



UNIVERSITY OF HAWAII SYSTEM

Legislative Testimony

Testimony Presented Before the
Senate Committees on Judiciary & Labor and
Ways & Means

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By

Risa E. Dickson, Vice President for Academic Planning and Policy
University of Hawai'i System

HB 52 HD1 SD1 – RELATING TO THE SELECTIVE SERVICE REGISTRATION AWARENESS AND COMPLIANCE ACT

Chairs Keith-Agaran and Tokuda, Vice Chairs Shimabukuro and Dela Cruz, and Members of the Committees:

HB 52 HD1 SD1 requires compliance with the Military Selective Service Act to qualify for state financial assistance, which would include loans, grants, scholarships and tuition waivers or other financial assistance for post-secondary education that is provided by the state.

The intent of HB 52 HD1 SD1 is laudable; however, the University respectfully recommends that the current draft of the bill be revised as follows:

- Delete language on page 3, lines 6-8 subsection (b) which pertains to a section in HB 52 HD1 that has since been deleted.
- Delay the effective date from July 1, 2017 to July 1, 2018, in order to provide adequate planning and implementation time for the University.

All individuals who apply for federal financial aid through the Free Application for Federal Student Aid (FAFSA) are data matched through the Selective Service confirmation process and males are afforded the option to automatically register for Selective Service. This FAFSA information is downloaded to the University's student information system. Since not all high school graduates venture into higher education nor apply for federal financial aid, the yield to the US Military Selective Service may not be as high as anticipated. Perhaps, the yields would be greater if all age appropriate males would comply with the requirements *prior to graduating from high school*.

In gauging the practices across the country, the University was only able to confirm that the University of Texas System has a requirement for proof of Selective Service registration tied to receiving federal and state aid.

Should HB 52 HD1 SD1 pass, there will be major impacts on the workload of frontline operations, involving the altering of computerized and manual workflows to the University financial aid application processes. This will involve overtime and/or the need for additional human resources to comply. HB 52 HD1 SD1 has the potential of affecting

student enrollments negatively which will have a consequential impact on the quality of student life as well as the financial resources available on the University's campuses. Finally, the bill's applicability to continuing students (i.e. those already enrolled) will require ample planning, foresight, and anticipation to minimize disruption in their continued enrollment and persistence.

Thank you for the opportunity to testify on this measure. The University understands the intent of this bill, and is concerned about its impact on operations, workflow, and enrollment.



Selective Service System

Hawaii Headquarters

(1) Committee on Judiciary and Labor and (2) Committee on Ways and Means

Monday, April 04, 2016

RE: House Bill 52, HD 1, SD1-- RELATING TO SELECTIVE SERVICE AWARENESS AND COMPLIANCE

I am Andrew Pepper, State Director for the United States Selective Service System. My role is to ensure young men¹ in Hawaii ages 18 through 25 register with the Selective Service System, as required by law. This helps ensure that they do not lose valuable Federal benefits linked to the registration requirement and helps ensure that any future military draft is fair and equitable to the residents of Hawaii. In the very unlikely event the draft is resumed, we want it to be the fairest and most equitable in our Nation's history. It is important to remember that every young person who fails to register inequitably increases a law-abiding person's chances of being drafted.

¹ Currently, the law only allows the registration of men. This limitation is based historically on the fact that most military jobs have been closed to women and so conscription of women in the event of a national military emergency would not result in an increase in combat manpower (which would be the point of conscription). On January 2, 2016, however, the Department of Defense opened all military jobs to women. In the view of many, this has undermined the rationale for the non-registration of women. However, the Selective Service System is not a policy making body and has no institutional "opinion" on the issue. Whether women will be required to register in the future is a decision for the Congress and the President. Whatever the decision, we stand ready to implement the will of our Nation's political leaders.

Last session many people asked the basic question: “Why do we still have the Selective Service System?” It is a fair question with an easy answer: The Selective Service System is our Nation’s ultimate insurance policy in that it provides a ready source of personnel for national service should world events dictate the need for such personnel. The number of Selective Service registrants, and our Agency’s ability to rapidly deliver personnel for national service, are openly disclosed to ensure that all potential adversaries understand both our national resolve and our national mobilization capabilities. In other words, the Selective Service System helps keep us safe and at peace.

The Selective Service System supports the passage of HB 52, HD1, SD 1 because it will unquestionably increase registration compliance in Hawaii. Hawaii has a problem: Only 73% of 18-year-old men in Hawaii have registered with Selective Service. This means that 27% of the young people in this critical age group are at risk of losing, *for life*, a host of federal benefits linked to the registration requirement. These benefits include: Federal employment, Federal student financial assistance, participation in Federally-funded job training programs, and eligibility for U.S. citizenship.

