

BY THE U.S. GENERAL ACCOUNTING OFFICE

Report To The Director Selective Service System

Failure Of Registrants To Report Address Changes Would Diminish Fairness Of Induction Processing

Having correct mailing addresses for registrants is vital to the Selective Service's ability to administer a draft equitably. GAO found, however, that most persons who moved after registering did not notify the Service of their new mailing addresses.

As a result, address information for between one-fifth and two-fifths of the registrants facing induction could be outdated, should a draft be reactivated. Since undelivered or late induction notices increase the probability that those persons who keep their registration current would be drafted, the equity of the system is reduced.

GAO recommends that the Director, Selective Service System, take specific actions to maintain the fairness of the draft system.



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UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

FEDERAL PERSONNEL AND
COMPENSATION DIVISION

B-206884

The Honorable Thomas K. Turnage
Director, Selective Service System

Dear General Turnage:

We have completed our review of the currency of registrant mailing addresses kept by the Selective Service System. Correct addresses, which are necessary to ensure the prompt delivery of induction notices, are vital to both the equity and effectiveness of a draft, if it is reactivated. First, undelivered or late notices could result in some registrants avoiding or postponing being drafted which, in turn, increases the probability that a person who kept his registration current would be drafted. Second, undelivered or late notices could impede the Service's ability to rapidly provide inductees to their assigned military bases during the early days of a mobilization because of potential class action law suits challenging the fairness of induction processing.

We found that about 85 percent of the persons who moved after registering in 1980 did not notify the Service of their mailing address changes. As a result, address information for between one-fifth and two-fifths of the registrants in the prime induction group--those to be called first in the event of an emergency--could be outdated. At the end of 8 years (the end of draft eligibility), almost three-fourths of the addresses could be outdated.

Many registrants are apparently not aware of the requirement to report mailing address changes. In addition, there appears to be confusion about the distinction between the current mailing address and the permanent address. We believe notification requirements could be better communicated to the registrants, which would greatly reduce the number of incorrect mailing addresses and minimize placing an unfair burden on those who do register and report as the law requires. If improved communication is not successful, then having a time-limited registration just before the prime year of susceptibility--the year during which registrants reach age 20--may be a solution. This would minimize the elapsed time, during which registrants might move, between the registration date and the date of induction orders.

OBJECTIVE, SCOPE, AND METHODOLOGY

We conducted this study because we were concerned that the volume of change-of-address information reported to the Selective Service was not commensurate with the high mobility rate of the registered population. Our objective was to determine if the registrant mailing addresses on file with the Service are likely to be accurate when registrants reach prime draft age, in order to ensure that the system is equitable and can respond promptly in the event of mobilization.

To do this, we first obtained mailing address information from Service computer files for a random sample of registrants. We then sent questionnaires to the sampled registrants asking them whether the mailing addresses on file were current. On the basis of results obtained, we calculated the percentage of mailing address changes not reported to the Service. We then applied this percentage to Bureau of the Census, Department of Commerce, change-of-address statistics for draft-aged males to estimate the rates that address changes would not be reported throughout the years of draft eligibility. Our sampling methodology is described in the appendix.

We reviewed the Military Selective Service Act, Selective Service System regulations, and the Presidential proclamation concerning draft registration. We reviewed the Selective Service's Washington, D.C., headquarters' activities to inform registrants of the requirement to report change-of-address information and also assessed the impact that incorrect mailing addresses would have on the Service's meeting mobilization requirements of the Department of Defense. We also determined whether the Service had appropriate contingency plans to deal with this problem.

In addition, we obtained mail forwarding information from the Postal Service, Washington, D.C., headquarters to determine the extent to which registrants were reporting change-of-address information to the Postal Service but not to the Selective Service. We made this review during the period August 1981 to July 1982 in accordance with our Office's current "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions."

IMPORTANCE OF CORRECT ADDRESSES

Having registrants' correct addresses is vital to the Service's ability to administer a draft equitably. Induction notices that the Postal Service is unable to deliver or delivers late because of incorrect addresses, in effect, reduce the size of the registration pool. This, in turn, increases the probability that a person who kept his registration current would be drafted.

