



EASTERN

WORKFORCE BOARD

*PROUDLY SERVING ADAIR, CHEROKEE, MCINTOSH, MMUSKOGEE, SEQUOYAH, AND WAGONER COUNTIES IN
OKLAHOMA*

Youth Program Policy

Objective Assessment and Individual Service Strategy

REVISED 2019

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Purpose:

To establish a local policy for the Youth Objective Assessment and Individual Service Strategy (ISS) consistent with Workforce Innovation and Opportunity Act WIOA. This policy and all procedures, forms, and issued instructions are intended to provide clear guidance so that quality career management as well as effective and efficient services are provided to ensure participant success. It shall be the policy of the Eastern Workforce Board (EWB) and its Board of Local Elected Officials (LEO) that all WIOA services shall be delivered in a manner that fully complies with the WIOA law and regulations.

Authority

- Workforce Innovation and Opportunity Act (WIOA) 129
- Oklahoma Workforce Development Issuance (OWDI) 02-2016, change 2,

Background:

WIOA funding allows the delivery of services that prepare youth for post-secondary educational and employment opportunities, attainment of educational and/or skills training credentials, and obtainment of employment with career opportunities. To accomplish this, each youth must be assessed to determine skills, interests, needs, and personal goals.

Local Policy:

- **Eligibility**
Eligibility for the youth program can be found in Oklahoma Workforce Development Issuance 02-2015, change 2
- **Equal Opportunity**
An equal opportunity (EO) notice must be provided in appropriate formats to registrants, applicants, eligible applicants/registrants, and applicants for employment, employees, and participants with visual impairments. A record of a participant receiving an EO notice must be made part of the participant's file. The notice must be provided in the participant's native language, upon request. For more information, please see the Equal Opportunity policy.
- **Grievance Procedures**
A copy of the grievance notice must be provided in appropriate formats to registrants, applicants, eligible applicants/registrants, and applicants for employment, employees, and participants with visual impairments. A record of a participant receiving the grievance procedures must be made part of the participant's file. The notice must be provided in the participant's native language, upon request. For more information, please see the Grievance Policy.
- **Personal Identification Information**
Every individual receiving WIOA or other services must read, sign, and date the Authorization of Release and Obtain Information form, and the form shall be uploaded per state and local policy. This form can be found in the Board Personal Identification Information Policy. The form must be provided in the participant's native language, upon request.
- **Media Release Form**
Every individual receiving WIOA or other services must read, sign, and date the Media Release form and the form shall be uploaded per state or local policy. This form is Attachment A of this policy. The form must be provided in the participant's native language, upon request.

- **Selective Service**

To be eligible to receive WIOA Title I funded services, all males age 18 and above born on or after January 1, 1960, must present documentation showing compliance with the Selective Service registration or the documented exception from that requirement.

Center Staff will assist the participant in obtaining the Selective Service Status Information Letter. This process will be completed by using the Selective Service System phone number 1-847-688-6888 or via website www.sss.gov. Acceptable documentation to determine a person's Selective Service registration status may include:

1. Selective Service Status Information Letter;
2. Selective Service Registration Card;
3. Selective Service Registration Record;
4. Service Verification Form (Form 3A);
5. Stamped Post Office Receipt of Registration; and/or
6. US Selective Service Verification printed from the internet www.sss.gov;
7. DD-214 "Report of Separation"; or
8. Current Military ID.

The Selective Service System website (<https://www.sss.gov/>) provides additional information about registration requirements, including the "Who Must Register Quick Reference Chart."

If the participants' 26th birthday has passed and the person is being denied eligibility for WIOA services,

Follow these steps:

- Complete the "Selective Service Registration;
- Provide copies of documents that support the participant's explanation, showing any periods when they were hospitalized, institutionalized, or incarcerated between their 18th and 26th birthdays that support their statement;
- If the participant is a non-citizen, he/she will be required to provide documents that show when he/she entered the United States and under what pretense and when he/she became nationalized;
- The Selective Service Registration Waiver Form must be filled out completely;
- All information shall be provided to board staff for review.

For participants who were required to register, the determination will be based on whether or not the failure to register was knowing and willful.

