

SUPPORTING STATEMENT FOR ELECTRONIC APPLICATIONS FOR THE ATTORNEY GENERAL'S HONORS PROGRAM AND THE SUMMER LAW INTERN PROGRAM

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Pursuant to 28 C.F.R. § 0.15, the Deputy Attorney General of the United States Department of Justice has the responsibility for administering the Department's recruitment programs for law graduates and law students. This includes hiring third-year law students and recent law school graduates (e.g., legal fellows, graduate law students and judicial law clerks) for full-time employment following graduation or completion of a qualifying post-law school activity through the Attorney General's Honors Program and hiring compensated legal interns, primarily rising second-year law students, for summer employment through the Summer Law Intern Program. The Honors Program has been in existence since 1953 and is considered the Federal Government's premier legal recruitment program.

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.

The Deputy Attorney General has delegated the responsibility for administering these programs to the Director, Office of Attorney Recruitment and Management (OARM), pursuant to 28 C.F.R. § 0.15(c) and 0.15(e). OARM, together with Department representatives who make the ultimate hiring selections, designed, developed, and uses electronic applications for both the Attorney General's Honors Program (HP) and Summer Law Intern Program (SLIP) to collect the information considered essential to make informed hiring decisions about applicants (e.g., eligibility, qualifications, and interests).

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.

OARM centrally manages the HP/SLIP. As part of its management functions, OARM contracts with Avue Digital Services (Avue), a personnel management system provided by Avue Technologies Corporation, for an online application and applicant management system tailored specifically for the HP and SLIP in a Software as a Service (SaaS) solution. Specifically, job applicants use the system to apply online and OARM personnel and authorized DOJ hiring organizations use the system as a managerial portal to oversee the hiring process. Position and

applicant information is shared, as is necessary and appropriate, with Component Human Resources (HR), managers, selecting officials, and hiring committees. The HP/SLIP application allows job applicants to apply for employment with hiring organizations (updated annually) during an annual recruitment cycle. In addition, Avue is a managerial portal where OARM can review applicant eligibility, track hiring by multiple components throughout the hiring cycle, conduct outreach to fill ad hoc vacancies, communicate with applicants, post real-time status updates, and generate aggregate application workflow data.

Applicants may create an account and submit applications during the annual open season (typically July 31 through the Tuesday after Labor Day). DOJ employees in participating components can log into Avue with credentials that are created by Avue after OARM staff submit a user management request.

Candidates enter information pertinent to legal employment on a series of electronic screens (the number of screens varies by Program; hiring organizations vary by year). The data is then certified and submitted into a database for OARM review and transmission to the components that consider the candidates for legal employment. The candidate is automatically notified by e-mail that his/her application has been received when he/she certifies and submits his/her electronic application, and provided other hiring status updates throughout the hiring cycle. All communications issued to candidates during the hiring cycle through this platform attach to the individual's application.

As noted in paragraph 6, below, the HP/SLIP hiring process operates on an expedited hiring timeline to remain competitive with private-sector employers, which mandates an application form that provides the concise information needed to evaluate the volume of applications the Department receives each year in a timely manner.

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 A.2 above.

OARM is the only office within the Department that collects this data. There is no existing source for collecting the information requested on the application. For example, resumes generally do not provide the information needed to determine if a candidate is eligible for the Programs nor do they follow a standard format that allows for swift review or data input of the requisite information for the application. (The collection of certain data from the applicant is critical to the successful operation of the Programs. The collection of certain data triggers the generation of electronic status updates, selection/rejection notifications, instructional email messages for each applicant, and numerous statuses and statistical reports for the Department.)

No standard forms currently in use lend themselves to collection of the information needed by the Department of Justice's HP and SLIP hiring programs (e.g., law school class rank and other academic achievement, participation in law review, participation in moot court/mock trial or legal clinical programs, relevant experience, written and oral communication skills, public service interest, past or future graduation dates, extracurricular activities and legal externships, judicial clerkships/legal fellowships). Absent collection of the relevant information needed by

the Department, hiring officials would not be able to identify the best qualified candidates for the position.

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

There is no significant impact on small business or other private entities.