HB52, HD1, SD1 is not designed or intended to deny anyone access to student financial aid or an education within the University of Hawaii system; to the contrary, it is a good-faith attempt to create more opportunities for young people to discover that they are not in compliance with the registration requirement of the Military Selective Service Act and, at that time, correct their non-compliance as part of their student financial aid application process. Basically, HB52, HD1, SD1 is an attempt to create an additional safety net to help young people (who may be out of compliance with the Selective Service registration requirement) realize their status and be brought into compliance, thereby preserving their federal rights and benefits.

Thirty-one States around the Nation have already passed this type of legislation. By passing HB 52, HD1, SD1---to link eligibility for State supported student financial aid to Selective Service registration compliance--it will further increase the registration compliance rate in Hawaii. It will also further remind young people in Hawaii of their civic and patriotic obligation to contribute to the defense of our country in a national emergency.

Registration with the Selective Service System is each citizen's contract with freedom.

To address the concerns expressed by the University of Hawaii about the effort and financial burdens required to comply with HB 52, HD1, SD1, the Selective Service System notes that it has developed close and effective working relationships with the thirty-one other states that have adopted similar legislation and has implemented computer processing systems designed to minimize the effort required by our State agency partners. Should HB 52, HD1, SD1 pass into law, the Selective Service will work closely with the University of Hawaii to ensure that the University's concerns are addressed and alleviated. As State Director for Hawaii, I will serve as personal liaison between the Selective Service and the University of Hawaii to implement this law smoothly and with minimal impact on the University.

When this matter was re-referred to WAM, I asked the Selective Service office to provide me with more detailed information as to the procedural and mechanical steps involved in implementing a registration verification system relationship between the Selective Service System and the University of Hawaii. The attached slides below provide bullet points to explain how the system and relationship work. And while the Selective Service System is sensitive to the University's concerns about costs (which would be *de*

minus), the Selective Service believes that the protection and preservation of federal benefits otherwise lost by students who fail to register should be the focus of the discussion as to the merits of HB 52, HD1, SD1. The Selective Service, much like the University of Hawaii, is an agency with constant budgetary concerns and limitations. But we at the Selective Service live by the creed of “accomplish the mission of protecting our young people first” and the resources to do so will always be found. We encourage the University of Hawaii to join us in placing that mission ahead of all else. Because the consequences otherwise can be heartbreaking (such as the loss of the right of naturalization by a person who has a deep desire to become a proud American citizen).

In closing, passing HB 52, HD1 will help ensure that the youth of Hawaii do not lose valuable Federal benefits linked to the registration requirement, ensure that any future draft is fair and equitable as possible, and will help remind young people of their patriotic obligation to contribute to the defense of our country in a national emergency.

Thank you for the opportunity to submit this testimony.

Very Respectfully,



Andrew L. Pepper
State Director
U.S. Selective Service System

Attachment



Mr. Andrew Pepper
Hawaii State Director
U.S. Selective Service System
April 4, 2016



Overview

- HB 52, HD1, SD1 requires SSS verification for state-supported secondary education student loans (already done for federally-supported student loans)
- SSS automates processing for verifying registrations with universities
 - Batch processing – lead time is approximately 1 week
- Verification via SSS.gov
 - Webpage has *instantaneous* results
- University System determines frequency of submissions
 - Weekly, Monthly, Quarterly, Semi-Annual, Annually



Path Forward

- If Legislation passes and becomes law:
- SSS and University of Hawaii complete:
 - Memorandum of Understanding
 - Interconnection Security Agreement for Data Transfer
- Agree on file layout
- Finalize data transfer process
- Complete testing
- Implement



Methods of Verification

(Batch Processing)

- SSS receives files from University in some format (whatever is convenient to the University):
 - Encrypted file on media (*i.e.* DVD)
 - Encrypted file through email
 - Secure File Transfer Server
- SSS compares data against registration data
 - If matched, Selective Service Number added to file
 - If no match, research conducted to find possible match. If still no match, file is marked accordingly.
- File returned to University with registration status



Methods of Verification

(Manual)

- University personnel go to SSS.gov website
 - Verification page requires only three things: Last Name, SSN, and DoB—Shortest form in U.S Government
 - Results returned *instantly* with printable written verification.



Potential Costs

(Batch Processing)

- Selective Service absorbs most costs (*e.g.*, its national data center) and already has personnel working with universities across the Country.
- University of Hawaii Potential Costs are *de minimus*:
 - Creating data extract
 - File transmission
 - Reviewing Results
 - No additional computer equipment needed by State.
 - Selective Service doing this in 30+ states and is sensitive to cost issues and has identified and mitigated process issues that might lead to costs. National data center personnel in Chicago highly and specially trained to assist universities.
 - Selective Service is committed to smooth implementation.



Potential Costs

(Manual)

- University of Hawaii potential costs:
 - Time for registrar to check website (testing shows that entering three data points and awaiting registration confirmation takes less than 30 seconds).
 - Time for registrar to contact SSS Call Center if needed
 - Website already deployed to handle requests
 - Call Center staffed 0900 – 1700 Eastern Time