

SUPPORTING STATEMENT

SSS FORM 2, 3B AND 3C

OMB NO. 3240-0003

**PART A. JUSTIFICATION**

1. The Military Selective Service Act (50 U.S.C. §3801 et seq) and 32 Code of Federal Regulation part 1600 (Selective Service System), and President Proclamation mandate it is the duty of every male citizen of the United States between the ages of eighteen and twenty six submit to registration. The Selective Service System statutory mission is to be prepared to provide trained and untrained personnel to the Department of Defense in the event of a national emergency. The Selective Service System requires those registering to provide their full name, date of birth, address, sex, Social Security Number (if available), and a signature in order to fulfill its mission. The principal purpose of the requested information is to establish or verify a person's registration with the Selective Service System. Registration information may be shared with the following government agencies for the purposes stated:
  - a. Department of Justice – for review and processing of suspected violations of the Military Selective Service Act (MSSA), for perjury, and for defense of a civil action arising from administrative processing under such Act.
  - b. Department of State and U.S. Citizenship and Immigration Services - for collection and evaluation of data to determine a person's eligibility for entry/reentry into the United States and for United States citizenship.
  - c. Department of Defense and U.S. Coast Guard – to exchange data concerning registration, classification, induction, and examination of registrants and for identification of prospects for recruiting.
  - d. Department of Labor – to assist veterans in need of data concerning reemployment rights, and for determination of eligibility for benefits under the Workforce Investment Act.
  - e. Department of Education – to determine eligibility for student financial assistance.
  - f. U.S. Census Bureau – for the purposes of planning or carrying out a census or survey or related activity pursuant to the provisions of Title 13.
  - g. Office of Personnel Management and U.S. Postal Service – to determine eligibility for employment.
  - h. Department of Health and Human Services – to determine a person's proper Social Security Account Number and for locating parents pursuant to the Child Support Enforcement Act.
  - i. State and Local Governments – to provide data that may constitute evidence and facilitate the enforcement of state and local law.
  - j. Alternative Service Employers – to exchange information with employers regarding a registrant who is a conscientious objector for the purpose of placement and supervision of performance of alternative service in lieu of induction into the military service.

- k. General Public - Registrant's name, Selective Service Registration Number, Date of Birth and Classification, (Military Selective Service Act, Section 6, 50 U.S.C. App.3806h)
2. U. S. Postal Service does not maintain registrant information or files.
  3. We know of no duplication of data, including Selective Service Number.
  4. Men are required to register within 30 days of their 18th birthday and to inform SSS of any changes to the information provided at registration. We are not aware of any other system of records that is based on this population base.
  5. N/A. The information collection does not involve small organizations.
  6. Collection of updates or corrections to the registrant data file on any basis, other than on a continuing basis, when necessary, would result in an incomplete and outdated database for use in the event of a mobilization during a national emergency.
  7. This collection conforms to all regulations and guidelines applicable to Federal information collection activities
  8. Consultations outside the Agency.  
N A to SSS-2 and SSS-3B.  
The SSS-3C is generated from the SSS Compliance Program. The information contained in this form is obtained by matching records on the SSS registrant data file with input files provided primarily by Department of Motor Vehicles (DMV) of various states, Department of Defense (DoD), and the Department of Education (ED). Non-matching records from input files are used to print the SSS-3C and to inform potential non-registrants of the need to register with SSS.
    - a. Discussions are routinely held with the numerous officials from DoD, ED, state governors, and OMV officials throughout the year concerning the SSS-3C. Names and telephone numbers are furnished upon request:
    - b. N/A, no unresolved problem.
    - c. Public contacts and comments. Comments are obtained from Congress, OMB and the public through the usual channels, such as the Federal Register, periodic reports to OMB and the Congress, and the annual budget review process. Comments and SSS responses are furnished upon request.
  9. The information collected to update files is used only according to the Privacy Act Notification printed on each form supported by this Supporting Statement.  
Source documents are maintained in a controlled environment during preparation for computer processing. Thereafter, the information is maintained on magnetic media and microfilms which are stored in a secure facility. The paper source documents are then macerated. The information collection complies with the Privacy Act of 1974, OMS Circular A-108, and OMS Matching Guidelines dated May 11, 1982.
  10. Information collected in the SSS-3C is necessary to register or verify registration and to determine if the respondent is exempt from the registration requirement. The MSSA specifies exemptions that are allowed, and the questions are in conformance with the provisions of the governing regulation.

