

JUSTIFICATION FOR A NON-MATERIAL/NONSUBSTANTIVE CHANGE TO OMB 1105-0086

1. **Circumstances of the Change:** In 89 FR 22182, March 29, 2024, the Office of Management and Budget announced revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15). The revised SPD 15 replaces and supersedes OMB's 1997 *Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity*. OMB took this action to meet its responsibilities to develop and oversee the implementation of Government-wide principles, policies, standards, and guidelines concerning the development, presentation, and dissemination of statistical information. These revisions to SPD 15 are intended to result in more accurate and useful race and ethnicity data across the Federal government.
2. **Effective Date:** The provisions of these standards were effective March 28, 2024 for all new record keeping or reporting requirements that include racial or ethnic information. OPM directed that all existing record keeping or reporting requirements should be made consistent with these standards through a non-substantive change request to the Office of Information and Regulatory Affairs (OIRA), or at any time a collection of information is submitted to OIRA for approval of either a revision or extension under the Paperwork Reduction Act of 1995 (PRA), as soon as possible, but not later than March 28, 2029.
3. **Office of Attorney Recruitment and Management (OARM) Action:** The previous demographic form offered respondents the opportunity to select one category or multiple categories; however, OARM ensured that the revised form contained OPM's preferred terminology, "Select all that apply." OARM revised the voluntary demographic form associated with the Attorney Student Loan Repayment Program list racial/ethnic groups alphabetically, and adopted race and ethnicity questions with minimum categories and examples, as illustrated in Figure 2, 89 FR 22182, 22194. Due to the limited number of public responses, estimated as twenty-one per year, OARM determined that the potential benefit of more detailed data would not justify the additional burden to the agency and the public or the additional risk to privacy or confidentiality. This change is limited to the format of an optional demographic form that individuals requesting student loan repayment funding under the DOJ Attorney Student Loan Repayment Program may voluntarily provide and will be effective with the 2025 ASLRP. There is no impact on the public burden or cost.