

Before the

SELECTIVE SERVICE SYSTEM

Arlington, VA

Privacy Act of 1974:
System of Records
(FR Doc. 2025-23111)

)
) **COMMENTS OF THE MILITARY LAW TASK**
) **FORCE (MLTF) OF THE NATIONAL LAWYERS**
) **GUILD, JEWISH C.O. PROJECT, RESTORE THE**
) **FOURTH (RT4), ELECTRONIC PRIVACY**
) **INFORMATION CENTER (EPIC), COMMITTEE**
) **OPPOSED TO MILITARISM AND THE DRAFT**
) **(COMD), PROJECT ON YOUTH AND NON-**
) **MILITARY OPPORTUNITIES (PROJECT YANO),**
) **EPISCOPAL PEACE FELLOWSHIP (EPF), AND**
) **CENTER ON CONSCIENCE & WAR (CCW)**
)

January 16, 2026

Military Law Task Force (MLTF)
of the National Lawyers Guild,
<https://nlgmtf.org>

The Military Law Task Force (MLTF) of the National Lawyers Guild, Jewish C.O. Project, Restore the Fourth (RT4), Electronic Privacy Information Center (EPIC), Committee Opposed to Militarism and the Draft (COMD), Project on Youth and Non-Military Opportunities (Project YANO), Episcopal Peace Fellowship (EPF), and Center on Conscience & War (CCW) submit these comments in response to the System Of Records Notice (SORN) by the Selective Service System (SSS), “Privacy Act of 1974: System of Records”, FR Doc. 2025-23111, published at 90 *Federal Register* 58677-58678 (December 17, 2025).

ABOUT THE COMMENTERS

The Military Law Task Force (MLTF) is a standing committee of the National Lawyers Guild (NLG) open to attorneys, legal workers, law students, and military and draft counselors. Since the 1970s, the MLTF has been a national center of expertise in Selective Service law, and has published a regular journal of commentary on military law, including matters relating to Selective Service. The MLTF produces reference materials and conducts training, including continuing legal education, for attorneys and counselors working with members of the military, veterans, and individuals subject to Selective Service registration and induction.

The MLTF is a non-profit educational and legal organization and is not part of, or affiliated with, the U.S. military or any other government entity.

The Jewish C.O. Project is designed to promote awareness of conscientious objection to war within the Jewish community, educate youth and young adults about what would happen in a future military draft in the U.S. and to assist them in being prepared to claim C.O. status if a draft was called, provide legal support for Jewish members of the U.S. Armed Forces who are struggling with issues of conscience, and tell the story of conscientious objection through history and its connection to Jewish values.

Restore The Fourth (RT4) is a not-for-profit social welfare corporation, founded in 2013, dedicated to robust enforcement of the Fourth Amendment and related due-process rights. Restore the Fourth oversees a series of local chapters whose membership includes lawyers, academics, advocates, and ordinary citizens. Restore the Fourth also files amicus briefs in major cases about Fourth Amendment or due process rights.

The Electronic Privacy Information Center (EPIC) is a public interest research center in Washington, D.C. EPIC was established in 1994 to protect privacy, freedom of expression, and democratic values in the information age. Our

mission is to secure the fundamental right to privacy in the digital age for all people through advocacy, research, and litigation.

The Committee Opposed to Militarism and the Draft (COMD) is a 46-year-old organization that addresses the issues of education policy and the right of students to be free from uninvited invasions of their privacy by military recruiters.

The Project on Youth and Non-Military Opportunities (Project YANO) was founded in 1984 in San Diego County, California. Project YANO works to educate young people about their options for non-military careers and college financial aid.

The Episcopal Peace Fellowship (EPF), founded in 1939, is a movement of Episcopalians rooted in active love. EPF members collectively build a culture of justice and peace in the church and world by developing alternatives to violence and militarism and by praying, studying, and acting for peace.

The Center on Conscience & War (CCW) is the only national organization in the U.S. whose mission is to extend and defend the rights of Conscientious Objectors to war. CCW was founded in 1940 by the Historic Peace Churches (Quakers, Mennonites, Church of the Brethren), and the Methodist Office

of World Peace because of the brutal treatment of conscientious objectors during World War One. CCW continues to support and advocate for conscientious objectors to war.

