
**U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

**PAPERWORK REDUCTION ACT SUBMISSION
1 SUPPORTING STATEMENT A**

**RESOURCE ADVISORY COUNCIL APPLICATION
(43 CFR SUBPART 1784)**

OMB CONTROL NUMBER 1004-0204

Terms of Clearance: The Office of Management and Budget (OMB) provided the following Terms of Clearance when it last approved this information collection (See OMB Notice of Action dated April 22, 2022).

OMB Terms of Clearance: Before submitting for renewal, the agency will work to address state concerns about difficulty filing electronically particularly the difficulty with electronically signing.

BLM Response:

To proactively address concerns about difficulty filing electronically particularly the difficulty with electronically signing, the BLM developed an alternative platform to electronically file, sign, and submit applications. The BLM is responsible for advisory councils located within the jurisdiction of eleven state offices. A soft launch was initiated in FY23 for the six advisory councils located within the BLM Oregon/Washington State Office. The OR/WA State Office was chosen to pilot the platform because the highest number of councils are located within their jurisdiction.

A link to the electronically fillable and signable application platform was provided on each of the six councils' webpages in addition to the link to the PDF version of the application that can be printed, filled out by hand, and either submitted through the mail or scanned and submitted via email; or the PDF can be downloaded in Adobe Acrobat, electronically filled out and digitally signed, and then submitted via email.

The BLM regulations contained in 43 CFR Subpart 1784.4-1 require that "candidates for appointment to advisory committees are sought through public calls for public nominations. Such calls shall be published in the Federal Register and are made through media releases and systematic contacts with individuals and organizations interested in the use and management of public lands and resources". The BLM is required to solicit applications for 30- to 45-day periods initiated through Federal Register notices. The platform was developed in a manner that a BLM employee served as a receiving hub for applications and then electronically distributed applications to the six individual council coordinators. Because applications can only be accepted during open calls for nominations, the BLM had to post and remove the electronically fillable link in accordance with nomination periods presenting an additional workload that presented additional burdens that did not result in efficiency. Ultimately, only one member of the public chose to utilize the platform and the BLM discontinued the pilot program.

Abstract: The Bureau of Land Management (BLM) collects this information to determine education, training, and experience related to possible service on advisory councils established under the authority of Section 309 of the Federal Land Policy and Management Act (43 U.S.C. 1739) and the Federal Advisory Committee Act, 5 U.S.C. Ch. 10. This information is necessary to ensure that each advisory council is structured to provide fair membership balance, both geographic and interest-specific, in terms of the functions to be performed and points of view to be represented, as prescribed by its charter. This request is for OMB to renew this OMB control number for an

additional three years.

Abstract: The BLM collects the information on the Resource Advisory Council Application (RAC), Form No. 1120-19, to determine education, training, and experience related to possible service on advisory committees established under the authority of Section 309 of the Federal Land Policy and Management Act (43 U.S.C. 1739) and the Federal Advisory Committee Act, 5 U.S.C. App. 2. This information is necessary to ensure that each advisory council is structured to provide fair membership balance, both geographic and interest-specific, in terms of the functions to be performed and points of view to be represented, as prescribed by its charter. The BLM is requesting minor changes to the RAC application form. The changes include removing some of the previously collected information that is not needed and, in response to user feedback, clarifying certain portions of the applications. This request is for OMB to renew with revisions this OMB control number for an additional three (3) years.

Justification

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

The BLM seeks 3-year approval of revisions of a currently approved information collection requirements pertaining to Resource Advisory Council (RAC) applications. Section 309 of the Federal Land Policy and Management Act (FLPMA) (43 U.S.C. 1739) requires the Secretary of the Interior to “establish advisory councils of not less than ten and not more than fifteen members appointed by [the Secretary] from among persons who are representative of the various major citizens’ interests concerning the problems relating to land use planning or the management of the public lands located within the area for which an advisory council is established...Appointments shall be made in accordance with rules prescribed by the Secretary.” Section 309 also requires that the establishment and operation of an advisory council conform to the requirements of the Federal Advisory Committee Act (FACA), 5 U.S.C. Ch. 10. In accordance with FLPMA Section 309 and FACA, the BLM has promulgated regulations (43 CFR Subpart 1784) governing the establishment and operation of advisory committees.

