

## SUPPORTING STATEMENT

### POTENTIAL BOARD MEMBER INFORMATION FORM

(3240-0005)

#### A. JUSTIFICATION

1. Circumstances that make this information necessary are:
  - (a) The determination of the President to continue Selective Service Registration;
  - (b) The requirement of the Military Selective Service Act (MSSA) which stipulates that the Selective Service System (SSS) must be ready, without notice, to provide untrained manpower that would be required to staff our Armed Services during a military emergency; and
  - (c) The need for a system to process registrant claims for classification and render judgment concerning deferments and/or exemptions from the draft in a fair and equitable manner.
2. The purpose of the information collected on the Potential Board Member Information Form (SSS Form 404) is to identify individuals willing to serve as a member of Local Boards (LBs) and Appeal Boards (ABs) in the SSS. The information will aid in the proper selection, nomination, appointment, and training of these standby boards, all of which would be necessary for the timely processing of registrant claims and appeals during an emergency mobilization.

The establishment of the SSS LBs and ABs was completed during 1982 with approximately 11,000 volunteer members. Board membership is voluntary, with members serving without compensation for services rendered in connection with SSS affairs.

This standby system allows the Agency to schedule and conduct training and instruction for Board Members on the Selective Service regulations and procedures, and on the major duties and responsibilities of Board membership. A standardized training program is used to ensure equitable and uniform due process for all registrants who present claims before the SSS.

Because the staffing of the SSS LBs and ABs has been completed, this request for approval is concerned with the information needed to replace Board Members

who voluntarily resign or no longer qualify for Board membership. The current Board Member turnover is about 900 board positions per year.

Governmental personnel involved in the selection and appointment process of Local Board Members include the following:

- (a) Screening of incoming SSS Form 404s is performed by SSS Region Headquarters (RHQ) Program Officers and the corresponding SSS State Directors (SD), with coordination and related administrative support provided by SSS National Headquarters (NHQ) and RHQ personnel. The SSS SD decides which potential LB applicants will be interviewed to determine their eligibility for Board membership.
- (b) Interviewing is conducted by Reserve Force Officers (RFO) assigned to the SSS. A standard interview format and training plan are used to ensure that the RFOs interview each candidate similarly and that each potential Board Member is made aware of the same duties, responsibilities, and expectations of membership. The SSS wishes to make certain during the interview that the candidate has stated his/her willingness to serve and apply objectively the provisions of the Military Selective Service Act (MSSA) and SSS regulations. Results of these interviews are returned to the SDs through the SSS Region staff.
- (c) The SSS SD makes the final selection for each Board seat in accordance with established county profiles and in coordination with the staff of the State Governor.
- (d) A selection list is sent by the SSS SD to the State Governor or comparable executive official for recommendation to LB and DAB positions in the Governor's or comparable executive official's jurisdiction. The Governor or comparable executive official has the option of making any changes that he/she deems to be in the best interest of the state and the SSS.
- (e) The Director of the SSS in the name of the President of the United States, appoints LB and AB Members.

The current Selective Service Board System is a vital component of the Agency's capability to accomplish its mission and provide the fairness guaranteed to registrants as stated in the MSSA.

3. The use of improved technology to collect the necessary

information would not reduce substantially the burden of each respondent. Completion of the SSS Form 404 by a potential Board Member is voluntary and requires a signature by the applicant. (Use of improved technology in this process would therefore not be practical in this collection).

4. We know of no duplication of data in this collection activity.
5. We know of no other system of records similar to the Board Member Application.
6. The information collection does not involve small organizations.
7. Less frequent collection of information would not provide any substantial benefits to the Government, since respondents are only required to complete and file the form once to apply for a Board position. If there are more qualified applicants than Board positions, the non-selected applicants are usually retained in a potential position pool to fill Board vacancies as they occur.
8. The collection conforms the regulations and guidelines applicable to Federal information collection activities.
9. Consultations outside the Agency. The SSS NHQ and the three RHQs of the SSS launch public outreach programs to announce the Local Board Selection Program and inform the general public of the need to standby Board members. As part of this outreach program, the SSS contacted key major public interest and civic groups to ensure that a representative cross-section of the community is aware of the selection program and the need for appropriate racial and ethnic representation on the various Boards.
10. The information collected is used only according to the Privacy Act Notification printed on each form covered by this Supporting Statement.

Source documents are maintained in a controlled environment during preparation for computer processing. Therefore, the information is maintained on magnetic disk or tapes that are stored in a secured facility. The paper source documents are retained only for individuals appointed to Board positions and persons who can be nominated to fill future Board vacancies.

11. By statute, SSS LB membership must, to the maximum extent practicable, represent the ethnic and national origin of those registrants within its jurisdiction. In order to be considered for

appointment to a Board, candidates must,

- be a citizen of the United States;
- be at least 18 years of age;
- reside in the county in which the Board has jurisdiction;
- be able to devote sufficient time to accomplish Board Member duties;
- be willing to apply the Selective Service Law and Regulations fairly and uniformly and,
- be registered with the SSS, if required to do so.

Candidates must not:

- be an active duty or retired member of the armed forces or any reserve component;
- have 20 or more cumulative years of prior Selective Service Board membership;
- be employed by public or private enterprise which handles Selective Service matters; or be an elected appointed official; or be a member of a law enforcement occupation as defined by Selective Service policy (example: law enforcement officer or judge)
- be a Selective Service employee or a spouse of:
  - compensated or uncompensated employee of the Selective Service System;
  - a RFO assigned to the SSS;
  - an appointee to any other SSS Board; or
- have been convicted of any criminal act (other than a major traffic offense involving a fine of more than \$400.00)

The forms and questionnaires used in this information collection have been designated to enable the SSS to identify and select Board Members in compliance with the requirement of the MSSA.

12. Estimate of Annualized Cost

SSS personnel supporting the activities described in this supporting statement are located at Selective Service System National Headquarters in Arlington, Virginia; Region Headquarters in Chicago, Illinois; Denver, Colorado; and Smyrna, Georgia; and the State Directors for each state and U.S. Territory. A total of 6.0 FTE employees or 6.0 FTE positions are involved in the administration of this program. However, only 30 percent of their time is directly related to this information collection at the time this report was put together.

Government:

Cost Formula - Support FTE x 30% x SSS FY 10 Personnel Budget  
Total SSS FTE (FY 10)

$$\text{Cost} = \frac{6.0 \times 30\% \times \$12,650,443}{124} = \$183,635$$

$$\text{Hours} = 6.0 \times 30\% \times 2088 = 3,758 \text{ hours}$$

13. Estimate of burden of the collection of information

Respondents	1077
Frequency	One time
Burden per Response	.25 hour
Estimated burden	269 hours = (1077 x .25)

SSS is not required to use an information Collection Budget.

14. The basic SSS Form 404 has not changed since the previous OMB approval, and the time estimate of its completion is still .25 hours.

The estimated annual turnover of Board Members remains at 900.

15. Plans for tabulation and publication include as required, release of statistical data to the media, as well as the SSS Annual Report to the Congress of the United States.

16. Collection of Information Employing Statistical Methods.