OBJECTIONS TO PROPOSED ROUTINE USES

The SSS is proposing and seeking comments on amendments to the routine uses of three systems of records: (1) Registration, Compliance and Verification (RCV), SSS-19; (2) Integrated Mobilization Information Management System (IMIS) and Reserve and National Guard Personnel Records, SSS-5; and (3) Enterprise Content Management System (ECM), SSS-50.

We note that this Notice represents the first procedurally adequate opportunity to contest changes to SSS's routine uses since 2017.¹ While SSS published a Notice of Amendment in the Federal Register last July claiming to update and amend its existing general routine uses,² that Notice cannot act—and did not purport to act—as a complete Systems of Records Notice (SORN) under the Privacy Act. The Act requires a SORN to include nine categories of information, including categories of records and record sources, agency procedures, and claimed

1. 82 Fed. Reg. 29971, 29971 (June 30, 2017).

2. 90 Fed. Reg. 35358, 35358 (Jul. 25, 2025).

routine uses.³ The 2025 Notice, however, lumps several systems of records together and briefly lists only the claimed routine uses and name of the responsible agency official.⁴ Given the significance of the routine uses, it is not possible to assess any changes without complete information on the agency's relevant procedures, practices, and policies. Although the instant Notice displays the same deficiencies,⁵ it holds itself out as a complete SORN, and we address it as such.

We also note that the proposed routine uses appear to be related solely to the first of these three systems of records, SSS-19. The descriptions of these uses have no apparent relevance or applicability to the categories of individuals or records in SSS-5 or SSS-50. This SORN provides no explanation for applying these routine uses to the categories of individuals and information in SSS-5 or SSS-50, and to do so would be arbitrary and capricious.

Perhaps this is the result of an error in promulgation of this SORN, since the list of routine uses in this SORN omits all of the routine uses included in the previous SORNs currently in effect for SSS-5 and SSS-50.

Pursuant to the Privacy Act, individuals are entitled to notice of which routine uses apply to information from each system of records, and each routine use

3. 5 U.S.C. 552a(e)(4)(A)-(I).

4. 90 Fed. Reg. 35358, 35358 (Jul. 25, 2025).

5. 90 Fed. Reg. 58677, 58677-78 (Dec. 17, 2025).

must be justified with respect to each system of records to which it applies. An agency may not give general notice that records in a list of systems of records will be subject to one or more routine uses, without providing specific notice as to which of those uses apply to which of those systems of records. This SORN should be revised to apply solely to system of records SSS-19, and any changes to the routine uses of records contained in SSS-5 and/or SSS-50 should be made through a separate SORN.

Our comments below pertain solely to SSS-19, on the assumption that this SORN was intended to make changes only to SSS-19 and that it will be amended to apply only to SSS-19.

Our comments below pertain solely to the Privacy Act. New uses of information would also require updating of notices on forms and other modes of information collection such as websites, and public notice, opportunity for public comment, and approval by the Office of Management and Budget (OMB) of those revised forms and websites pursuant to the Paperwork Reduction Act (PRA). Some of these uses would also require notices, approvals, and reports pursuant to the Computer Matching Act. New uses cannot be made of information previously collected, if those uses would be inconsistent with the purposes for which it was collected.

As discussed below, Routine Uses 2, 7, 9, and 13 in the proposed SORN would violate the Privacy Act and/or the Constitutional rights of individual data subjects. The SORN should be revised to remove these unlawful and improper proposed routine uses.

Routine Use 2 would allow disclosure of information from this SSS system of records, “To the Department of State and U.S. Citizenship and Immigration Services for collection and evaluation of data to determine an individual’s eligibility for United States citizenship.”

There is no lawful basis for such disclosure, since no information in SSS records is necessary for, or relevant to, determination of eligibility for U.S. citizenship.

Registration with the SSS is neither a statutory requirement nor a factor authorized by statute to be considered in determining eligibility for U.S. citizenship, either by birth or naturalization.

Nor does any current regulation make convictions for violations of the Military Selective Service Act (MSSA) a factor in determining eligibility for naturalization.

We reserve the right to submit comments should such a rule be proposed.

But even assuming that a valid statute were enacted or rule were promulgated making a criminal conviction for knowing and willful failure, refusal, or evasion of registration with the SSS relevant to eligibility for naturalization, the courts, not the SSS, would remain the authoritative source of information as to whether an individual has been convicted of violating the MSSA or any other law. No information from this system of records would be needed for that check of criminal records.

