

# Supporting Statement A

## FORMS TO DETERMINE COMPLIANCE BY CERTAIN LANDHOLDERS 43 CFR PART 426

### OMB Control Number 1006-0023

#### Terms of Clearance: None

#### General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

#### Specific Instructions

#### Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Reclamation Act of 1902, Sections 206, 224(c), and 228 of the Reclamation Reform Act of 1982 (RRA), and Section 5302 of the Omnibus Budget Reconciliation Act of 1987 mandate and/or authorize the collection of information in this information collection request (ICR). Respectively, they establish a policy of Federal assistance through irrigation development, establish ownership and pricing provisions for Reclamation irrigation water deliveries, require RRA form submittal (including water district responsibility for submittal and collection thereof) as a condition for the receipt of Reclamation irrigation water, and establish audit requirements for certain farm operations and trust landholders.

Certain sections in the RRA and the Acreage Limitation Rules and Regulations (Regulations, 43 CFR part 426) further delineate requirements pertaining to when RRA forms are submitted. Specifically, section 426.18 of the Regulations specifies RRA forms submittal thresholds for a qualified recipient (a landholder who benefits 25 or fewer persons who must submit an RRA form only if he/she/it holds at least 80 acres, and more often, at least 240 acres), and a limited recipient (generally an entity landholder benefitting more than 25 persons that must submit an RRA form only if it holds more than 40 acres). In addition to establishing other full-cost requirements, **section 205(a)(3) of the RRA** directs any limited recipient that did not receive Reclamation irrigation water prior to October 1, 1981, to pay the full-cost rate for **all** Reclamation irrigation water deliveries. **Section 214 of the**

**RRA** provides an exemption from application of the acreage limitation provisions (including RRA forms submittal requirements) to trustees acting in a fiduciary capacity, and **section 426.7 of the regulations** establishes the criteria all trusts must meet in order to benefit from this exemption. In order to ensure the criteria are met, 43 CFR 426.7(b) requires that Reclamation review all trusts.

Reclamation has encountered specific situations in which Reclamation is required to enforce certain statutory and/or regulatory requirements with regard to trust, entity, public entity, and religious or charitable organization landholders who are, or believe themselves to be, below the applicable RRA form submittal threshold and therefore do not submit an annual RRA form (as approved under OMB approval number 1006-0005). Without the information that would have been included on that RRA form, Reclamation has no basis with which to administer the aforementioned statutory and regulatory requirements. The forms in this ICR, as described in item 2 below, facilitate acreage limitation administration in these situations.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

The RRA forms described below are to be completed only upon Reclamation's request by certain entity, trust, public entity, and religious or charitable organization landholders subject to the acreage limitation provisions of Federal reclamation law. Reclamation will identify the specific entity, trust, public entity, and religious or charitable organization landholders that must complete and submit to Reclamation one of the RRA forms described below. Once completed, a copy of the "Limited Recipient Identification Sheet," "Trust Information Sheet," "Public Entity Information Sheet," or "Religious or Charitable Organization Identification Sheet" will be retained by the entity, trust, public entity, or religious or charitable organization landholder (as applicable), a copy will be retained by the district office for retention in the district's landholder files, and the original will be retained by Reclamation.

In order to obtain the draft forms proposed for approval, one change has been made to the currently approved forms. This change provides respondents with the opportunity to facilitate communication with Reclamation by voluntarily providing an e-mail address. Provision of an e-mail address on the forms is clearly labeled as optional. All remaining changes are typographical in nature.

#### List of forms

Following is a list of the four forms in this ICR, and a brief discussion of the purpose of each form. A detailed discussion of the purpose of each question on the forms is provided in Attachment 1.

