

**JUSTIFICATION FOR A NON-MATERIAL/NONSUBSTANTIVE CHANGE TO OMB 1105-0103,
Electronic Submission Form for Requests for Corrective Action Pursuant to 28 C.F.R. Part 27,
Whistleblower Protection for Federal Bureau of Investigation Employees**

1. **Circumstances of the Change:** The Director of the Office of Attorney Recruitment and Management (OARM) has the authority to adjudicate claims of whistleblower reprisal brought pursuant to the FBI whistleblower regulations, 28 C.F.R. Part 27. To submit a complaint to OARM, individuals may use OARM's Request for Corrective (RCA) form (OMB 1105-0103); however, any written format is acceptable. OARM has revised its RCA form to change OARM's point of contact and so the form properly aligns itself with existing standards for analyzing jurisdictional claims for certain personnel actions.
2. **Effective Date:** The effective date of the RCA form is as soon as practicable after it is approved by OMB.
3. **OARM Action:** As noted above, OARM has made two changes to the RCA form. First, in the "How to File" paragraph on the first page instructions, OARM has changed the point of contact from one employee's email account to the general OARM whistleblower email account because more than one person monitors that account. Second, in paragraph 5 of the "Exhaustion of Conducting Office Remedies" section, the previous RCA form asked complainants whether they had exhausted the same protected disclosures and same personnel actions with the Conducting Office. This text has now been deleted. Through this change, OARM has modified the question to more accurately articulate its standards for analyzing jurisdiction claims for certain personnel actions. OARM conducts this fact-intensive analysis after the claim is submitted. The proposed changes are not expected to impact on the public burden, and do not add questions, revise the method of collection, or alter the uses of the information.