



**NATIONAL COMMISSION ON MILITARY, NATIONAL, AND  
PUBLIC SERVICE  
MEMORANDUM FOR THE RECORD**

**Subject: Selective Service System (SSS) Data Management Center, Chicago (June 2018)**

The following is a record of a meeting at the SSS Data Management Center, which took place on June 29, 2018 in Chicago, IL. Commissioners present included Vice Chair Debra Wada, Avril Haines, Jeanette James, Alan Khazei, and Edward Allard. Staff present included Kent Abernathy, Keri Lowry, Jill Rough, Cristina Flores, Mark Enriquez, Eleanor Vuono, Jud Crane, John Lira, Peter Morgan, Chantel Ramzey, and Katie McSheffrey. Vice Chair Wada moderated the discussion with Jeanette James as the co-lead. This memorandum is protected by the deliberative process privilege and contains attorney-client privileged information and should be treated as For Official Use Only. This memorandum is not a verbatim transcript of the discussion.

Attendees from the SSS Data Management Center:

1. Nicole Harris, Program Manager.
2. Kyle Wisher, Supervisor for Data entry.
3. Andy Gonzalez. Lead research assistant.
4. Mrs. Nichols. Lead Research assistant and trainer.
5. Trevor Barlow. Mail and logistics. 3.5 million documents that come in and out. Letters printed, and sent to customers and storage and record control
6. Matt Adams. Data manager.
7. Daisy Sontiago. IT specialist for data entry.

**Key Takeaways:**

- The SSS Data Management Center (“the Center”) personnel emphasize the importance of business processes, such as reconciling conflicting data and extending registration to portions of the population that are not covered by other databases to ensure a fair and equitable draft process. They are concerned about eliminating the SSS and expressed concern about the loss of knowledgeable personnel and data if the country ever reversed course and sought to return to a registration system. The Center had innovated several process improvements, especially outreach and communications.
- The Center personnel are confident about their ability to update their systems to include women. They are fully prepared to implement any changes required by Congress, but made it clear that additional time, money, and people would be needed. This is a professional group of public servants open to change and improvement.

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**Discussion:**

**Inclusion of Women in the Selective Service System**

*Ms. Wada introduced the mission of the Commission and described the specific questions related to Selective Service that the Commission is considering. Her first question to the assembled group of Center personnel was to ask about the changes that would be required for their operations to accommodate women in the registration process.*

**The Director** explained that it would not be difficult to add women to the registration process, but it would require time, additional money, and probably about 20 new hires for the Center. She also identified several areas where change would be needed. First, new software must be developed to allow women to register online at the SSS website. SSS Headquarters owns and controls the software to make the changes so Center personnel would not make those changes.

Perhaps the biggest change would be a need to modify the external agency interfaces, because the Center receives registration data from many other agencies, for example the Office of Federal Investigations, Military Entrance Processing Command, the Department of Education, and the Departments of Motor Vehicles in numerous states, all of which capture information only from men. She expressed her opinion that the Center is prepared for the drill if Congress should legislate registration for women.

*Mr. Allard discussed how registrants' information is passed from state DMVs. In the event Congress expands registration to women, he suggested that the states would have to update their laws to ensure that they have authority for female registration. It is possible that some states would be slow or resistant to changing their state law.*

One of the Center employees cited a statistic that in 2000, before a lot of DMVs began participating in the passive registration program, 60% of registrations were electronic. Now 90% of registrations are electronic. He was concerned that if the state DMVs refuse to share information—whether because their state laws are not changed to include women, or they choose not to participate following an expansion of the registration pool—there might be a big increase in paper registrations.

*Ms. James asked for an estimate for the length of time needed to update the software systems before they would be ready to register women.*

**The Director** thinks it would take about a year to be ready to register females. Other than the changes to software, their processes would not need to change. Essentially, they would just need to increase capacity. Their office space is big enough to expand and add personnel. They have a national call center that currently handles about 7,000 calls per year. They would need to add employees to handle the additional questions on the phone lines, and they would need to increase capacity for the mail center which would have to process more mail in and out (currently processing about 3.1 million items of mail each year).

