



United States Department of the Interior



BUREAU OF RECLAMATION
PO Box 25007
Denver, Colorado 80225-0007

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IN REPLY REFER TO:
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Dear Ladies and Gentlemen:

In consultation with the regional Reclamation Reform Act of 1982 (RRA) coordinators, we have developed an electronic submittal option for districts subject to the acreage limitation provisions as detailed in the enclosed directive. The electronic district summary form submittal option is voluntary, and commences with the district summary forms for the 2009 water year.

An electronic submittal option is available for only the district summary forms (i.e., the forms districts complete and submit to Reclamation). The electronic submittal option is not available for RRA forms completed by landholders, now or for the foreseeable future, because generally Reclamation does not collect and retain the landholder RRA form submittals. To require districts to offer such an option to landholders would unduly burden many districts, and could result in confusion among landholders if the option was not offered universally by all districts.

As described in the enclosed directive, the electronically submitted district summary form files must be password protected, and must be "signed" using a personal identification number obtained from Reclamation for the specific water year in question. This ensures that Privacy Act requirements are met with regard to the information contained on the electronically submitted district summary forms. It also eliminates the need for file encryption during transit from the district to the applicable Reclamation office. Although there are current software capabilities for file encryption and digital signatures, the limitations associated with such features makes their use impractical for electronic submittal of district summary forms. Furthermore, software features such as these are set up so that they are controlled and maintained locally with the software used at the district, and would, therefore, encumber Reclamation's ability to read and authenticate electronically submitted district summary forms.

If you have questions about the enclosed directive, please contact the appropriate Reclamation office.

Sincerely,

Richard W. Thuzia ACTING FOR

Roseann Gonzales
Director, Policy and Program Services

Enclosure

RECLAMATION

Managing Water in the West

Electronic Submittal of District Summary of Landholdings Forms

(Reclamation Reform Act of 1982, RRA)



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OVERVIEW

The Bureau of Reclamation is offering to districts subject to the acreage limitation provisions the option of submitting the “District Summary of Landholdings” forms in electronic format, provided certain conditions are met. In general, districts that want to implement the electronic submittal option must:

1. Have the hardware capability to electronically complete the appropriate district summary forms for the district;
2. Have the resources with which to obtain, use, and maintain the software required to properly complete and submit the electronic forms;
3. Use the necessary software and/or hardware to prepare district summary forms in the required electronic format if the electronic district summary forms provided by Reclamation on the RRA website are not used;
4. Comply with existing substitute RRA form standards, including computer generated printouts (if applicable – refer to the “Standards for Substitute RRA forms and Computer Generated Printout” [dated November 2008] for more information);
5. Request a new Personal Identification Number (PIN) each year in which electronic district summary forms are to be submitted to Reclamation; and
6. Comply with existing RRA forms retention requirements, including retaining hard copies of any district summary forms that are submitted electronically.

Although there are many advantages to submitting district summary forms electronically, districts are asked to remain cognizant of any disadvantages presented by electronic submittal. For example, districts that prefer to make notations in the margins on the summary forms will find that more difficult to accomplish on electronic forms. In such a case, even though Reclamation’s information collection needs are met by completing the existing fields on the district summary form, a district may find that its own information collection methods and needs may differ by using electronic district summary forms.

SOFTWARE REQUIREMENTS

The only format for electronically submitted district summary forms that Reclamation will accept is “portable document format” (pdf) for the following reasons:

1. The electronic versions of the RRA forms provided on the RRA website (www.usbr.gov/rra) are pdf files;
2. Software used to create and save pdf files will also allow the security options necessary to protect the information listed on the tabulation sheets, some of which is covered by the Privacy Act of 1974¹; and
3. Use of pdf files will ensure the unaltered appearance and formatting of the district summary forms, as required within the parameters of the information collection approval issued by the Office of Management and Budget under the Paperwork Reduction Act of 1995² for the use of the RRA forms.

The most widely available software currently attainable that will allow for completion and saving of completed RRA form pdf files is the Adobe Acrobat Reader software³ (version 7.0 or higher). The free, downloadable version of Adobe Reader is sufficient for electronic district summary form submittal purposes as listed above.

REQUESTING A PIN AND SECURED RRA FORMS

The signature requirement for electronically submitted district summary forms is accomplished using a PIN that is issued by Reclamation. To acquire a PIN, you must:

1. Request a PIN be issued to you by e-mailing your request to RRA1982@usbr.gov.

¹ 5 U.S.C. § 552a -- as amended

² 44 U.S.C. 3501 et seq.

³ While Reclamation does not sponsor or endorse particular software vendors, it is necessary to identify software program(s) that will allow users to comply with the electronic district summary form submittal requirements. At the time these guidelines were developed, Adobe Acrobat was the most widely used and compatible software available for electronic district summary form submittal purposes. However, software packages that equal or surpass Adobe Acrobat’s capabilities may become available in the future.

- NOTE: If the district is also a substitute RRA forms developer or a user of computer generated printouts (to be attached to the Reclamation issued RRA forms), you may include a request for a PIN in your written approval request for your substitute forms or computer generated printouts for water years in which Reclamation approval must be obtained. For water years in which you are not required to submit substitute forms or computer generated printouts for approval, you must e-mail your request for a PIN as specified above.
2. “Request for PIN” must appear in the subject line of the email;
 3. Include in your e-mail request a physical address to which Reclamation can send written notification of your PIN; and
 4. Accompanying your PIN notification will be a CD-ROM containing electronically fillable pdf district summary forms and associated tabulations for the applicable water year. The files on the CD-ROM will be secured using your PIN for that water year.

