little use.

To respond to your concerns, we talked to representatives in ASCS' headquarters in Washington, D.C., who were responsible for designing and publishing the results of the wheat poll; reviewed pertinent ASCS handbooks and notices; did review work at four ASCS county offices, the level at which ballots were distributed, in three states; telephoned representatives of ASCS' state offices in two of eight community property states to learn how ballots were distributed in those states; interviewed representatives of ASCS' Kansas City Management Office to learn how they processed the ballots for counting and analysis; reviewed the legislative history for Section 301 of the Food Security Act of 1985 and laws and decisions related to restrictions on a cabinet secretary's comments and actions; and reviewed newspaper reports quoting or characterizing the Secretary of Agriculture's comments about production controls and the wheat poll. A more detailed explanation of our review's scope and methodology is included in appendix I.

We are sending copies of this report to the Director, Office of Management and Budget; the Secretary of Agriculture; various Senate and House Committees; members of Congress; and other interested parties. Copies will be provided to others on request.

This work was performed under the direction of Brian P. Crowley, Senior Associate Director. Major contributors to the report are listed in appendix VIII.

Sincerely yours,

A handwritten signature in cursive script that reads "J. Dexter Peach". The signature is written in black ink and is positioned above the printed name and title.

J. Dexter Peach
Assistant Comptroller General

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Abbreviations

ASCS	Agricultural Stabilization and Conservation Service
GAO	General Accounting Office
USDA	U.S. Department of Agriculture

Background

The Agriculture and Food Act of 1981 authorized voluntary production control programs for each of the 1982-85 crops of wheat, feed grains, cotton, and rice to help avoid large surpluses. These programs included acreage reduction and land diversion. Under acreage reduction programs, producers removed a specific portion of their land from production of program crops. In exchange, producers received loans and subsidy payments (referred to as deficiency payments) for the commodities that they produced. Producers who enrolled in land diversion programs took a specified percentage of their land out of production (in addition to any land removed under the acreage reduction program). In return, producers received a direct cash payment (referred to as a diversion payment) for the commodities that they would have grown had they not participated in the land diversion program.

However, despite the use of voluntary production control programs, U.S. producers have continued to produce large harvests of wheat, feed grains, cotton, and rice. Abundant harvests and declining exports have resulted in continued surpluses that have depressed commodity prices and reduced farmers' incomes. As another attempt to get the production of program crops more in line with demand, the congressional debate on the Food Security Act of 1985 included discussion on the imposition of mandatory production controls on producers of wheat.

Although the Congress did not enact mandatory production controls in the Food Security Act of 1985, the law required the Secretary of Agriculture to conduct a poll of wheat producers to learn their views about mandatory production controls. Specifically, the poll was to determine whether wheat producers favored mandatory limits on wheat production that would result in wheat prices not lower than 125 percent of the cost of production (excluding land and residual returns to management) as determined by the Secretary. The law did not require the Secretary of Agriculture to take any action based on the poll results.

The U.S. Department of Agriculture's (USDA) Agricultural Stabilization and Conservation Service (ASCS) was responsible for conducting the wheat poll. Primarily, three ASCS components were involved. Headquarters ASCS designed the poll, assigned responsibilities to the other two components, and published the results. ASCS' county offices¹ were responsible for distributing the ballots and receiving returned ballots.

¹Generally, each county has an ASCS office. These offices, under the supervision of a county executive director, administer the ASCS programs at the county level. Among others, the programs include agricultural conservation, acreage allotment, and price support.

And the ASCS Kansas City Management Office² was responsible for the centralized computer processing of the ballots. ASCS estimated that administering and reporting on the wheat poll cost about \$2.6 million.

On June 25, 1986, ASCS mailed ballot packages to 1.56 million producers who had an interest in an estimated 1.14 million farms with a wheat base. Ballots were to be returned no later than July 14, 1986.

On August 15, 1986, USDA announced that 54 percent of the producers returning valid ballots favored mandatory production controls. Of the ballots distributed, 346,034 (about 22 percent) were returned and 26,626 were determined to be invalid. Approximately 16,000 ballots were rejected at county ASCS offices. County offices rejected ballots for several reasons such as the following: (1) if the certification envelope³ was not signed by the producer identified on the envelope, (2) if more than one ballot was included in the same envelope, or (3) if the envelope was postmarked after the deadline date. Approximately another 10,000 ballots were rejected at the ASCS Kansas City Management Office primarily because the question asking producers whether they favored production controls was not answered.

About 20 percent of the ballots distributed were returned and deemed valid. Of the 319,400 producers returning valid ballots, 171,389, or 54 percent, favored production controls.

Prior to taking the wheat poll, the Secretary of Agriculture took a strong public stand against mandatory production controls and encouraged producers to vote against them. For example, he was quoted as stating that:

"There are so many sound reasons this ought to be rejected that I hardly know where to begin. It's a program that just plain won't work."

Further, the Secretary of Agriculture discounted the wheat poll results. In the press release announcing the results, the Secretary stated that:

²Its mission is to function as ASCS' National Accounting Office and to provide centralized development and maintenance support of ASCS' automated data processing systems.

³A ballot package consisted of one ballot, an opaque envelope to place the executed ballot inside of, and a return certification envelope to place the opaque envelope inside of. The certification envelope had the producer's name and address on it and a place for the producer to sign that he or she personally voted the enclosed ballot.

"Based on the relatively small response to the wheat poll, I don't think a great deal of significance can be attached to the results. I therefore consider the poll to be inconclusive."

Objectives, Scope, and Methodology

We performed this review in response to an October 3, 1986, letter from Representative Lane Evans. He asked us to review USDA's design and implementation of the 1986 wheat poll and to make any observations and recommendations, if merited, that might be helpful in designing any future polls or referendums that the Congress may require. Specifically, we agreed to answer the following questions:

1. What did the law require the Secretary of Agriculture to do in conducting the poll? (See app. II.)
2. Was the program for conducting the poll consistent with the provisions and intent of the 1985 act? (See app. III.)
3. Was the program for conducting the poll administered effectively? (See app. IV.)
4. Were the Secretary of Agriculture's actions and public comments about the poll, prior to its completion, consistent with governing legislation? (See app. V.)

To answer the first question, we reviewed Section 301 of the Food Security Act of 1985, which required the wheat poll, and its legislative history to determine the purpose and intent of the law and to determine what the law required of the Secretary of Agriculture.

To answer the second and third questions, we interviewed officials at ASCS' headquarters in Washington, D.C., who had responsibility for designing, administering, and reporting on the wheat poll.

