Monroe County/Rochester
Workforce Development Board

WIOA Policy 102

DATE: **September 18, 2015**

REVISED: **August 11, 2026**

SUBJECT: **Selective Service System Registration**

I. Purpose

Workforce Development System Technical Advisory #12-9.2, issued 8/22/2025, communicates updated policy regarding Selective Service System (SSS) registration requirements for the Workforce Innovation and Opportunity Act (WIOA). Males over the age of 18 must be registered with SSS within thirty (30) days of their 18th birthday to be eligible for the WIOA Adult, Dislocated Worker (DW), and Youth programs.

II. Exceptions

In the following circumstances, SSS registration is not required, and WIOA registration and service delivery under the Adult, DW, and Youth programs can proceed, given all other eligibility criteria are met. (**Note:** WIOA program and services eligibility is dependent on any work authorization verification requirements imposed by the federal government.)

- Males born on or before December 31, 1959 are not required to register with SSS.
- Males on active duty in the U.S. Armed Services are not required to register with SSS.
- Males currently enrolled at a service academy, excluding cadets at the Merchant Marine Academy, are not required to register with SSS.
- Male veterans who served in the U.S. Armed Services past their 26th birthday are not required to register with SSS.
- Males who are incarcerated, hospitalized, or institutionalized for medical reasons are not required to register with SSS. (They must register within thirty (30) days of release unless already age 26).
- Males who are disabled, physically or mentally, and continually confined to a residence, hospital, or institution are not required to register with SSS.
- Males who are seasonal agricultural workers on an H-2A visa are not required to register with SSS.
- Lawful non-immigrants on current non-immigrant visas are not required to register with SSS.
- Individuals who are born female are not required to register with SSS.

- Males age 26 or older who are not but should be registered with SSS, for whom it has been determined that their failure to register was not knowing or willful, are an exception to the registration requirement.

III. Additional Information

The New York State Department of Labor (NYSDOL) has implemented a three-pronged approach to verifying SSS registration for males over the age of 18 being enrolled into the WIOA Adult, DW, and Youth programs.

1. For males who meet one or more of the exceptions described in Section II, above, SSS registration is not required. Proceed with WIOA enrollment and service delivery.

A One-Stop Operating System (OSOS) comment must be entered, noting the specific reason for the exception from SSS registration. Note that a current military ID card or DD 214 should be used to verify exemption from SSS based on military service.

2. For males 18 years of age or older who were born after December 31, 1959, and whose SSS registration can be verified via the SSS online look up, proceed with WIOA enrollment and service delivery. The Selective Service Number must be entered in the OSOS Add'l Info tab.

3. For males 18 years of age or older who were born after December 31, 1959, and whose SSS registration cannot be verified via the SSS online look up, career center staff must take action. This action falls into three categories:

a. If the male attests to being registered with SSS, local staff must verify their registration via another means. Approved source documents, as defined by USDOL ETA, include:

i. Selective Service Acknowledgement Letter;

ii. Form DD-214 "Report of Separation";

iii. Selective Service Registration Card;

iv. Selective Service Verification Form (Form 3A); and/or

v. Stamped Post Office Receipt of Registration.

b. If the male is not registered but is between the ages of 18 and 26, inform the individual that he must register with SSS before WIOA services can be provided. Once he has registered with SSS, proceed with WIOA enrollment and service delivery. Note that Wagner-Peyser (W/P) funded services can be provided. This means that New York State Department of Labor (NYSDOL) staff can serve the customer with non WIOA-funded services and that the customer may use the resource room at the NYSDOL career center. Career center staff should take care not to enter any WIOA-enrolling activities in OSOS.

c. If the male is not registered and is age 26 or older, local staff must determine that failure to register with SSS was not knowing and willful. Note that W/P funded services can be provided. This means that New York State Department of Labor (NYSDOL) staff can serve the customer with non WIOA-funded services and that the customer may use the resource room at the NYSDOL career center. Career center staff should take care not to enter any WIOA-enrolling activities in OSOS.

So that local staff may determine if a failure to register was knowing and willful, the individual must present evidence to show that his failure was not knowing or willful. He should be encouraged to provide as much evidence as possible, which can include (but is not limited to):

- Evidence that he served honorably in the U.S. Armed Forces, such as a DD 214 or his Honorable Discharge Certificate. Such documents are considered sufficient evidence that his failure to register was not knowing or willful. DD 214s are now available at http://www.archives.gov/veterans/military-service-records/index.html.

- Affidavits from parents, teachers, employers, doctors, etc. concerning reasons for not registering.

- A written, signed statement from the individual answering any of the applicable questions below.

Once all evidence has been presented, career center staff must make a determination regarding the applicant's failure to register. Helpful questions to consider when making this determination include:

- Was the individual aware of the requirement to register?
- If the individual knew about the requirement to register, was he misinformed about the applicability of the requirement to him (e.g., veterans who were discharged before their 26th birthday were occasionally told they did not need to register)?
- On which date did the individual first learn that he was required to register?
- Where did the individual live when he was between the ages of 18 and 26? (Note: If an individual immigrated to the United States after age 26, he was not required to register. A comment noting this must be added to the individual's OSOS record.)
- Was the failure to register done deliberately and intentionally?
- Did the individual have the mental capacity to choose whether or not to register and decided not to?
- What actions, if any, did the individual take when he learned of the requirements to register?

If career center staff determines that the failure to register was not knowing and willful and the individual is otherwise eligible for WIOA services, the individual must complete the NYSDOL **Selective Service System Waiver** form. Career center staff can then proceed with WIOA enrollment and service delivery; upload the NYSDOL **Selective Service System Waiver** form to the Attachments tab of the individual's OSOS record; and add an OSOS comment stating that the failure to register was not knowing and willful.

If it is determined that evidence shows that the failure to register was knowing and willful, WIOA services must be denied. Individuals denied services must be made aware of grievance procedures. The RochesterWorks, Inc. Director of Workforce System Performance must also be informed of the determination. The career center must retain the evidence used to make this determination. W/P funded services can be provided. This means that New York State Department of Labor (NYSDOL) staff can serve the customer with non WIOA-funded services and that the customer may use the resource room at the NYSDOL career center. Career center staff should take care not to enter any WIOA-enrolling activities in OSOS.

In all cases, data entry requirements do exist. Please see the most current NYSDOL Technical Advisory (TA) on Data Element Validation and Eligibility for instructions. Note that an OSOS comment can be used to verify SSS status in most cases, and there is no need to retain any hard copy documentation. However, if the determination has been made that the failure to register was knowing and willful and the individual was refused services under WIOA, the career center manager should retain the evidence used to make this determination.

*****In the event that an individual has been denied WIOA services, career center staff should take care not to enter any WIOA-enrolling activities into OSOS.*****

Date Technical Revisions Approved by Executive Director: August 11, 2026