Registrants must keep current significant items of information on the registration form until they reach age 26. To maintain the integrity and the effectiveness of the registration process, the Military Selective Service Act, as implemented by Service regulations, requires every registrant to notify the Service within 10 days of any change in the mailing address and permanent residence address that he provided on his registration form. Failure to notify the Service of an address change is punishable by up to 5 years' imprisonment, a \$10,000 fine, or both.

Under the current Presidential proclamation, young men are required to register for the draft at age 18 and, if a draft is authorized by the Congress, would generally be subject to being called for induction until age 26. If a draft is reactivated, however, the year of prime susceptibility is the one during which registrants reach age 20. Under the previous system, a young man registered at age 18 but often would not be drafted until immediately prior to his 26th birthday. The revised draft selection procedures are designed to reduce the period of prime draft susceptibility of eligible persons and to establish a fair and impartial selection method.

Under the current system, if the draft were reactivated, those registrants in the prime selection group not selected for induction during their 12-month period of exposure would be placed into a lower priority category and would not be susceptible to induction unless the prime selection group were completely used up. After age group 20, the order of call is 21 to 26, then 19, and lastly 18 year olds.

After selecting persons for induction on the basis of a national birthday lottery, the Director, Selective Service System, would immediately send their induction orders by Western Union Mailgrams, to be delivered within 24 hours, to the mailing address in the computer file. Draftees would be required to report for induction within 10 days from the date of the induction order. To meet Defense requirements, the Service must provide the first inductees to military training bases within 13 days after the call for mobilization. Additionally, it must provide 100,000 inductees within 30 days and 650,000 inductees within 180 days of mobilization.

OUTDATED ADDRESSES COULD REDUCE EQUITY OF REGISTRATION SYSTEM

We estimate that about 20 percent to 40 percent of addresses in Selective Service files will be outdated for registrants who turn 20 in any given year. Furthermore, at the end of 8 years, when registrants reach their last year of draft eligibility, the extent of outdated addresses could reach almost 75 percent. As a

result of outdated addresses, many registrants would not receive induction notices at all or would not receive them in time to meet Defense mobilization requirements. Therefore, many more registrants would be susceptible to the draft than would be necessary if the Service had current mailing addresses.

If a draft is reactivated, a registrant would be drafted, on the basis a national lottery, in the year of his 20th birthday. Depending on his date of birth, the order of the random lottery, and the date of the lottery, a person would be drafted about 1 to 3 years after registration. For example, a person born on December 31, 1963, who registered in December 1981, when he turned 18, could be drafted as early as 13 months later, in January 1983. Conversely, a person born on January 1, 1963, who registered in January 1981, when he turned 18, could still be in the prime selection group 35 months later, in December 1983.

Extent of incorrect addresses

To determine the potential extent of outdated registration address information, we obtained Bureau of the Census data on changes-of-address of draft-eligible males (aged 18 through 25) from March 1975 to March 1980. 1/ We examined address changes of 18-year-old persons during the 5 years and found that 22.8 percent of these persons had moved by the time they were age 19. By applying the percentage of moves not reported to the Selective Service (84.7 percent) from our sample of registrants to the Census data, we estimate that 19.3 percent of the addresses on Selective Service files would be outdated within 1 year. (See the appendix for a discussion of the nonreporting rate.)

Also, we estimate that the percentage of outdated addresses at the end of the second through the fifth years following registration would be 32.5, 41.1, 52.8, and 61.6 percent, respectively. Furthermore, on the basis of Census data for older persons within the draft-eligible ages, we estimate that about 75 percent of the addresses provided to the Selective Service at the time of registration would be outdated by the end of draft eligibility.

Impact of mail forwarding

To the extent there are incorrect addresses, some registrants would not receive draft notices at all or would receive them after some delay. For example, in our sample about 8 percent of the registrants had outdated addresses which resulted in mail which

1/Geographical Mobility: March 1975 to March 1976, 1977, 1978, 1979, and 1980, series P-20, Bureau of Census, U.S. Department of Commerce.

could not be delivered by the Postal Service. Also, about 17 percent of the registrants in our sample had outdated addresses but received their mail after it was forwarded by the Postal Service or relative. Since our review did not measure delivery time, we do not know the extent of delays associated with incorrect addresses. The Postal Service standard is to deliver mail within 2 to 4 days after a forwarding address has been determined; however, actual delivery time has not been studied. Therefore, it is uncertain what impact delays due to mail forwarding would have on meeting established mobilization schedules.

