



The Draft: Men Only?

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The Selective Service Act, or the draft, requires the registration of males 18 to 25 years-old but not females. The purpose of registration is to provide a pool of potential soldiers for combat in case of a national emergency.

*Over 30 years ago, the U.S. Supreme Court in *Goldberg v. Rostker*, 453 U.S. 57 (1981), stated that requiring only males to register did not violate equal protection under the Fifth Amendment to the U.S. Constitution. For equal protection to apply, males and females had to be “similarly situated.” They were not because females could not serve in combat.*

*Since *Goldberg v. Rostker*, the military has expanded the roles of females to include some combat positions. In January 2013, the Pentagon officially rescinded its ban on females serving in combat, which*

will open up most, if not all, combat positions to females. As a result, when it comes to registration for the draft, males and females are now similarly situated.

Key Words: selective service, draft, discrimination, equal protection, *Goldberg v. Rostker*

52,212 American military men died in the Vietnam War¹ --30 percent of them were drafted². Eight—not 8,000, not 800, not 80—but 8 American military females died in the war, and if you include American civilian females, the total is 68, all volunteers³.

It does not seem fair. After all women can vote and one of the policies behind allowing people to vote in a democracy is that it gives them a stake in the government they may have to defend with their lives. Females have never been forced to fight, to die, to be physically maimed or psychologically destroyed for America in a just war or a stupid one, but they've had the vote for nearly a century. The times, however, may be "a-changing." The Pentagon has decided to put females into combat positions.

When the U.S. Supreme Court ruled in 1981 that the federal government could discriminate by requiring only males to register for the draft but not females, the Court based its reasoning on the fact that females were not allowed into combat because of certain statutes and Pentagon policy. The statutes were repealed over the years and now the Pentagon's policy has changed. So, logically, women should have to register, but logic, when it comes to the courts treating the sexes equally, is often a casualty.

The 1981 case was *Goldberg v. Rostker*, 453 U.S. 57. In a six to three decision, the justices condemned only men to registering for the draft and punishment if they did not. Today, failure to register means a man faces a maximum jail term of five years, a maximum fine of \$250,000, no federal student aid in the form of loans or grants for college, no federal benefits for employment training, no federal employment and in many states no driver's license, no state government employment and no state student aid for college.

The *Goldberg v. Rostker* case started in June 1971 during the Vietnam War when the total number of American males who had come home in a box was around 45,000. A group of young guys did not want to go, most likely because of their lottery numbers, and not the Powerball or Mega kind. These numbers, running from 1 to 366, depending on your date of birth, determined whether the U.S. Government was going to use your life to defend certain corporate interests in Vietnam, such as Firestone's rubber tree plantation in the Mekong Delta. The lower the number, the more likely you were on your way.

The Government instituted the lottery in 1969 in an attempt to quell opposition to the war by the classic tactic of "divide and rule." Before the lottery, every male faced the prospect of Vietnam when he graduated from high school or college. With the lottery, many guys knew their necks were no longer on the line, so they curtailed or ended their anti-war activities. Of course, the lottery did not affect females. On the night of the drawing, young men across America tuned in to listen for their fate while females went about their usual concerns with short dresses, see-through blouses, make-up and how much their boyfriends spent on them.

The draft had two parts then, one required young males to register that created a pool of bodies for possible conscription into the military, and the second part was conscription. In 1973 the conscription part ended and in 1975 the registration requirement was terminated. As a result, the *Goldberg v. Rostker* case languished in the courts because there were effectively no draft laws left for the plaintiffs to oppose.

That all changed with Jimmy Carter and the 1980 Russian invasion of Afghanistan. President Carter, not satisfied that the United State's boycott of the Olympics would sufficiently deter the Commies from further aggression, reinstated draft registration and asked Congress to appropriate

the money for such. To his credit, he also asked Congress to amend the Military Selective Service Act, 50 U.S.C.App. § 451 et seq., to require females 18 to 26 to register for the draft. Women would not be used in combat but in support roles even though in one study the Defense Department had found as early as 1978 that the height and weight differences of the female population were not considered in-surmountable, and at times could be an advantage. Asian men were also significantly lighter and shorter than American males on the average, but this in no way prevented their use in the military, nor did it prevent various Asian nations from fielding very effective fighting forces, such as the North Vietnamese and Viet Cong who defeated America⁴. The Selective Service and the military went along with Carter's request and provided evidence and testimony at hearings before Congress that females should be required to register for the draft:

One question often raised is whether men and women can serve together efficiently in the Armed Services. Perhaps the best answer is that they are doing so now [1980] without apparent difficulty⁵.

