

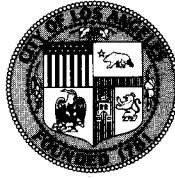
# CITY OF LOS ANGELES

CALIFORNIA

LILLIAN KAWASAKI  
GENERAL MANAGER

COMMUNITY DEVELOPMENT  
DEPARTMENT

215 W. 6TH STREET  
LOS ANGELES, CA 90014



JAMES K. HAHN  
MAYOR

DATE: **SEP 27 2001**

TO: All Workforce Development One-Stop and Satellite Contractors

FROM: Ann Giagni, Director  
Workforce Development Division

SUBJECT: **WIA DIRECTIVE NO. 02-17**  
**SELECTIVE SERVICE REGISTRATION**

The purpose of this Directive is to inform all Workforce Development One-Stop and Satellite Contractors of the revised procedures for determining WIA eligibility of males over the age of 26 who failed to register with the Selective Service System (SSS).

According to Federal law, a man must register with Selective Service within 30 days of his 18th birthday. Selective Service will accept late registrations, but not after a man has reached age 26.

Since November 4, 1998, the City of Los Angeles Local Workforce Investment Area (LWIA) has adhered to the guidelines of the Department of Labor (DOL) Training and Employment Guidance Letter (TEGL) Number 8-98 (attached) in determining a participant's compliance with the Selective Service registration requirement. The TEGL stated that any male over the age of 26 that failed to register with Selective Service was presumptively disqualified from participation in any JTPA program. This subsequently applied to WIA. Service providers could determine whether or not a client's failure to register was **knowing and willful**.

The TEGL provided several examples of acceptable documentation that could be used in determining whether or not the applicant's failure to register was knowing and willful, which included:

- ◆ DD Form 214 attesting to honorable service in the U.S. Armed Forces
- ◆ Honorable Discharge Certificate
- ◆ INS Form indicating he entered the country after his 26<sup>th</sup> birthday
- ◆ Department of Corrections documentation that the client was incarcerated during the time of registration.

A man's lack of knowledge or familiarity with the Selective Service requirement was **not** considered a valid exemption by the City of Los Angeles LWIA and the client was precluded from receiving WIA services.

However, retroactive to July 1, 2001, **clients may now indicate that their failure to comply with Selective Service registration was due to a lack of knowledge or familiarity as a valid exemption.** The client should provide an applicant statement and a

reasonable explanation in as much detail and with as much evidence as possible. **If the service provider determines that the client's failure to register was not knowing and willful, they will have a valid exemption from the Selective Service requirement and may be eligible to receive WIA services, provided they meet all other WIA eligibility requirements.** Examples to support a claim of lack of knowledge could include the following:

- ◆ Indication of a language barrier that hindered the client from comprehending SSS correspondence.
- ◆ Verification of a change of address to prove the client never received SSS correspondence.

**It is the service provider's responsibility to determine eligibility for services on a case-by-case basis. Do not refer clients to MIS to determine the appropriateness of a client's explanation or documentation.**

The procedures outlined in the attached State of California Directive Number WIAD01-4 should be followed in determining a client's compliance with the Selective Service requirement.

If you have any questions regarding this Directive, please contact Donya Plazo of my staff via electronic mail at [dplazo@cdd.lacity.org](mailto:dplazo@cdd.lacity.org), or by calling (213) 485-0652.

AG:MC:VV:MB:DP:dp