

Electronic RRA Forms Submittal Options for the 2020 Water Year

The three options below are voluntary and intended to lessen the burden of obtaining RRA forms from landholders when the usual hardcopy, paper submittal is made difficult in the current health-conscious environment for many cities and states. As with paper RRA forms, districts are expected to maintain protection of information covered by the Privacy Act of 1974 that is contained on electronically submitted RRA forms¹. If your district finds anything to be prohibitive in the following options, the traditional option of submitting hardcopy, paper RRA forms is always available and can be utilized in the manner that is most appropriate for your district. Please note that it will be the district's responsibility (not Reclamation's) to provide assistance to landholders regarding navigation of any of these electronic submittal options, including digital signatures, if utilized. Additionally, if a 2020 RRA form requires a signature authorization that is *not already on file at the district*, please contact your regional RRA coordinator.

Option 1 – Electronic completion, manual signature, electronic submittal

1. Landholder completes the appropriate RRA form online using the RRA website, or prints the form from the RRA website and completes it manually.
 - a. RRA forms are located at https://www.usbr.gov/rra/RRA_landholder_forms.html
2. Landholder manually signs the printed, completed RRA form.
3. Landholder sends signed RRA form to the appropriate district(s), utilizing and assuming the usual responsibility for appropriate Privacy Act information protection practices, by one of the following methods:
 - a. Electronically by fax, if equipped to do so, or
 - b. Electronically by e-mail after the landholder scans the signed RRA form into an electronic format.
4. District receives electronic RRA form and responds to the landholder confirming receipt of the form (via e-mail or verbally with written documentation of the conversation).

The date of the district's response to the landholder (in step 4 above) is the recorded date the district received the landholder's RRA form. This date is required to be prior to the landholder's receipt of Reclamation irrigation water, in the same manner as receipt of a hardcopy RRA form. A copy of the district's dated confirmation e-mail (or dated documentation of verbal conversation) must accompany a copy of the electronically submitted form in the landholder's file.

Option 2 – Electronic completion, digital signature, electronic submittal

1. Landholder completes appropriate RRA form online.
 - a. This requires downloading the appropriate RRA form from the RRA website and opening it using computer software for portable document format (pdf) files that contains digital signature capability².

¹ Electronic submittal of information covered by the Privacy Act of 1974 requires encryption of the files being submitted. Various free and paid software is available on the internet to encrypt files.

² Adobe Acrobat Reader DC is the most commonly used free software for pdf files, and is available at <https://get.adobe.com/reader/>. Adobe Acrobat Reader DC has digital signature capability, and is distinct from Adobe's paid software, Adobe Acrobat Pro DC, which has more pdf file capabilities. There is other software available on the internet, both free and paid, that offer similar capabilities.

2. Landholder signs RRA form digitally in software of choice.
3. Landholder sends RRA form electronically by e-mail to the appropriate district(s), utilizing and assuming the usual responsibility for appropriate Privacy Act information protection practices.
4. District receives electronic RRA form and responds to the landholder's e-mail confirming receipt of the RRA form.

The date of the district's e-mail response to the landholder (in step 4 above) is the recorded date the district received the landholder's RRA form. This date is required to be prior to the landholder's receipt of Reclamation irrigation water, in the same manner as receipt of a hardcopy RRA form. A copy of the district's dated confirmation e-mail must accompany a copy of the electronically submitted form in the landholder's file.

Option 3 – District completion of landholder form with electronic permission from the landholder, and manual landholder signature before the end of the 2020 water year

1. District e-mails landholder, using sample language provided in Enclosure 3, to obtain and document landholder's permission to complete RRA form(s) on their behalf for the 2020 water year.
2. Landholder must respond affirmatively by e-mail to the district's e-mail.
3. District completes the landholder's RRA form, utilizing and assuming the usual responsibility for appropriate Privacy Act information protection practices.
 - a. It is highly recommended that the district obtains verbal confirmation from the landholder regarding the information being placed on the form to ensure accuracy.
4. District and landholder are responsible to ensure the landholder's 2020 RRA form is signed by the landholder prior to the end of the 2020 water year, once it is feasible to do so given public and personal health conditions.
 - a. The landholder will date their signature using the current date (i.e., the date on which the form is signed). This date must be prior to the end of the 2020 water year.
 - b. Consistent with existing practices, the district is not allowed to sign an RRA form on behalf of a landholder, even though the district is completing the form's information for the landholder.
 - c. As always, a landholder's failure to sign a 2020 RRA form (in this case, by the end of the 2020 water year) could result in the assessment of an administrative fee.

The date of the landholder's response to the district's email (in step 2 above) is the recorded date the district received the landholder's RRA form. This date is required to be prior to the landholder's receipt of Reclamation irrigation water, in the same manner as receipt of a hardcopy RRA form. A copy of the landholder's dated confirmation e-mail must accompany a copy of the signed RRA form in the landholder's file.

Reclamation's Requirements for Landholder File Contents if an Electronic RRA Form Submittal Option is Used for the 2020 Water Year

Option 1 – Electronic completion, manual signature, electronic submittal

1. Printed copy of the landholder's electronically submitted form, including appropriate signature(s).
2. Printed copy of the district's dated receipt confirmation of the landholder's electronically submitted RRA form (i.e., a copy of the district's confirmation e-mail sent to the landholder, or a copy of the written documentation of a verbal confirmation with the landholder).
3. As with paper RRA forms, the appropriate signature authorizations must be on file at the district if someone else is signing the form for the landholder.

Option 2 – Electronic completion, digital signature, electronic submittal

1. Printed copy of the landholder's digitally signed and electronically submitted form, including appropriate signature(s).
2. Printed copy of the district's dated e-mail confirmation of receipt of the landholder's electronically submitted RRA form.
3. As with paper RRA forms, the appropriate signature authorizations must be on file at the district if someone else is signing the form for the landholder.

Option 3 – District completion of landholder form with electronic permission from the landholder, and manual landholder signature before the end of the 2020 water year

1. Printed copy of landholder's dated affirmative response e-mail to the district's e-mail request for landholder's permission to complete the appropriate RRA form on the landholder's behalf.
2. Printed copy of the landholder's 2020 RRA form with the appropriate wet signature(s), dated as described in Enclosure 1 (Option 3, item 4a).
3. As with paper RRA forms, the appropriate signature authorizations must be on file at the district if someone else is signing the form for the landholder. The district is not allowed to sign the RRA form on behalf of the landholder, even though the district is completing the form's information for the landholder.

Sample E-mail Language for Obtaining Landholder Permission to Complete the Landholder's RRA Form for the 2020 Water Year

“Due to the COVID-19 pandemic and the current local business office closures, stay-at-home orders, and/or quarantines in place, *[insert district name]* staff can be granted your permission to complete your 2020 RRA form(s) in order to meet the requirement to have your form(s) on file at the district prior to your first date of Reclamation irrigation water. You are required to reply to this e-mail to confirm your permission to the district to complete and file your 2020 RRA forms. *You are also responsible to sign a paper copy of the 2020 RRA form(s) the district completes for you*, once it is feasible to do so given public and personal health conditions, and prior to the end of the 2020 water year.”

When the district sends the e-mail request above for landholder permission, the district may also suggest a confirmation response such as the following that the landholder can place in their reply email:

“I grant permission for *[insert district name]* staff to complete my RRA form(s) for the 2020 water year, and I understand and accept my signature responsibilities for my RRA form(s), as specified in the district's e-mail.”