

SUPPORTING STATEMENT
Selective Service System Record Request, NA Form 13172
OMB Control No. 3095-0071

1. **Circumstances making the collection of information necessary.** The National Archives - Saint Louis has accessioned into our archival holdings records of the Selective Service System (SSS) Classification Ledgers and Registration Cards for registrants born before January 1, 1960. Individuals that would like to request one of these public records may use the NA Form 13172 to do so. If the person requesting the record is not the SSS registrant who's the subject of the record, certain redactions are required (usually the social security number). For requesters who are the subject of the record, we added a digital signature field to the form in August 2018 for their signature. With this signature on the form, a copy of the SSS card can be released to the requester/subject without redactions that are otherwise required. In March 2020, we also made two additional changes to the form: we added a purpose field and an email address field. These fields help the receiving technician understand the reason for the request and communicate better with the requester, which increases our ability to better serve requesters and to provide more electronic services such as electronic delivery of requested copies and e-billing.
2. **Purpose and use of the information.** The information on NA Form 13172 is limited to only the items required to locate the requested record and to provide a response.
3. **Use of information technology and burden reduction.** The requester may more efficiently find the requirements and submit a request because the NA Form 13172 is available online from NARA (<https://www.archives.gov/files/st-louis/pdf/sss-naform13172revision-12mar2020.pdf>) and from SSS (<https://www.sss.gov/wp-content/uploads/2020/07/Record-Request-Form.pdf>). In addition, the new fields we have added will increase options for requesters to receive services, products, and billing electronically.
4. **Efforts to identify duplication and use of similar information.** This information does not duplicate similar information.
5. **Impact on small businesses or other small entities.** This collection does not have a significant impact on small businesses.
6. **Consequences of collecting the information less frequently.** The information cannot be collected less frequently because the requesters initiate the collection and determine when they want to request information.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** This information collection complies 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. We published a notice in the *Federal Register* on May 10, 2021 (86 FR 24900), requesting public comment. We received one

comment. The commenter stated, “I am a professional genealogist and I frequently research elusive individuals who lived in the 20th century. These selective service records are immensely useful, because they cover nearly all males, but they are very inaccessible because they can only be found if the individual's exact address is known. The form necessarily requires address, because that is how the records are organized. However, this impacts my ability to do my job because it renders the vital documents unusable if the registrant moved around and I cannot pinpoint exactly where he lived. I hope that NARA prioritizes either the indexing or digitization of these documents, so that they can be better utilized by the research community, thus not requiring the address to be known.”

We have considered this comment and provided a response to the commenter. Due to the size of the collection, we have no immediate plans to index the Records of the Selective Service System. However, a great number of the Draft Registration cards, including those from WWI (1917-1918) and WWII, have been digitized and are available online at [ancestry.com](https://www.ancestry.com), [fold3.com](https://www.fold3.com), and [familysearch.org](https://www.familysearch.org) (the latter two offer free memberships), which provide their own means of searching and tagging to aid people in finding the records. Once normal operations resume, records on [ancestry.com](https://www.ancestry.com) can be viewed for free in National Archives Public Research Rooms with Public Access PCs. Prior to the pandemic, we discussed possibly digitizing the post-WWII Draft Registration cards, and hope to continue such discussions post-pandemic, once we resume normal operations. We appreciate the comment and will continue efforts to make records more accessible.

This comment does not change the purpose of the information collection or change the information we collect from researchers who are requesting access to archival records. We have therefore submitted the described information collection to OMB for approval. We will continue requesting as much record-identifying information from researchers as possible, pursuant to this information collection, to aid us in finding the documents researchers seek, including the SSS records this researcher mentions.

9. **Explanation of any payment or gift to respondents.** This information collection involves no gifts or payments to respondents.
10. **Assurance of confidentiality provided to respondents.** We use respondent information on the NA Form 13172 for reference service purposes only and do not make it available to the public.
11. **Justification for sensitive questions.** We do not ask any questions of a sensitive nature.
12. **Estimates of hour burden including annualized hourly costs.** The hour burden estimate for all respondents is:

<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>
NA Form 13172	1,980	1	2	66

13. **Estimate of other total annual cost burden to respondents or recordkeepers.** The estimated time for form completion is based on the expectation that most respondents will

be the subject individual (or a close associate) who can provide the required information from memory. The cost estimate is based on an average of two minutes to complete the NA Form 13172 (using the minimum wage rate of \$7.25 per hour, divided by 60 minutes, for a rate of \$.12 per minute). The estimate is also based on the use of paper forms printed by the requester (as is the case for 75.7% of all requests).

<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>
NA Form 13172	1,980	2	\$.24	\$ 1,802
Additional Costs		form printout	\$.06	
		envelope	\$.03	
		postage	\$.58	
		TOTAL	\$.91	

14. **Annualized cost to the Federal Government.** The annual costs to the Government of this information collection are negligible. The information collected helps reduce Government costs and time by making searches for records and communicating with requestors more efficient and by enabling electronic communications.

15. **Explanation for program changes or adjustments.** The small increase in costs comes from an increase in requestors during the past three years, thus raising our annual estimate, and an increase in the cost of postage. We did make changes to the form’s design and arrangement to assist the user in providing more accurate and complete information, to streamline the ability for requestors who are the subject of the requested record to receive unredacted copies, and to enable us to provide electronic responses and services, which may have been part of the cause for the increase in requests.

16. **Plans for tabulation and publication and project time schedule.** We do not use the information we collect for statistical studies or publications.

17. **Reason(s) display of OMB expiration date is inappropriate.** We display the expiration date of the OMB approval on the form.

18. **Exceptions to certification for Paperwork Reduction Act submissions.** We are not requesting any exceptions to the certification statement identified in Item 19 of OMB Form 83-I.