1. **Knowing**

- a) Was the participant aware of the requirement to register?
- b) Participant knew about the obligation to register, was he misinformed about the requirement (e.g., veterans who were discharged before their 26th birthday were occasionally told that they did not need to register)?
- c) What date did the participant first learn that he was required to register?
- d) Where did the participant live when he was between the ages of 18 and 26?
- e) Does the status information letter indicate that Selective Service sent letters to the individual at their address and did not receive a response?

2. **Willful**

- a) Was the failure to register deliberately and intentionally?
- b) The participant did have the mental capacity to choose whether to register and decided not to register?
- c) What actions, if any, did the individual take when he learned of the requirement to register?

- d) If the local Board determines it was not a knowing and willful failure and the individual is otherwise eligible, services may be provided. If the Local Board determines that evidence shows the individual's failure to register was knowing and willful, WIOA services must be denied. Individuals denied services must be advised of available WIOA grievance procedures. The service provider career manager must keep documentation related to Selective Service determination.

For the male individuals that do not have to register for the Selective Service, each case must be documented in client notes and be supported by documentation. Supporting documentation shall be uploaded in the participant's virtual case file under Universal Uploads. The upload should have the Selective Service Status Information Letter along with any other documentation that supports them not lawfully having to register.

All participants who were denied access to services due to not registering for Selective Service must have all support documentation uploaded under the Universal section in OSL plus a detailed client note.

Objective Assessment

The Objective Assessment, at a minimum, will consist of:

1. Participant Self-Assessment (PSA) as directed by board staff
2. Behavioral Observations,
3. Structured interviews utilizing the career manager interview requirements developed by service provider,
4. OKCareerGuide's:
 - a. Work Values Assessment
 - b. Career Interest Assessment
 - c. Skills Confidence Assessment
 - d. TABE test.

Individual Service Strategy (ISS)

The provision of youth services elements must be based on the employment and education needs of the individual as determined by the individual with assistance from the career manager. This information must be identified through an individual service strategy (ISS). Each step of the individual's career pathway must be clearly documented in the ISS as it is developed and as the plan evolves. The Service Provider/career manager may accept a recent individual service strategy from another education or training partner agency if the Service Provider determines it is appropriate.

The ISS shall be developed with the information gathered from the objective and other appropriate assessments. The state database Individual Employment Plan / Individual Service Strategy section will be used to document the components of the ISS, along with the Client Involvement Statement located on the bottom of the that page. The participant must receive a copy of the ISS once created or updated. Each substantial update of the ISS must have a new Client Involvement Statement signed. General updates from the career manager on the participant's progress do not require client signature, however, the career manager must mark the appropriate box, under the Client Involvement Statement and Agreement section found at the bottom of the Individual Employment Plan / Individual Service Strategy page. Additionally, if action steps or planned services are changed, then a client signature must be obtained, and a new ISS should be printed and given to the participant. The above examples are not the only reasons to or not to require participant signature for Client Involvement Statement.

All services entered into the Service & Training Plan must be tied to the participant's ISS, with a correlating program note detailing how the service will help the participant attain their goal. The ISS is

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flexible and ongoing based on the participant's needs and must contain, at a minimum, the sections identified below. The career manager must be mindful of which sections may need a correlating measurable skills gain goal.

Required Individual Service Strategy Sections:

The Individual Service Strategy (ISS) shall be reviewed and updated as appropriate to ensure the participant's progress is tracked and recorded in the state database. Other sections found within ISS that are not addressed in this policy may be used by the One-Stop Operator, but the use should be supported by policy and follow the format outlined herein. If a section is not necessary for the participant, please place an "NA" in the appropriate section with a brief explanation.

Occupational Assessment and Career Research:

A summary of the participant's abilities and aptitudes, primary interests based upon assessment and career exploration results, and any other relevant information may be placed in this section. Highlight where abilities or interests align with the occupational interest with an asterisk (*).

Note: Using Career OneStop.org, click "Interests" in the occupation's online O*Net description to view interests from the Profiler that are associated with the target occupation.

Identify what performance indicators in which the participant will be counted.

Justification for Employment Goal:

The employment goal is the selection of a single employment goal with the identification of an initial career pathway of occupations to consider. This decision should be based on collaboration between the career manager and the participant. Provide a specific O*Net SOC code that is tied to the target occupation. Detail job-specific skills, educational requirements, job growth and job demand information, and earnings potential for the target occupation (reference sources such as Career One Stop (.org) website, O*Net online, and EMSI.)