Limited Recipient Identification Sheet, Form 7-2536: Some entities that receive Reclamation irrigation water may believe themselves to be under the applicable RRA forms

submittal threshold, and consequently may not submit the appropriate RRA form(s). However, some of these entities may, in fact, have a different RRA forms submittal threshold than what they believe it to be due to the number of natural persons benefiting from each entity and the location of the land held by each entity. In addition, some entities that are exempt from the requirement to submit RRA forms due to the size of their landholdings may in fact be receiving Reclamation irrigation water for which the full-cost rate must be paid because the start of Reclamation irrigation water deliveries occurred after October 1, 1981 [43 CFR 426.6(b)(2)]. In accordance with the requirements of 43 CFR 426.6(b)(2), the “Limited Recipient Identification Sheet” will enable Reclamation to determine whether an entity landholder that is not submitting RRA forms (1) is, in fact, a limited recipient required to submit RRA forms, and (2) is remitting the appropriate rate for Reclamation irrigation water deliveries.

Trust Information Sheet, Form 7-2537: In accordance with the requirements of 43 CFR 426.7(b), Reclamation must review all trusts to ensure that they meet the regulatory criteria specified in 43 CFR 426.7. Land held in trust generally will be attributed to the beneficiaries of the trust rather than the trustee if the criteria are met. When Reclamation becomes aware of trusts with a relatively small landholding below the applicable RRA forms submittal threshold (40 acres or less in districts subject to the prior law provisions of Federal reclamation law, and 240 acres or less in districts subject to the discretionary provisions of Federal reclamation law), we may extend to those trusts the option to complete and submit for Reclamation’s review the “Trust Information Sheet” instead of actual trust documents. If Reclamation finds nothing on the completed “Trust Information Sheet” that warrants further investigation of a particular trust, that trustee will not be burdened with submitting trust documents to us for in-depth review.

Public Entity Information Sheet, Form 7-2565: In accordance with the requirements of Public Law 91-310 (enacted July 7, 1970) and 43 CFR 426.10, Reclamation is required to ascertain whether or not public entities that receive Reclamation irrigation water can be considered exempt from the application of the acreage limitation provisions. This determination is made based on whether a public entity meets certain criteria pertaining to the revenue generated through the entity’s farming activities. Per statute and regulation, Reclamation must make this determination regardless of how much land a public entity directly or indirectly owns or leases. As such, making this determination becomes difficult for those public entities that are below the 40-acre RRA forms submittal threshold. Such public entities are not required to submit the “Declaration of Public Entity’s Landholdings” (Form 7-21PE), which is currently approved in another ICR under OMB approval number 1006-0005. The “Public Entity Information Sheet” will enable Reclamation to determine whether or not a public entity that holds 40 acres or less and receives Reclamation irrigation water is exempt from application of the acreage limitation provisions. In addition, for those public entities that Reclamation determines are not exempt from the application of the acreage limitation provisions, the “Public Entity Information Sheet” will allow Reclamation to determine the proper rate to charge for Reclamation irrigation water deliveries.

Religious or Charitable Organization Identification Sheet Form 7-2578: Some religious or charitable organizations that receive Reclamation irrigation water may believe that they are

under the RRA forms submittal threshold and, consequently, may not submit the appropriate RRA form(s). However, some of these organizations may in fact have a different RRA forms submittal threshold than what they believe it to be depending on whether these organizations meet all of the required criteria for full special application of the acreage limitations provisions to religious or charitable organizations [43 CFR 426.9(b)]. In addition, some organizations that (1) do not meet the criteria to be treated as a religious or charitable organization under the acreage limitation provisions, and (2) are exempt from the requirement to submit RRA forms due to the size of their landholdings, may in fact be receiving Reclamation irrigation water for which the full-cost rate must be paid because the start of Reclamation irrigation water deliveries occurred after October 1, 1981 [43 CFR 426.6(b)(2)]. The “Religious or Charitable Organization Identification Sheet” will allow Reclamation to establish compliance with Federal reclamation law by certain religious or charitable organizations.