Under the mail forwarding system, a person provides change-of-address information to the Postal Service and mail is forwarded for 1 year. Therefore, the proportion of post office nondeliveries in comparison to mail forwarded could dramatically increase once the registration address information is more than 1 year old.

We provided the Postal Service with the names and outdated addresses of 88 registrants who had changed their addresses without notifying the Selective Service. As of May 18, 1982, only 39 of these registrants (44 percent) had change-of-address information on file with the Postal Service. For the remaining 49 registrants, a change of address was not reported or it was reported more than 1 year ago.

Impact of incorrect addresses

The number of registrants is more than adequate to meet current Defense requirements. However, incorrect registrant mailing addresses could affect the Selective Service's ability to promptly meet initial induction requirements. Since the incorrect addresses could substantially increase the exposure to induction of registrants who would not be exposed if all addresses were correct, persons could refuse to report for induction and initiate class action law suits challenging the fairness of induction processing.

For example, during previous draft calls, class action law suits were initiated by persons challenging the fairness of Selective Service System actions regarding conscientious objectors. While the actions regarding change-of-address reporting are different, the primary issue still involves the fairness of the draft system. Thus, it is possible that class action law suits based on unfairly reducing the size of the draft pool because of outdated registrant mailing addresses could also arise. If such class action law suits were initiated, they could possibly disrupt induction processing during the critical early days of a mobilization.

To meet mobilization requirements, the Service will have to induct additional persons to replace those registrants not reporting for induction within 10 days because of late and undeliverable mail. To the extent that incorrect mailing addresses

delay or prevent delivery of draft notices, the Service simply plans to increase the volume of daily notices beyond the currently planned rate.

As of July 25, 1982, there were 8.4 million registrants available to meet Defense's requirement. This represents 13 registrants for every person required during the first 6 months of mobilization. The Selective Service's mobilization plans, based on historical data on the percentage of draftees who show up and satisfy induction requirements, provide for about 5 times as many notices as the number of inductees currently required by Defense. Thus, it appears that the 20 to 40 percent estimate of incorrect mailing addresses disclosed by our review would not adversely affect the Service's ability to deliver on time a sufficient number of induction notices to meet mobilization requirements. However, we did not determine the accuracy or the appropriateness of the data used by the Service to develop its planned induction rates.

MANY REGISTRANTS UNAWARE OF REQUIREMENT
TO REPORT ADDRESS CHANGES

The primary cause of the outdated addresses in the Service's computer files appears to be registrants' lack of knowledge about the reporting requirement. Two-fifths (207 of 536) of the persons responding to our questionnaire said they were not aware that they were to notify the Service of address changes.

Almost all (77 of 88) registrants who had moved but did not report the change said they did not know about the reporting requirement. Also, included in the total of 207 registrants not knowing about the requirement were about 30 percent (130 of 448) who said that the mailing addresses in the Selective Service computer files were correct.

Service officials expressed surprise that so many registrants were unaware of the reporting requirement. They said that each registrant is sent an acknowledgement letter within 90 days after he registers. The letter contains all registrant information and thus permits registrants to verify the accuracy of the information. A change-of-information form is also provided along with a postage-paid return envelope. The following statement regarding reporting requirements is included in the acknowledgement letter:

"The law requires you to notify Selective Service of any changes in your current or permanent address or any legal name change within ten (10) days of the date of that change. To notify Selective Service of changes in your record, you may use either the change of information

form enclosed in this letter or the Selective Service System change of information forms which are available at any U.S. Post Office or overseas at an American Embassy or Consulate."

However, registrants are not required to acknowledge receipt of the registration acknowledgement letter or to attest to the accuracy of the information contained in the letter. Penalties that could be imposed for failing to report changes could easily be overlooked because the penalty notice is presented on the reverse side of the letter. Also, the letter does not make a clear distinction between the current mailing address and the permanent address. On the basis of our discussions with some of the registrants, there appears to be some confusion as to the need to report changes in the mailing address when the permanent address has not changed.