11. Estimates of Annualized Cost.

Government:

Cost: CY 13 Percentage of SSS Forms 2, 3B, and 3C received to Total "Paper" Forms = 33%

Personnel Support:	\$ 224,000
Printing and Processing:	\$ 226,000
Postage	\$1,190,000
Total:	\$1,670,000

DMC Production FTE = 47  
Hours per FTE = 1,776  
Percent Forms 2, 3B and 3C =33%

Respondent:

Hours: Receipts per form CY 13

SSS 2	2,300
SSS 3B	13,209
SSS 3C	235,079
Total -	250,588

Hours per response: .0333

HOURS = 250,588 x .0333 = 8,345

12. Estimates of the burden of the collection of information

The potential SSS-2 and SSS-3B respondent universe includes registrants who have incorrect data recorded on their registration record by virtue of transcription errors, incorrect data provided, or change of information.

The potential SSS-3C respondent universe includes new registrants and individuals who possibly have not complied with the MSSA following President Carter's establishment of registration in 1981.

SSS estimates .0333 hours or less than two (2) minutes to respond to the information requested on each form.

The SSS Form 2, entitled Change of Information, is available only at post offices in the United States and the U.S. Embassies and Consulates in foreign countries. Use of this form enables registrants who move to provide SSS with updated information for their files.

Another method of collecting changes is to mail each registrant a Registration Acknowledgment letter (SSS Form 3A) with a Registration Acknowledgment and Change of Information SSS Form 3B attached or enclosed. These are sent in the following situations: an individual registers, a name or date of birth change is received, a post office change of address notice is processed, a record is reactivated, or when specifically requested by the registrant.

The Registration Acknowledgment and the Registration Change Form are both preprinted with the exact information that is recorded in the database. However, the usage of these forms differs in that the Registration Acknowledgment is retained by the registrant as proof of his registration, whereas the registrant is requested to correct/update the data on the Registration Change Form, and return it to SSS if he needs to change any data in his record.

Because the purpose is the same, (exception: SSS form 3A is an outbound form) i.e., the verification and/or the correction of individual registrant records, and the information collected is the same, the SSS Form 3A&B and 3C are considered to have blanket approval for public use under OMB Approval No. 3240-0003.

Estimates provided in A.11. are based on the estimated production workload schedule for the SSS Data Management Center (DMC) in Great Lakes, Illinois. These projections are based on SSS experience from prior year production runs at the DMC.

An ICB is not used at the SSS.

13. No reduction in the reporting burden is anticipated.
14. Plans for tabulation and publication include ad hoc and quarterly releases of registration information to the media, as well as the Annual Report to Congress.
15. Federal Register notice required for soliciting public comments on this collection of information was published on January 3, 2018. One comment was received and responded to.

Comment: "Registration with the Selective Service System results in military recruiting. The Selective Service System provides the names of all registrants to the Joint Advertising Marketing Research & Studies (JAMRS) program for inclusion in the JAMRS Consolidated Recruitment Database. The names are distributed to the SSS for military recruitment purpose on a quarterly basis. In addition, Congress may use registration to legislate military conscription."

SSS Response: Information that SSS provides registration data for the purpose of military recruiting is covered on the cover of the SSS Form 1 under the Privacy Act Statement. In addition, the purpose of registration is to enable conscription in the event of a national emergency.

Comment: "Military service results in training requiring you to obey all orders of superiors including the killing of other human beings, both military and civilian. Military service may result in your death, dismemberment, or other fatal injuries. You may receive sub-standard care at Veterans Hospitals for non-fatal injuries. Military service may result in post-traumatic stress disorder for the rest of your life. In addition, 11 percent of homeless persons are veterans."

SSS Response: This information is superfluous to the Military Selective Service Act's registration requirement. Further, the U.S. Supreme Court has consistently held that registration and the military draft are constitutional.

## **PART B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

1. N/A to SSS. Statistical methods are not used in the collection described in this statement.