We obtained ASCS' handbook and notices that contained instructions for conducting the wheat poll and compared the criteria for distributing ballots to producers with the criteria established in the Food Security Act of 1985. We also obtained ASCS' instructions for conducting elections and referendums for other programs to compare with the administration of the wheat poll to determine if there were any major differences. In addition, we obtained and compared producer participation rates in the other ASCS elections and referendums with producers' participation in

the wheat poll to determine to what extent, if any, the participation in the wheat poll varied from other recent ASCS experiences.

We also reviewed ASCS' transmittal letter and wheat poll ballot that were distributed to producers to determine whether they were consistent with accepted principles for developing and writing questionnaires and other data-collection instruments. As a basis for evaluating the letter and the six questions contained on the wheat poll ballot, we used Developing and Using Questionnaires⁴ and Mail and Telephone Surveys: The Total Design Method.⁵ We particularly looked for features that may have affected the reliability or validity of responses to the poll or overall response rates.

We visited four judgmentally selected ASCS county offices in three states to determine how wheat poll ballots were distributed, collected, and forwarded to ASCS' Kansas City Management Office for tabulation. The four ASCS county offices are located in Sumner, Kansas; St. Clair, Illinois; and Ray and Saline, Missouri. We selected a county in Kansas because it was the largest wheat-producing state. We selected counties in Illinois and Missouri because both states received a large number of ballots although neither was among the top 10 wheat-producing states.

We judgmentally selected one county in each state that both distributed and received a large number of ballots to assure a reasonable volume of activity to review. In addition, we selected a second county in Missouri that had a manual record system—as opposed to the automated systems used in the other three counties—to determine if its administration of the wheat poll differed from the counties with automated record systems.

At each of the four county offices, we took a random sample of producers from the list of producers that were provided wheat poll ballots. We reviewed the ASCS farm records of each person in our sample to determine how many of the producers were in a predetermined target group (explained more fully on pp. 19-22) that appeared to closely approximate the group identified by law to be polled. We also identified how many of the producers in our sample returned their wheat poll ballots

⁴Transfer Paper 7, July 1986, GAO, Program Evaluation and Methodology Division. The document summarizes the most important principles and procedures used in developing, writing, and analyzing effective questionnaires. It is based on the work of leading practitioners in the field, on a review of the literature in the field, and on GAO's own trial-and-error experiences with questionnaires in over 1,000 evaluations.

⁵By Don A. Dillman and published by John Wiley & Sons, New York.

and compared the response rate of our target group with the response rate for others. We projected the sample results to the universe for each county and for the four counties combined at the 95-percent confidence level. (See app. VI.)

To determine how the distribution of ballots was conducted in the eight community property states—where both producers and their spouses were routinely provided ballots—we telephoned ASCS representatives in the two community property states (Idaho and Texas) that distributed the most wheat poll ballots.

In addition, we visited ASCS' Kansas City Management Office to learn how it processed and tallied the wheat poll ballots.

To answer the fourth question, we reviewed pertinent legislation and decisions and comments attributed to the Secretary of Agriculture to determine whether his public comments opposing mandatory production controls violated governing legislation. We reviewed the legislative history for Section 301 of the Food Security Act of 1985 and reviewed laws and decisions related to restrictions on a cabinet secretary's comments and actions. In addition, we conducted a literature search to identify wire service or newspaper articles quoting or characterizing the Secretary of Agriculture's comments about mandatory production controls for wheat and the wheat poll prior to, during, and after the poll.

We began our field work in October 1986 and completed it in March 1987. Our work was done in accordance with generally accepted government auditing standards except that we did not validate the accuracy of the computer data we obtained from USDA. In addition, we did not do any testing of the accuracy of ASCS' tallying of the wheat poll results. The requester's office agreed that such testing was unnecessary unless we found some indication of a problem in this area as we were doing our other work. We did not note anything that suggested a problem in this area.

The Law Required the Secretary of Agriculture to Poll a Target Group of Wheat Producers

The Food Security Act of 1985, enacted on December 23, 1985, required the Secretary of Agriculture to poll a target group of wheat producers by July 1, 1986, to determine whether they favored mandatory production controls for wheat. The law did not require the Secretary—who had taken a public position against mandatory production controls—to take any action based on the outcome of the poll.

Section 301 of the Food Security Act of 1985 required the wheat poll. It stated that:

“(a) Not later than July 1, 1986, the Secretary of Agriculture shall conduct a poll, by mail ballot, of eligible producers of wheat to determine whether such producers favor the imposition of mandatory limits on the production of wheat that will result in wheat prices that are not lower than 125 percent of the cost of production (excluding land and residual returns to management) as determined by the Secretary.

(b) The Secretary shall conduct such poll in such a manner as will reflect the types and sizes of farm operations (including livestock), distinctions among types and classes of wheat produced, and such demographic and other information as the Secretary determines is necessary to reflect State, regional, and national responses.

(c) To be eligible to vote in such poll, a producer must have produced a crop of wheat during at least one of the 1981 through 1985 crop years for wheat on a farm with a wheat crop acreage base of at least 40 acres.” [Underscoring added.]

A key question raised by the wording of the act, which ASCS had to resolve in implementing the poll, was:

“How should the target group be defined since the term ‘wheat crop acreage base’ used in the Food Security Act of 1985 to define the target group was new? According to ASCS representatives, it applied to future years 1986 through 1990 and had no meaning for crop years 1981 through 1985.”

ASCS’ resolution of this question is discussed in appendix III as a part of our analysis of its conduct of the poll.

ASCS Complied With the Law in Conducting the Wheat Poll but Did Not Assure That the Results Were Reliable

ASCS complied with the law even though it distributed wheat poll ballots to all wheat producers in 1986, rather than to the target group specified by law only. ASCS accomplished this by asking producers on the ballot if they were in the target group and reporting the wheat poll results in accordance with the producers' responses to this question. These results are not reliable, however, because ASCS did not verify that producers correctly placed themselves in or out of the target group.

ASCS did not verify that producers correctly classified themselves as being in or out of the target group because it maintained that the definition of the target group contained in the law could not be applied to the years 1981 through 1985 as required by the law. However, ASCS could have taken an alternative approach that would have identified a target group that appeared to closely approximate the group indicated in law, verified which producers were in that group, and thereby assured the reliability of its wheat poll results. Further, had ASCS distributed ballots to this alternative target group only, it would have distributed substantially fewer ballots.