The BLM seeks to collect information to determine education, training, and experience related to possible service on an advisory council of the BLM. This information is necessary to ensure that each advisory council is structured to provide fair membership balance, both geographic and interest-specific, in terms of the functions to be performed and points of view to be represented, as prescribed by its charter.

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 information obtained is used by BLM officials to make selections for appointment to BLM advisory councils, also known as Resource Advisory Councils (RACs). Applicants fill out BLM Form 1120-19 (Bureau of Land Management Resource Advisory Council Application). The BLM forwards pertinent information from that form to the Department of the Interior (DOI) Executive Secretariat for review of applicants. The Office of the DOI White House Liaison also uses information from Form 1120-19 to perform background checks on the applicants to confirm that the applicants have no derogatory record that could be a negative reflection to the DOI and the BLM.

Form 1120-19 asks for the applicant’s first name, middle name, last name, and date of birth so the individual can be identified, and the BLM is able to distinguish that individual from others in the vetting process. The BLM asks for the applicant’s home address so that the BLM can send an official appointment letter if they are selected. Business addresses and phone numbers are no longer being collected because the BLM does not contact applicants’ places of employment. The applicant is asked for their email address because the General

Services Administration requires this information for its Federal Advisory Committee database. Form 1120-19 asks for the applicant's home phone number in case the BLM must reach the individual for questions regarding their application.

The form previously requested information regarding applicants "education, including colleges, degrees, major fields of study". The form is being revised to collect information regarding "related or relevant education or training in the specific area of interest you seek to represent" to provide the BLM with information more relevant to the interest areas applicants seek to represent.

The form previously requested applicants "work history". The form is being revised to collect information regarding "related or relevant work experience in the specific area of interest you seek to represent" to provide information more significant to the council's work.

The form previously requested applicants to "list significant related experience, previous advisory committee experience, civic and professional activities, education, and training that qualifies you to serve on this committee. If applying as an elected official, please also include dates of service". The form is being revised to collect information regarding "previous advisory committee experience or relevant civic and professional activities" to provide more applicable information regarding an applicant's qualifications.

The form previously requested information regarding applicants "experience working with disparate groups". The form is being revised to collect information regarding "experience working on a team or with disparate groups" to better evaluate whether the applicant is able to work with others to come to conclusions on possibly controversial issues.

The form previously requested applicants "experience of knowledge of the committee's geographic area of jurisdiction". This information was not useful because page one of the form states that "council members must reside in the states within the geographic jurisdiction of the RAC" making it inherent that the applicant is familiar with the geographic area because they reside within the council's jurisdiction. The form is being revised to collect information regarding "why [the applicant is] interested in serving on this advisory council" to better demonstrate an applicant's desire to serve on the committee.

The form asks in which interest area the applicant believes they are qualified to serve so that BLM knows which interest area to possibly appoint the applicant. The form asks if the applicant or their employers hold any BLM permits, leases, or licenses. The BLM's advisory committee regulations (43 CFR Subpart 1784) provide that "persons or employees of organizations who hold leases, licenses, permits, contracts, claims, or grants which involve lands or resources administered by the Bureau of Land Management normally shall not serve on advisory committees..." The form asks whether the applicant is a federally registered lobbyist because the Obama Administration prohibited individuals who are currently federally registered lobbyists to serve on all FACA and non-FACA boards, committees, or councils. The form asks the applicant to attach letters of reference from interested parties or organizations the applicant is seeking to represent because the BLM's advisory committee regulations state this as a requirement. The applicant is also required to sign the form to ensure that he or she is the one who completed the form.

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.**

Form 1120-19 is electronically available to the public in fillable, printable format at

https://www.blm.gov/sites/default/files/docs/2022-05/BLM-Form-1120-19_RAC-Application.pdf

Respondents can download and print the PDF application, fill out the application by hand, and either submit the completed application through the mail or scan the completed application and submitted via email; or respondents can download the PDF and open it in Adobe Acrobat to electronically fill out and digitally sign, and then submitted via email.