*Ms. James asked about the security of the SSS database. Would adding women to the SSS database have any effect on, or compromise data security?*

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**The Director** answered that there would be no effect on data security with the addition of women. The director explained that DHS provides the headquarters network and the domain, and the SSS not only met their FIMSA metrics,<sup>1</sup> but is considered an exemplar. The SSS database experiences “hundreds” of hacking attempts per day and extending registration to women might raise the profile of the SSS database – already the 4<sup>th</sup> largest in the nation.<sup>2</sup> There are multiple layers of security before anyone could get to the database. Headquarters takes care of the security. The Center uses the Cloud for disaster security in case the building is destroyed.

### **Data Management Center Processes in General**

*Ms. James asked about the accuracy of the current database. Once someone has registered, do they keep their information updated?*

Address changes are done either online or by mail. The Center works closely with US Post offices to piggyback off the Post Office change of address program. Men usually do not tell the SSS when they have moved, but they do tell the Post Office, so the SSS typically updates its system based on information shared by the Post Office. After a recent mailing went through, 96% was mailed without being returned. Also, they are working to update the registration software to include email addresses for registrants, which should be piloted in September.

*Mr. Khazei asked if it would be feasible to update the registration system to capture skills, for example cybersecurity? How hard would it be? How would they keep the database current as an individual's skills develop over time?*

**The Director** explained that they would need to add new fields to the application to register skills. The Center would need to create new business rules to capture those skills. It would not be hard to do. They are currently in the process of adding emails as a new field. It's a step by step process. Next, they would have to tell the state DMVs to start collecting those skill-set fields and they would also have to coordinate with the many external federal agencies who provide registration information to make sure that they included the skills fields as well.

*Ms. James asked whether registrants age-out of the database or whether they remain in it forever? What happens when a registrant dies? Is there any problem adding women and essentially doubling the numbers?*

Data storage is cheap so adding women would not be a problem for the database. Once a registrant turns 26, there is no legal obligation to update his information, but nobody is ever deleted from the database. If someone dies, their file is deactivated, but they never delete anything. All registrations from 1960 forward are currently in the database. Back until 1953 is all on microfiche. Older records are in the National Archives system.

*Ms. Wada asked if the fact that driver's licenses for youth are on the decline matters for registration purposes.*

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<sup>1</sup> Federal Information Security Modernization Act, <https://www.dhs.gov/fisma>. FISMA establishes the authority for DHS to create directives for information security practices for all non-national security Federal Executive-branch systems and provides the ability to extend technical assistance to those agencies.

<sup>2</sup> The Director did not further characterize these attempts.

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Not particularly. Any state ID can be shared. The Center has outreach efforts to register the kids they cannot find through the state information sharing programs, for example in a state like California that does not share DMV information. The Center sends letters to people they think haven't registered to tell them how to register. There is outreach to high school guidance counselors. There are many incentives in place at the state and federal level to inspire registration. For example, kids in Ohio pay out of state rates at Ohio state universities unless they've registered. Many states require registration before joining JobCorps. Most federal benefits require proof of registration. The states also provide compliance letters, which helps identify those kids not found through any of the common methods.

*What about undocumented persons? Are they afraid to register, even though the law requires it?*

The SSS does not share any information with immigration services. Registrants do not have to include a Social Security Number on their registration form and many people do not include it, even if they have one. However, undocumented persons cannot register on the website because they do not have a SSN, so they must register using a paper form.

*How successful are the forms you send to kids to encourage them to register? How many people comply in response to a letter?*

65% comply after about 90 days. The Center sends a second letter to the others.

*Would the Center support including an additional form in their mailings to inform people of opportunities for non-military service?*

Yes, so long as the letter does not weigh more than one ounce, otherwise the postage becomes unaffordable.<sup>3</sup> The Center would be glad to add a second flyer for JAMMERS mailings, if it would not impact the cost of the mailing. Also, the resulting envelopes cannot be too thick to go through the US Post office machines. They spend \$1.4 million for postage each year. 65% of that cost relates to the JAMMERS materials and JAMMERS reimburses them. They could easily coordinate with JAMMERS to redesign the document to include information about other service opportunities.