ASCS Believed That Not Polling All Wheat Producers Would Have Been Unfair

The Food Security Act of 1985 required the Secretary of Agriculture to distribute wheat poll ballots to producers who "produced a crop of wheat during at least one of the 1981 through 1985 crop years for wheat on a farm with a wheat crop acreage base of at least 40 acres." ASCS concluded that because many producers had a wheat crop acreage base of less than 40 acres, it would have been unfair to exclude this group from the poll. ASCS explained its decision in the Federal Register as follows:

"About 50 percent of producers on farms with 1986 wheat crop acreage bases have bases of less than 40 acres. Accordingly, it has been determined that, in order to conduct an accurate and representative poll of wheat producers, the views of all producers of the 1986 crop, although not eligible to vote in the poll required to be held, should be obtained since it would be unfair to disregard these producers' reaction to such a change in farm program policy."¹

ASCS' Handbook Commodity Referendums² and supplementary ASCS Notices contained instructions to the ASCS county offices for distribution of wheat poll ballots. The ASCS Notices stated that ballots be mailed to

¹Federal Register, Vol. 51, No. 124, June 27, 1986, p. 23448

²This handbook contains the basic instructions for conducting commodity referendums. Additional instructions tailored to a specific referendum or poll are issued as ASCS Notices. The ASCS Notices governing the wheat poll referenced the handbook Commodity Referendums.

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ASCS Complied With the Law in Conducting
the Wheat Poll but Did Not Assure That the
Results Were Reliable

all producers with a wheat base of any size in 1986. In addition, producers who did not receive a ballot, but who claimed to have been involved in producing wheat during at least one of the years 1981 through 1985, could request and receive a ballot. ASCS' instructions stated that:

"... County Offices shall mail 1 ballot ... to ALL owners and operators of farms with 1986 wheat base. The size of the 1986 wheat base does not alter this requirement.

"... County Offices shall also provide a ballot ... to any owner, operator, or producer who claims to have had an interest in the wheat crop on a farm with a 40 acre wheat base in at least 1 of the years 1981 through 1985."

Even though ASCS decided to poll all producers with a wheat base in 1986, it did make an effort to determine whether producers were in the group targeted by law to be polled. ASCS included question 6 on the wheat poll ballot—which includes language taken almost verbatim from the law—asking producers whether they were in that group. Producers were asked to answer "yes or no" to the following question:

"During at least one of the 1981 through 1985 crop years, did you produce a crop of wheat on a farm(s) with a wheat crop acreage base of at least 40 acres?"³

The ballot is shown on page 30.

ASCS Did Not Verify Whether Producers Were in the Target Group

We believe that, to assure that the results of the wheat poll were reliable, ASCS should have determined whether producers were in the target group rather than rely on the producers to place themselves in or out of the group (in answer to question 6 on the wheat poll ballot). The ASCS Handbook Commodity Referendums and the supplementary notices, which governed the administration of the wheat poll, did not require this determination. While such determination would have taken more time, we believe it was essential to achieve reliable results.

ASCS representatives stated that they could not have made such a determination because the law did not clearly identify the group targeted to be polled. The target group was identified with a definition that applied to future program years. ASCS representatives said that the term "wheat crop acreage base" was a new term introduced in the Food Security Act of 1985 and was defined as the average number of acres planted (and

³USDA's published results show that 57 percent of the producers who answered "yes" to this question voted for production controls.

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ASCS Complied With the Law in Conducting
the Wheat Poll but Did Not Assure That the
Results Were Reliable**

considered planted⁴) to wheat over the previous 5 years. It was to be used in administering the wheat program during future years 1986 through 1990. Accordingly, they said, the term could not be applied to the years 1981 through 1985 when the common terminology was "wheat base" and the number of years used for determining such bases was different.

During the period 1982 through 1985, the acreage base for wheat was based on an average of the acres planted for wheat during the previous 2 years. In 1981, no acreage bases were established for individual crops. However, acres planted for wheat in 1981 or the average planted in 1980 and 1981, whichever was higher, were used to compute a producer's 1982 wheat base.

In our opinion, ASCS could have overcome its difficulties with the language of the law by taking an alternative approach that would have defined an alternative target group for crop years 1981 through 1985 that appeared to closely approximate the target group indicated by law. As previously stated, the second part of its criteria for ballot distribution states that any producer who "... had an interest in the wheat crop on a farm with a 40 acre wheat base in at least 1 of the years 1981 through 1985." ASCS could have used this part of its criteria as the definition for an alternative target group that appeared to closely approximate the target group indicated in the law. The definition substitutes the term "wheat base" (applying to 1985 and prior years) in place of the language "wheat crop acreage base" (applying to 1986 through 1990). USDA could have used this definition for an alternative target group before sending out ballots to producers. USDA could have then determined, prior to distributing the ballots, whether producers were in that group and indicated it on the ballot.

An ASCS representative said that making such a determination would have required additional time on the part of county office personnel and would have required a significant amount of overtime.

While we agree that determining whether producers were in or out of the alternative target group would have required additional staff time, we believe that without such a determination, the wheat poll results

⁴In this report, the term "planted" includes any acres that the producer planted and any acres that USDA considered planted. In recent years, USDA considered that acreage which a producer was prevented from planting for a program crop as a result of a natural disaster or acreage taken out of production to comply with any USDA acreage reduction program would be "considered planted" for program purposes and included as part of the base acreage computation.

were not reliable. At the four counties we visited, the county executive directors estimated that making such a determination would have required, on average, about 70 percent more time than they used. For example, the executive director at one county office estimated that the time required would have increased about 80 percent (from 20 to 36 staff days) because of additional research that would have been required to determine whether producers met the criteria for the alternative target group.

Another alternative available to ASCS, which would have required less time, was to verify whether or not producers were in the alternative target group for only those producers who returned ballots. This is similar to ASCS' approach to verifying the information on ballots cast in the mohair, sheep, and wool producer referendums.⁵ Because about 20 percent of the wheat poll ballots were returned, this approach would have required about 20 percent of the time required by the above alternative that would have required verification of all producers prior to mailing their ballot.

Substantially Fewer Ballots Would Have Been Distributed If Limited to the Alternative Target Group

To get some idea of the effect of sending ballots to all producers with a wheat crop acreage base in 1986, rather than to only those in the alternative target group, we reviewed ASCS records for a random sample of producers who were sent ballots in four counties. On the basis of the sample results, we estimate that from 22 to 73 percent fewer ballots would have been distributed in the four counties if ASCS had limited distribution to producers in the alternative target group. For the 4 counties combined, we estimate that 4,835, or 48 percent, fewer ballots would have been distributed. Our estimate is shown in the following table.