The Immigration and Nationality Act, as amended, provides that, “No person shall be naturalized unless such applicant... has been and still is a person of good moral character, attached to the principles of the Constitution of the United States, and well disposed to the good order and happiness of the United States.” 8 U.S.C. §1427.

U.S. Citizenship and Immigration Service (USCIS) has stated as agency policy that, “An applicant who refused to or *knowingly and willfully* failed to register for Selective Service negates his disposition to the good order and happiness of the United States, attachment to the principles of the Constitution, good moral character, and willingness to bear arms on behalf of the United States.... USCIS will deny a naturalization application when the applicant refuses

to register with Selective Service or has *knowingly and willfully* failed to register during the statutory period.” (*USCIS Policy Manual*, Volume 12 - Citizenship and Naturalization, Part D - General Naturalization Requirements, Chapter 7 - Attachment to the Constitution, <<https://www.uscis.gov/policy-manual/volume-12-part-d-chapter-7>>; emphasis added)

To the best of our knowledge, no court has reviewed or approved this USCIS interpretation of the statute as it might apply to registration with the SSS. We believe that this USCIS policy is not an appropriate or permissible interpretation of the naturalization statute.

USCIS has never proposed to incorporate this interpretation into any of its regulations. Notably, neither knowing and willful failure, evasion, or refusal to register with the SSS nor any other violation of the MSSA are included in the detailed list of crimes deemed by USCIS regulations to indicate a lack of good moral character. (8 CFR § 316.10) Nor is Selective Service registration or any other provision of the MSSA mentioned in the criteria in the USCIS regulations for determinations of “attachment to the Constitution” and “favorable disposition towards the good order and happiness of the U.S.” (8 CFR § 316.10)

In fact, many individuals “of good moral character, attached to the principles of the Constitution of the United States, and well disposed to the good order and happiness of the United States”, including birthright U.S. citizens, believe that military conscription is unconstitutional and have not registered with the SSS. Even if some tiny fraction of these individuals have been found by courts to have knowingly and willfully refused to register, that is no basis for a belief that they are not of good moral character, are not attached to the principles of the Constitution, or are not well disposed to the good order and happiness of the U.S.

But even if this USCIS policy were a valid interpretation of the immigration statute, the USCIS policy is explicitly limited to those who have “knowingly and willfully” failed to register.

Neither the SSS nor USCIS has the authority to adjudicate whether nonregistration was or is “knowing and willful”. Such a determination can be made only by a Federal criminal court in accordance with the U.S. Constitution and the Federal Rules of Criminal Procedure.

Knowing and willful failure, evasion, or refusal by an individual required to register with the SSS is a criminal violation of the Military Selective Service Act (50 U.S.C. § 3811). Knowledge and willfulness is an element of this or any other violation of the MSSA, and must be proven to a jury beyond reasonable doubt. “One

who fails to register must ‘knowingly’ do so before he is guilty of an offense.” (*U.S. v. Eklund*, 733 F.2d 1287, 8th Cir. 1984)

In the absence of knowledge and willfulness, nonregistration with the SSS is lawful. Neither the SSS nor any other agency or entity may lawfully or constitutionally presume an individual to be guilty of a crime of which they have neither been charged nor convicted.

Even if the USCIS policy were lawful, by its own terms nonregistration that hasn’t been found to be “knowing and willful” provides no basis for a determination, pursuant to that policy, of lack of good moral character or ineligibility for naturalization as a U.S. citizen.

Neither the SSS, USCIS, nor the Department of State may lawfully presume that failure, evasion, or refusal of registration with the SSS is “knowing and willful”. To do so would be to presume the existence of an unproven element of a criminal offense, and presume an individual to be guilty of a crime of which they have neither been charged nor found guilty. This would deny the presumption of innocence, the right to due process, and other Constitutional rights.

The SSS has no information in this or any other system of records as to whether individuals have “knowingly and willfully” failed to register. But if the SSS

had information which it believed provided probable cause to believe a crime had been committed, including evidence sufficient to provide probable cause to believe that failure, evasion, or refusal of registration was knowing and willful, the duty of the SSS would be to refer this evidence to the Department of Justice (DOJ) for investigation in accordance with Routine Use 1 of this SORN.

The most recent indictment for knowing and willful refusal to register with the SSS or any other violation of the MSSA was in 1986. (Steven Nelson, “Gender-Neutral Draft Registration Would Create Millions of Female Felons”, *U.S. News & World Report*, May 3, 2016, <<https://www.usnews.com/news/articles/2016-05-03/gender-neutral-draft-registration-would-create-millions-of-female-felons>>; Edward Hasbrouck, “Prosecutions of Draft Registration Resisters”, *Resisters.info*, <<https://hasbrouck.org/draft/prosecutions/>>.)