Our data on incorrect addresses was obtained more than 12 months after the Service sent acknowledgement letters to the registrants. Periodic reinforcement of registrants' awareness of the reporting requirement may be needed. The Service plans to undertake a major revalidation of individual addresses by mailing verification letters to all registrants during the calendar year they attain their 20th year of birth. However, according to Service officials, the verification letter program has been delayed because of tight funding.

A statement regarding reporting requirements similar to that included in the acknowledgement letter is included in the verification letter. As with the acknowledgement letter, penalties for failing to report changes are not stated in the body of the verification letter, and registrants are not required to acknowledge receipt of the letter and attest to the accuracy of the information it contains.

CONCLUSIONS

Most registrants have changed their addresses without notifying the Service of the changes, even though the failure to report subjects the registrants to severe penalties. Many registrants are apparently not aware of the reporting requirement. In addition, there may be confusion about the distinction between the current mailing address and the permanent address.

To the extent that failure to report a current mailing address results in avoiding or postponing being drafted, the equity of the system is decreased. Means must therefore be found to improve the currency of registrant mailing addresses. We believe the Service's planned program to periodically reinforce awareness of the reporting requirement by mailing verification letters to registrants is a positive step, and, therefore, we endorse implementation of the program. In addition, modifying the registration

acknowledgement letter to more prominently state the penalties for not promptly reporting change-of-address information and to explain the distinction between the current mailing address and the permanent address would help.

The Service should require a random sample of registrants to furnish their current mailing addresses to test the completeness of address change reporting after the results of the modified registration acknowledgement letters and after the verification letters have been recorded. This would be more economical than requiring all registrants, regardless of whether or not they have moved since they registered, to acknowledge receipt of the letters and to attest to the currency of the mailing address information contained in the letters.

If the results of the test show that most registrants continue to fail to report address changes to the Service, then having a time-limited registration 3 to 6 months before the prime year of draft susceptibility may be a solution. This would minimize the elapsed time, during which registrants might move, between the registration date and the date of induction orders. Time-limited registration was also mentioned in a prior General Accounting Office report as a possible means of improving registration compliance. 1/

It is probable that there will always be some outdated addresses in the registration file for which the Postal Service has forwarding information. It might be possible to make arrangements with the Postal Service for handling induction notices that can be forwarded in a way that would reduce the normal delays associated with mail forwarding.

RECOMMENDATIONS

We recommend that the Director, Selective Service,

- modify the registration acknowledgement letter to more prominently state the penalties for not promptly reporting change-of-address information and to explain the distinction between the current mailing address and the permanent address;
- require a random sample of registrants to furnish their current mailing addresses to test the effectiveness of acknowledgement and verification letters in improving the completeness of address change reporting;

1/"Alternatives to Current Draft Registration Program Needed Unless Level of Compliance Improves," FPCD-82-20, April 19, 1982.

--if address information is not substantially improved by October 1984, propose Presidential proclamation language changing the registration requirement from age 18 to 3 to 6 months prior to the year of prime draft susceptibility; and

--determine whether arrangements can be made with the Postal Service for special handling of induction notices that can be sent to forwarding addresses.

AGENCY COMMENTS AND OUR EVALUATION

The Selective Service generally agreed with our findings, conclusions, and recommendations. In commenting on the report's findings, the Service said that initial draft call adjustments to compensate for incorrect addresses could be made to ensure that Defense personnel requirements are met during the critical early days of a mobilization. While this may be possible, we are concerned that class action law suits based on unfairly reducing the size of the draft pool because of outdated registrant mailing addresses could arise and disrupt induction processing. We added a section to the report to explain this concern.

In commenting on the report's proposals, the Service said that placing an October 1983 deadline on substantially improving registrant address information was impractical because a planned major corrective action, the verification letter program, has not been implemented because of tight funding. Since the program has been delayed until fiscal year 1983, we revised the report to reflect an October 1984 deadline.

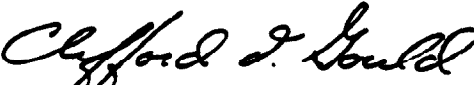
Also, the Service said that a time-limited registration was not the only solution to the problem of non-current address files. The Service suggested that we also consider recommending the following alternatives: (1) improve the Selective Service's public affairs program, (2) increase the number of change-of-address reporting locations, (3) update registrants' mailing addresses through the use of existing Government computer files, and (4) increase enforcement efforts. As discussed in the report, lack of knowledge about the reporting requirement is a primary cause of outdated mailing addresses. Our report indicates that registrants' awareness of the reporting requirement needs periodic reinforcement. (See pp. 6 and 7.) However, we have not recommended that a program awareness program be established because the Service's planned verification letter program may preclude the need for additional public affairs efforts. In our view, the other alternatives suggested by the Service are not likely to significantly improve address currency.

