## SUPPORTING STATEMENT Selective Service Record Request, NA Form 13172 OMB Control No. 3095-00XX

- 1. Circumstances Making the Collection of Information Necessary. The National Personnel Records Center (NPRC) of the National Archives and Records Administration (NARA) administers Selective Service System (SSS) records. Classification records and registration cards of registrants born before January 1, 1960 have been transferred to the legal custody of NARA. When registrants or other authorized individuals request information from or copies of SSS records they must provide on forms or in letters certain information about the registrant and the nature of the request. Requesters use NA Form 13172, Selective Service Record Request to obtain information from SSS records stored at NARA facilities. Currently, SSS records are stored at various NARA facilities. All records will be transferred to NARA, NPRC, 1 Archives Dr., St. Louis, MO in the near future. Classification records are public information. Selective Service registration cards are NARA-accessioned holdings, therefore, exempt from the Privacy Act.
- 2. **Purpose and Use of the Information**. SSS records described above are in NPRC's physical and legal custody. NPRC uses information submitted on NA Form 13172 to locate requested records. Without the information collection, NPRC would be unable to provide requested information to requesters since information submitted in the information collection is the minimum NPRC staff need in order to locate and release requested records.
- 3. <u>Use of Information Technology and Burden Reduction.</u> With the use of information technology NPRC has made NA Form 13172 available online at the location listed below. At this time, however, no information technology application is available to accept the collected information online. The collected information is the minimum information needed to allow NPRC to locate the record and provide the requested information. *Web address*: <a href="http://www.sss.gov/PDFs/Record%20Request.pdf">http://www.sss.gov/PDFs/Record%20Request.pdf</a>.
- 4. **Efforts to Identify Duplication and Use of Similar Information.** There is no duplication.
- 5. <u>Impact on Small Businesses or Other Small Entities.</u> NPRC has minimized the burden on small businesses and other small entities by accepting requests directly from individuals who are seeking information from SSS records for employment with small businesses/entities or for other purposes. NPRC also accepts requests from small businesses/small entities in the format of the requester's choosing.
- 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 the classification records or registration cards. 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 information or to verify some aspects of an individual's Selective

Service classification or registration history.

- 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 1320.5.
- 8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency. No formal consultations have taken place. NARA published a notice in the *Federal Register* on February 15, 2012 (77 FR 8901 and 8902) requesting public comment. No comments were received. A second notice will be published in the *Federal Register* (May 2, 2012 77 FR 26047 and 26048) when this information collection is submitted to OMB for clearance.
- 9. **Explanation of Any Payment or Gift to Respondents.** This information collection involves no remuneration to respondents.
- 10. <u>Assurance of Confidentiality Provided to Respondents.</u> SSS records are exempt under the Freedom of Information Act (FOIA).
- 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 all individual respondents is as follows:

Form of Request from Respondents	Number of	Responses per	Minutes per	Annual Hour
	Respondents	Respondent	Response	Burden
NA Form 13172	3200	1	2	107

13. <u>Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.</u> The NPRC developed the respondent data by observing the percentage of forms received by NPRC from requesters. The estimated times for the form is based on the expectation that most respondents will be the individual who can complete required information from memory.

Form of Request from Respondents	Number of	Minutes per	Respondent	Annualized Cost for
	Respondents	Response	Cost	Hour Burden
NA Form 13172	3200	2	\$0.69	\$2,213

The estimated annualized cost for individual respondents is \$0.69. The total estimated annualized respondent cost is \$2,213. These costs are based on NPRC's estimate that respondents who submit NA Form 13172 will take 2 minutes to complete the form. 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 \$7.25 per hour. The remainder of each respondent cost consists of costs for envelopes (\$.01) and postage (\$.44).

- 14. Annualized Cost to the Federal Government. The total estimated annualized cost to NARA is \$125. This cost consists of the estimated annualized costs for desktop printing of NA Form 13172. However, no cost is assigned to the staff time required to perform core functions at NPRC, including: responding to letter and forms requests that contain sufficient information; and reviewing and preparing the responses for mailing.
- 15. **Explanation for Program Changes or Adjustments.** This is a new information collection.
- 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.** The expiration date of the OMB approval will be displayed on the forms.
- 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.