Over the 35 years from 1986 through 2021, the SSS referred *millions* of names of suspected nonregistrants to the DOJ for investigation and possible prosecution. More than 1.5 million names of suspected nonregistrants were included in the last ten years of these referrals, from Fiscal Year 2012 through Fiscal Year 2021. (Micheal A. Migliara, SSS Chief FOIA Officer, letter to Edward Hasbrouck in response to Freedom Of Information Act request, August 17, 2022,

<<https://hasbrouck.org/draft/FOIA/SSS-FOIA-response-17AUG2022.pdf>>) None of these millions of individuals have been investigated or prosecuted, because the SSS has provided the DOJ with no evidence of knowledge or willfulness on the part of any of these individuals.

According to a statement by a spokesperson for the SSS in July 2024, “As for the referrals on noncompliance to DOJ, we did not share referrals with DOJ on individuals who failed to register with SSS in 2022 and 2023 at the request of DOJ.” (Edward Hasbrouck, “Compliance, noncompliance, and enforcement of Selective Service registration”, *Resisters.info*, <<https://hasbrouck.org/draft/compliance.html>>.) Presumably, the DOJ requested that the SSS stop sending these referrals, and the SSS agreed, because the SSS had no evidence of “knowledge and willfulness” that would provide probable cause for investigation or prosecution.

This evidence of millions of cases, persisting for many decades, in which the SSS had no evidence of knowledge and willfulness even when it referred individuals to the DOJ for investigation, helps shows why it would be arbitrary and capricious for the SSS, USCIS, or the Department of State to presume that nonregistration with the SSS is knowing and willful – even if the Constitution permitted such a presumption of criminal guilt, which it doesn’t.

In the absence of a criminal conviction, nonregistration with the SSS must be presumed to be innocent and lawful and thus has no relevance to eligibility for U.S. citizenship. SSS records of registration, in the absence of criminal convictions, have no relevance to eligibility for U.S. citizenship. The proposed Routine Use 2 would thus serve no lawful purpose.

Routine Use 7 would allow disclosure of information from this SSS system of records, “To all U.S. Universities and colleges to determine eligibility for student aid, including grants and loans as required by state and local law.”

It’s unclear what’s meant by, “As required by state and local law.” Neither state nor local law can require the SSS, as a Federal agency, to disclose information to state or local government agencies or private entities such as “universities and colleges” (a broad, vague category not defined in the SORN and not mentioned in the MSSA or in SSS regulations).

Congress has recently determined that mere nonregistration with the SSS, in the absence of a criminal conviction for knowing and willful failure, evasion, or refusal to register, should not be grounds for a determination of ineligibility for Federal student aid.

This Congressional decision was based on recognition that most failure to register with the SSS is not knowing or willful, is therefore lawful, and should not be presumed to be criminal in the absence of a criminal conviction for *knowing and willful* failure, evasion, or refusal.

Pursuant to the FAFSA Simplification Act, Title VII, Division FF of the Consolidated Appropriations Act, 2021, P.L. 116-260, “Notwithstanding section 12(f) of the Military Selective Service Act (50 U.S.C. 3811(f)), an individual shall not be ineligible for assistance or a benefit provided under this title if the individual is required under section 3 of such Act (50 U.S.C. 3802) to present himself for and submit to registration under such section and fails to do so in accordance with any proclamation issued under such section, or in accordance with any rule or regulation issued under such section.”

Regulations implementing this provision took effect August 16, 2021. (Office of Postsecondary Education, Department of Education, “Notice: Early Implementation of the FAFSA Simplification Act’s Removal of Requirements for Title IV Eligibility Related to Selective Service Registration and Drug-Related Convictions”, 86 *Federal Register* 32252, June 17, 2021)

Pursuant to the Privacy Act, “Each agency that maintains a system of records shall— (1) maintain in its records only such information about an individual as is relevant and necessary to accomplish a purpose of the agency required to be accomplished by statute or by executive order of the President.” 5 U.S.C. § 552a (e). “The term ‘routine use’ means, with respect to the disclosure of a record, the use of such record for a purpose which is compatible with the purpose for which it was collected.” 5 U.S.C. § 552a (a)(7).

