

SUPPORTING STATEMENT
Standard Form 180, Request Pertaining to Military Records
(OMB Control No. 3095-0029)

1. **Circumstances making the collection of information necessary.** The National Personnel Records Center (NPRC) of the National Archives and Records Administration (NARA) administers military personnel and medical records of veterans after discharge, retirement, and death. Personnel records of military members who were discharged, retired, or died in service 62 or more years ago have been transferred to NARA's legal custody and are referred to as "archival" records. Personnel records of military members who were discharged, retired, or died in service less than 62 years ago remain in the legal custody of the creating service and are administered in accordance with rules issued by the Department of Defense (DoD) and the Department of Homeland Security (DHS, Coast Guard). These records are referred to as "non-archival" records. In addition, NPRC administers the medical records of dependents of service personnel.

When veterans, dependents, and other authorized individuals request information from, or copies of, documents in military personnel, military medical, and dependent medical records, they must provide on forms, in letters, or online, certain information about the veteran and the nature of the request. Federal agencies, military departments, veterans, veterans' organizations, and the general public use Standard Form (SF) 180, Request Pertaining to Military Records, to make these requests for information from military personnel service records stored at NPRC. Veterans or their next of kin may instead submit requests online using eVetRecs. Authorized agencies requesting the loan of a military personnel record may order it using eMilrecs (electronic equivalent of the SF 180). The authority for this collection is contained in 36 CFR 1233.18.

In October 2014, a follow-up form, NA Form 13176, Status Update to Request for Military Service Records, was added to this information collection to allow customers who have requested their military records a faster way to check on the status of their request.

2. **Purpose and use of the information.** Non-archival military personnel records described above are in NPRC's physical custody, but legal custody of the record remains with DoD and DHS (US Coast Guard). We must handle requests for information from non-archival records in conformance with legal requirements of the Freedom of Information Act (FOIA), the Privacy Act, and DoD and DHS (US Coast Guard) regulations. Although archival records are open to the public and the Privacy Act does not apply to them, in order to protect the veteran's privacy and that of his/her family and third parties named in the records, the personal privacy exemption of the Freedom of Information Act (5 U.S.C. § 552 (b) (6)) may still apply and preclude the release of some information.

We use information submitted on the Standard Form 180 or online via eVetRecs to determine what is being requested, where records are located, what information is releasable, and where to send the response. When third parties submit requests, the information collected and provided serves as records of disclosure, which are required by the Privacy Act. The information collected via the SF 180 and eVetRecs is vital to NPRC. We need this information to locate and release information from requested records. It also significantly improves our ability to provide timely and accurate information to

requesters.

In 2007-08, OMB conducted a Social Security Number (SSN) Survey, requesting information on whether it was necessary to collect SSNs and why. We reported to OMB that, specific to the SF 180, it was necessary to collect SSNs. The SSN serves as a unique identifier for military records. When possible, a Military Service Number is used to identify the military record instead. However, such an alternative identifier has not always been available for military personnel. In cases in which NPRC is unable to identify a record, we may also use the SSN to help locate additional information to identify, locate, and retrieve military service information or files for the requester's needs.

3. **Use of information technology and burden reduction.** Requesters may submit the requested information online through eVetRecs at <https://www.archives.gov/veterans/military-service-records>. In addition, the SF 180 is available on NARA's web site at: <http://www.archives.gov/research/order/standard-form-180.pdf>. NPRC also accepts the SF 180 via fax transmission. In addition, authorized agencies requesting the loan of a military personnel record may order it using eMilrecs (electronic equivalent of the SF 180). Because we receive an average of around 350,000 requests for records each year using the paper version of the SF 180, we still accept paper and fax submissions, but online submission is available and encouraged.
4. **Efforts to identify duplication and use of similar information.** There is no duplication. Requesters submit SFs 180 or the web-based information to the appropriate custodian of the records only when they need information from or copies of the records. Questions on the SF 180/online equivalent outline the minimum information that NPRC staff needs for responding to customers' requests.
5. **Impact on small businesses or other small entities.** NPRC has minimized the burden on small businesses and other small entities by accepting the SFs 180 and web information directly from individuals who are verifying their military service for employment with small businesses/small entities or for other purposes. NPRC also accepts forms from small businesses/small entities themselves.
6. **Consequences of collecting the information less frequently.** The frequency of response is on occasion, such as when individuals, businesses, and Government agencies desire to acquire information from military personnel records. Therefore, the information collection cannot be conducted less frequently because requesters determine when they want to request information. Many requesters submit one request in order to obtain replacements of documents in military service files or to verify some aspects of an individual's military service. Some requesters who conduct genealogical research may submit multiple requests, although we estimate that such individuals comprise no more than 4% of the total number of requesters.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** We conduct this information collection in a manner consistent with 5 CFR 1320.6.
8. **Comments in response to the Federal Register notice and efforts to consult outside agency.** We have not conducted formal consultations; however, we have consulted with DOD components and the