In 1980, there were 150,000 women on active service in the armed forces, now there are around 214,000, which is probably why the number of false sexual abuse accusations have increased dramatically faster than the number of founded sexual abuse cases⁶.

In 1980, Bernard T. Rostker, the Director of the Selective Service System, testified that

[T]here were no administrative obstacles to running a registration and induction process including both males and females;⁷

[S]eventy-two countries in the world have military conscription, and ten of these register or conscript both men and women;⁸

[I]n the Vietnam conflict, more than 7,000 women served in support roles which qualified for combat pay.⁹

Every representative from the various armed services testified that they would have no objection to the registration of women. General Bernard W. Rogers, Chief of Staff, United States Army, testified before the Senate that:

Women should be required to register . . . in order for us to have an inventory of what the available strength which is within the military qualified pool in this country.¹⁰

The representative for the Department of Defense testified that:

If women were registered . . . we would have a very large pool of women whose location would be known, and who would be available to be called up, classified and examined in case induction or conscription were required by national emergency. The Armed Services would have to determine the number of women that they needed both for purposes of expanding the forces and support forces and the support jobs that they have to do, and also for releasing men from the support functions to combat functions.¹¹

[In a time of national emergency] not only will we need to expand combat arms, as I say, that is the pressing need, but we also have to expand the support establishment at the same time because that meets the situation where the combat arms can carry out their function successfully, and the support establishment now uses women very effectively, and in wartime I think the same would be true.¹²

It is in the interest of national security that, in an emergency requiring the conscription for military service of the nation's youth, the best qualified people for a wide variety of tasks in our armed forces be available. The performance of women in our Armed Forces today strongly supports the conclusion that many of the best qualified people for some military jobs in the 18-26 age category will be women. The Administration strongly believes they should be available for services in the jobs they can do.¹³

The President's decision to ask for authority to register women is based on equity. It is a recognition of the reality that both men and women are working members of our society and confirms what is already obvious throughout our society that women are now providing all types of skills in every profession. The military is no exception. Since women have proven that they can serve successfully as volunteers in the Armed Forces, equity suggests that they be liable to serve as draftees if conscription is reinstated.¹⁴

The Senate and the House of Representatives, however, were not buying the administration and military's reasons for registering females. Congress, in particular Senators Sam Nunn and John Warner, argued that since females were not trained for combat, putting them in the rear with the gear would create a Battle of the Bulge problem. In World War II, Patton had to reach back into his support base and pull forward soldiers to fill the front lines in order to turn the tide during the Battle of the Bulge, Germany's last major offensive. Since females in 1981 were prohibited from serving in combat, they were not trained for it, so if a similar situation arose, the female support troops would be useless as combat soldiers. This argument coupled with Congress's assumption that the purpose of draft registration was to provide a pool of readily available combat soldiers resulted in Congress deciding that draft registration should not include females. Congress also assumed that any need for women to fill non-combat positions outside the theatre of war would be filled by volunteers.

A three judge panel in the U.S. Eastern District Court of Pennsylvania that heard the *Goldberg v. Rostker* case rejected Congress's reasons for denying females the obligation to register and declared the Military Selective Service Act unconstitutional.

To reach this decision, the three district judges first found that draft registration mainly impacted civilian life; therefore, it was not part of military operations. The reason for this conclusion was to avoid deferring to Congress on its registration decision because the Constitution gives Congress the power to do pretty much whatever it wants regarding the military. "The constitutional power of Congress to raise and support armies and to make all laws necessary and proper to that end is broad and sweeping." *United States v. O'Brien*, 391 U.S. 367, 377 (1968). Another reason for the three judges divorcing registration from military operations was that the courts lack the competence to make decisions concerning the military. In *Gilligan v. Morgan*, 413 U.S. 1, 10 (1973), the Supreme Court stated:

[It] is difficult to conceive of an area of governmental activity in which the courts have less competence. The complex, subtle, and professional decisions as to the composition, training, equipping, and control of a military force are essentially professional military judgments, subject always to civilian control of the Legislative and Executive Branches.

