



Nagode, Jill <jnagode@usbr.gov>

Fwd: ICRs ready in ROCIS: 1006-0005, 0006, and 0023

1 message

Nagode, Jill <jnagode@usbr.gov>
To: Jill Nagode <jnagode@usbr.gov>

Thu, Aug 3, 2017 at 11:15 AM

----- Forwarded message -----

From: **McPhee, Stephanie** <smcphee@usbr.gov>
Date: Mon, Jul 10, 2017 at 12:33 PM
Subject: Re: ICRs ready in ROCIS: 1006-0005, 0006, and 0023
To: "Nagode, Jill" <jnagode@usbr.gov>

Jill -

This may be more than you need, but here goes (3 paragraphs):

The main reason the RRA forms are submitted for early approval is adherence to a necessary printing and distribution schedule for hard copy forms in order to provide current, approved RRA forms to respondents in ample time for them to complete and submit the forms as an annual statutory and regulatory prerequisite for the receipt of Reclamation irrigation water. As background, the RRA forms are completed by a landholder who wishes to receive Reclamation irrigation water (i.e., the forms in 1006-0005). Water districts also submit annual forms in fulfillment of statutory and regulatory requirements associated with their repayment contract with Reclamation (i.e., the forms in 1006-0006). Reclamation provides the RRA forms electronically; however, many respondents choose not to use the electronic format. Beyond the fact that Reclamation has no authority or funding to require or assist contracting water districts with the actions that would be required to mandate the sole use of electronic forms, there are also many landholders who do not have the necessary technological equipment to access or utilize electronic RRA forms. It is the landholders (i.e., the respondents for 1006-0005), not the water districts, who represent the vast majority of respondents for all of the RRA information collections and to whom Reclamation must be the most responsive with regard to providing ways to reduce the burden associated with reporting. Therefore, Reclamation continues to provide hard copy RRA forms to address the needs of landholders who do not, or simply cannot, use electronic RRA forms and must instead use hard copy forms as the only means by which they can meet the statutory and regulatory requirements for receipt of Reclamation irrigation water. With regard to water districts, although most districts do possess the required technology, some districts choose to use hard copy forms, and there are districts/water user associations that operate out of a private residence and do not have the required technology for electronic form usage. In these cases, hard copy forms are, again, the only means by which districts can meet statutory and regulatory reporting requirements.

In order to get the RRA forms printed each year, the forms have to be submitted through the Government Printing Office procedures for contracting a printer, and the printer has to have time to print and deliver the printed product to Reclamation. Thereafter, Reclamation must have ample time to distribute the forms to the appropriate water districts so they are available to each district prior to the contractual start date of each district's irrigation season, and so that landholders can then have ample time to complete and submit their forms prior to first delivery of Reclamation irrigation water. These processes can take several months, which is why OMB approval is sought well in advance of the current expiration date. It is also necessary to try to time the approval renewal so that we do not have RRA forms that are expiring while an irrigation season is still in force. We accomplish this timing by making sure the new approval, printing, and distribution processes are all completed well in advance of the next water year, which also happens to be well in advance of any given RRA forms' expiration date. For example, the 2018 RRA forms that are involved in this renewal request must be approved, printed, distributed, and completed in advance of the 2018 water year, which in many cases corresponds to January 1, 2018, of the calendar year. We cannot wait until closer to the October 31, 2018, OMB expiration date to renew approval because (1), there will be no time for printing, distribution, completion, and submittal, and (2) In October 2018, many landholders will still be receiving Reclamation irrigation water as part of the 2018 water year, and may be required to submit new RRA forms with a new expiration date (doubling their annual reporting burden) so they are not using expired forms to continue their irrigation activities for the year.

Section 17 of the Supporting Statement for each of the three RRA information collections details our need for early approval. In fact, for many years we have requested and been granted the approval to make the OMB expiration date correspond with the end of a calendar year. For example, in the current renewal requests, we would have requested an OMB expiration date of December 31, 2019, instead of what will likely be a Fall 2020 expiration date. Our requests for an

altered expiration date eliminated the possibility of expired RRA forms being used during an ongoing water year because the OMB expiration date coincided with the end of the vast majority of contractual water years and irrigation seasons. However, our requests for an altered expiration date have been denied in the last few OMB approval cycles, and we are now seeing the questions that appear without that altered date. Specifically, if during the last OMB approval cycle we had been granted our requested date of December 31, 2017, our current renewal requests under review now would not have appeared to be nearly as premature as they do with the current October 17, 2018, expiration date. Although we have chosen not to belabor the request for an altered OMB expiration date by requesting it again, we remain hopeful that we can adequately explain and be mindful of the fact that our timing needs have not changed with regard to the schedule for approval/printing/distribution/completion/submittal of the RRA forms, whether or not the OMB expiration date is at the end of a calendar year or at the end of the usual 3-year approval period.

Stephanie K. McPhee

Bureau of Reclamation

Reclamation Law Administration Division

Denver CO

303-445-2897

smcphee@usbr.gov