- 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 BLM must obtain this information in order to maintain Federal advisory committees. The necessary information is unique to each applicant and cannot be obtained except from the respondents to this information collection. There is no similar information already available and no duplication of information collection.

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

The information collection activity has no impact on small businesses. Information is collected only from individuals.

- 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.**

If the BLM did not collect this information, it could not maintain advisory committees as required by section 309 of the Federal Land Policy and Management Act, as amended (43 U.S.C. 1739).

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

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * 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;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * 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; or
- * 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.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d).

- 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.

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.

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.

On June 11, 2024, the BLM published a *Federal Register* notice soliciting comments for a period of 60 days on this collection of information (89 FR 49183). The comment period closed on August 12, 2024. No comments were received in response to this notice.

Additionally, as required by 5 CFR 1320.5(a)(1)(iv), BLM published a notice in the *Federal Register* announcing the submission of this request to OMB and allowing the public 30 days to send comments on the proposed extension of this OMB number to OMB.

The BLM has consulted with the below listed RAC State Coordinators to obtain their views on the clarity of instructions; reporting formats; and on the utility of the requested information. State Coordinators were consulted with because they are the ones that interact with RAC applicants. We asked them if they have ever received feedback on the application form; including if they could obtain any current feedback.

- AK RAC coordinator
- AZ RAC coordinator
- CA RAC coordinator
- CO RAC coordinator
- ID RAC coordinator
- MT/Dakotas RAC coordinator
- NM RAC coordinator
- NV RAC coordinator
- OR/WA RAC coordinator
- Utah RAC coordinator
- WY RAC coordinator

Feedback was received from AK and OR/WA. AZ, AK, CO, ID, MT/Dakotas, NM, NV, OR/WA, UT, and WY coordinators indicated that they have not received any feedback on the application form. The CA State Coordinator submitted 3 items of feedback:

"Instead of just saying "Education: including colleges, degrees, major fields of study," reword to say, "Related or relevant education or training in the specific area of interest you seek to represent." Instead of saying, "Work history," reword to say "Related or relevant work experience in the specific area of interest you seek to represent." Basically, I'm suggesting breaking up the section where they are asked to "List significant related experience, previous advisory committee experience, civic and professional activities, education, and training that qualifies you to serve on this committee," into separate boxes and incorporate it into the already existing questions and focus it more on the specific area of interest they are seeking to represent. If you break up that section, I would add back, "List previous advisory committee experience or relevant civic and professional activities." I find that when I'm reviewing applications, there isn't a lot of relevance in the current "Education and Work History" boxes.

I propose to add this question, if possible, "Why are you interested in serving on this advisory committee?" On the contact info area of the application, instead of having a business and home phone number section, just have one number area with best contact phone number.

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

We provide no payments or gifts to the respondents.

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

According to General Records Schedule 26, "Committee management records include copies of charters, membership lists, agendas, policy statements, statistical data files, financial operating plans, General Service Administration reports and other statistical reports on the number of committees, types of committees, membership rosters, requests for approval of committee nominees, appointment documents for individual committee members, financial disclosure documents, material required to be available for public information and other related topics maintained by the Committee Management Officer." General Records Schedule 26 mandates that Federal agencies, "Destroy/delete when [the records are] 6 years old."

Upon receiving the records, the BLM will store them in locked cabinets to ensure privacy protection. The information in each application will be maintained in the Interior Volunteer Service File System (Interior/DOI-05) and is subject to routine uses of that system of records. These routine uses can be found at 66 FR 28536 (May 23, 2001).

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.

This collection of information includes no questions of a sensitive nature.

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

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

Table 12-1, below, shows our estimate of the hourly cost burdens for respondents. This cost was determined using national Bureau of Labor Statistics data for "All Occupations" at:

http://www.bls.gov/oes/current/oes_nat.htm. We chose the hourly rate for all occupations because the

respondents vary widely in terms of the type of business they are in, how they choose to perform the information collection, the circumstances of each operation, and the proportions of personnel performing the work (e.g., managerial technical, administrative). The benefits multiplier of 1.4 is supported by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

Table 12-1: Hourly Cost Calculation

| Occupational Category | Mean Hourly Wage | Benefits Multiplier | Total Mean Hourly Wage |
|-------------------------|------------------|---------------------|------------------------|
| All Occupations 00-0000 | \$31.48 | 1.4 | \$44.07 |

The sole component of this information collection request, Form 1120-19 (Bureau of Land Management Resource Advisory Council Application), requires an estimated 4 hours per response. The number of responses if based on program records and the estimated 4 hours per response is based on the BLM’s experience with the collection; including what applicants have noted as an average response time.