All four forms in this ICR include a section for Reclamation completion. In this section Reclamation identifies the entity that is to complete the form, the district in which the entity holds land, and the date by when Reclamation requests the entity complete the form. All of this information is required for Reclamation’s record keeping purposes.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

The “Limited Recipient Identification Sheet,” the “Trust Information Sheet,” the “Public Entity Information Sheet,” and the “Religious or Charitable Organization Identification Sheet” will not be included in Reclamation’s electronic RRA forms efforts because (a) they are used only under very limited circumstances, and (b) they are used only at Reclamation’s specific request. As shown below in item 12, of the thousands of landholders in the 177 water user organizations that complete the RRA forms currently approved under OMB approval numbers 1006-0005 and 1006-0006, Reclamation expects only a select few landholders to complete the four forms within this ICR. When Reclamation has reason to request that a landholder complete one of these four forms, Reclamation contacts that landholder in writing (rather than through electronic means) since Reclamation neither maintains nor has any reason to request landholder contact information (such as a telephone number), particularly for landholders that are not required to submit the RRA forms currently approved under OMB approval number 1006-0005. Because Reclamation’s initial contact with the landholder in question is, by necessity, of written format, attaching a paper copy of the required form for landholder completion proves to be more efficient than trying to coordinate the electronic completion and submittal of the required form, which would include the ascertainment of whether the respondent in question has the capability to electronically complete and/or submit an electronic form.

It should be noted that as shown below in item 12, the “Limited Recipient Identification Sheet” and the “Trust Information Sheet” each take an average of 5 minutes to complete which results in only 28 total annual burden hours. The “Public Entity Information Sheet” takes approximately 15 minutes to complete, and because there are very few public entities that use this form, there would only be 25 total annual burden hours for this form. The “Religious or Charitable Organization Identification Sheet” takes approximately 15 minutes to complete, and there would only be 19 total annual burden hours for this form because there is anticipated to be a very small subset of religious or charitable organizations that will use this form. Furthermore, each form is generally completed **only once** by a particular landholder upon Reclamation’s specific request.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The acreage limitation provisions of Federal reclamation law apply only to certain Reclamation projects that provide Reclamation irrigation water for agricultural purposes; consequently, similar data are neither collected nor available through any other Federal agency, State or local government, or private organization. An attachment to a letter from Mr. Scott J. Cameron, Deputy Assistant Secretary for Performance and Management (Department of the Interior), to U.S. Representative Doug Ose regarding an April 11, 2002, hearing on Paperwork Reduction Act issues (specifically, pages two and three of the attachment to Mr. Cameron’s letter) detail the following general findings:

- a. Not all of Reclamation’s customers participate in USDA programs, and most of USDA’s customers do not receive Reclamation irrigation water.
- b. Reclamation and USDA do not use the same categories of program respondents due to statutory and regulatory program requirements.
- c. The level and nature of detail in USDA and Reclamation ICRs differ in such ways that it is clear USDA data would not be sufficient to allow Reclamation to properly administer and enforce the acreage limitation provisions of Federal reclamation law.
- d. RRA forms are filed at the local (district) level; USDA forms are filed at county offices with little centralization of that data.

For the foregoing reasons, it has been determined that there is no duplication with regard to this particular data collection.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Small organizations, such as family trusts, are among the respondents to this requirement. These forms will be given to only a small portion of such respondents, and only at Reclamation’s discretion. Reclamation has carefully analyzed this requirement to ensure that the information requested of all potential respondents is the minimum necessary to implement and enforce the acreage limitation provisions of Federal reclamation law.

For example, the “Trust Information Sheet” reduces the burden placed upon trustees by eliminating the need to submit to Reclamation copies of actual trust documents for review.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

By failing to gather the information described above, the Department of the Interior would risk violating the provisions of laws previously cited. Enforcement of the and the collection of appropriate water charges would be hampered if this information were not collected.

Generally, these forms will be submitted **only once** per identified entity, trust, public entity, or religious or charitable organization. In other words, although Reclamation annually encounters new entities, new trusts, new public entities, and new religious or charitable organizations, field data have shown that the burden hours for this ICR do not increase significantly because each form is completed only once per identified entity, trust, public entity, or religious or charitable organization. It would therefore not be possible to conduct the collection on a less frequent basis than once per identified landholder, and continue to accurately enforce the acreage limitation provisions of Federal reclamation law.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**a. requiring respondents to report information to the agency more often than quarterly;**

Not applicable. Generally, these forms will be submitted only once per identified entity, trust, public entity, or religious or charitable organization. Any additional requirements will generally only be determined on, at most, an annual basis.

