

Cumberlands Workforce Development Board (CWDB)

POLICY: COMPLIANCE WITH SELECTIVE SERVICE REGISTRATION REQUIREMENTS

EFFECTIVE DATE: SEPTEMBER 15, 2026

SUBJECT: SELECTIVE SERVICE REGISTRATION REQUIREMENTS

I. PURPOSE

The purpose of this policy is to establish requirements and procedures for verifying compliance with Selective Service registration requirements for applicants and participants receiving services funded through the Workforce Innovation and Opportunity Act (WIOA). This policy applies to all Cumberlands Workforce Development Board (CWDB) staff, subrecipients, fiscal agents, contractors, direct service providers, and other entities administering WIOA-funded programs and services within the Cumberlands Workforce Development Region. This policy further establishes procedures for determining whether an individual's failure to register was knowing and willful.

II. AUTHORITY

This policy is issued under the authority of the Cumberlands Workforce Development Board pursuant to the Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128, applicable federal regulations, U.S. Department of Labor guidance, Department of Workforce Development guidance, and all other applicable federal and state laws governing workforce development programs.

Authority for Selective Service registration requirements is established through federal law and U.S. Department of Labor guidance, including Training and Employment Guidance Letter (TEGL) 11-11 Change 2, Selective Service Registration Requirements for Employment and Training Administration Funded Programs.

The Cumberlands Workforce Development Board is responsible for establishing local policies and procedures to ensure compliance with WIOA eligibility requirements and for making determinations regarding eligibility for participation in WIOA-funded programs and services.

III. POLICY

Federal law requires certain individuals to register with the Selective Service System. Compliance with Selective Service registration requirements remains a condition of eligibility for WIOA-funded services.

CWDB shall ensure compliance with all applicable federal requirements regarding Selective Service registration as a condition of eligibility for WIOA-funded services. Individuals required by federal law to register with the Selective Service System must provide

documentation demonstrating compliance with registration requirements or documentation supporting an exception or exemption recognized under federal law.

The Selective Service System announced that the Status Information Letter (SIL) program would sunset no later than June 30, 2026. Organizations may continue to verify registration status through the official Selective Service verification website, while eligibility determinations remain the responsibility of the agency administering benefits or services.

Additionally, pursuant to the National Defense Authorization Act for Fiscal Year 2026 (Public Law 119-60), the Selective Service System is expected to begin implementing automatic registration procedures beginning in December 2026, subject to federal implementation for males born on and after December 18, 2000. CWDB will continue to comply with all applicable federal and state guidance regarding Selective Service eligibility requirements until such guidance is revised.

A. Registration Requirements

Individuals required to register with the Selective Service System must do so in accordance with federal law.

Prior to enrollment in WIOA-funded services, staff shall verify Selective Service registration status when required for eligibility determination.

For individuals under age 26 who are required to register but have not done so, registration must be completed prior to enrollment or continued participation in WIOA-funded services.

B. Acceptable Documentation

Acceptable documentation verifying Selective Service registration status includes, but is not limited to:

- Selective Service Registration Acknowledgement Letter;
- Selective Service Registration Card;
- DD Form 214, Certificate of Release or Discharge from Active Duty;
- Stamped United States Post Office Registration Receipt;
- Selective Service Verification Printout obtained from the official Selective Service website; or
- Other documentation recognized by federal or state guidance.

A Selective Service Verification Printout may include:

- Verification confirming registration; or
- A verification search result indicating that no registration record was found.

Documentation maintained in the participant file should contain sufficient identifying information to document the verification, including the individual's name or last name, partial Social Security Number, date of birth, verification result, and date of verification.

Screenshots or printed copies of official Selective Service verification results are acceptable source documentation.

C. Failure to Register Determinations

Individuals over age 26 who were required to register with Selective Service and did not do so

may be considered for WIOA eligibility only after CWDB determines that the failure to register was not knowing and willful.

CWDB shall evaluate the totality of available evidence when making a determination.

D. Determination Process

When an individual over age 26 cannot provide evidence of registration and a Selective Service verification search indicates that no registration record exists, staff shall:

Obtain and retain a Selective Service Verification Printout or No Record Found Verification Search Result from the official Selective Service website.

Require the applicant to complete Attachment A - Selective Service Failure to Register Determination Questionnaire which includes a signed written statement from the applicant explaining the circumstances surrounding the failure to register and why the applicant believes the failure was not knowing and willful.

Collect Supporting Documentation

Supporting documentation may include, but is not limited to:

- School records;
- Military records;
- Medical documentation;
- Incarceration records;
- Immigration documentation;
- Court records;
- Third-party affidavits or statements;
- Employment records; and
- Other documentation deemed relevant to the determination.

Staff Review

The service provider shall review all documentation and complete a written recommendation regarding whether the failure to register was knowing and willful.

Final Determination

The completed determination packet shall be submitted to the CWDB Executive Director or designee for final review and approval.