*Ms. Rough asked whether passive registration from state DMVs or other federal agencies undermines the value of a person actively taking part in registration, as an act of citizenship.*

Every single person receives a letter in the mail informing them that they've registered even when another agency passively registered them. So, a "gut check" happens on the back-end. Approximately 2.3 million acknowledgments are sent out each year.

*Ms. Wada asked how they handle transgender individuals' registration.*

A person is required by law to register only if they are male at birth. If a person changes their birth certificate from female to male, they are free to register, but they would not be required to register

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<sup>3</sup> Staff weighed the current registration response letter: 0.7 oz.

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by law. The Center also registers females who check the male box because they err on the side of registration and cannot always identify gender based on the name alone.

**Discussion about a Major Overhaul of the SSS registration process**

*Vice-Chair Wada asked about their reaction to eliminating the SSS registration process and instead using other federal and state databases to identify individuals in the event of a draft. What would be the challenges?*

**The Director** responded that it would be a poor option for the SSS to give up control of the database. They have all the necessary business rules already imbedded in their system. And, they would not want another agency to manage their database.

Another employee expressed concern that undocumented immigrants would not be notified if only external databases were used, because they do not have Social Security cards and would not exist in the Social Security database. It would not be fair and equitable if a group of people (for example undocumented immigrants) could not be found and called upon for the draft.

Eliminating the SSS would mean losing a lot of committed public service employees who care passionately about the system. They are also very knowledgeable about the registration process. All of that knowledge would be lost if the SSS were eliminated. The Center sends out over 100 different types of letters to people who are confused about how to register. They work hard to fix poorly written registrations and make sure that everyone is registered.

If registration is eliminated and then the nation decides to restart registration at a later date, the startup costs would be enormous. When registration returned in 1980, the backlog of paperwork was huge. Boxes of information were piled high in the hallways. Technology is better now, but it would still be hard to come back out of deep standby. One employee described the many boxes of forms stacked in the hallway that needed to be processed after standby ended in 1980.

**Issues concerning Conscientious Objectors**

*Ms. Haines: What percentage of the population would identify as CO?*

The Center does not keep statistics on COs. Local boards keep that information. If a person submits a letter along with their registration claiming CO status, the Center maintains that letter on file. But the Center has nothing to do with CO classification. They do not keep track of how many people file such CO letters. There is no field at data entry to note that someone is registering with CO written on the file.

The Center's collective thinking is that it would be confusing and problematic to provide a box on the registration form for a self-identified CO to check. Adding a box is do-able from a data processing perspective, but it could create legal/policy problems if people think they have established themselves as a CO and do not understand that only the local boards have authority to classify a person as a CO. People already write a lot of extra information on registration forms--more than just CO and religious objections. The Center also gets fake registrations for Mickey Mouse. There are business rules that identify these types of errors.

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**Potential improvements to the registration process**

*Ms. Wada asked whether there were additional improvements they'd like to see in legislation to make the process work better.*

It should be enough for an individual to fill out a single form at any federal agency and have that count as a SSS registration. It should be easier to register all those people who provide information to other federal agencies. For example, immigration authorities automatically send the Center information on individuals who become permanent residents and thus, they are automatically registered.

Ignorance of the system is everywhere. Nobody understands the Selective Service System. The Center is now working with penal systems to help get out the word on registration. More states are planning for more public service announcements and outreach. The military now requires registration before allowing men to enter the service. DD Form 4 on every military contract tells new military recruits that they will be registered automatically and the military provides that information to the Center.

One of the data management employees shared his opinion. He said that he spent over 20 years in the Marine Corps and then worked as a high school teacher. Kids just need to be educated about how important it is to serve. Let's get rid of the fear of registration. Kids in America want to do their part.