The three district judges reasoned that:

Ordinarily deference is due to congressional and executive decisions in military matters. We are not here concerned with military operations or day to day conduct of the military into which we have no desire to intrude. . . . [The] issue does not involve the court in determining how the military should utilize women in any given situation. The issue before us is the constitutionality of the total exclusion of women from the [Military Selective Service Act], not the extent to which the military services must utilize women.

Goldberg v. Rostker, 509 F.Supp. 586, 596 (E.D. Pa.1980).

Once the hurdle of the required deference to the Congress in military affairs was overcome, the judges had to determine whether requiring the registration of only males violated "equal protection" as required by the Fifth Amendment to the Constitution. When the federal government is doing something, a clause in the Fifth Amendment requires that "No person shall be . . . deprived of life, liberty, or property, without due process of law . . ." Due process of law means "fairness," and it is not fair for the federal government to treat similarly situated persons differently the way King George III did and many modern-day bureaucrats do.

That does not mean different groups of people who are all in similar situations, such as riding a bus or having a coke at the five and dime lunch counter, cannot be treated differently by the gov-

ernment. To do so, however, requires that the different treatment serve a government purpose. How significant the government purpose and how effectively it is served depends on the reason for treating similarly situated groups differently. For example, if the only difference is skin color, then the government must have a “compelling” purpose that is strictly served. That’s the highest standard. If it is sex difference, then the government must have just an “important” purpose that is substantially served. That’s the middle standard. The lowest standard is that government must have a legitimate purpose that is rationally served, such as requiring drivers to be 17 and older.

Since it was undisputed that the Military Selective Service Act created a sex-based difference, it was up to the government to show that keeping females from registering substantially served an important government purpose.

The purpose of registration according to Congress was to equip the Department of Defense with information so that if it decided on a national mobilization, it could move quickly, effectively and with great flexibility to achieve wartime personnel requirements from the pool of registered persons: 18 to 26 year-olds. The issue for the three judges then was whether excluding females from that pool substantially served the purpose of mobilizing the military in time of national emergency quickly, effectively and with flexibility in conscripting registrants? The three judges ruled it did not and declared the discrimination unconstitutional:

It is incongruous that Congress believes on the one hand that it substantially enhances our national defense to constantly expand the utilization of women in the military, and on the other hand endorses legislation excluding women from the pool of registrants available for induction. Congress allocates funds so that the military can use and actively seek more female recruits but nonetheless asserts that there is justification for excluding females from selective service, despite the shortfall in the recruitment of women. Congress rejects the current opinion of each of the military services and asserts that women can contribute to the military effectively only as volunteers and not as inductees.

The President, the Director of the Selective Service System, and representatives of the Department of Defense informed Congress that including women in the pool of registrants eligible for induction would increase military flexibility. The record reveals that in almost any conceivable military crisis the armed forces could utilize skills now almost entirely concentrated in the female population of the nation. Congress itself has appropriated funds for the increased recruitment and utilization of women in the armed services.

The problem with [prohibiting female registration] is that the record before [this court] proves that there already is extensive utilization of females in the military and that this utilization will substantially increase. The die is already cast for substantial female involvement in the military. Furthermore, the military does not lose flexibility if women are registered because induction calls for females can be made according to military needs as they accrue in the future. Though military flexibility might call for less utilization of female inductees than male inductees in a given crisis situation, it is the antithesis of “flexibility” to exclude women from the pool of registrants that could be called upon in a time of national need.

The principal reason the government proffers for a male-only registration is that it provides military flexibility. The record here, however, reveals that women do serve a useful role in the military and provide important skills. The foregoing discussion also illustrates that flexibility is not enhanced, but is in fact limited by the complete exclusion of women. We therefore hold that the complete exclusion of women from the pool of registrants does not serve “important governmental objectives” and is not “substantially related” . . . to any alleged government interest. Thus, the Military Selective Service Act unconstitutionally discriminates between males and females.

Goldberg v. Rostker, 509 F.Supp. 586, 603 - 605 (E.D. Pa.1980).

Sounds fair, sounds just—and then the Supreme Court stepped in.

