Selective Service System (SSS) Form 1 (Registration) Supporting Statement OMB Control Number: 3240-0002

PART A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The Military Selective Service Act [MSSA (50 U.S.C 3801 et seq.)] requires that every male citizens of the United States and other males residing in the United States, unless exempted by the MSSA, as amended, who were born on or after January 1, 1960, and who have attained their eighteenth birthday but have not yet attained their twenty-sixth birthday, shall present themselves for registration.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicated that actual use the agency has made of the information received from the current collection.

<u>Department of Justice</u>. For review and processing of suspected violation of the MSSA, or for perjury, and for defense of a civil action arising from administration processing under such Act.

<u>Department of State</u>. For collection and evaluation of data to determine a person's eligibility for entry/re-entry into the United States.

<u>Department of Homeland Security – U.S. Citizenship and Immigration Services</u>. For collection and evaluation of data to determine a person's eligibility for United States Citizenship.

<u>Department of Defense and U.S. Coast Guard</u>. For exchange of data concerning registration, classification, induction, and examination of registrants and for identification during a national emergency and for identification of prospects for military recruiting.

<u>Department of Education</u>. To determine applicants eligibility for federal student financial assistance.

<u>Office of Personnel Management and U.S. Postal Service</u>. To determine applicants eligibility for federal employment.

<u>Department of Health and Human Service</u>. To determine a person's proper Social Security Account Number and for locating parents pursuant to the Child Support Enforcement Act.

<u>Bureau of Census</u>. For the purpose of planning and carrying out a census, survey, or related activity pursuant to the Provisions of Title 13.

<u>State and Local Governments</u>. To provide data which may constitute evidence and facilitate the enforcement of state and local laws.

<u>General Public</u>. Registrant's name, Selective Service Number, Date of Birth, and Classification (MSSA, Section 6, 50 U.S.C. App 3856)

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

The Selective Service System provides an electronic method of registration via its government website (www.sss.gov). There is still ten percent (10%) of the male population that cannot access the electronic registration due to religious or cultural beliefs, or are located outside the United States. A paper form must be provided in order for them to comply with the registration requirement.

There is no other known system or records collection comparable to the information collected to satisfy the registration requirement by the MSSA, 32 CFR 1615.1, and Proclamation 4771.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

There is no known duplication effort of this data, as this is unique to the Selective Service System and the assignment of a Selective Service System Number.

5. If the collection of information impacts small business or other small entities, describe any method used to minimize burden.

N/A. This information collection does not involve small organizations.

6. Describe the consequences to Federal Programs or policy activities if the collection is not conducted or is conduced less frequently, as well as any technical or legal obstacles to reducing the burden.

<u>Department of Education</u>. Male students who fail to register with the Selective Service System before turning age 26 are ineligible for Federal student loans and grant program, including Pell Grants, Federal Work Study, and Stafford Loans. Several states have also made Selective Service registration a prerequisite for state financial aid and for matriculation at public colleges and universities.

<u>Office of Personnel Management and U.S. Postal Service</u>. An executive agency must request a written statement of Selective Service registration status from each covered individual at an appropriate time during the consideration process prior to appointment, and from each covered employee who becomes 18 after appointment.

7. Explain any special circumstance that would cause an information collection to be conducted in a manner:

N/A

8. If applicable, provide a copy and identify the date and page of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

On May 23, 2018, a 60-day Federal Register Notice was published at 83 FR 23985.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

N/A

10. Describe any assurance of confidentiality provided to respondents and the bases for the assurance in statute, regulation, or agency policy.

The information collected to update registrant's files is used only according to the Privacy Act Notification printed on each form support by this Supporting Statement.

Source documents are maintained in a controlled environment during preparation for computer processing. Thereafter, the information is maintained on magnetic tapes and microfilms that are stored in a secure facility. The paper source documents are the macerated. The information collection complies with the Privacy Act (5 U.S.C. 55c), Privacy Act of 1974, OMB CircularA-108, and OMB Matching Guidelines date May 11, 1982.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

The Selective Service System registration does not collect any information of a sensitive nature. Only the following information is collected at this time: full name, date of birth, gender, Social Security Account Number, mailing address, and email address.

12. Provide estimate of the hour burden of the collection of information.

| Form Name | Form Number | No. of Respondents | No. of Responses per Respondents | Average Burden per Response (in hours) | Total Annual Burden (in hours) | Average Hourly Wage Rate | Total Annual Respondent Cost |
|--------------|----------------|-----------------------|--|--|---|-----------------------------------|---------------------------------------|
| Registration | SSS Form 1 | 534,650 | 1 time | .000833 | 445.54 | 0 | 0 |
| TOTAL | | | | | | 0 | 0 |

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information.

FTE Cost: \$77,087.77

14. Provide estimates of annualized costs to the Federal Government.

USPS Processing: \$83,274.88 Printing Cost: \$34,986

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

The Selective Service System will be collecting one additional data point – telephone number – on the SSS Form 1. The impact is estimated to be an additional two seconds has been added.

16. For the collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project; include beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Annual the raw number of Selective Service System registrations is reported in the Annual Report to Congress. This has been an ongoing collection since 1980 and will remain an open collection as long as the Agency and the MSSA exist.

17. If you are seeking approval to not display the expiration date for OMB approval of the information collection, explain that reason that display would be inappropriate.

At this time, Selective Service is not seeking approval.

In efforts to reduce paper waste and cost to the government, previous (OMB expired) versions of SSS Form 1 will remain in circulation until supplies are deleted. This stocks are located the US Postal Service Supply Depot and Post Offices nationwide.

18. Explain each exception to the topic certification statement identified in Certification for Paperwork Reduction Act Submission.

No comment.

19. Federal Register notice required for soliciting public comments on this collection of information was published on May 23, 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.