⁵While these referendums involved substantially fewer producers than the wheat poll, the procedures followed provide one approach for verification that could be used in any poll or referendum

**Appendix III
ASCS Complied With the Law in Conducting
the Wheat Poll but Did Not Assure That the
Results Were Reliable**

**Table III.1: Estimated Number of Ballots
Distributed to Alternative Target Group in
Four Counties**

County/State	Actual ballots distributed	Estimated distribution to target group (note a)	Difference	Percentage less
Sumner, Kans	3,863	3,012	851	22
St. Clair, Ill.	3,157	852	2,305	73
Saline, Mo	1,665	819	846	51
Ray, Mo	1,412	579	833	59
Total	10,097	5,262	4,835	48

^aThe confidence level for the samples are 95 percent, and the sampling errors are (+ or -) Sumner = 409, St. Clair = 346, Saline = 209, Ray = 174, and total = 601

While data for the four counties cannot be projected as representative of all counties, it suggests that ASCS would have distributed substantially fewer ballots if it had limited distribution to producers in the alternative target group. This position is further supported by ASCS' estimate that 50 percent of the producers who had a wheat crop acreage base in 1986 had a base of less than 40 acres.

Conclusion

ASCS complied with the law even though it distributed wheat poll ballots to all producers with a wheat crop acreage base in 1986, rather than to the smaller group targeted by law to be polled. ASCS complied with the law by including a question on the ballot (that used language almost verbatim from the law) asking producers whether they were in or out of the target group. However, because the definition in the law did not clearly identify the target group, ASCS could not verify whether producers' self-selection into or out of the target group was correct.

We believe that ASCS should have identified an alternative target group that appeared to closely approximate the group indicated by law to be polled. One approach for identifying an alternative target group was to define it as those producers who had an interest in a farm with a 40-acre wheat base (based on the average acres planted to wheat during the prior 2 years) in at least 1 of the years 1981 through 1985. Further, we believe that ASCS should have used the definition to verify whether or not producers were in the target group to assure that the wheat poll results for this group were reliable.

**Recommendation to
the Secretary of
Agriculture**

To assure that the results from any future poll or referendum that the Secretary of Agriculture may be required to conduct are reliable, we recommend that the Secretary direct the Administrator, ASCS, modify the ASCS Handbook Commodity Referendums to require that appropriate verification is made of the producers in the target group. The Administrator has at least two alternatives. The Administrator could:

1. Determine which producers are in the target group (or alternative target group, where necessary) prior to distributing the ballots and indicate it on each ballot.
2. Verify whether or not producers are in the target group (or alternative target group, where necessary) for only those producers who return ballots. This is similar to the ASCS approach to verifying the information on ballots cast in the mohair, sheep, and wool producer referendums.

Weaknesses in ASCS' Administration of the Wheat Poll Raises Questions About the Reliability of the Results

In addition to not determining whether producers were in the target group to be polled, as previously discussed in appendix III, we noted weaknesses in ASCS' administration of the wheat poll. Producers' spouses were routinely allowed to vote in some states but not in others, some producers may have voted more than once, and some producers who were not eligible to vote may have voted. These actions may have happened because ASCS

- distributed 15 percent of the 1.56 million ballots to producers and their spouses in some states, because of governing state law, but did not distribute ballots to producers' spouses in other states;
- distributed an estimated 5 percent of the total ballots to multiple-county producers who received more than one ballot; and
- erroneously distributed an estimated 10 percent of the ballots in the four counties we visited to producers who did not have a wheat crop acreage base in 1986 or a wheat base in any of the years 1981 through 1985.

In addition, the transmittal letter accompanying the ballot did not encourage producers to respond nor was the question asking if producers favored or opposed mandatory production controls designed to assure that responses were reliable.

The ASCS Assistant Deputy Administrator for State and County Operations said that to meet the deadline for completing the poll, they had to make some judgments and trade offs, so some things did not get done that might have had they had more time. We believe that little additional effort would have been required to have overcome the weaknesses in ASCS' administration of the wheat poll, with the possible exception of resolving the differing treatment that ASCS extended to producers and their spouses in different states. Depending on the alternative ASCS might have selected to resolve this difference, it may or may not have required significantly more time. However, the important point is that proper administration of the wheat poll was essential to achieving reliable results.

Producers in Community Property States Were Treated Differently Than Producers in Other States

ASCS instructions for conducting the wheat poll treat producers' spouses in community property states differently than producers' spouses in other states. Community property states have laws stating that property in the name of one spouse belongs to both. Accordingly, ASCS instructions state that, in community property states, the spouse of an eligible voter is also eligible to vote. However, in other states, ASCS instructions allow spouses of eligible voters to vote only if the spouse is identified on ASCS county records as a joint owner, operator, or tenant. Thus, a greater portion of wheat poll ballots were routinely distributed to producers and their spouses in community property states.

Of the 1.56 million wheat poll ballots distributed, ASCS distributed 234,572 (about 15 percent) to producers in the 8 community property states. Of the 319,408 valid ballots returned, 41,082 (about 13 percent) came from the community property states. Table IV.1 shows the distribution and return of ballots in the community property states.

Table IV.1: Wheat Poll Ballots Distributed to and Returned From Producers in Community Property States

State	Ballots distributed	Ballots returned
Arizona	2,076	438
California	16,421	2,723
Idaho	34,319	6,065
Louisiana	11,236	1,083
Nevada	593	133
New Mexico	4,048	1,073
Texas	141,251	21,699
Washington	4,628	7,868
Total	234,572	41,082

At least two alternative approaches could have been used by ASCS to assure that wheat poll ballots were distributed to producers in every state on a consistent basis.

- Regardless of the number of producers having an interest in a farm with a wheat base, allow only one ballot for all the producers (similar to the criteria for voting in ASCS mohair, sheep, and wool referendum).
- Distribute ballots to producers and their spouses in every state, not just community property states.