Department of Veterans Affairs to maintain a current address list of custodians for the back of the form. NARA published a notice in the *Federal Register* on December 11, 2020 (85 FR 80192), requesting public comment. We received no comments.

9. **Explanation of any payment or gift to respondents.** This information collection involves no remuneration to respondents.
10. **Assurance of confidentiality provided to respondents.** We retain SFs 180, letters, and other request forms in military personnel service records as Privacy Act-protected records of disclosure. SFs 180, letters, and other request forms become releasable only in accordance with Privacy Act provisions, contained in 5 USC § 552a(b), and the routine uses for systems of military service records, contained in NARA's Privacy Act system of records notice (SORN 35), published in the *Federal Register* at 78 FR 245 (December 20, 2013). Archival records are not subject to Privacy Act provisions.
11. **Justification for sensitive questions.** We ask respondents no questions of a sensitive nature.
12. **Estimates of hour burden including annualized hourly costs.** We estimate the hour burden for individual respondents who submit a paper SF 180 or electronic request via eVetRecs as follows:

<i>Form of request</i>	<i>Number of respondents</i>	<i>Responses per respondent</i>	<i>Minutes per response</i>	<i>Annual hour burden</i>
SF 180/ eVetRecs and NA Form 13176	by mail/fax: 361,712	1	5	79,444 (953,328 x 5/60)
	through eVetRecs: 591,616			
	total: 953,328			

The estimated time per response is based on the fact that most respondents are veterans who can complete required information from memory. Even next of kin or others acting on authority of veterans are usually prepared to complete the essential information just as quickly. NPRC has found that most respondents leave blank those entries for which the information is not readily known rather than research the information. The estimated number of respondents is based on the number of requests submitted during each of the past three years, and is lower than

13. **Estimate of other total annual cost burden to respondents or recordkeepers.** The estimated annual cost for individual respondents who complete the SF 180 by mail is \$1.18, while the estimated annual cost for individual respondents who complete the request electronically or by fax is \$.60. Because requests are normally made for the personal benefit of requesters, we established the cost of a respondent's time (for paper and electronic responses) at the minimum wage rate of \$7.25 per hour (which is \$.60 for five minutes). In addition, those who choose to mail their requests incur costs for envelopes (\$.03) and postage (\$.55).

<i>Form of request</i>	<i>Number of respondents</i>	<i>Minutes per response</i>	<i>Respondent cost</i>	<i>Annual cost for time</i>
SF 180/eVetRecs and NA Form 13176	953,328	5	\$.60 (\$7.25/ 5 mins)	\$571,997 (953,328 x .60)

<i>Form of request</i>	<i>Number of respondents</i>	<i>Responses per respondent</i>	<i>Respondent mailing cost</i>	<i>Annual cost of mailing</i>
SF 180 and NA Form 13176 by mail	360,267	1	\$.58 (\$.03 envelope + \$.55 postage)	\$208,955 (360,267 x .58)

14. **Annualized cost to the Federal Government.** No cost is assigned to the staff time required to perform functions at NPRC, including responding to requests that contain sufficient information, and reviewing and preparing the responses for mailing; that is part of the mission of NPRC and isn't changed pursuant to this information collection. We used to itemize a cost to the Government for printing the SF 180s, but we no longer print the forms.
15. **Explanation for program changes or adjustments.** The number of respondents over the past three years have decreased because fewer respondents have requested their records.
16. **Plans for tabulation and publication and project time schedule.** We do not use the collected information for statistical studies or publications.
17. **Reason(s) display of OMB expiration date is inappropriate.** We display the expiration date for OMB approval of this information collection.
18. **Exceptions to Certification for Paperwork Reduction Act Submissions.** We are not requesting any exceptions to the certification statement identified in Item 19, Certification for Paperwork Reduction Submissions, of OMB Form 83-I.