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.

Formal hiring via the Honors and Summer Law Intern Programs is conducted once per year. It is the only way the Department hires entry-level attorneys and compensated legal interns. Students hired under the SLIP may be "funneled" (hired directly after serving as a SLIP) into the Honors Program. Thus, this Program is equally vital to the Department. Eliminating this once-a-year cycle would eliminate one entire year of entry-level attorney and law student hiring, seriously curtailing the effective operations of the Department's litigating divisions and participating U.S. Attorneys' Offices. The Department depends on these programs to hire the high caliber entry-level attorneys required to conduct the Department's important legal work.

These applications are vitally important to the Department. The Department employs many more entry-level attorneys than any other federal agency. Consequently, timely and efficiently recruiting and hiring the highest caliber legal staff is of the utmost importance. The Department's chief competitors for the nation's best legal talent are the country's finest private law firms and corporations. In order to be competitive with private-sector employers, we must operate within similar recruitment time frames. This dictates that the programs have an early September deadline date. To encourage the maximum number of applicants to the program, it is crucial that the Department has an application form that provides the concise information needed to evaluate the volume of applications it receives each year in a timely manner. Use of the online applications is consistent with an Executive Order ([Reforming The Federal Hiring Process and Restoring Merit to Government Service](#)) dated January 20, 2025. Specifically, it integrates modern technology to support the recruitment and selection process, including the use of data analytics, improves communication with candidates to provide greater clarity regarding application status, timelines, and feedback, including regular updates on the progress of applications and explanations of hiring decisions where appropriate, and supports time to hire goals.

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 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 secret, 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.**

There are no special circumstances.

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 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 3 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.

The 60-Day Notice was published in the Federal Register on March 24, 2025 (90 FR 13498). The comment period ended on May 22, 2025. No comments were received.

Besides the 30-day and 60-day Federal Register notices and the comment process, there have been no 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 record keeping, or reporting format, and on the data elements to be recorded, disclosed, or reported. No other agency runs a recruiting or hiring program comparable to the Department's program.

Moreover, it must be again stressed that this application form is: (1) submitted voluntarily; (2) submitted only once a year by law students/recent law school graduates who will be in this applicant pool only once; and (3) the information sought only relates to the hiring criteria established as an internal matter by Department of Justice (DOJ) personnel. Full consultation has been made with DOJ legal personnel on the data to be recorded, disclosed, or reported.

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

No government funds will be used as payment or for gifts to respondents.

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

Confidentiality is not required in the processing of this information collection.

Social security numbers are not collected. Avue collects applicant data (e.g., names, addresses, telephone numbers, e-mail addresses, and other information related to employment, education, and other information relevant to the jobs for which the individual applies). Such Personally Identifiable Information (PII) is available only to users who have a need-to-know, and who have appropriate permissions (e.g., applicant information is shared with designated DOJ human resources staff, managers, selecting officials, and other agency employees or contractors involved in the selection process).

This information can be shared in accordance with routine uses as published in system of record notice JUSTICE/DAG-008, Summer Intern Program Records, 50 FR 42611 (as modified by JUSTICE/DAG-009, Summer Intern Program Records, 66 FR 8425; 71 FR 35342; 71 FR 63354; 72 FR 3410; and 82 FR 24147) and OPM/GOVT-1, General Personnel Records, 71 FR 35342, as modified by 77 FR 73694. Providing the information requested by DOJ on this application is voluntary; however, failure to provide it may result in a determination of ineligibility or disqualification from consideration. The routine use of the information is to evaluate individuals for specific employment opportunities as well as to facilitate the selection process. Any voluntarily provided RSNO, ethnicity or disability information is not linked to the individual application and is only used in aggregate form by OARM for programmatic evaluation and provided in the form of aggregate summaries to participating components for evaluation.

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.

No questions of a sensitive nature are included.

