

SUPPORTING STATEMENT
Standard Form 180, Request Pertaining to Military Records
(OMB Control No. 3095-0029)

1. **Circumstances Making the Collection of Information Necessary.** The National Personnel Records Center (NPRC) of the National Archives and Records Administration (NARA) administers military personnel and medical records of veterans after discharge, retirement, and death. Personnel records of military members who were discharged, retired, or died in service 62 or more years ago have been transferred to the legal custody of NARA and are referred to as “archival” records. Personnel records of military members who were discharged, retired, or died in service less than 62 years ago remain in the legal custody of the creating service and are administered in accordance with rules issued by the Department of Defense (DOD) and the Department of Homeland Security (DHS, Coast Guard). These records are hereafter referred to as “non-archival” records. In addition, NPRC administers the medical records of dependents of service personnel. When veterans, dependents, and other authorized individuals request information from or copies of documents in military personnel, military medical, and dependent medical records, they must provide on forms, in letters or online certain information about the veteran and the nature of the request. Federal agencies, military departments, veterans, veterans’ organizations, and the general public use Standard Forms (SF) 180, Request Pertaining to Military Records, in order to obtain information from military personnel service records stored at NPRC. Veterans or their next of kin also may submit requests online using eVetRecs. The authority for this collection is contained in 36 CFR 1228.164

2. **Purpose and Use of the Information.** Non-archival military personnel records described above are in NPRC’s physical custody, legal custody of the record remains with DoD and DHS (US Coast Guard). Handling requests for information from non-archival records must conform to the legal requirements of the Freedom of Information Act (FOIA), the Privacy Act, and the regulations of DoD and DHS (US Coast Guard). Archival records are open to the public. The Privacy Act of 1974 does not apply to archival records. However, in order to protect the privacy of the veteran, his/her family, and third parties named in the records, the personal privacy exemption of the Freedom of Information Act (5 U.S.C. 552 (b) (6)) may still apply and preclude the release of some information.

NPRC uses information submitted on the Standard Form 180 and online via eVetRecs to determine what is being requested, where records are located, what information is releasable, and where to send the response. When third parties submit requests, information collected - in conjunction with information provided - serve as records of disclosure, which are required by the Privacy Act. The information collected via the SF 180 and eVetRecs is vital to NPRC. It is the information needed to locate and release information from requested records. It also significantly improves NPRC’s capability of providing timelier accurate information to requesters.

NARA reported to OMB on January 16, 2007, in response to the OMB SSN Survey, that specific to the SF 180, the function served by the SSN was as a unique identifier to military records. As an alternative, when possible, a Military Service Number is used to identify the military record. However, another unique identifier is not always available for military personnel. During the OMB review process for clearance for this information collection in October, 2008, NARA’s desk officer, Nicholas A. Fraser, requested additional information concerning whether the collection of Social

Security Number (SSN) was necessary for the purpose of this collection. NARA believes the collection of the Social Security Number (SSN) is necessary for the purpose of this collection. The SSN is needed to identify the military records of a service member. When appropriate, based on year of discharge, a Service Number (SN) can be used in lieu of the SSN. In cases where NPRC is unable to identify a record the SSN may be used to help in locating additional information to aid in the identification, location of and/or retrieval of military service information or file.

3. **Use of Information Technology and Burden Reduction.** NPRC uses information technology to make available and accept information collection. The Standard Form 180 is available on NARA's web site at: <http://www.archives.gov/veterans/military-service-records/standard-form-180.html>. NPRC also accepts the SF 180 via fax transmission and online through eVetRecs at <http://www.archives.gov/veterans/evetrecs/>.

