

SUPPORTING STATEMENT
SSS Volunteer Board Member Application
(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 Military Selective Service Act (MSSA) requirement (50 U.S.C. 3809) which stipulates that the Selective Service System (SSS) shall have personnel adequate to reinstitute immediately to full operation;
 - (c) The MSSA requirement (50 U.S.C. 3809) to create and establish within SSS civilian local boards, civilian appeal boards, as may be necessary to carry out its function, including a system to render determinations concerning postponements, deferments and/or exemptions from training and service in a fair and equitable manner; and
 - (d) The MSSA requirement (50 U.S.C. 3809) that SSS local and appeal boards consist of not less than three civilian members appointed by the President after recommendation by a Governor to act on judgmental claims submitted by registrants;

Copies attached.

2. The purpose of the information collected on the SSS Volunteer Board Member Application (SSS Form 404) is to identify individuals willing to serve as members of local boards in SSS. The information will aid in the proper selection, recommendation, appointment, and training of these standby boards, all of which would be necessary for the timely processing of registrant claims and appeals during a national emergency. Board membership is voluntary, with members serving without remuneration in connection with SSS affairs.

This active standby system allows the Agency to schedule and conduct training and instruct board members on SSS 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 SSS during full operation.

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Government personnel are involved in the selection and appointment process of board members include the following:

- (a) Screening of incoming SSS Forms 404 is performed by SSS personnel to determine the jurisdictional eligibility of the potential board member applicant. This is based on the county of residence.
- (b) Any required interviewing is conducted by SSS personnel. A standard interview format and training plan are used to ensure each candidate is considered similarly and each potential board member is made aware of the same duties, responsibilities, and expectations of membership. 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 MSSA, CFR 32, and SSS regulations.
- (c) Program analysts determine the final selection for each board seat in accordance with established county profiles and in conjunction with established SSS regulations. The appointment packages, to include the board member application and interview records, are forwarded to the Governor, or comparable executive, for recommendation to a board position in the Governor's jurisdiction.
- (d) The Governor has the option of approving or denying the recommendations that he/she deems to be in the best interest of their state/territory and SSS.
- (e) Once the Governor provides a recommendation, the Director of Selective Service, in the name of the President of the United States, appoints local board members.

The current Selective Service Board System is a vital component of the Agency's readiness and provides the fairness guaranteed to registrants in the MSSA.

- 3. SSS uses the paper version of this form and also collects the information electronically. The use of improved technology to collect the necessary information does not necessarily substantially reduce the burden of each respondent. Completion of SSS Form 404 by a potential board member is voluntary.
- 4. SSS knows of no duplication of data in this collection activity. This is a requirement unique to SSS. SSS knows of no other record similar to the Board Member Application.
- 5. The information collection does not involve small organizations.

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6. If the collection is not conducted, SSS is less capable of performing the requirements in paragraph 1. 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 to apply for a board position.
7. The collection conforms to the regulations and guidelines applicable to Federal information collection activities. There are no special circumstances for collection.
8. A copy of the 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 is included as required. As part of a comprehensive review of this form, an integrated process team including individuals that process the data consulted with individuals that fill out this form to help streamline the collection process.
9. There is no payment or gift to respondents.
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. The system of record, the Information Management Information System, is covered by a Privacy Impact Assessment dated August 2017. Any paper source documents are not retained and are destroyed after being entered into the system of record.

11. By law, SSS board membership must, to the maximum extent practicable, represent the ethnic and national origin of those registrants within its jurisdiction. To be considered for appointment to a board, candidates must include information on gender and ethnic background.
12. Estimate of annualized cost for collection

Average GS grade	11.5
Salary (DC area)	\$89,069
Benefits	21%
TOTAL	\$107,773
Number of employees	6
TOTAL	\$646,638
Percent of time dedicated	30%
TOTAL COST	\$193,991

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Total FTE	1.8
Number of hours / year	2080
TOTAL Number of Hours	3,744

13. Estimate cost burden to respondents

a. Capital costs: this is a mature program in operation for more than 40 years. There are no more capital or start-up costs as the system is fully depreciated.

b. Maintenance costs

Cost to Respondents	900 annually (on average)
Frequency	One time
Burden per Response	.25 hour
Estimated burden	225 hours = (900 x .25)

SSS operation and maintenance costs

IT personnel

GS grade	14.5
Salary (DC area)	\$154,428
Benefits	21%
TOTAL	\$186,857
Percent of time dedicated	50%
TOTAL COST	\$93,428

14. Estimate of annualized costs to SSS: \$287,419

15. The SSS Form 404 has minor changes since the previous OMB approval. SSS removed some unnecessary applicant restrictions, including one on law enforcement personnel, and streamlined other entries. The time estimate of its completion remains .25 hours.

16. SSS does not anticipate the official publication of any data collected from this form.

17. SSS is not seeking approval to not display the expiration date for OMB approval.

18. There are no exceptions to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."