

1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

OMB Control Number 1092-NEW Office of the Solicitor Internship/Externship Application Process.

Terms of Clearance: None. This is a new collection in use without OMB approval.

General Instructions: A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

With the diverse workload in the Office of the Solicitor and the demand of extensive litigation and program counseling, the Office is continually looking for talented, dedicated law students with an interest in gaining practical experience advising agencies on the legal aspects of their mission as well as participating in complex civil litigation before administrative tribunals or assisting the Justice Department in litigating matters before federal courts. Our legal interns/externs are called upon to conduct legal research on a variety of environmental and administrative law issues, as well as issues involving Indian law. The Office resolves appeals under the Freedom of Information Act and is also home to the Department's Ethics Office. Students typically draft legal memoranda, briefs and motions, and assist with discovery in active federal cases. Students may participate in conference calls and strategy sessions with other agency counsel, including Justice Department lawyers and agency officials. There may be additional opportunities to attend hearings and meetings in the Washington, D.C. area. The authorizing statute for this information collection is 43 U.S.C. Chapter 31, Department of the Interior.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The following information is collected by the Office of the Solicitor by members of the SOL-HR Team who manage the Internship/Externship Program and Intern POCs who manage the intern selection process within each Division and Region in the Office of the Solicitor. The information is used to identify and select potential interns for internships with the Office of the Solicitor:

1. Applicant's resume: Resume to aid Intern POCs in deciding who to offer the internship too, following review of work history, including internships, their qualifications, and

interest in areas of law practices in the Solicitor's Office

2. Two professional or academic references: References are requested to provide Intern POCs with contacts to inquire to learn more about the applicants and past performance.
3. Request for Consideration form: Applicants use this form to identify the Divisions and Regions that they would like to be considered for if offered an internship. Additional, on this form they will indicate what time of year they would like to intern (Spring, Fall, or Summer), and if they wish to participate virtually (remote internship), in-person at an SOL Office, or if they have no preference.
4. A cover letter addressed to "To Whom it May Concern": In addition to the applicant's resume, the cover letter will aid the Intern POC in selecting a candidate and help them gauge their level of interest in the Internship Program and reasons for seeking an internship with the Office of the Solicitor
5. A copy of the applicant's most recent law school transcript (official or unofficial): As part of the Internship Program, all applicants must be enrolled at least part-time at an accredited law school. Transcripts are used to confirm their eligibility. Intern POCs also find the transcripts useful when selecting a candidate as they can view the areas of law they have been interest in.
6. Writing sample of no more than three (3) pages: A writing sample is requested to assist Intern POCs in selecting an intern with an appropriate level of writing skills, as writing and research will be a large part of their participate in the Internship Program. , the POCs. The information is collected for the purpose of applying to SOL's Legal Internship/Externship Program. The information is used to verify the applicant's eligibility, interest in the program, and the location/office they wish to be considered for an internship.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

Applicants are required to submit their application package as one consolidated pdf to an inbox managed by the Office of the Solicitor's HR Team (studentemployment@sol.doi.gov).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

I am unaware of any other resources where the requested information is already available.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection does not impact small businesses.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Without the collection of the internship application materials, it will be difficult to maintain a successful internship program within the Office of the Solicitor without assessing other ways to collect the same information from interested candidates.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Not applicable. SOL does not have these requirements. Submission of application materials is voluntary.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On March 6, 2024, we published in the *Federal Register* (89 FR 16009) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments

for 60 days, ending on May 6, 2024. We did not receive any comments in response to that Notice:

In addition to the Federal Register Notice, we consulted with the nine (9) individuals who are familiar with this collection of information in order to validate our time burden estimate and asked for comments on the four questions below:

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”

“The accuracy of our estimate of the burden for this collection of information”

“Ways to enhance the quality, utility, and clarity of the information to be collected”

“Ways to minimize the burden of the collection of information on respondents”

We received 3 responses but no one had any specific feedback that would change our current process.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Not applicable

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance.**

Generally, estimates should not include burden hours for customary and usual business practices.

- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate that we will receive **200 responses** totaling **400 burden hours**. We estimate the annual dollar value of the burden hours is **\$19,512** (rounded).

We used Table 1 of the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-26-0505, March 20, 2026, Employer Costs for Employee Compensation—March 2026, to calculate the total annual burden.

- Individuals – the hourly rate for all workers is listed as \$48.78, including benefits.

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours	Hourly Rate	\$ Value of Annual Burden Hours
Application Process							
Individuals	200	200	200	2	400	\$ 48.78	\$19,512
Totals:	200		200		400		\$19,512

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3)

for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Not Applicable

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated annual cost to the Federal Government to administer this information collection is \$15,755 (rounded).

To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2026-DCB as an average nationwide rate. To account for benefits, we multiplied the hourly rate by 1.62 in accordance with from BLS News Release USDL-26-0505.

Position	Grade/ Step	Hourly Pay Rate	Fully Burdened Hourly Rate (Incl. Benefits)	Total Hours	Total Cost (Fully burdened rate x total hours)
Professional/technical staff	GS-11/06	47.77	77.38	40	3,095.20
Management	GS-14/05	78.15	126.60	100	12,660.00
Totals:				140	\$ 15,755.20

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This is a new information collection, in use without approval.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

We will not publish this information. Information collected is strictly for use by Solicitor staff to determine eligibility for the Program.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB approval number and expiration date.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.