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As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations. This statement must be sent to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date of the report. A written statement must also be sent to the House and Senate Committees on Appropriations with the agency's first request for appropriations made over 60 days after the date of the report.

We are sending copies of this report to the Secretary of Defense, the Director, Office of Management and Budget, and interested congressional committees.

Sincerely yours,


Clifford I. Gould
Director

DETERMINATION OF THE EXTENT
TO WHICH REGISTRANTS REPORT ADDRESS
CHANGES TO THE SELECTIVE SERVICE SYSTEM

To determine the extent to which registrants update their Selective Service records whenever they have changes in their addresses, we obtained address information from the computer files for a random sample of registrants. Using the current addresses in the System computer files, we mailed questionnaires to 701 randomly selected persons from the universe of 3.7 million young men who were required to register in 1980 and had registered as of August 30, 1981. We asked the registrants to answer the following questions:

1. Is the current address shown on the questionnaire correct?
2. If incorrect, what is the correct information?
3. If incorrect, have you changed your address since you registered?
4. If changed, was the Selective Service System notified of this change?
5. Do you know that you are to notify the Selective Service of any address change?

A total of 520 questionnaires were returned to us, including completed questionnaires and post office returns of undeliverable mail. For the remaining 181 registrants, we randomly selected 65 registrants and contacted them by either telephone or certified mail. The results of the subsample of 65 were similar to those of the 520 returned questionnaires. Therefore, we projected the subsample results to the remaining 116 registrants who did not respond to our questionnaire. We are 95 percent confident that the responses from the 701 randomly selected registrants are representative of the 3.7 million universe, subject to a maximum sampling error of about plus or minus 4 percent.

The following table shows the results of our inquiries into the accuracy of registrant mailing addresses in Selective Service computer files.

	<u>Number</u>	<u>Percent</u>
Registrant returns, correct address on file:		
Initial responses	402	77.3
Followup contacts	46	70.8
Projections	<u>82</u>	<u>70.7</u>
Total	<u>530</u>	<u>75.6</u>
Registrant returns, incorrect address on file:		
Initial responses	72	13.9
Followup contacts	16	24.6
Projections	<u>29</u>	<u>25.0</u>
Total	<u>117</u>	<u>16.7</u>
Post office returns, undelivered mail:		
Initial responses	46	8.8
Followup contacts	3	4.6
Projections	<u>5</u>	<u>4.3</u>
Total	<u>54</u>	<u>7.7</u>
Total returns:		
Initial responses	520	100.0
Followup contacts	65	100.0
Projections	<u>116</u>	<u>100.0</u>
Total	<u>701</u>	<u>100.0</u>

As shown above, about one-fourth of the registrants had addresses in the computer files that were incorrect. This included registrants who told us they had changed their addresses without notifying the Selective Service (16.7%) and those registrants whom questionnaires were sent but could not be delivered by the Postal Service (7.7%) (we concluded that these registrants had also changed their addresses without notifying the Selective Service).

