

Guidance - Work Authorization for Services Funded Under Title I of WIOA

Per [Training and Employment Guidance Letter \(TEGL\) 10-23](#), many services under the Workforce Innovation and Opportunity Act (WIOA) may be provided to individuals without verification of work authorization. Work Authorization verification may be postponed until an individual is moving into services which require such verification. Services or activities for which work authorization **must be verified** include:

- Job Placement;
- Occupational Post-Secondary Training;
- Work Experience;
- Supportive services that represent a direct financial benefit, such as a voucher or reimbursement, relocation expenses, or needs-related payments.

Registration in Arizona Job Connection (AJC), the State's system of record, requires individuals to select one of the following options regarding work authorization:

- U.S. Citizen
- Non-citizen eligible to work in the U.S.
- Non-citizen not eligible to work in the U.S.

As of 5/16/2024, the eligibility criteria based on the above data field, Citizenship or Employment Eligibility, has been removed from WIOA Title I (Adult, Dislocated Worker, Youth, National Dislocated Worker Grants) and Title III (Wagner-Peyser Employment Service) program enrollments in the AJC system. The system will now allow for enrollment into the Title I-B and Title III programs regardless of the response in this field. The field is still required during registration, and the response will be reflected in the Demographics Snapshot section of each program enrollment.

Services in the AJC system are categorized as either accessible or inaccessible to individuals who are not U.S. Citizens and ineligible to work in the U.S. This categorization is aligned with the guidance in TEGL 10-23 (Section 4.c). When adding a service to the Service & Training Plan, program staff will see a limited list of services for those individuals who have answered "Non-citizen not eligible to work in the U.S." in the Eligibility to Work in the U.S. section of the Demographics Snapshot.

The Arizona Department of Economic Security (DES) together with America's Job Link Alliance (AJLA), the AJC system vendor, will continue to make the necessary updates to ensure compliance with TEGL 10-23.

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How to Verify Work Authorization:

- The following may be used to assist with verifying the acceptable documentation of work authorization:
 - USCIS Form I-9 *Acceptable Documents*: <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents>
 - The following documents, if reviewed for eligibility and/or data validation, may also be used to validate work authorization:
 - Any documents from list A, such as a passport card; or
 - Any documents from both list B & C:
 - For example, a driver's license or school identification card may be used for list B, while a social security card or birth certificate may be used for list C.
 - USCIS online tools SAVE, which is available to federal, state, tribal, and local governments: <https://www.uscis.gov/save/about-save/about-save>; and E-Verify, <https://www.e-verify.gov/>.
- Staff must include a case note confirming that the applicant presented, and that staff verified, acceptable sources for work authorization, identifying the source (documents or online) reviewed, the date reviewed, and name of the staff who conducted the verification.
- Documents should not be retained or uploaded unless they are needed for eligibility determination and/or data validation. If retained or uploaded, any Personal Identifiable Information (PII) included on the document, that is not needed for eligibility determination and/or data validation, must be redacted.