Identify and list potential next steps along a "Career Pathway"* associated with the chosen target occupation (regardless of whether it's short-term WIOA-funded activities, or long-term possibilities using other or additional funding sources as needed).

Suggested next steps would include actions that enable lateral or upward movement along a career track, or into alternate but related occupations, and might involve making strategic job-change choices and/or obtaining other certificates or degrees that help sustain career success/advancement. (Visit the Career One Stop.org website for additional information about Career Ladders/Lattices and Competencies, which may be appropriate to cite within the ISS.)

**Note: In O*Net Online, the "Summary Report" for a given occupation has a subsection entitled "Related Occupations" that is an easy way to explore other job titles related to the primary target occupation. Use that section to support conversations with the participant about career options and to assist with content regarding other potential pathways that can be pursued after training is completed*

Performance Indicators:

1. Unsubsidized employment/ participation education or training activities 2nd quarter after exit.
2. Unsubsidized employment/ participation education or training activities 4th quarter after exit.
3. Obtain unsubsidized employment in an occupation with a salary wage higher than the set goal.
4. Receive a credential within the program year or a year after.
5. Of those who are in an educational or training program and is leading to a measurable skill gain.

Justification for Vocational Goal:

The training goal outlines the participant's training/education needs to assist them in attaining their employment goal through licensure, certification, and/or skills development. The participant shall be evaluated to determine if one has the appropriate skills to successfully complete training and obtain employment upon completion. This section must be updated to reflect training outcome.

Client Strengths:

This item is to be completed with participant at the time the plan is developed. Detail the participant's positive work habits, attributes, transferable work skills/aptitudes, and talents that will help them achieve their employment and/or training goals. Example strengths (not all inclusive): Enthusiasm, Trustworthiness, Creativity, Discipline, Patience, Respectfulness, Determination, Dedication, Honesty, and Versatility.

Plan for Overcoming Identified Barriers (Needs and Barriers and Goals):

This goal identifies potential needs and barriers that hinder the participant from achieving their employment/training goals. Needs and barriers may include but are not limited to assistive technology needs, housing needs, nutritional needs, mental health needs, hygiene needs, physical health needs, personal needs, needs to improve barriers, supportive service needs, and any other needs or skill gaps reported by the participant. This is the participant's "roadmap" detailing an action plan and specific services to be provided to implement that action plan, including the coordination of resources with partners.

The career manager will itemize and discuss the customer's specific barriers/needs and their rationale for providing specific services to address those needs/barriers. Identify short-term and long-term goals and objectives, whether occupational, educational, or both.

The barriers/needs that are identified should be individually addressed by a specific slate of activities and services to achieve the stated short- and long-term goals/objectives. To measure this progress, identify specific timelines and milestones for achieving goals and objectives. Subdivide this section so that each barrier is listed separately, and a service/training solution is offered to overcome or minimize each barrier. Indicate where the participant will receive services, the specific name and type of service/training, job title for OJT or Work Experience, and estimated start and end dates.

For occupational skills training, denote that the proposed training institution is on the approved eligible training provider list. Include the total costs for the proposed training ("total" meaning the entire grand total of ALL training costs, not just the portion or amounts that WIOA funding intends to cover).

The Plan for Overcoming Identified Barriers is to include those needs and barriers identified on the participant's demographic screen.

The following examples are not all-inclusive:

1. **Needs & Barriers Example:** Ex-offender, high school dropout, lack of post-secondary education/training, lack of marketable skills for in-demand occupations, lack of industry-recognized credential(s), laid-off and forced into career transition, and older/mature worker.
2. **Service Options & Solutions Example:** Job search workshops, individual career services and career guidance, career and interest exploration and testing, job search and placement assistance, job referrals and/or job development, and case management and career coaching.
3. **Goals & Objectives Example:** Explore and identify a job/Career Pathway, enhance basic educational skills, enhance basic computer skills, obtain new job skills, acquire gainful

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employment, earn self-sufficient wages, reduce reliance on or transition off of public assistance, and transition to a new career.