**b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

This would never be required.

**c. requiring respondents to submit more than an original and two copies of any document;**

This would never be required. Each entity, trust, public entity, or religious or charitable organization that is identified to complete the applicable form will only be required to complete the original. Reclamation will make and distribute any needed copies.

**d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

In general, any of these forms that are submitted to the district will be retained in the landholder's file as long as the entity, trust, public entity, or religious or charitable organization holds land in the district. These forms help establish the acreage limitation status of the entity, trust, public entity, or religious or charitable organization.

- e. in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

The forms in this ICR will not be used this way.

- f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Statistical data classification will not be used.

- g. that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;**

A pledge of confidentiality is not used; reference item 7.h. for Privacy Act system of records information.

- h. requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The forms are protected by the Privacy Act of 1974, system of records notice INTERIOR/WBR-31.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Notice was given in the Federal Register on February 17, 2015 (80 FR 8343). No public comments were received in response to this notice or in response to the PRA statement associated with the collection over the past two years. The change to the draft proposed forms as detailed in item 2 above originated internally, as the result of observations made by Reclamation's RRA staff during regularly scheduled water district reviews.

- a. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and**

**recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Every year that Reclamation seeks renewal of OMB approval for its ICRs, all districts subject to the acreage limitation provisions receive a letter from Reclamation that announces the start of the public comment period. In that letter is a copy of the corresponding Federal Register notice and an announcement regarding the availability of copies of the draft forms upon request. Regarding the current request for ICR approval, all districts subject to the acreage limitation provisions received such a letter from Reclamation dated February 25, 2015.

- b. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained**

This ICR contains forms that are completed by an extremely small number of landholders when compared to the many thousands of landholders that complete RRA forms (specifically, the forms currently approved under OMB approval number 1006-0005) each year. The landholders that submit the forms in this ICR are among a small subset of landholders who are not required to submit standard RRA forms (i.e., the forms currently approved under OMB approval number 1006-0005) because their total landholdings do not exceed the applicable RRA forms submittal threshold specified in the regulations. This small subset of landholders is further limited to those whose landholdings are specifically identified (by Reclamation) as possibly being subject to aspects of the acreage limitation provisions other than RRA forms submittal (such as land attribution and water pricing).

The burden hour estimate associated with each form in this ICR is an average figure because not all sections of each form in this ICR are applicable to every landholder. While some landholders may utilize the full burden hour estimate to complete multiple, applicable sections of a form in this ICR, other landholders may utilize only a fraction of the burden hour estimate to complete the one section that is applicable to them. Furthermore, because the respondents change from year to year (again, each form is completed only once per respondent), consultation with persons outside the agency would likely yield results that would prove to be inaccurate when applied to a multi-year period (such as the length of an OMB approval), and in most cases would be more burdensome (from a time perspective) than completing the form itself. Throughout each year, Reclamation conducts regularly scheduled water district reviews at district offices that are subject to the acreage limitation provisions. Discussions between Reclamation RRA staff and district staff are held at those reviews during which burden hour feedback is addressed. In other words, Reclamation continually assesses burden hour estimates for the RRA forms through discussions with district staff that are in direct contact with the respondents of the forms in this ICR. The estimated burden identified in item 12 below reflects the outcome of these ongoing discussions.



**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Personal and financial information collected on these forms is protected under the Privacy Act of 1974. The Privacy Act system of records notice associated with this ICR is INTERIOR/WBR-31, Acreage Limitation.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a private or sensitive nature will be asked.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

See response to item 12(b).

- b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

Based on actual numbers of completed forms year-to-year, the estimated number of total respondents for all four forms is 500. The total number of annual responses for the four forms has remained constant from previous years.

