

**SUPPORTING STATEMENT FOR REQUEST FOR OMB  
APPROVAL UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320**

**A. Justification**

1. **Circumstances of the Information Collection:** The Department of Justice Attorney Student Loan Repayment Program (ASLRP) is an agency recruitment and retention incentive program based on 5 U.S. C. § 5379, as amended, and 5 CFR Part 537. The Department selects participants during an annual open season each spring. Any Department of Justice employee serving in or hired to serve in an attorney position may request consideration for the ASLRP. The number of requests varies from year to year, but the vast majority of submissions are from current DOJ employees. We estimate that requests submitted by incoming hires average fewer than 20 requests annually. The Department anticipates selecting new attorneys each year for participation on a competitive basis and renewing current beneficiaries, subject to availability of funds. ASLRP benefits are paid directly to the loan holder, not to the individual attorney. Initial acceptance of ASLRP funding triggers a three-year service obligation to the Department. To receive ASLRP benefits, the attorney must qualify, the attorney's student loans must qualify, and all statutory requirements must be met. Attorneys who do not complete their service obligation must repay the Department for all funds received through the ASLRP, unless a waiver of indebtedness is approved.
2. **Purpose for collection of information:** The main purpose for collecting the information is to establish the terms under which an individual receives a student loan repayment benefit under the Attorney Student Loan Repayment Program. The information collected is used as a basis for payroll actions and to identify and validate qualifying Federal student loans.
3. **Use of Automated, Electronic, Mechanical or Other Technological Collection Techniques:** Since the inception of the ASLRP, the application forms and the service agreement forms have been available on the OARM website - in form-fillable PDF format. Thus, the applicants were able to complete and print the necessary documentation directly from their computers. One hundred percent of the applicants for the benefits available under this Program completed and printed their applications on the web. However, federal law and regulations require DOJ to validate qualifying federal student loans: individuals requesting participation must submit relevant student loan documents (e.g., payment history, current payment status, the type of loan, the loan balance, and other relevant information) for each existing federal student loan. In many cases, the individual holds multiple student loans from various lenders. The Office of Recruitment and Management (OARM), which oversees the DOJ Attorney Student Loan Repayment Program, has one attorney who validates loan data for all submissions and collates payment data, and one administrative specialist who prepares submission packets for distribution to five geographically dispersed evaluators as well as the master file. Permitting electronic submission would substantially increase the burden and cost to OARM while conferring only a

limited benefit on the affected members of the public (the incoming hires who average fewer than 20 applicants per year).

4. **Efforts to Identify Duplication:** There is no evidence of duplication from available sources. Similar information is not available.
5. **Impact on Small Business and Small Entities:** There is no impact on small business or entities.
6. **Consequences if Information is Collected Less Frequently:** The Attorney Student Loan Repayment Program is conducted only once a year. New applicants must submit their paperwork to their hiring components in the early spring; applicants seeking renewals of their previously-received repayments must submit their documentation by the middle of the spring. It is the only manner in which the Department determines the eligibility of the recipients of these benefits.
7. **Special Circumstances:** The ASLRP selection process requires review of two distinct subparts of each individual submission - a justification and the requester's resume - by five separate senior officials who are not co-located. Due to other duties, this group cannot meet for joint review, which takes between 20-30 hours to complete. The Program is administratively managed by two people. There is insufficient time, personnel and resources to copy and collate 5 copies of each requester's justification and resume, and assemble 5 sets of review files. Accordingly, respondents are asked to submit six copies of the justification and resume, a master file copy and five copies issued for review by selecting officials.
8. **Outside Consultation:** Prior to initial implementation, the agency consulted with the Department of State, which had a similar program, to identify best practices and take advantage of lessons learned regarding availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported. After analyzing the statutory and regulatory requirements, several Program options were developed and briefed to Department leaders along with recommended courses of action. A final version was discussed with representatives from OPM prior to implementation. The agency is part of an interagency working group that regularly assesses government-wide issues associated with federal student loan repayment programs. The Program is reviewed and updated annually for compliance with all regulatory provisions implemented by OPM. The 30 day federal registers notice has been published in the federal register for public comments and one comment was received.

OARM received one public comment about our Federal Register notice. The comment specifically addresses the use of tax revenue to fund the Program rather than addressing the collection of information used to administer it. The comment comes from someone who, using an alias, asserts that the ASLRP is unnecessary; that DOJ attorneys are undeserving

of loan repayment incentives working at this agency. After does not think it necessary to make be collecting to administer these

and do not perform any real public service by reviewing the comment sent to us, OARM any changes to the information that we will Programs.

9. **Payment or Gift:** Not applicable
10. **Assurance of Confidentiality:** The information collected is used within the agency by employees with a need to know to process payroll actions and to identify and validate qualifying Federal student loans. Disclosure of identifiable information, including Social Security Numbers, may be made to the Internal Revenue Service for tax withholding purposes, the National Finance Center for payroll action, the Department of Labor for worker compensation claims, and lending or educational institutions to identify and validate qualifying Federal student loans. ASLRP requests are stored in locked containers in a secured workspace not accessible to the public or DOJ employees without the need to access the information in the course of official duty. This information may also be used by the Department of Justice for other lawful purposes, including law enforcement and litigation. In addition, these records, or information therein, may also be used within the Department of Justice for study purposes, such as projection of staffing needs, and/or creation of non-identifiable statistical data for reports to other Federal agencies and Congress.
11. **Justification for Sensitive Questions:** The application requests the individual's social security number and documentation of the individual's qualifying federal student loans required to determine statutory and regulatory eligibility. Disclosure of the individual's social security number is required to issue payment through the National Finance Center (NFC), U.S. Department of Agriculture ([www.nfc.usda.gov/](http://www.nfc.usda.gov/)). Student loan repayments are a form of incentive award: gross awards are subject to federal and state taxes and withholdings and are considered income to the employee. NFC and IRS regulations require use of the SSN to identify the taxpayer (see, e.g., NFC at <https://www.nfc.usda.gov/Publications/SPPSWEB/SPPSWEB.pdf> at page 21 and [https://www.nfc.usda.gov/Publications/FESI\\_Codes/DataCros-110.pdf](https://www.nfc.usda.gov/Publications/FESI_Codes/DataCros-110.pdf)). The application does not pose any other questions of a sensitive nature except request that the applicant identify personal characteristics, i.e., gender, race/national origin, disability status (if applicable). It is made clear to the applicant that the provision of this information is entirely voluntary, and that the information will be used by OARM to compile Program statistical data.
12. **Estimates of Hour Burden:** The Department anticipates that on a yearly basis, only about 20 non-DOJ employees (incoming hires who already accepted an offer of employment) will complete the application for selection as a new participant. It is estimated that each new application will take one (1) hour to complete.
13. **Estimates of the Total Cost Burden:** There is no cost associated with this collection.

14. **Estimate of Annualized Cost to the Federal Government:** \$650.00
15. **Program Changes or Adjustments:** Not applicable.
16. **Publishing Information:** This information is used internally for selecting recipients of the Department's attorney student loan repayments and will not be published.
17. **Display of Expiration Date for OMB Approval:** OARM will display the OMB number and expiration date on the instructions and on the electronic application.
18. **Certification for Paperwork Reduction Act Submission:** OARM is not seeking any exception to the certification statement identified in Item 19 of the Form 83-I.
- I. **Collections for Information Employing Statistical Methods:** This information collection does not employ statistical methods.

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**Louis DeFalaise**  
**Director, Office of Attorney Recruitment and Management**  
**Authorizing Official**

- I. **Collections for Information Employing Statistical Methods:** This information collection does not employ statistical methods.