Example:

<p>Barrier-(Refer to Demographic Snapshot) Long Term-Short Term</p> <p>a. state what is barrier</p> <p>b. Enter how we will assist in overcoming the barrier (include start and end dates when applicable):</p>	<p>Lack of Industry Recognized Credential Long-Term Goal</p> <p>Participant is interested in becoming Registered Nurse but does not have the appropriate credentials to obtain employment in that field. CM will work with participant to obtain an ITA for OST to help the participant complete the appropriate steps to reach his/her Registered Nursing employment goal.</p> <p>Career Guidance - Virtual Job Shadow Proficiency Testing – TABE Supportive Services - Childcare Partner Referral - DHS Occupational Skills Training – License Practical Nurse Program - To be determined- Pending Training Provider enrollment, tentative dates of training 01/09/2018 through 08/31/20.</p> <p>Through the services above the CM can determine if becoming a RN is an appropriate employment goal based on the results of the initial and comprehensive assessments, including structured interview, and proficiency testing. By providing the participant with listed supportive services, the CM can remove or drastically reduce all barriers prior to placing the participant in OST, allowing for a better chance of successful completion. In providing career management and monthly contacts, the CM can help the participant succeed in their goals.</p>
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For program tracking and reporting purposes, the customer’s Service and Training Plan must contain service entries that correspond to the actual activities and services proposed within this section.

Assistive Technology Needs for Achieving Goals:

All assistive technology needs will be addressed under the Plan for Overcoming Identified Barriers (Needs and Barriers Goal) section. Enter “N/A” in this section.

Client Responsibilities and Agency Responsibilities:

Example:

Participant has agreed to meet face-to-face with a WIOA Representative every 90 days at a minimum, maintain 30-day contact. Client will also provide feedback regarding the employment search, including the areas of application/resume submission, interviewing, and follow-up. Client has also agreed to the goals, progress, funding, attendance, and training guidelines while participating in WIOA sponsored services.

Responsibilities of the career manager include monitoring the training, submitting the appropriate paperwork in a timely manner, and providing support and assistance to the participant. The career manager will provide guidance to the participant in his job search and refer the participant to appropriate workshops. Regular assistance will be maintained to enhance the participant’s success in the job market.

Economic Need Statement and Planning

If proposing classroom training, list any/all other financial aid being leveraged;

AND:

If the participant is waiting for (or already has) a Pell Grant, note the amount(s) here, and explain in full detail how Pell funds will be used and how WIOA funds will be used to ensure sufficient resources to pay for training and to cover any training-related expenses (e.g. day care expenses, transportation expenses, room and board and living expenses, etc.);

OR:

If not proposing classroom training, explain any personal economic factors or conditions that may influence the participant’s ability to fully participate in and successfully complete the activities and services to which the participant agreed.

Example:

<p>O*Net Code and Type of Training: Training Provider: Estimated Dates of Training: Distribution of Funds: (The distribution of funds outlined in this section should reflect that of the ITA)</p>	<p>29-1141 Registered Nurse – OST Cue University 01/09/2018 -05/28/20</p> <ol style="list-style-type: none"> 1. 2018-2019 Pell Grant - \$2345.00; Funds will be used to purchase books and supplies for the training program. 2. WIOA DLW Funds – 4,300.00; Funds will be used to cover tuition and fees, and additional books and supplies. 3. Department of Rehabilitation Services Funds – \$2,300.00; Funds will be used for tuition and fees. 4. Second Chance Scholarship - \$200.00; Funds available for tuition only.
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Required Support Services During Active Participation:

List any/all supportive service needs. Record “N/A” if there are no current supportive service needs (e.g., day care, transportation, referral to other agencies, etc.).

Example:

<p>Supportive Service: State the Objective: State Case Managers Action Steps – CAS. If multiple action steps, then place the appropriate number after the acronym. (I.e. CAS 1, CAS 2, CAS 3). There should be a due date underneath every CAS</p> <p>State Participant Action Steps – PAS. If Multiple action steps, then place the appropriate number after the acronym. I(i.e. PAS 1, PAS 2, PAS 3)</p> <p>There should be a due date underneath every PAS.</p> <p>Once action steps are completed, a “Date Completed” field should be added with the appropriate completion date. All updates/changes to ISS will be accompanied by a detailed program note explaining the change, the outcome of an action step, or any pertinent information about the change.</p>	<p>Transportation – Bus Pass This service is needed so the participant can attend Occupational Skill Training at Cue University.</p> <p>CAS1: Request Supportive Service approval. Due Date: 01/20/2018 (5 days)</p> <p>CAS2: Contact Participant to inform them of decision, set up time to pick up bus pass if appropriate.</p> <p>Due Date: Participant contacted within 2 days of approval.</p> <p>Childcare – One Month This service will allow the participant time to make additional arrangement for childcare and continue occupational skill training.</p> <p>PAS1: Apply for DHS Childcare subsidies, then call to make an appointment with career manager. Due Date: 01/31/2018 (2 weeks) Completion Date: 01/26/2018, Participant was accepted to receive subsidized childcare. The appropriate support documentation has been uploaded.</p> <p>CAS1: Request Supportive Service approval. Due Date: 01/20/2018 (5 days)</p>
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Post- Employment Needs:

The necessary follow-up services shall be detailed here:

Example:

<p>Date Entered Follow Up – this is not necessarily the exit date <i>Type of Exit:</i> <i>Hard Exit</i> is an unplanned exit. <i>Soft Exit</i> is a planned exit, when the participant has successfully been placed into employment and no other services are needed other than follow up services.</p>	<p>01/19/2018 – Enter Follow Up <i>Hard Exit</i> – Due to lack of engagement, the participant’s ISS has not been completed, nor have they obtained employment. Several contact attempts have been made to reengage the participant to no avail. Career manager will continue to contact participant per board and internal policy.</p> <p>Career Guidance shall be the service provided in follow up until contact with the participant can be made to make a more personalized exit plan.</p>
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Client Involvement Statement:

This section shall state:

“In conclusion with my career manager, I have determined that the employment goal and services strategy stated in this ISS, is my choice and is consistent with my assessment results. I also understand that this is a general plan of services and training and it is neither entitlement nor a contract between the program and me. I understand that I am responsible for my actions and my responsibilities in successfully completing this plan of action. I understand that my goal for completing this plan is to become self-sufficient. By my signature below, I certify that the information contained herein is accurate and true to the best of my knowledge.”

Compliance:

EWB is responsible for providing regular oversight of the expenditures of funds found within its policies in accordance with local monitoring policies.

Attachment A: Media Release Form

Attachment B: Selective Service Registration Waiver Form

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Media Release

<u>Participant ID</u>	<u>Date of Birth</u> / /	<u>Date:</u>	
<u>First Name</u>	<u>M.I.</u>	<u>Last Name</u>	
<u>Street Address</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
<u>Primary Telephone(s):</u>			

I, _____ guardian of _____
 (Parent or Guardian) _____ (Participant)

Do hereby give the Oklahoma Employment Security Commission (OESC), Local Workforce Development Board (LWDB), and/or the LWIB Contracted Service Provider full permission to use or release the information in the categories checked below.

I understand the information about the named minor will be used to promote public awareness and educate persons with an interest in utilizing the services of the OESC, LWDB, and/or LWDB contracted service provider to find employment, obtain training, and participate in the many other services provided by the OESC, LWDB and/or LWDB contracted service provider.

I understand the released information may be included in a newspaper article written by a reporter, who is not employed by the OESC, LWDB, and/or LWDB contracted service provider and OESC, LWDB, and/or LWDB contracted service provider do not have control over the information included in a newspaper article, including the caption under the pictures or the headline used for the article.

I understand the released information may be included in public awareness material produced by the OESC, LWDB, and/or LWDB contracted service provider.

I further understand that I will not receive any form of compensation for the use of this information, nor will I receive any royalty for its use.

I further understand that the information in written, oral, picture, or video form is prohibited for commercial or political purposes.

Participant Signature _____ Date _____

Guardian Signature _____ Date _____

Workforce Tulsa Representative Signature _____ Date _____

Translated By _____ Date _____

WHAT IS SELECTIVE SERVICE REGISTRATION?

The process of providing the Selective Service System with personal information, such as name, address, date of birth, Social Security Number and other related information so in a crisis requiring a draft, registered men would be called to active duty in a sequence determined by random lottery number and year of birth. Then, they would be examined for mental, physical and moral fitness by the military before being deferred or exempted from military service or inducted into the Armed Forces.