The estimated number of annual responses per respondent is 1.00 annually, or 500 total annual responses (when calculated as appropriate for each of the four forms and then

totaled to obtain a total annual response figure). The average annual burden per response is 8.64 minutes (0.144 hours).

The total estimated annual burden hours for this ICR are 72 hours. The estimated annual burden hours per form are listed below:

<b>Form Name</b>	<b>Estimated No. of Respondents</b>	<b>Frequency of Response</b>	<b>Total Annual Responses</b>	<b>Burden Estimate Per Form (in minutes)</b>	<b>Total Burden Hours</b>
Limited Recipient Identification Sheet	175	1.00	175	5	15
Trust Information Sheet	150	1.00	150	5	13
Public Entity Information Sheet	100	1.00	100	15	25
Religious or Charitable Identification Sheet	75	1.00	75	15	19
<b>TOTAL</b>	<b>500</b>	<b>1.00</b>	<b>500</b>		<b>72*</b>

\* Due to rounding when figuring the total burden hours for certain forms (i.e., converting minutes to hours), the total burden hour figure is higher by 1.2 (the actual figure is 70.8). However, the 72 figure is used for ease of depiction and uniformity with the previous years' justification.

- c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "Annual Cost to Federal Government."**

The average annual cost per response is estimated to be \$3.15. This is based on the median wage rate of \$15.64\* per hour for office and administrative support occupations, multiplied by a benefits multiplier of 1.4\*\*, multiplied by .144 hours per response. The total annual cost is estimated to be \$1,575 (\$3.15 per response multiplied by 500 responses). This represents a net increase of \$60 from previous years, solely due to updating of the wage rate figure used for calculations.

\* Occupational Employment and Wages, May 2014 (Office and Administrative Support Occupations) (<http://www.bls.gov/oes/current/oes430000.htm> )

\*\*Bureau of Labor Statistics news release USDL-15-0386, March 11, 2015 Private industry workers, sales and office, by occupational group (office and administrative support), December 2014 Table 9 (<http://www.bls.gov/news.release/pdf/ecec.pdf>)

The respondents for this ICR are primarily private sector clerical employees. For the 100 estimated public entity respondents that could possibly be state or local government workers, the wage rate figure for clerical employees in state and local governments is \$28.33 per hour (including benefits). The average annual cost per response in the case of state or local government workers is estimated to be \$3.77. This is based on the median wage rate of \$28.33\*\*\* per hour (including benefits), multiplied by .133 hours per response. Assuming all of the 100 estimated public entity respondents are in fact state or local government employees, this represents an hourly wage increase of \$.62 (\$3.77 annual cost per response [state or local] minus \$3.15 annual cost per response [private sector]). This results in a negligible annualized cost increase from applying the \$.62 per-response cost difference toward the 100 public entity responses. In fact, the 100 applicable responses represent only 20 percent of the total responses for this ICR.

\*\*Bureau of Labor Statistics news release USDL-15-0386, March 11, 2015  
State and local government workers, all workers, December 2014  
Table 3 (<http://www.bls.gov/news.release/pdf/ecec.pdf>)

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- a. The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

The estimated total capital and start-up cost to respondents is \$0.00. The estimated total operation and maintenance and purchase of services component is estimated to be \$0.00.

- b. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

Cost estimates will not vary.

- c. Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Cost estimates do not include these purchases.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

Annual cost to the Federal Government is estimated as follows:

Item	Costs
Printing	\$ 300
Personnel	\$ 2,090 (50 person-hours x \$41.79 per hour)*
Miscellaneous administrative costs	\$ 75
<b>TOTAL</b>	<b>\$ 2,465</b>

\* Wage rate figure is based on the following:

- The average grade level of staff included in this cost estimate is GS-11 step 5.
- The 2015 hourly base wage for a GS-11 step 5 Federal employee is \$27.86\*
- The total hourly wage with benefits is \$41.79 (\$27.86 base wage x 1.5\*\* benefits multiplier)
- This represents an increase of \$41 since 2012.