No statute requires the SSS to enforce state or local laws or university or college policies. Information in this system of records is collected solely for the statutory purposes of the SSS: planning and preparation for classification, selection, and delivery of inductees to the military. Disclosure of information from this system of records to universities or colleges is neither necessary for nor compatible with this purpose, and is thus prohibited by the Privacy Act.

No provision of the MSSA delegates to state or local government agencies or public or private universities or colleges any responsibility for enforcing sanctions for violations of the MSSA. That function is assigned by law exclusively to Federal law enforcement agencies and criminal courts. Given this, and the recent determination by Congress that mere nonregistration with the SSS should not disqualify an individual from Federal student aid, there is no basis for inferring

from the MSSA any Congressional intent to authorize disclosure of information from this system of records to state or local government agencies or public or private universities or colleges. The only purpose for such disclosures would be an improper one: to facilitate the improper denial of student aid or other benefits or entitlements on the basis of a wrongful presumption of knowledge, willfulness, and criminality without charges or trial.

If an individual has been convicted of knowing and willful failure, evasion, or refusal to register with the SSS, and is therefore ineligible for some benefit, that fact can be determined from court records, without the need for any information from this SSS system of records.

Routine Use 9 is incompatible with the original purpose for collecting the information held in the RCV, IMIS, and ECM systems of records. This routine use has been substantially broadened from the prior SORN to purportedly allow the SSS to disclose records to “Federal, state, local, territorial, tribal, or foreign law enforcement authority for investigation or prosecution where a record indicates a violation or potential violation of law.”⁶ Any routine use of personal information

6. 90 Fed. Reg. 58677, 58677 (Dec. 17, 2025).

held in a system of records must be “compatible with the purpose for which [the record] was collected.”⁷ The SSS has not met this burden.

Open-ended disclosure of SSS information for law enforcement purposes is not compatible under any of the systems of records. SSS collects and retains the personal information of millions of males across the U.S., including their dates of birth, citizenship and immigration status, Social Security Account numbers, addresses, and contact information. In the case of the RCV system, this information was collected to aid in registering individuals for Selective Service, ensure compliance with the MSSA,⁸ and verify information provided to the SSS.⁹ Similarly, the IMIS system is used to meet the mundane “operational business needs” of the agency, such as processing reimbursement and requests for personnel records,¹⁰ and ECM is meant to manage the documentation workflow for registration.¹¹ None of

7. 5 U.S.C. 552a(a)(7).

8. 50 U.S.C. app. 451-471a.

9. SSS, *Registration, Compliance and Verification (RCV) Cloud Modernization Privacy Impact Assessment*, (Apr. 14, 2025), <https://www.sss.gov/wp-content/uploads/2025/05/RCV-PIA-final_20250414_signed-1.pdf>. This Privacy Impact Assessment includes the following: “9. Under which Privacy Act SORN does the system operate? Provide a number and name. Federal Registry [sic] / Vol 65, No 184, page 57215-57222.” But that *Federal Register* citation is to a notice of amendments to the SORNs for other SSS systems of records. The cited notice does not mention the Registration, Compliance and Verification (RCV) system of records, SSS-19.

10. SSS, *Privacy Impact Assessment for the Selective Service System IMIS* at 6 (Aug. 2017), <<https://www.sss.gov/wp-content/uploads/2020/02/Privacy-Impact-Assessment-IMIS-V1.0.pdf>>.

11. SSS, *Privacy Impact Assessment (PIA) for the Selective Service System Enterprise Content Management (ECM) System*, at 3 (Sept. 2022), <https://www.sss.gov/wp-content/uploads/2025/03/SSS-ECM-PIA_Final-9_29_22-ADIT-Signed.pdf>.

these stated purposes relate to any law enforcement tasks outside of the MSSA's registration requirement. To the extent that any of these systems contains evidence that an individual violated the MSSA, disclosing that information is already accounted for in the pre-existing Routine Use 1.¹²

The SSS's decision to grant itself broad disclosure power needlessly and impermissibly increases the risk that the sensitive information with which the agency is entrusted will be lost, misused, or abused by recipient agencies.¹³ These risks are not abstract. In the last year, DHS and the DOGE have run roughshod over privacy protections to illegally access and consolidate the personal information of tens of millions of individuals (including voters,¹⁴ benefits holders,¹⁵ and veterans¹⁶) from agencies across the federal government in service of a brutal anti-immigrant agenda. DOGE has already obtained access to SSS records for unknown

12. 82 Fed. Reg. 29971, 29971 (June 30, 2017).