The final determination shall be documented and maintained in the case management system of record.

E. Determination Standards

When evaluating whether a failure to register was knowing and willful, CWDB may consider:

- Whether the individual was aware of the registration requirement;

- When and how the individual became aware of the requirement;
- Whether the individual believed an exemption applied;
- Circumstances occurring between ages 18 and 25 that may have prevented registration;
- Whether the individual intentionally chose not to register;
- The individual's actions after becoming aware of the requirement; and
- Any other relevant evidence.

Determinations shall be based on a preponderance of the evidence.

F. Appeals and Grievances

Applicants denied WIOA services based upon a determination that failure to register was knowing and willful shall be informed of applicable grievance and appeal procedures consistent with CWDB policies and WIOA requirements.

IV. MONITORING

CWDB shall monitor compliance with this policy through programmatic monitoring, participant case management system of record reviews, technical assistance, and corrective action procedures as necessary.

Direct service providers are responsible for maintaining documentation supporting Selective Service eligibility determinations and for ensuring compliance with all requirements contained within this policy.

V. RECORD RETENTION

All documentation related to Selective Service eligibility verification and failure-to-register determinations shall be maintained in accordance with applicable federal, state, and local record retention requirements.

VI. REFERENCES

Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128, Training and Employment Guidance Letter (TEGL) 11-11 Change 2, Selective Service Registration Requirements for Employment and Training Administration Funded Programs, Selective Service System Memorandum, Status of Information Letter Program, April 28, 2026, National Defense Authorization Act for Fiscal Year 2026 (Public Law 119-60), Applicable Federal and State Guidance

VII. ATTACHMENTS

Attachment A – Selective Service Registration Determination Questionnaire

The Selective Service Registration Determination Questionnaire shall be completed for any applicant who:

- Is over age 26;
- Was required to register with Selective Service; and

- Cannot provide evidence of registration or whose Selective Service verification search indicates that no registration record exists.

The completed questionnaire, participant statement, verification printout, supporting documentation-if applicable, staff recommendation, and final determination shall be maintained as part of the participant eligibility documentation in the case management system of record.

VIII. EFFECTIVE DATE

This policy becomes effective upon approval by the Cumberland Workforce Development Board Executive Committee.

Cumberlands Workforce Development Board (CWDB)

Attachment A: Selective Service Failure to Register Determination Questionnaire (Required Form)

Purpose: This questionnaire is one component of the eligibility determination and does not, by itself, determine WIOA eligibility. Final determinations are made by the CWDB Executive Director or Designee after review of the complete determination packet.

Participant Information

Name: _____ DOB: _____ Last 4 SSN: _____
Phone: _____ Program: _____ Verification Date: _____

Knowing and Willful Determination Questions

1. Were you aware males were required to register with Selective Service between ages 18–25? ☐ Yes ☐ No

2. If yes, when and how did you become aware? _____

3. Prior to age 26, did anyone tell you that you were required to register? ☐ Yes ☐ No

If yes, who? _____

4. Did you believe you were exempt from registration? ☐ Yes ☐ No

If yes, explain: _____

5. Between ages 18–25, did any of the following apply?

- ☐ Continuous hospitalization ☐ Institutionalization ☐ Homelessness ☐ Foster Care ☐ Outside U.S.
☐ Cognitive impairment ☐ Military ☐ Incarceration ☐ Other

Explain any circumstances affecting your ability to register: _____

6. Did you intentionally choose not to register? ☐ Yes ☐ No

Explain: _____

7. After you became aware that Selective Service registration may have been required, did you make any attempt to determine whether you could still register or obtain information regarding your registration status?

- ☐ Yes
☐ No

If yes, explain: _____

Supporting Documentation Checklist-if applicable

- ☐ School Records
☐ Military Records
☐ Medical Documentation
☐ Incarceration or Court Records
☐ Immigration Documentation
☐ Third-Party Affidavit(s) or statements
☐ Employment records
☐ Other: _____

Participant Narrative Statement

In your own words, explain why you did not register and why you believe your failure to register was not knowing and willful.

[illegible]

Certification: I certify that the information provided is true and correct to the best of my knowledge.

Participant Signature: _____ Date: _____

Staff Review

- ☐ SSS Verification Obtained
- ☐ Participant Statement Obtained
- ☐ Supporting Documentation Reviewed-if applicable

Staff Recommendation: ☐ Failure Was Not Knowing & Willful ☐ Failure Knowing & Willful

Rationale/Comments:

Staff Signature: _____ Date: _____

CWDB Executive Director or Designee Determination

- ☐ Failure to Register Determined was NOT Knowing and Willful
- ☐ Failure to Register Determined Knowing and Willful

Basis for Determination / Comments:

Authorized Signature: _____ Date: _____

This document contains information used for WIOA eligibility determinations and shall be retained with the participant eligibility documentation