\* Information was obtained from the Office of Personal Management ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/GS_h.pdf))

\*\* Bureau of Labor Statistics news release USDL-15-0386, March 11, 2015  
Civilian workers, by occupational and industry group (farming), December 2014  
Table 2 (<http://www.bls.gov/news.release/pdf/ecec.pdf>)

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

We are not reporting through this document any program change or adjustment change in the hour burden of the ICR budget due to review of actual field data pertaining solely to annual “Limited Recipient Identification Sheet,” “Trust information Sheet,” “Public Entity Information Sheet,” and “Religious or Charitable Identification Sheet” completion.

**16. For collections of information whose results will be published, outline plans for**

**tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The results of this ICR are not intended for publication.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Although the current OMB approval for this ICR does not expire until June 30, 2016, we are initiating this approval request now because the forms in this ICR must have a new approval date by September 2015. The following is a discussion of the two main reasons why approval of the ICR must proceed now, instead of later this year.

The forms in this ICR must be printed in the fall of 2015: Contractual irrigation seasons typically correspond to the calendar year. Although landholders may fall under a district's RRA forms submittal threshold, the landholders applicable to the forms in this ICR can and do receive Reclamation irrigation water for the 2016 irrigation season whenever the district makes such water available. Depending on a district's contract, the 2016 irrigation season may actually start in 2015, similarly to how the Federal government's fiscal year begins with the last quarter of the previous calendar year. As discussed in item 3 above, the forms in this ICR are distributed by Reclamation in hard copy, and therefore the forms in this ICR printed by a contracted printer in late summer of the year prior to when the forms will be required. For the 2016 irrigation season, OMB approval for the 2016 forms must be obtained now so the 2016 forms can be printed in preparation for 2016 water deliveries that can begin in early fall of 2015 (this year). In general, it benefits the landholders applicable to the forms in this ICR to complete these forms as soon as Reclamation identifies them. They are then made aware of any possible acreage limitation matters associated with the Reclamation irrigation water they are receiving, even though their small landholding size does not trigger the RRA forms submittal requirements associated with the RRA forms approved under OMB approval number 1006-0005.

The OMB expiration date will be printed on these forms. In the past, Reclamation has requested from OMB an expiration date of December 31<sup>st</sup> of the applicable calendar year, in order to allow the OMB expiration date to coincide with the end of the calendar year, by which time most irrigation seasons have also ended. For example, in the most recent ICR approval request for RRA forms corresponding to the 2014 and 2015 irrigation seasons, Reclamation requested an OMB approval expiration date of December 31, 2015. Although Reclamation's December 31<sup>st</sup> expiration date request had been granted for many prior OMB approvals, the December 31, 2015, expiration date request for the ICR corresponding to the 2014 and 2015 RRA forms was denied. The resulting June 30, 2016, expiration date caused much confusion for the landholders and water district staff who are able to see an OMB expiration date printed on the forms in this ICR, particularly an expiration date that falls in the middle of the 2016 irrigation season. This confusion is eliminated if Reclamation requests renewal of approval for the forms in this ICR now. This will ensure that all 2016

RRA forms printed and distributed to water districts by Reclamation have a new OMB approval expiration date that does not fall in the middle of the 2016 irrigation season when the forms in this ICR are at their peak of use.

As such, Reclamation would like to again request that the OMB approval expiration date for the forms in this ICR be set for December 31, 2017 (instead of the typical three years, which would generate a July/August 2018 date). This December 31, 2017, date will have the forms expiring after the typical 2017 irrigation seasons have ended, and will also ensure there is no mid-season 2018 expiration date visible to the public that will cause confusion. If this approval expiration date request is granted, it will apply to the RRA forms for the 2016 and 2017 water years, thereby shortening the usual 3-year OMB approval timeframe in the interest of preserving the correlation of the forms in this ICR to the water years to which they will apply. Another request for OMB approval will be initiated for this ICR in advance of forms being required for the 2018 and 2019 irrigation seasons, due to the timing of typical irrigation seasons and the forms' printing schedule as explained above.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

No exceptions to the certification statement are being requested.

# **ATTACHMENT 1**

List of information collection questions and justifications