13. The agency's own materials display an understanding that disclosure of the information individuals trust it to maintain can lead to identity theft, financial harm, and risks to data integrity and agency operations. *See, e.g., SSS, Privacy Impact Assessment for the Selective Service System IMIS* at 5 (Aug. 2017), <<https://www.sss.gov/wp-content/uploads/2020/02/Privacy-Impact-Assessment-IMIS-V1.0.pdf>>.

14. *See Comments from EPIC & 15 Organizations to the U.S. Department of Homeland Security on the System of Records Notice for the SAVE Program*, USCIS-2025-0337 (Dec. 2025), <<https://epic.org/documents/comments-from-epic-15-organizations-to-the-u-s-department-of-homeland-security-on-the-system-of-records-notice-for-the-save-program/>>.

15. *See, e.g., Comments of the EPIC to the USDA on System of Records Notice for the SNAP Information Database* (Apr. 15, 2025), <<https://epic.org/documents/comments-of-epic-to-the-usda-on-system-of-records-notice-for-the-snap-information-database/>>.

16. *See Matt Bracken, Senate Democrats Want Answers from VA Secretary after DOGE Data Dive*, FedScoop (Feb. 18, 2025), <<https://fedscoop.com/veterans-affairs-data-doge-elon-musk/>>.

purposes.¹⁷ Despite this record, SSS proposes a routine use that would enable disclosure of sensitive information to a long list of unspecified recipients, for undisclosed law enforcement purposes, and without any indication of how the agency will mitigate the risks such disclosures create.¹⁸ This the Privacy Act does not permit.

Routine Use 13 would allow disclosure of information from this SSS system of records, “To the General Public for the purpose of retrieving a copy of their Selective Service Number for various purposes such as applying for employment, security background check, student grants and loans, and citizenship.”

To the extent that this routine use is intended solely to permit the disclosure to an individual of information pertaining to themselves, it is both unnecessary and improper. Pursuant to the Privacy Act, disclosures to the individual who is the

17. Information from this system of records has already been disclosed by the SSS to DOGE, on an unknown legal basis and for unknown purposes. “A DOGE representative visited our Agency this week.... We’ve established a great working relationship. They asked us about our data and requested access, which we gave in compliance with the President’s Executive Order on Establishing and Implementing the Department of Government Efficiency.” Statement by SSS spokesperson quoted in “DOGE gets access to Selective Service registration database”, Edward Hasbrouck’s blog, April 17, 2025, <<https://hasbrouck.org/blog/archives/002781.html>>. The SSS has promulgated neither any SORN nor any memorandum of understanding or notice, pursuant to the Computer Matching Act of 1988 (Public Law 100-503), mentioning access or use by DOGE.

18. See 5 U.S.C. 552a(e)(10).

subject of a record are covered by the “Record Access Procedures” in the SORN, not by the “Routine Uses”.

The “Record Access Procedures” most recently promulgated for this system of records, which appear not be changed by the amendments to the routine uses in the SORN, are in the “Notice of Amendment to Systems of Records: Registration, Compliance and Verification (RCV) System”, 82 FR 29971-29972, June 30, 2017.

To the extent that this routine use is intended to authorize disclosure to the general public of information about other individuals, it is neither necessary and relevant to any statutory purpose of the SSS nor compatible with the purpose for which this information was collected.

“Various purposes such as...” is impermissibly vague. It gives no indication of what, if any, limitations would apply to this routine use. Routine uses must be for specified purposes.

The purposes given as examples of this routine use are “applying for employment, security background check, student grants and loans, and citizenship.”

But as discussed above, no information in this system of records is relevant to student aid or citizenship. The same analysis applies to employment or security background checks.

If an individual wishes to disclose information from this system of records pertaining to themselves to a state or local agency, public or private university or college, or a member of the general public, they can obtain a copy from the SSS, in accordance with the record access procedures in the SORN. The individual can then disclose those records to any person or entity of their choice. Or the individual can execute a waiver of their rights pursuant to the Privacy Act, authorizing the direct disclosure of specific information to a specific third party. A “routine use” is neither necessary nor appropriate for disclosures requested or authorized by the individual.

This SORN should be amended to remove Routine Uses 2, 7, 9, and 13.

Respectfully submitted,

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