Of the two alternatives, allowing one ballot for all producers having an interest in a farm with a wheat base would have required the least additional ASCS time. ASCS would have had to decide who should be sent the

ballot for each farm and notify the other producers of the identity of that producer so they could provide their input to him or her. For producers participating in ASCS' wheat program, ASCS could have sent the ballot to the operator listed on its records who represents all the producers having an interest in the particular farm. Sending ballots to producers and their spouses in noncommunity property states would have required additional ASCS time. In one county office we visited in a noncommunity property state, the county executive director estimated that they had no more than 2 percent of the spouses identified in their records for the 3,863 producers who were sent ballots. He said that obtaining this information would have required added effort over a period of time. Although they could have sent a letter to the producers requesting the information, he said they normally receive only a 20-percent response to such letters. He said they would had to have followed up with additional letters until they obtained the information needed.

Some Producers Received More Than One Ballot

ASCs did not ensure that producers with wheat bases in more than one county received only one ballot nor did it assure that those who received more than one ballot voted only once. ASCS instructions did not contain any guidance to county offices to prevent more than one county from mailing a ballot to producers with an interest in farms with a wheat base in 1986 that were located in more than one county. Therefore, producers with wheat bases in 1986 in more than one county would have received a ballot from each county. To discourage producers from voting in each county that he or she received a ballot from, ASCS relied on the transmittal letter it sent with each ballot stating that a producer could only vote once. (See p. 29.) Thus, ASCS has no assurance that producers who received more than one ballot voted only once.

We estimate that about 83,000 (5.3 percent) of the 1.56 million ballots distributed went to producers who had already received a ballot. Our estimate is based on our analysis of the most recent (1983) farm data base file that ASCS developed containing information on almost all farms. It shows 1.03 million different producer identification numbers, for producers with an interest in one or more farms with a wheat base, when counted at the county level and totaled for all counties. But when duplicate identification numbers are eliminated by comparing identification numbers in each county to identification numbers in all the other counties, it shows only 978,649 different wheat producers. This is 5.3 percent less than the 1.03 million identification numbers indicated when counted on an individual county basis.

For producers participating in ASCS' wheat program, ASCS could have limited the distribution of more than one ballot to multiple county producers with very little additional effort by using control listings routinely developed for controlling payments. A list of multiple county producers in each county is periodically sent from ASCS' Kansas City Management Office to each county office. The list shows the name of each multiple county producer and the counties where the producer has an interest in a farm participating in an ASCS program. ASCS could have instructed its county offices that for each producer shown on the list, the county office in the first county listed for that producer would send a ballot.

To minimize the possibility that multiple county producers who do not participate in ASCS programs or do not participate in all counties would vote more than once, ASCS could have implemented procedures that it follows in conducting the mohair, sheep, and wool referendums. The instructions for conducting these referendums were designed to guard against producers casting more than one ballot by requiring

- the county offices to check with other county offices where they were aware that a producer had an interest in farms in more than one county to assure that the producer did not vote in more than one county and
- each producer to sign a statement on the ballot certifying that he or she cast only one ballot (and the ballot for the sheep and wool referendum included a warning that false statements may result in a fine of up to \$10,000 and up to 5 years imprisonment or both).

Ballots Were Distributed to Producers Who Were Not Eligible

Although ASCS instructed its county offices to send wheat poll ballots to only those producers with a wheat base in 1986, some producers were erroneously sent ballots even though they had no wheat base. At the 4 counties we visited, we estimate that 1,087, or about 10 percent, of the 10,097 ballots distributed went to producers who had no wheat base in 1986 or during any of the crop years 1981 through 1985. The county offices erroneously sent the ballots because the producers at one time had a wheat allotment.¹

In preparing a list of producers with a wheat base to send ballots to, county offices with an automated data base system used a standard computer program. The program listed all producers with a wheat base

¹A term used through 1977, at which time it identified the number of acres on a farm that could be placed in USDA's wheat program.

or a wheat allotment (carried forward from past years). In addition, some producers were erroneously listed in the automated data base as having a wheat allotment or wheat base when they did not have either (according to ASCS farm records). Once the automated system printed the list, county office personnel did not go through and eliminate those producers who did not have a wheat base in 1986 or during any of the crop years 1981 through 1985.

This was an oversight on the part of county office personnel that could have been avoided. ASCS would have avoided sending wheat poll ballots to producers who did not have a wheat base by determining, as we observed on page 19, whether producers were in or out of the alternative target group before sending them a ballot. When making the determination, ASCS should have found that these producers did not have a wheat base and should not have sent them a ballot.

Improved Design of the Wheat Poll Ballot Might Have Increased the Number of Producers Responding

The transmittal letter accompanying the wheat poll ballot did not encourage producers to respond nor was the question that asked if producers favored or opposed mandatory production controls designed to assure reliable responses. These problems can be minimized by following accepted principles for designing mail surveys and by testing the documents on potential users prior to deciding on the final design. However, ASCS did not test the documents prior to distributing them. Such testing is necessary to assure that the survey instrument (in this case, the wheat poll ballot and transmittal letter) will adequately communicate what is intended, that it will be uniformly interpreted, and that it will be free of design flaws that could lead to inaccurate interpretations. Undetected design flaws and incomplete measurements of critical variables can compromise the results. The ASCS Handbook Commodity Referendums does not contain any guidance on preparing the cover letter or ballot questions.

The letter and ballot are shown on pages 29 and 30.

Transmittal Letter Did Not Encourage Producers to Respond

Although it is standard practice among survey researchers and practitioners to include a message to encourage recipients of mail surveys to respond, ASCS did not include such a message in its wheat poll transmittal letter. The transmittal letter is key in persuading people to respond. Typically, such letters include an explanation of the importance of the survey and the usefulness of the information that the person will provide.

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Weaknesses in ASCS' Administration of the
Wheat Poll Raises Questions About the
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Figure IV.1: Letter Transmitting Wheat
Poll Ballot

WHEAT POLL

The Food Security Act of 1985 requires that the Secretary of Agriculture conduct a nonbinding poll of wheat producers to determine whether they favor the imposition of mandatory limits on the production of wheat, which will result in wheat market prices that are at least 125 percent of the cost of production (excluding land and residual returns to management), as determined by the Secretary.

Participation in the poll is voluntary and your response will be kept strictly confidential. You are entitled to one response for the farm or combination of all farms that you own, operate, or on which you otherwise have an interest in the wheat crop.

You should mail your response in the enclosed preaddressed envelope. Your response **must be postmarked by July 7, 1986**. The results of the nonbinding poll will be announced soon thereafter and will reflect types and sizes of farm operations and classes of wheat.

PLEASE SEE REVERSE FOR COMPLETING THE POLL

The July 7, 1986 deadline for returning your response has been extended to July 14, 1986.