The Supreme Court ruled that the district court’s “efforts to divorce registration from the

military and national defense context . . . [were] unpersuasive.” *Goldberg v. Rostker*, 453 U.S. 57, 68 (1981). “Registration is not an end in itself in the civilian world but rather the first step in the induction process into the military one, and Congress specifically linked its consideration of registration to induction, see, e. g., S. Rep. No. 96-826, pp. 156, 160 (1980).” *Id.*

[I]nduction is interlocked with registration: only those registered may be drafted, and registration serves no purpose beyond providing a pool for the draft. Any assessment of the congressional purpose and its chosen means must therefore consider the registration scheme as a prelude to a draft in a time of national emergency. Any other approach would not be testing the Act in light of the purposes Congress sought to achieve.

Id. at 75.

Since the Supreme Court interlocked registration with induction, it deferred to Congress’ decision:

This is not . . . merely a case involving the customary deference accorded congressional decisions. The case arises in the context of Congress’ authority over national defense and military affairs, and perhaps in no other area has the Court accorded Congress greater deference. In rejecting the registration of women, Congress explicitly relied upon its constitutional powers under Art. I, § 8, cls. 12-14. The “specific findings” section of the Report of the Senate Armed Services Committee, later adopted by both Houses of Congress, began by stating:

‘Article I, section 8 of the Constitution commits exclusively to the Congress the powers to raise and support armies, provide and maintain a Navy, and make rules for Government and regulation of the land and naval forces, and pursuant to these powers it lies within the discretion of the Congress to determine the occasions for expansion of our Armed Forces, and the means best suited to such expansion should it prove necessary.’ S. Rep. No. 96-826, *supra*, at 160.

Goldberg v. Rostker, 453 U.S. 57, 63 (1981).

In addition to deferring to Congress’s conclusion that it had near complete power over registration, the Supreme Court also deferred to its finding that the purpose of registration was to prepare for a draft of combat troops. Since women were excluded from combat, Congress decided that they would not be needed in the event of a draft, and therefore decided not to require them to register. But what about all those non-combat, support jobs that females could perform? Logically a draft could have been used to fill those roles during an emergency but Congress believed enough females would volunteer. Sure, if the military paid them enough, which it was not, which was why its recruitment efforts for women were not going as planned. The Supreme Court simply overlooked these realities. By tying registration to military affairs and the purpose of registration to create a pool of potential combat soldiers, the Supreme Court ruled that it was up to Congress to make decisions about the registration and induction—not the Court.

None of this is to say that Congress is free to disregard the Constitution when it acts in the area of military affairs. In that area, as any other, Congress remains subject to the limitations of the Due Process Clause . . . but the tests and limitations to be applied may differ because of the military context. We of course do not abdicate our ultimate responsibility to decide the constitutional question, but simply recognize that the Constitution itself requires such deference to congressional choice.

Goldberg v. Rostker, 453 U.S. 57, 67 (1981). That is legalize for passing the buck in order to avoid a decision at a time that would have been politically unpopular.

The six Justices who overruled the district court’s decision apparently forgot that:

The irreplaceable value of the power articulated by Mr. Chief Justice Marshall [*Marbury v. Madison*, 5 U.S. 137, 1803 WL 893 (1803)] lies in the protection it has afforded the constitutional rights and liberties of individual citizens and minority groups against oppressive or

discriminatory government action. It is this role, not some amorphous general supervision of the operations of government, that has maintained public esteem for the federal courts and has permitted the peaceful coexistence of the countermajoritarian implications of judicial review and the democratic principles upon which our Federal Government in the final analysis rests.

United States v. Richardson, 418 U.S. 192 (1974)(Powell, J., concurring). So when it came to which was more important: Congress' power to violate individual rights or the individual rights violated—rights lost.

On the issue of equal protection, the six Justices said,

This is not a case of Congress arbitrarily choosing to burden one of two similarly situated groups, such as would be the case with an all-black or all-white, or an all-Catholic or all-Lutheran, or an all-Republican or all-Democratic registration. Men and women, because of the combat restrictions on women, are simply not similarly situated for purposes of a draft or registration for a draft.

Goldberg v. Rostker, 453 U.S. 57, 78 (1981).

