

**SUPPORTING STATEMENT FOR
SELECTIVE SERVICE SYSTEM FORM 109
CLAIM DOCUMENTATION FORM – STUDENT CERTIFICATE**

1. Any resumption of the induction of young men into the Armed Services under the provisions of the Military Selective Service Act (MSSA) would make the collection of this information an absolute necessity. In accordance with the law, the collection of this information permits each registrant attending a college, university, high school, or similar institutions of learning, the opportunity to submit information substantiating his claim for postponement of induction as a student.

The receipt of Selective Service System (SSS) Forms 109 allows the SSS to adjudicate registrants' claims in an orderly, efficient and equitable manner.

There are no immediate plans for any public use of this form prior to the resumption of induction. The form will only be used for training SSS employees on the policies and procedures involved in processing and determining claims for postponement as a student.

Throughout the history of the SSS, forms similar to the SSS Form 109 have been approved and used whenever classification and induction actions were authorized. This form is so vital to the induction process that not having a master copy of the form on hand at each Area Office for reproduction or not having SSS employees trained in the use of this claim form would seriously delay the accomplishment of the SSS mission, lower the morale of registrants, and have a deleterious effect on National Security. Therefore, OMB approval is requested for SSS Form 109, Claim Documentation Form – Student Certificate, so that a master copy of the approved SSS Form 109 may be prepositioned with each SSS Area Office ready for immediate reproduction and use if induction resumed.

2. The MSSA provides for postponements, deferments and exemptions for registrants ordered to report for induction. The Act also provides the registrant an opportunity to have his classification changed for good reason. The SSS Form 109 provides a convenient vehicle for the registrant to document his claim for student postponement with the SSS. If this collection of information were not conducted, the claims of registrants for reclassification or postponement could not be promptly considered nor could the SSS fulfill its mission in a fair, efficient and equitable manner.
3. Consideration of improved technology to reduce the reporting burden is not applicable.

4. There is no duplication of this information.
5. Similar information does not exist.
6. This collection of information does not involve small organizations.
7. This is a one time action and cannot be conducted less frequently.
8. Registrants are required by SSS regulations to submit documentation for their claims for postponement within 10 days from the date the SSS Form 109 is mailed to them. To extend the response time to 30 days would seriously delay the induction of men into the Armed Services and would, in time of military emergencies, imperil the National Security.
9. Because no changes have been made to this form, no consultations have been held with persons outside the Agency.
10. The confidentiality of this information is assured both by Agency policy and Agency compliance with the provisions of the Privacy Act.
11. The information provided on this form is given voluntarily and may be, in some cases, of a sensitive nature. Without this information, however, a registrant's claim for postponement could not be resolved.
12. Since the form is in a contingency status only, the annualized cost to the Federal Government is considered to be \$1.00.
13. The number of respondents, the frequency of responses, and the annual burden are all considered to be one since the form is in a contingency status.
14. There are no changes in the burden.
15. Not applicable.