We believe that more producers might have responded if ASCS' transmittal letter had encouraged the producers to return their ballot. For example, the letter could have emphasized to the producer that his or her response was important to the Congress in deciding whether mandatory wheat production controls should be imposed on producers. At a minimum, it could have included the sentence that was in the upper right hand corner of the ballot—in very small print (see p. 30)—that stated:

"While furnishing this data is voluntary, your cooperation is necessary in order to carry out the intent of this poll."

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Figure IV.2: 1986 Wheat Poll Ballot

U.S. DEPARTMENT OF AGRICULTURE Agricultural Stabilization and Conservation Service		Form Approved OMB No. 0560-0127	
1986 WHEAT POLL BALLOT		NOTE: Section 301 of the Food Security Act of 1985 (P.L. 99-198) requires the Secretary to gather the following data. This data will be used to determine if producers favor the imposition of mandatory limits on the production of wheat. While furnishing this data is voluntary, your cooperation is necessary in order to carry out the intent of this poll. This information may be provided to any agency required to assist in the evaluation of this data.	
PLEASE RESPOND TO ALL THE FOLLOWING QUESTIONS YOUR BALLOT WILL NOT BE VALID UNLESS ALL ITEMS ARE FILLED OUT		STATE & COUNTY CODE & C/D	
1. Do you favor imposition of mandatory limits on the production of wheat that will result in wheat prices that are not lower than 125 percent of the cost of production (excluding land and residual returns to management)? Check only one box.	A) YES	A)	1
	B) NO	B)	
2. Are you a farm owner who rents land to others or are you an operator or producer? Check only one box, even if you can classify yourself in more than one category.	A) Owner only/cash lease	A)	2
	B) Owner only/crop share	B)	
	C) Owner/operator	C)	
	D) Operator only	D)	
	E) Other	E)	
3. How would you classify your predominant farm operation(s)? Check only one box.	A) Wheat	A)	3
	B) Feed grain/soybean	B)	
	C) Cotton/rice	C)	
	D) Livestock/dairy	D)	
	E) Other	E)	
4. What is the predominant class of wheat produced in your farm operation(s)? Check only one box.	A) Hard red winter	A)	4
	B) Soft red winter	B)	
	C) White	C)	
	D) Hard red spring	D)	
	E) Durum	E)	
5. Size of operation in 1986. Enter the total number of acres in whole acres. All blanks must be completed.	A) In your farm operation(s)	A)	5
	B) Of cropland in your farm operation(s)	B)	NUMBER OF ACRES
	C) Of wheat base in your farm operation(s)	C)	
	D) Planted to 1986-crop wheat for harvest for grain in your farm operation(s) (Enter "0" if appropriate)	D)	
6. During at least one of the 1981 through 1985 crop years, did you produce a crop of wheat on a farm(s) with a wheat crop acreage base of at least 40 acres? Check only one box.	A) YES	A)	6
	B) NO	B)	

The Main Question on the Ballot Could Have Been Better Designed

Since the 1986 wheat poll was nonbinding, we believe the ballots should have been designed consistent with accepted practices for conducting surveys. Specifically, neither the wording of question number 1—the main question on the ballot—nor the response choices offered were consistent with accepted practice in conducting surveys like the wheat poll. The producers were requested to answer “yes” or “no” to question 1, which asked:

“Do you favor imposition of mandatory limits on the production of wheat that will result in wheat prices that are not lower than 125 percent of the cost of production (excluding land and residual returns to management)?” (See p. 30.)

The question did not meet accepted standards for mail surveys for three reasons:

- Because some people have a bias to say “yes” to a question and others have a bias to say “no”, “yes or no” questions are prone to bias and should be avoided.
- By asking only if producers favored (rather than if they favored or opposed) mandatory limits on wheat production, the question presented only one side of the argument. Questions worded this way can influence responses by implicitly suggesting how respondents should answer. In this instance, the wheat poll question may have encouraged more “favor” responses than “oppose” responses.
- Because producers who were undecided or who had no opinion were not provided a place to give their answers, the response choices were not adequate. This may be why many producers who returned their ballots did not answer question number 1. ASCS reported that the vast majority of 10,000 ballots rejected at its Kansas City Management Office during counting “. . . were disqualified because producers failed to answer the first question.” Other producers may have provided answers that did not reflect their true opinions or may have been discouraged from completing and returning the ballot.

The consequences of these deficiencies are potential decreases in the total number of responses and decreased confidence that the survey results are valid.

Ideally, USDA should have tested the transmittal letter and ballot, prior to distributing them, on some producers who were eligible to vote in the poll to minimize any problems in the design and contents of the documents. We recognize, however, that the time limitation imposed by the law may have prevented such testing. Nonetheless, at a minimum, we

believe that the transmittal letter and ballot should have met accepted standards for mail surveys to encourage maximum participation by producers and to help ensure more reliable results.

Conclusions

We do not believe that ASCS effectively administered the wheat poll. While we realize that the law mandating the poll imposed time constraints, we believe that ASCS should have taken some additional steps to ensure that the poll results were reliable. Because ASCS did not take these steps, producers' spouses were allowed to vote in some states but not in others, some producers may have voted more than once, and some producers who were not eligible to vote may have voted. Further, the transmittal letter accompanying the wheat poll ballot did not encourage producers to respond nor was the question asking if producers favored or opposed mandatory production controls designed to assure that responses were reliable.

Because of these factors, we concluded that the results are not reliable. It would be virtually impossible to determine whether the poll's results regarding mandatory production controls reflect the opinions of the targeted producers. There simply is no way to be sure.

Recommendations to the Secretary of Agriculture

To assure that the results from any future poll or referendum that the Secretary of Agriculture may be required to conduct are reliable, we recommend that the Secretary direct the Administrator, ASCS, to modify the ASCS Handbook Commodity Referendums to include policies and procedures to overcome the weaknesses identified in the administration of the wheat poll. To do this, we recommend that the Handbook include procedures that would do the following:

- Treat producers and their spouses in noncommunity property states the same as those in community property states in any national poll or referendum.
 1. ASCS could distribute ballots to producers and spouses in noncommunity property states just as it does in community property states.
 2. ASCS could distribute ballots on a basis similar to that used in the mohair, sheep, and wool referendums where, regardless of the number of producers having an interest in the operation (or a farm, in the case of the wheat poll), only one ballot is allowed for all the producers collectively.

