



## **Unit Objectives**

- Describe the importance of an Administrative Record
- Create and maintain a complete Administrative Record

## Why Is the Administrative Record Important?

- Demonstrates the agency considered all the evidence before it made a decision
- Demonstrates the agency understood the laws it was applying
- Provides support for the agency's interim and final decisions
- It is the body of evidence used in legal proceedings
- Demonstrates the agency acted reasonably
- Decision made without support in the administrative record will be considered arbitrary and capricious

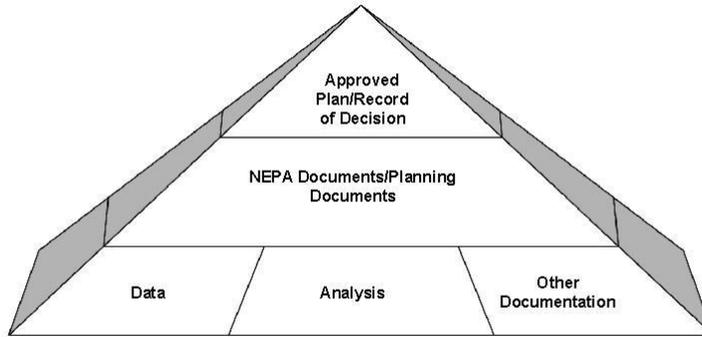
2.4 - 2

## The Decision-Making Pyramid

- Relationship between the decision and the record
  - ◆ Record of Decision (ROD)—agency decision
  - ◆ RMP/EIS—conclusions and explanations
  - ◆ Supporting documentation (studies, reports, surveys)
- Without foundation of evidence, the decision would not be supported and could ultimately fail

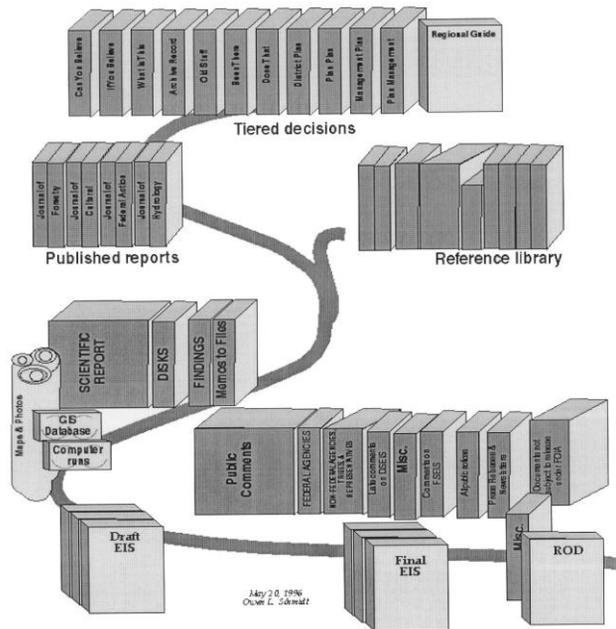
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# Decision-Making Pyramid



2.4 - 4

# Administrative Record



Refer to IB 2003-074

2.4 - 5

## **Organizing and Maintaining the Administrative Record**

- It is important to have a complete and organized record (for legal review)
- Identifying lines of responsibility
  - ◆ BLM staff
  - ◆ Collaborators
- Administrative record: policies and guidelines
- Physically storing the administrative record
- IT programs to organize the administrative record

BLM Planning Handbook Appendix F-6

2.4 - 6

## **What Can Go Wrong with an Administrative Record?**

- Missing information
- Incomplete and unorganized
- Failure to collect as you go (staff departures)
- Failure to include collaborator administrative record material
- Data in the record indicates one thing, but public documents and/or decisions say another
- Consequences: without a complete administrative record, the agency may not be able to justify its decision in court

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