Despite much of the media and some not very bright lawyers believing that *Goldberg v. Rostker*, 453 U.S. 57 (1981) was decided on equal protection grounds, it was not. The Supreme Court's statement about equal protection was just dicta. That means it was not necessary to its decision to uphold male-only registration as constitutional.

On January 23, 2013, the Pentagon decided to end the policy of excluding women from combat positions, and over the years the statutory restrictions had been repealed. Today, the basis of the Supreme Court's argument that requiring the registration of only men is constitutional no longer flies—or does it?

Former Defense Secretary Leon Panetta's change of policy did not open all combat positions to females immediately. The Department of Defense is currently in an "assessment phase" in which each branch of the armed forces will examine all its jobs and units that do not have females in them. The assessment phase is scheduled to end in January 2016, but it's not certain that at its end, females will face the same dangers that men do in combat.

The Defense Department has stated that after the assessment, if a branch finds that a specific job or unit should not include females, then that branch can go back to the Secretary of Defense and ask for an exemption to the policy and to designate the job or unit as closed to women. The official goal of the Pentagon is to open as many jobs as possible consistent with what females can do. Despite Panetta's rhetoric, the Defense Department apparently believes that women are not men, despite depictions to the contrary by Hollywood. In 1992, the Presidential Commission on the Assignment of Women in the Armed Forces decided that placing women in combat was not a bright idea. The commission produced a graph showing that, generally speaking, the strongest military woman was only as strong as the weakest military man. It also concluded that the average 20-something woman had the lung power of the average 50-something man.

In 2011, the Marine Corps presented to the Defense Advisory Committee on Women in the Services studies that showed women are endowed with 20 percent lower aerobic power than men, 40 percent lower muscle strength, 47 percent lower lifting strength, and 26 percent slower road-march speed. In addition, their attrition rate from injuries is twice that of men, their nondeployable rate three times higher, and most females cannot heave a grenade beyond its 35-meter burst radius. These facts do not mean that the Department of Defense will keep females out of certain combat roles at the end of its assessment phase. The Department can simply lower its requirements for such positions and that would eliminate the Supreme Court's argument that males and females are not similarly situated. So then under equal protection of the Fifth Amendment, draft registration would have to include both men and women.

That's good news for men and the following reasoning would make it even better. Since the

physiology of females has not significantly changed in the last 50 years, meaning females could have served in combat roles during that time had the government not been biased against them, the Pentagon should enforce affirmative action for men. So when the next major war or national emergency requires the use of the draft, only females should be drafted. That would make up to some degree for the past injustices done to all the men who were drafted during the Vietnam War while the ladies stayed safely at home to enjoy life.

When another case or cases challenging the draft registration of only males make their way to the Supreme Court, it may be before the Pentagon finished its assessment of the extent of females in combat positions. In that scenario, the Court would probably say the case was not “ripe.” Meaning, the Court has no way to resolve whether men and females are similarly situated when it comes to draft registration because the Pentagon has not yet decided whether combat roles will be the same for both. Still, it would be wise to bring cases challenging the discrimination of draft registration, since it usually takes three or more years to reach the Supreme Court.

In the scenario where a case reaches the Court after the military decides its policy on combat roles, the Supreme Court’s decision may not depend on whether the Defense Department includes women in all combat roles, but whether the bill introduced by New York Congressman Charles Rangel to require draft registration of females has become law. Since the basis of the Court’s decision in *Goldberg v. Rostker*, 453 U.S. 57 (1981), was that the Constitution gave Congress the power over the military to which the Supreme Court deferred, logically, the passage of Rangel’s bill would mean the Supreme Court would once again defer to Congress. Males and females would both have to register.

Perhaps, but we must not forget that America is a society that gives females preferential treatment pretty much everywhere and all the time so long as men end up paying the price. Therefore, even if Rangel’s bill becomes law, the Supreme Court may choose not to defer to Congress when the Pentagon keeps females out of some combat positions. Such a result would enable the Court to ignore Congress, and then use equal protection to assure females preferential treatment by saying Rangel’s law is unconstitutional because it treats females and males in the same fashion when they are not similarly situated. A majority of the Justices would most likely do this if they thought it politically popular.