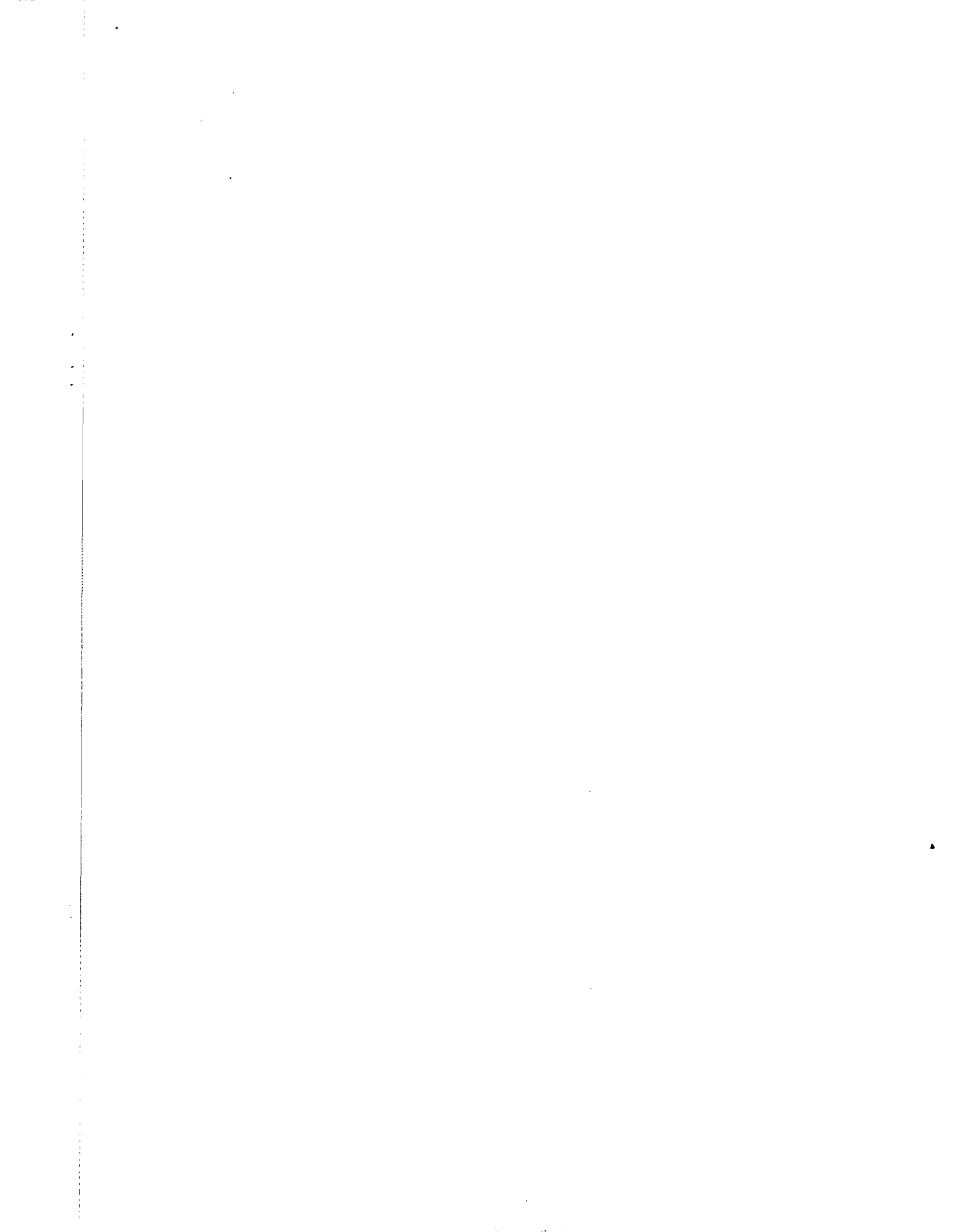
The percent of persons not reporting change-of-address information and those who had reported this information to the Selective Service follows.

	<u>Number</u>	<u>Percent</u>
Registrants who had moved and reported their address change	31	15.3
Registrants who had moved but did not report their address change	<u>171</u>	<u>84.7</u>
Total	<u>202</u>	<u>100.0</u>

As shown above, about 85 percent of the registrants who moved did not report the move to the Selective Service. Registrants who had moved and reported their address change was determined by comparing questionnaire responses to the Selective Service System master history computer files. Registrants who had moved but not reported their move was determined by adding the number of registrants who made such a response to our questionnaire and the number of questionnaires which could not be delivered by the Postal Service.

The percentage of registrants not having current mailing addresses on file may be even greater than indicated by our sample. For example, we spoke to the relatives (or in some cases directly with the registrant) of 36 registrants who said that the registrant's mailing address as recorded in the Selective Service System computer files was correct. However, 15 (about 42 percent) of these persons said that the registrant was not living at the supposedly "correct" mailing address. Another registrant returned his completed questionnaire to us stating that the current mailing address in the Service's computer files was correct. However, he added a note "I'm sorry, I've been at college or I would have sent the card sooner." Accordingly, it is questionable whether these registrants have, in fact, provided their current mailing addresses to the Selective Service.

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