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- Minimize the possibility that producers with multiple-county farm operations would receive and cast more than one ballot in a national poll or referendum. To do this, procedures would need to be developed both for producers participating in the particular agricultural program and for producers not participating in the program (whom ASCS has less information about).
 1. For producers participating in agricultural programs, ASCS could utilize the listings routinely prepared for each county (for payment purposes) which list all other counties that each producer operates in if the producer participates in the agricultural program. ASCS could have the first county listed send each producer his or her ballot.
 2. For producers not participating in agricultural programs, ASCS could follow procedures similar to those established for the mohair, sheep, and wool producer referendums. In these referendums, ASCS instructed county offices to check with other county offices when they were aware that a producer had an interest in operations in more than one county. In addition, ASCS required all producers to sign a statement on the ballot that he or she cast only one ballot (and the ballot for the sheep and wool referendum included a warning that false statements may result in a fine of up to \$10,000 and up to 5 years imprisonment or both).
- Require that the letter transmitting a ballot and the ballot be designed in accordance with accepted principles for conducting mail surveys, such as the wheat poll, and tested prior to distribution to assure that the letter encourages producers to respond and to assure that the questions on the ballot are clear and unbiased.

Agency Comments and Our Evaluation

In commenting on this report, USDA did not comment on the findings, conclusions and recommendations. USDA simply commented that (1) the wheat poll was conducted in conformity with the applicable provisions of the Food Security Act of 1985 and (2) the results of the poll were inconclusive.

USDA's comment that the poll was conducted in conformity with the 1985 act is accurate and our report makes this clear. However, as our report demonstrates it was poorly designed and administered and the results were unreliable.

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USDA also commented that the results of the poll were inconclusive. In making this comment the Secretary appears to continue to take the position that the results were inconclusive because of the "relatively small" response rate. However, this report shows that regardless of the size of the response rate, USDA did not design and administer the poll in a manner that would produce reliable results. Therefore, the results had to be inconclusive, no matter what the response rate was.

The Secretary of Agriculture's Public Comments Against Production Controls Did Not Violate Governing Legislation

Prior to taking the wheat poll, the Secretary of Agriculture took a strong public stand against mandatory production controls and encouraged producers to vote against them. The statements attributed to him did not violate governing legislation.

In addition, the Secretary said that he did not view the wheat poll results as important because of the "relatively small" overall response rate of 20 percent. But ASCS did not determine a separate response rate for the group targeted in law to be polled. At the four counties we visited, we estimate that the response rate for producers in the alternative target group compares favorably with the response rate that ASCS has recently experienced in its other elections and referendums that were binding.

The Secretary Took a Strong Public Stand Against Mandatory Production Controls

Although the Secretary of Agriculture publicly opposed mandatory production controls and encouraged producers to vote against mandatory production limits on wheat in the 1986 wheat poll, his comments did not violate governing legislation.

By its terms, 18 U.S.C. §1913 (an anti-lobbying statute) prohibits, unless expressly authorized by the Congress, the spending of appropriated funds to influence members of Congress

"... to favor or oppose, by vote or otherwise, any legislation or appropriation by Congress, whether before or after the introduction of any bill or resolution proposing such legislation or appropriation"

The Secretary, in comments attributed to him prior to taking the poll, was not urging producers to influence members of Congress to pass or defeat any legislation. Rather, remarks attributed to him indicate that he was attempting to influence producers' votes in the wheat poll. Our review of newspaper articles and news service releases shows that the Secretary of Agriculture was urging producers to vote "no" on the question of mandatory production controls for wheat. For example, newspaper and news services quoted him as saying:

- "Make no mistake. Even though ASCS is conducting this poll, we are not advocating the concept of mandatory controls Even though the

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outcome of the poll is non-binding, a majority vote in favor of mandatory controls could eventually tip the scales in Congress, or at least cause a return to last year's debate."¹

- "There are so many sound reasons that this ought to be rejected that I hardly know where to begin. It's a program that just plain won't work."²
- "The strict marketing quotas that would be needed (under a mandatory production control program) to artificially raise (wheat) price would dry up commercial sales of American wheat in world markets."³

In other examples, newspaper and news services characterized the Secretary of Agriculture's comments on the wheat poll and production controls. They stated that he:

- "... stirred controversy by urging farmers to vote against production controls and by warning that he has no intention of establishing controls even if farmers want them."⁴
- "... urged wheat farmers to reject the concept of mandatory controls, which he said would require idling at least half of the nation's wheat acreage to boost market prices."⁵
- "... says wheat farmers should vote against mandatory government controls if they want to avoid problems even worse than they now face."⁶
- "... raised the ire of farm groups who advocate a 'yes' vote by urging farmers to vote 'no'. He said an affirmative vote could encourage producers of other crops to seek mandatory controls and high price guarantees, which could expand government bureaucracy and be harmful to the farm economy."⁷

¹Don Kendall, "Wheat Farmers to Oppose Government Controls," The Associated Press, AM Cycle, June 10, 1986.

²Editorial Page, "Mandatory Wheat Control Not Necessarily Beneficial," Omaha World Herald, June 12, 1986.

³The Associated Press, "USDA to Poll Wheat Farmers on Forced Crop Limit," The Kansas City Times, June 10, 1986.

⁴Ward Sinclair, "USDA to Poll Wheat Farmers on Mandatory Controls," the Washington Post, June 20, 1986.

⁵The Associated Press, AM Cycle, July 11, 1986

⁶Don Kendall, "Lyng Urges Wheat Farmers to Oppose Government Controls," The Associated Press, AM Cycle, June 10, 1986.

⁷Richard Orr, "Controversy Crops up in Wheat Farmers Poll," Chicago Tribune, July 7, 1986.

Thus, we concluded that although the Secretary attempted to influence producers votes, his comments about production controls and the wheat poll did not violate governing legislation because he was not encouraging producers to influence any members of Congress to pass or defeat a particular piece of legislation.

The Secretary Discounted the Significance of the Wheat Poll's Results

Although the Secretary concluded that the response rate to the wheat poll was "relatively small" and therefore "a great deal of significance" could not be "attached to the results," ASCS did not determine a separate response rate for the target group. In its published wheat poll results, ASCS showed an overall response rate of 20 percent. Nonetheless, our analysis at the four ASCS county offices we visited indicates that the response rate for producers in the target group compares favorably with the response rate ASCS has recently experienced in its other elections and referendums.