In 1981, the National Organization of Women filed an amicus brief in *Goldberg v. Rostker*, 453 U.S. 57 (1981), and testified before Congress that “omission from the registration and draft ultimately robs women of the right to first-class citizenship. . . . Because men exclude women here, they justify excluding women from the decision-making of our nation.”¹⁶ Recently Maj. Mary Jennings Hegar defended her decision to challenge the combat exclusion policy in court at the risk of potentially subjecting women to the draft.¹⁷ “The question is not whether we want our daughters to be drafted, she explained, but what kind of world we want them to inhabit: one where they’re infantilized as passive objects of chivalry or one where they’re empowered to achieve their potential as genuinely equal citizens?”¹⁸

So in a climate where females get what they want, men just need to give them the opportunity. For guys like us without government power or billions of dollars it is to start lawsuits in the federal courts claiming that young females should be treated equally with young males so that both can fulfill their potentials in this society.

Postscript: A group of civil rights lawyers and activists are now preparing to bring such a case in which they will pick up all the legal expenses. So far they have found one courageous young man who is seriously considering becoming a plaintiff but are looking for other plaintiffs to join a class action suit. The plaintiffs do not have to be just young men between 18 and 25 who registered for the draft, they can be

- females in the same age group because by preventing them from registering, the government is discriminating against them;
- males 26 years old or older and born after January 1, 1960, who knowingly or willfully never registered for the draft; and

• males 18 to 25 years old who failed to register for the draft within 30 days of their 18th birthday.

Readers who are interested in this initiative are invited to contact the author, Roy Den Hollander, Esq. at rdenhollander97@gsb.columbia.edu.

Footnotes

¹National Archives, Statistical Information about Fatal Casualties of the Vietnam War, <http://www.archives.gov/research/military/vietnam-war/casualty-statistics.html>

²Speech by Lt. Gen. Barry R. McCaffrey (reproduced in the Pentagram, June 4, 1993) assistant to the Chairman of the Joint Chiefs of Staff, Memorial Day 1993.

³Vietnam Women's Memorial Project, Washington, D.C.

⁴See Dept. of Defense, Background Study Use of Women in the Military at 25-27 (2d Ed. 1978).

⁵Presidential Recommendations for Selective Service Reform: A Report to Congress Pursuant to P.L. 96-107 at 14 (Feb. 11, 1980).

⁶Rowan Scarborough, False reports outpace sex assaults in the military, *The Washington Times*, May 12, 2013.

⁷Deposition of Bernard Rostker at 17-18 (May 13, 1980).

⁸Testimony of, Director of the Selective Service System, before the Sub-committee on Manpower and Personnel of the Senate Armed Services Committee at 36-37 (March 19, 1980).

⁹Statement of Bernard D. Rostker before the Subcommittee on Manpower and Personnel of the Senate Armed Services Committee at 2 and 6 (March 19, 1980).

¹⁰Subcommittee on Manpower and Personnel of the Committee on Armed Services of the United States Senate on March 13, 1979 at 10-11.

¹¹Testimony of Robert B. Pirie, Assistant Secretary of Defense for Manpower, Reserve Affairs and Logistics, before the Subcommittee on Military Personnel of the Armed Services Committee of the House of Representatives at 28-30 (March 5, 1980).

¹²Testimony of Robert B. Pirie, Assistant Secretary of Defense for Manpower, Reserve Affairs and Logistics, before the Subcommittee on Military Personnel of the Committee on Armed Services of the House of Representatives at 24-25 (March 5, 1980).

¹³Statement of Robert B. Pirie and Bernard Rostker before the Subcommittee on Military Personnel of the Armed Services Committee of the House of Representatives at 2 (March 5, 1980).

¹⁴Testimony of Robert B. Pirie, Jr., Assistant Secretary of Defense for Manpower, Reserve Affairs and Logistics at the March 5, 1980, hearing held by the Subcommittee on Military Personnel of the Armed Services Committee of the House of Representatives.

¹⁵"[W]e must guard against the acquisition of unwarranted influence, whether sought or unsought, by the military-industrial complex." President Eisenhower's Farewell Address as President.

¹⁶1980 Congressional testimony of National Organization for Women member Judy Goldsmith.

¹⁷Hegar et al. v. Panetta, 12-cv-06005 (N.D. Cal. 2012).

¹⁸Rachel Natelson, Selective Service Is an Obligation of Citizenship, Including Women, *U.S. News & World Report*, February 12, 2013.



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