It is a civic and legal responsibility. Men are required to register with Selective Service as soon as they reach the age of 18. According to 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.

WHO MUST REGISTER?

All male U.S. citizens, and some male aliens living in the U.S., who are 18 through 25, are required to register with Selective Service.

- **NONCITIZENS**

Non-citizens who are not required to register with Selective Service include men who are in the U.S. on a valid student or visitor visa and men who are part of a diplomatic or trade mission and their families. Almost all other male non-citizens are required to register, including undocumented immigrants, legal permanent residents, those seeking asylum, and refugees. Those men who enter the United States and take residency for the first time after the age of 26, do not have to register for Selective Service.

- **DUAL NATIONALS**

Dual nationals of the U.S. and another country are required to register, regardless of where they live, because they are U.S. nationals.

- **HOSPITALIZED OR INCARCERATED MEN**

Young men in hospitals, mental institutions, or prisons do not have to register while they are committed. However, they must register within 30 days after being released if they have not yet reached their 26th birthday.

- **DISABLED MEN**

Disabled men who live at home must register with Selective Service if they can reasonably leave their homes and move about independently. Men with disabilities that would disqualify them from military service still must register with Selective Service. Selective Service does not presently have authority to classify men, so even men with obvious handicaps must register now, and if needed, classifications would be determined later.

- **FULL-TIME MILITARY EXEMPTED FROM REQUIREMENT***

Young men serving in the armed forces on full-time active duty do not have to register if serving continuously from age 18 to age 26. Those attending the service academies do not have to register. However, if a young man joins the military after turning 18 or leaves the military before turning 26, he must register.

- **NATIONAL GUARD AND RESERVES***

Members of the Reserve and National Guard not on full-time active duty must register.

- **CONSCIENTIOUS OBJECTORS¹**

Men, who would be classified as CONSCIENTIOUS OBJECTORS if they were drafted, must register with Selective Service. If a draft begins and they are called, they would have the opportunity to file a claim for exemption from military service based on their religious or moral objection to war.

- **TRANSGENDER PEOPLE**

Individuals who are born female and changed their gender to male are not required to register. U.S. citizens or immigrants who are born male and changed their gender to female are still required to register.

FEDERAL JOB TRAINING

The Workforce Innovation & Opportunity Act (“WIOA”) offers programs that can train young men for in-demand jobs. This program is only open to those men who register with Selective Service. A man who fails to register with Selective Service before turning age 26 may find that some doors are permanently closed. **Only men born after December 31, 1959, are required to show proof of registration.**

HOW TO GET AN OFFICIAL SELECTIVE SERVICE RESPONSE STATING IF YOU WERE OR WERE NOT REQUIRED TO REGISTER?

Center Staff will assist the participant in obtaining the Selective Service Status Letter. This process will be completed by using the Selective Service System phone number 1-847-688-6888

Conscientious Objector: a person who refuses to serve in the armed forces or bear arms on moral or religious grounds

<https://www.merriam-webster.com/dictionary/conscientious%20objector>>

WHAT TO DO IF YOU DID NOT REGISTER AND ARE NOW 26 YEAR OF AGE OR OLDER?

If the participant has passed their 26th birthday and is now being denied eligibility for WIOA services, you may follow these next steps.

- Complete Selective Service Approval for Service Form on behalf of the client.
- Provide copies of documents that support your participant's explanation, showing any periods when they were hospitalized, institutionalized, or incarcerated occurring between their 18th and 26th birthdays and that supports their statement.
- If the participant is a non-citizen, they will be required to provide documents that show when they entered the United States.
- The Selective Service Approval for Service Form must be filled out completely.

BASIS OF DETERMINATION

For participants who were required to register, the decision will be based on whether the failure to register was knowing or willful.

- **Knowing.**
 - Was the participant aware of the requirement to register or not?
 - Participant 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 that they did not need to register)? What date did the participant first learn that he was required to register?
 - Where did the participant live when he was between the ages of 18 and 26?
- **Willful.**
 - Was the failure to register done deliberately and intentionally?
 - The participant did have the mental capacity to choose whether or not to register and decided not to register?

FINAL DECISION

The final decision regarding approval for services will be made by Eastern Workforce Board.