Table 12-2: Burden Hours and Hourly Burden Costs

| Collection of Information | Annual Responses | Average Response Time (hours) | Annual Burden Hours | Hourly Wage | Burden Hour Costs |
|--|------------------|-------------------------------|---------------------|-------------|-------------------|
| Form 1120-19 (Bureau of Land Management Resource Advisory Council Application) | 200 | 4 | 800 | \$44.07 | \$28,808 |

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.)
- * 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.
 - * 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.
 - * 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.

No non-hour cost burdens are associated with this information collection.

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.

The hourly cost to the Federal Government shown at Table 14-1, below, is based on the following U.S. Office of Personnel Management Salary Table: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS_h.pdf. The benefits multiplier of 1.6 is implied by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

Table 14 -1: Hourly Cost Calculations

| Position and Pay Grade | Hourly Pay Rate | Benefits Multiplier | Hourly Rate with Benefits | Percent of the Information Collection Completed by Each Occupation | Weighted Avg. (\$/hour) |
|--|-----------------|---------------------|---------------------------|--|-------------------------|
| FACA Coordinator - GS-11, Step 5 | \$39.40 | 1.6 | \$63.04 | 50% | \$31.52 |
| Advisory Committee Lead - GS-12, Step 5 | \$47.22 | 1.6 | \$75.55 | 15% | \$11.33 |
| Supervisor - GS-14, Step 5 | \$66.36 | 1.6 | \$106.18 | 10% | \$10.62 |
| Designated Federal Officer - GS-15, Step 5 | \$78.05 | 1.6 | \$124.88 | 25% | \$31.22 |
| Totals: | ---- | ---- | ---- | 100% | \$84.69 |

The sole component of this information collection request, Form 1120-19 (Bureau of Land Management Resource Advisory Council Application), requires an estimated 4.5 hours of Government time per response. When multiplied by an estimated 200 responses annually, the total estimated cost to the Federal government for this information collection is 900 hours times \$84.69 per hour, for a total of \$76,221 annually.

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

The information collected is being updated in response to feedback received from BLM RAC Coordinators. The form previously requested business addresses and phone numbers. This information no longer being collected because the BLM does not contact applicants’ places of employment. The form previously requested information regarding applicants “education: including colleges, degrees, major fields of study”. The information requested is being updated to “describe related or relevant education or training in the specific area of interest you seek to represent” to provide the BLM with information more relevant to the interest areas applicants seek to represent. The form previously requested information regarding “work history”. The information requested is being updated to “describe previous advisory committee experience or relevant civic and professional activities” to provide the BLM information more significant to individuals’ experience relating to advisory committee experience and participation on applicable activities. The form previously requested applicants to “list significant related experience, previous advisory committee experience, civic and professional activities, education, and training that qualifies you to serve on this committee. If applying as an elected official, please also include dates of service”. The form is being revised to collect information regarding “your experience working on a team or with disparate groups” to better evaluate whether the applicant is able to work with others to come to conclusions on possibly controversial issues. The form previously requested applicants “experience of knowledge of the committee’s geographic area of jurisdiction”. This information was not valuable because page one of the form states that “council members must reside in the states within the geographic jurisdiction of the RAC” making it inherent that the applicant is familiar with the geographic area because they reside within the council’s jurisdiction. The form is being revised to collect information regarding “why [the applicant is] interested in serving on this advisory council” to better demonstrate an applicant’s desire and motivation to serve on the committee.

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.

We have no plans to publish the information.

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.

The BLM will display the expiration date of the OMB approval on the form included in this information collection. The OMB number and expiration date displayed on the form as well as at www.reginfo.gov.

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

There are no exceptions to the certification requirements of 5 CFR 1320.9.

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