

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 records of the Selective Service System (SSS) Classification Ledgers and Registration Cards for registrants born before January 1, 1960. The NA Form 13172 may be used to request these public records. A digital signature field was added to the form in August 2018 for the signature of the requester if the requester is the registrant (subject of the record). With this signature on the form, a copy of the SSS card can be released to the requester without redactions that are otherwise required (usually the social security number).
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/na-13172.pdf>, <https://www.archives.gov/files/st-louis/archival-programs/other-records/na-13172.pdf>, and <https://www.archives.gov/files/st-louis/pdf/sss-naform13172revision-12mar2020.pdf>) and from SSS (<https://www.sss.gov/wp-content/uploads/2021/11/na-13172.pdf>).
4. **Efforts to identify duplication and use of similar information.** There is no duplication of this information.
5. **Impact on small businesses or other small entities.** The collection of information does not have a significant impact on small businesses.
6. **Consequences of collecting the information less frequently.** The information collection cannot be conducted less frequently because requesters determine when they want to request information.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** This information collection will comply 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 May 16, 2024 (89 FR 42903) requesting public comment. One comment was received as follows:

The Selective Service System would like to share a comment on the above-caption matter submitted by NARA to the Federal Register regarding NARA's Form NA13172.

The Agency recommends that NARA add, as a required field, the social security numbers as a field within the form to ensure the correct information is pulled when answering public inquires for information.

NARA responded:

Social Security Numbers (SSNs) are a rarity on the Selective Service System Registration Cards and Classification Ledgers in our holdings. Adding a required SSN field is unnecessarily restrictive as it will not assist in verifying the correct record has been pulled in most instances. We verify the correct record has been pulled by comparing the Registrant's full name, date of birth, and home address at the time of registration, as listed on each NA Form 13172 received, to the information on the document(s) requested.

We do not wish to revise the form based on this comment

9. **Explanation of any payment or gift to respondents.** This information collection involves no remuneration to respondents.
10. **Assurance of Confidentiality Provided to Respondents.** Respondent information on the NA Form 13172 is used only for reference service purposes and is not made available to the public.
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:

<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	1,737	1	2	58

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 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). The estimate is also based on the use of paper forms printed by the requester (as is the case for more than 95% 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	1,737	2	\$.24	\$ 1,754.37
Additional Costs		form printout	\$.06	
		envelope	\$.03	
		postage	\$.68	
		TOTAL	\$ 1.01	

14. **Annualized cost to the federal government.** There is no cost to the federal government as 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.** There was a slight decrease in the number of respondents.
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.