Response Rate of Alternative Target Group

Our analysis at the four ASCS county offices we visited shows that the response rate for producers in the alternative target group was more than double that of the other producers. The overall response rate in the four counties was 26 percent. But we estimate that the response rate for producers who were in this group was about 34 percent compared with an estimate of about 14 percent for other producers. This is shown in the following table:

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**Table V.1: Estimated Number of Ballots
Distributed and Returned by Alternative
Target Group in Four Counties**

	Actual	GAO estimate
Overall:		
Ballots distributed	10,097	
Ballots returned	2,581	
Response rate percentage	26	
Alternative target group:		
Ballots distributed		5,261
Ballots returned		1,795
Response rate percentage		34.1
Sampling error(+ or -)		(10 1)
Others:		
Ballots distributed		3,748 ^a
Ballots returned		519
Response rate percentage		13.8
Sampling error (+ or -)		(7.8)

^aThe remaining 1,087 ballots were distributed to producers who did not have a wheat crop acreage base in 1986 or a wheat base in any of the years 1981 through 1985

**Response Rates in Other
ASCS Elections and
Referendums**

To obtain some perspective on the reasonableness of the response to the wheat poll, we compared it with the response rates for other recent ASCS binding elections and referendums.⁸ Because the wheat poll was non-binding and the other elections and referendums were binding, we would not have been surprised to have found a substantial difference. But our comparison showed that the 34-percent response rate for the alternative target group in the four counties we visited was within the range of other recent ASCS elections and referendums. For other elections and referendums, ASCS records and estimates show response rates ranging from 18 to 53 percent. This is shown in table V.2. The comparison is particularly favorable, considering that the wheat poll was nonbinding and the other elections and referendums were binding.

⁸We included all elections and referendums that USDA representatives identified except that for tobacco, we limited our data collection to the two largest tobacco referendums. Information was not available showing a response rate on the peanut referendum.

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Table V.2: Response Rates for Other Recent ASCS Elections and Referendums

	Year held	Response (percent)
Election:		
County Committeemen ^a	1985	18
Referendums:		
Advertising and sales promotion of sheep and wool ^b	1986	18 ^d
Advertising and sales promotion of lamb ^b	1986	34 ^d
Marketing quota referendum for burley tobacco ^c	1986	47
Marketing quota referendum for flue-cured tobacco ^c	1986	53

^aEach county has an elected ASCS county committee, consisting of three members, one of whom is elected each year for a 3-year term. The committee is generally responsible for carrying out ASCS' agricultural programs at the county level through the county office and its staff. The county executive director, who supervises the county office staff, is hired by and reports to the county committee.

^bThese referendums were to determine whether producers wanted to continue the financing of advertising and sales promotion with deductions (not to exceed 4.5 cents per pound for mohair, 6 cents per pound for wool, and 30 cents per hundredweight for unshorn lambs and yearlings) from ASCS price support payments to producers of mohair, wool, and unshorn lambs for the 1986 through 1990 marketing years.

^cThese referendums were to determine whether tobacco growers approved of marketing quotas for marketing years 1986 through 1988.

^dBased on estimated data provided by an ASCS representative.

Conclusions

The Secretary of Agriculture took a strong public stand against mandatory production controls for wheat. But his comments did not violate governing legislation.

Even though the Secretary contended that the wheat poll had a relatively small response rate and therefore a great deal of significance could not be placed on the results, we found that the response rate in the four counties we visited was within the range of response rates to other recent ASCS binding referendums.

GAO Sample

At each of the four county offices included in our review, we took a random sample of producers from the list of producers that were provided wheat poll ballots. We projected the sample results to the universe for each county and for the four counties combined at the 95-percent confidence level. We used simple attribute-sampling techniques to compute the projection and sampling errors for each county. We used stratified sampling techniques to compute the projection and sampling errors for the four counties combined. In addition, to account for the disproportionate sample taken in each county, we weighted the results of each county on the basis of the ratio of the county universe to the combined universe of the four counties. The results are shown in table VI.1.

Table VI.1: GAO Sample at Selected County Offices of Producers Who Were Sent Wheat Poll Ballots

	Sumner, Kansas	St. Clair, Illinois	Saline, Missouri	Ray, Missouri	Total
Number of ballots distributed	3,863	3,157	1,665	1,412	10,097
Number of ballots returned (less those rejected)	1,280	592	416	293	2,581
GAO sample	59	63	61	61	244
Number of ballots in alternative target group	46	17	30	25	118
Number of ballots returned	18	3	12	6	39
Number of ballots not in alternative group—wheat base less than 40 acres	6	35	29	35	105
Number of ballots returned	1	2	7	7	17
Number not in alternative group—no wheat base	7	11	2	1	21
Number of ballots returned	1	2	1	0	4
GAO projections					
Number of ballots in alternative target group	3,012	852	819	579	5,261
(Sampling error + or -)	(409)	(346)	(209)	(174)	(601)
Number of ballots returned	1,179	150	328	139	1,795
Response rate, percentage					34.1
(Sampling error + or -)					(10.1)
Number of ballots not in alternative group—wheat base less than 40 acres	393	1,754	792	810	3,748
(Sampling error + or -)	(297)	(387)	(209)	(175)	(560)
Number of ballots returned	65	100	191	162	519
Response rate, percentage					13.8
(Sampling error + or -)					(7.8)
Number of ballots not in alternative group—no wheat base	458	551	55	23	1,087
No wheat base (Sampling error + or -)	(319)	(296)	(74)	(45)	(444)

Comments From the Department of Agriculture



DEPARTMENT OF AGRICULTURE
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WASHINGTON, D.C. 20250

SEP 14 1987

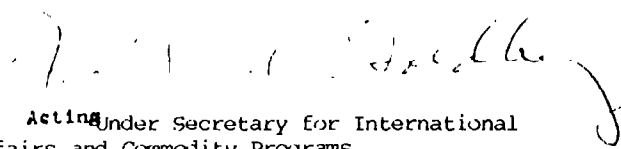
SUBJECT: USDA Review of GAO Draft Report--"USDA's 1986
Wheat Poll: The Results Are Not Reliable" RCED-87-174

TO: J. Dexter Peach
Assistant Comptroller General
Resources, Community, and Economic Development Division
General Accounting Office

This is in reply to GAO's request for the Department of Agriculture's comments on the Draft Report--"USDA's 1986 Wheat Poll: The Results Are Not Reliable."

The Department of Agriculture's reactions to the Draft Report are the following:

1. The Secretary of Agriculture conducted the Wheat Poll in conformity with Section 301 of the Food Security Act of 1985.
2. The Secretary of Agriculture continues to maintain that the results of the Wheat Poll were inconclusive.


Acting Under Secretary for International
Affairs and Commodity Programs

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