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. General, 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.**
- **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. Instead, this cost should be included in Item 14.**

Applications to the Department's Honors and Summer Law Intern Programs vary from year to year, but the Department attracts a significant number of high caliber applicants to the programs compared to the number of positions available. On average over the past three years, approximately 2428 candidates apply to the HP & SLIP annually. It is estimated that the electronic application takes approximately one hour to complete and submit. It is further estimated that it takes an average of an additional 45 minutes to review the instructions, search existing data sources, gather and maintain the data needed, and complete and review the information collected. In addition, approximately 600 HP applicants will complete the **Virtual Interview Scheduling form**. Each Interview Scheduling Form will take approximately 10 minutes to complete. Thus, the annual burden would be 4349 hours based on 2428 applicants (the average number of applications received in the last several years) x 1.75 response hours (estimated time to collect the appropriate information and complete the Program application) plus 100 hours (time for 600 HP candidates to complete the Virtual Interview Scheduling Form).

Estimated Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Name of collection instrument: Electronic Applications for the Attorney General's Honors Program and the Summer Law Intern Program (Individuals)	2428	1	2428	105 min	4249.		N/A
Virtual Interview Scheduling Form (Individuals)	600	1	600	10 min.	100		N/A
Unduplicated Totals	3028		3028		4349		N/A

Hourly rate source citation or you may enter a footnote:

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- 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 service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. 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.**

There are no start up costs to this collection. There are no costs to respondents.

14. Provide estimates of the 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), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

The annual IC cost burden for this collection is \$39,885 paid to Avue Technologies Corporation via ANASEC, Inc. (Avue Operating System (AOS) and Recruitment, Retention and Staffing (RRS) modules.

15. Explain the reasons for any program changes or adjustments.

- Change 1:** In compliance with the Executive Order issued January 20, 2025, (<https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>), a voluntary demographic question on the HP/SLIP application is revised to reflect "Sex" with the responses "Male," "Female" or "Decline to Answer," removing references to gender identity and sexual orientation. This change is limited to the format of the voluntary demographic information that may be provided by eligible applicants to the Attorney General's Honors Program and the Summer Law Intern Program and will be effective with the 2025 hiring cycle. Responses are completely voluntary. There is no impact on the public burden or cost.
- Changes 2 and 3:** OARM, in coordination with hiring offices, periodically reviews questions relating to qualifications and experience for relevance.

1) For the 2025 hiring cycle, we will add two "Yes/No" questions to the questions presented to SLIP applicants, specifically:

- Did you receive an award for oral advocacy in first year law school moot court?
- Did you receive Departmental honors or awards for an undergraduate/graduate thesis or dissertation?

This change is limited to the questions presented to eligible applicants to the Summer Law Intern Program, who often have limited objective law school accomplishments at the time they apply. There is de minimis impact on the public burden and no impact on cost.

2) In addition, a hiring officials reviewed questions presented to all applicants, requesting:

- a modification to an existing “check the box” question relating to whether any applicant had a specific type of public service experience, viewing the existing language as overbroad/too vague.

Old: Legislative experience

New: Full-time Federal/State Government employee (other than in the armed services) for at least one continuous year, including full-time work in a Congressional office or State legislature.

There is no impact on the public burden or cost to this change.

- a new “check the box” question relating to experience.

New: Full or part-time employment, or significant volunteer work with a non-legal non-profit organization.

There is de minimis impact on the public burden and no cost to the change.

c. Changes 4 and 5: Questions related to residency were eliminated based on a broader DOJ policy change regarding residency. A new “check the box” geographic areas of interest screen was added. By eliminating one screen and adding another, there is no resulting impact on the public burden. There is no cost to these changes.

d. Change 6: Estimate of annualized cost to the federal government decreased from \$53,184 to \$39,885. The prior estimate, submitted in 2021, erroneously included costs not related to respondents. Subsequent to submission of the 2021 collection, the Department, in conjunction with ROCIS.gov staff, provided additional Paperwork Reduction Act (PRA) training, advising that the estimated cost to the government did not include the cost of salaries of DOJ employees who used the information submitted by respondents. OARM reconfirmed this guidance with the ROCIS help desk on February 24, 2025. Following that confirmation, Paragraph 14, above, was amended.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

None.

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 are requesting no exemption.

18. Explain each exception to the certification statement.

This collection of information does not include any exceptions to the certificate statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection does/does not contain statistical data.