4. **Efforts to Identify Duplication and Use of Similar Information.** There is no duplication. Requesters submit Standard Forms 180 or the web-based information to the appropriate custodian of the records only when they need information from or copies of the records. Specific elements contained on the April 2008 version of the Standard Form 180 provides the minimum information that NPRC staff needs for responding to customers' requests.
5. **Impact on Small Businesses or Other Small Entities.** NPRC has minimized the burden on small businesses and other small entities by accepting the Standard Forms 180 and web information directly from individuals who are verifying their military service for employment with small businesses/small entities or for other purposes. NPRC also accepts forms from small businesses/small entities themselves.
6. **Consequences of Collecting the Information Less Frequently.** The frequency of response is on occasion, such as when individuals, businesses, and government agencies desire to acquire information from military personnel records. Therefore, the information collection cannot be conducted less frequently because requesters determine when they want to request information. Many requesters submit one request in order to obtain replacements of documents in military service files or to verify some aspects of an individual's military service. Some requesters who conduct genealogical research may submit multiple requests, although NPRC has estimated that such individuals comprise no more than 4% of the total number of requesters.
7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** This information collection will be conducted in a manner consistent with 5 CFR 1320.6.
8. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.** No formal consultations have taken place; however, NARA has consulted with DOD components and the Department of Veterans Affairs to maintain a current address list of custodians for the back of the form. NARA published a notice in the *Federal Register* on June 25, 2008 (73 FR 36128), requesting public comment. Two comments were received. One comment requested that the veteran or requestor should be afforded the opportunity to request their entire record on the form so they don't have to request it more than once. Another comment requested replacing "service" with "component" in several areas of the form; changing "VA Loan" to "VA Loan Programs"; and requesting all documents in the OMPF. Both comments were accepted and the changes were made to the SF 180.
9. **Explanation of Any Payment or Gift to Respondents.** This information collection involves no remuneration to respondents.
10. **Assurance of Confidentiality Provided to Respondents.** NPRC staff retains in military personnel service records Standard Forms 180, letters, and other request forms as Privacy Act-protected records of disclosure. Standard Forms 180, letters, and other request forms become releasable only in accordance with Privacy Act provisions, contained in 5 USC 552a(b), and the routine uses for systems of military service records, contained in the Privacy Act system notice. Archival records are not subject to Privacy Act provisions.

11. **Justification for Sensitive Questions.** Respondents are asked no questions of a sensitive nature.

12. **Estimates of Hour Burden Including Annualized Hourly Costs.** The hour burden for individual respondents who submit a paper SF 180 or electronically via VetRecs is estimated as follows:

<i>Form of Request From Respondents</i>	<i>Number of Respondents</i>	<i>Responses per Respondent</i>	<i>Minutes per Response</i>	<i>Annual Hour Burden</i>
Standard Form 180	1,028,769	1	5	85,731

The estimated time is based on the expectation that most respondents will be veterans who can complete required information from memory. Even next of kin or others acting on authority of veterans are usually prepared to complete the essential information just as quickly. NPRC has found that most respondents leave blank those entries for which the information is not readily known rather than research the information.

13. **Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.** The estimated annualized cost for individual respondents who complete the SF 180 is approximately \$0.91. Because requests are normally made for the personal benefit of requesters, the cost of a respondent's time is established at the minimum wage rate of \$5.85 per hour. The remainder of each respondent cost consists of costs for envelopes (\$.01) and postage (\$.41).

<i>Form of Request From Respondents</i>	<i>Number of Respondents</i>	<i>Minutes per Response</i>	<i>Respondent Cost</i>	<i>Annualized Cost For Hour Burden</i>
Standard Form 180	1,028,769	5	\$0.91	\$933,608

14. **Annualized Cost to the Federal Government.** The total estimated annualized cost to NARA is \$1256. This cost consists of the estimated annualized costs for printing Standard Forms 180. No cost is assigned to the staff time required to perform functions at NPRC, including responding to requests that contain sufficient information, and reviewing and preparing the responses for mailing.

15. **Explanation for Program Changes or Adjustments.** There has been an increase in the number of respondents during the last three (3) years due to a continual rise in the number of requests received via the online ordering system, eVetRecs.

16. **Plans for Tabulation and Publication and Project Time Schedule.** The information collection is not used for statistical studies or publications.

17. **Reason(s) Display of OMB Expiration Date is Inappropriate.** NARA will display the expiration date for OMB approval of this information collection.

18. **Exceptions to Certification for Paperwork Reduction Act Submissions.** NARA is not requesting any exceptions to the certification statement identified in Item 19, Certification for Paperwork Reduction Submissions, of OMB Form 83-I.