Please allow 2 weeks (including time for mail transit of written PIN notification) for issuance of a new PIN. Submit your e-mail PIN request to only the e-mail address specified above; no other Reclamation office other than the office that monitors the above email address is authorized to issue PINs.

A new PIN must be requested **for each water year** in which you intend to submit electronic district summary forms to Reclamation. Your PIN and your disc of secured district summary forms will be mailed to you for security purposes.

ELECTRONIC DISTRICT SUMMARY FORM COMPLETION

While there are several available methods of electronic district summary form completion (such as using a Reclamation-provided RRA form [pdf file] from the RRA website, using your own Reclamation-approved electronic RRA form if you are a substitute RRA forms developer or a user of commercial RRA forms software, and/or scanning into a pdf file a completed hardcopy of a Reclamation-issued RRA form), Reclamation will accept only one format of completed electronic district summary forms.

Specifically, the completed electronic district summary forms submitted to Reclamation must be completed versions of the secured pdf forms you received on the CD-ROM with your PIN for that particular water year. As stated above, the files on the CD-ROM are secured using your PIN for that water year. In order to open any of the files on the

CD-ROM for electronic completion, you will be prompted to enter a password (i.e., your PIN). The completed, electronically submitted files Reclamation receives must have the same password prompt so that Reclamation staff is required to enter your PIN for the applicable water year in order to view your completed, electronically submitted district summary forms.

Your Reclamation-issued PIN for the current water year must be entered in the signature field. This PIN will be authenticated by Reclamation staff upon receipt of the electronic district summary form. Although there are current software capabilities for digital signatures, the limitations associated with digital signatures make their use impractical for electronic submittal of district summary forms. For example, there are keys, certificates, digital IDs, etc., that are required in order to use digital signatures. Software is set up so that these items are controlled and maintained locally with the software used at the district, and would therefore encumber Reclamation's ability to authenticate signatures.

ELECTRONIC DISTRICT SUMMARY FORM SUBMITTAL

To electronically submit your completed and secured electronic district summary forms to Reclamation, you must e-mail your pdf files to the appropriate Reclamation office in one of two ways:

1. Use the e-mail option within the software program (such as Adobe Acrobat) if the software includes a menu option to e-mail the pdf file currently open on the screen; or
2. Use your own e-mail provider and attach the pdf files to your e-mail message.

The district will be notified of the proper e-mail address to electronically submit their district summary forms in the letter that transmits the PIN for a particular water year.

All information on the completed electronic form must be legible and complete. Illegible or incomplete information, and/or files submitted without the proper password security will not suffice for district summary form submittal purposes. If you choose to secure any other document features in your electronic district summary form file, you must use your PIN for that password as well.

Retain the CD-ROM of secured district summary forms for the duration of the applicable water year. If you are required to resubmit your district summary forms for the current water year and you choose to submit them electronically, you must use the secured pdf files on the CD-ROM. Please note that electronic submittals of district summary

forms (whether initial submittals or resubmittals) will **not** be accepted **after** the due date established by the Reclamation Regional Office to which you submit your district summary forms. Hard copy submittals will be required if you are submitting district summary forms for the current water year after the established due date applicable to your Reclamation Regional Office, or for a water year other than the current water year (e.g., a forms correction for a previous water year).

RECLAMATION RECEIPT OF ELECTRONIC DISTRICT SUMMARY FORMS

Reclamation will notify the district electronically when the electronic submittal of district summary forms is received. Reclamation will consider the electronically submitted district summary forms as “received” on the date and time provided by the electronic receipt notification that is sent from the Reclamation office that receives the forms to the district that submitted them. If you have any specific questions concerning legibility of the forms, receipt of all required forms, urgent submittals, etc., the district is responsible for presenting such questions to Reclamation.

DISTRICT RESPONSIBILITIES FOR ELECTRONIC DISTRICT SUMMARY FORM SUBMITTAL

1. **Software:** It is the responsibility of the district submitting the electronic district summary forms to obtain and maintain the required Adobe software, and update the software in the future, as necessary. It is also the responsibility of the district to obtain and maintain the expertise required to use the software. Because software versions change, these guidelines will not include any technical information associated with using the software. For the same reason, Reclamation will not provide technical support for the software; such support must be obtained through the software manufacturer or other appropriate means.
2. **PIN:** If a district chooses to submit district summary forms electronically, the district must annually request a PIN. Once a PIN is provided, it is the district’s responsibility to secure the PIN. Your PIN must be entered in the signature field on the district summary form.
3. **Resubmission:** Districts are responsible for resubmitting district summary form files that Reclamation either cannot read or are incomplete.

RETENTION OF ELECTRONIC DISTRICT SUMMARY FORMS

Districts that choose to submit electronic district summary forms to Reclamation are still required to retain the district summary forms in accordance with current retention requirements. This includes printing a hard copy of the electronically submitted district summary form and placing a copy in the district's records. Districts may not simply rely upon retaining only an electronic copy of their electronically submitted district summary forms, as there are numerous circumstances that can compromise the electronic file (e.g., software revisions that can make a file unreadable, scratches on a CD that can make the CD unreadable, PC hardware issues such as hard drive failure, etc.).