

## Comments and Responses to Work Authorization Verification Requirements

[8.2 Eligibility \(wisconsin.gov\)](#), [8.2 Eligibility \(wisconsin.gov\)](#), [10.3 Eligibility \(wisconsin.gov\)](#), [10.3 Eligibility \(wisconsin.gov\)](#), [12.3 Adult Program File Documentation \(wisconsin.gov\)](#), [12.4 Dislocated Worker Program File Documentation \(wisconsin.gov\)](#), and [12.5 Youth Program File Documentation \(wisconsin.gov\)](#)

1. Work Authorization Verification, states that there are specific services that cannot be provided to participants without work authorization. However, the notes states "once a participant has self-attested to being eligible to work in the US.." Does this mean that we can allow self-attestation for authorization to work in the US?

### **DWD-DET Response:**

The Work Authorization Verification Requirements Guidance states that there are specific services that cannot be provided to participants without *verifying* work authorization. Self-attestation of work authorization is allowable for the services where Work Authorization Verification is not required. The [Work Authorization Verification Requirements \(wisconsin.gov\)](#) include a list of ASSET services and, for each service, identifies if work authorization verification using I-9 acceptable documents is required **before** the participant receives that service

2. Within the Work Authorization Verification Requirements document, in the "Note" section, the statement appears to say that a participant can self-attest to being eligible to work in the US, and the Career Planner can then assist the participant with obtaining work authorization documents if the program funded supportive service costs are reasonable. TEG 10-23, page 8 is more specific in saying that it permits paying these fees except for individuals not yet authorized to work. The language in the Work Authorization Verification Requirement document is not consistent with the TEG. Based on the policy note, it appears that WIOA could pay for documents that are used to verify work authorization.

### **DWD-DET Response:**

DWD-DET interprets "not yet authorized to work" as individuals who self-attested to be eligible to work in the United States but still need to obtain documentation. This does not include those who want to become work authorized.

3. Can staff start collecting work authorization verification based on their initial interview with participants since some participants come in disclosing what they would like to get out of WIOA, many times those services being ones that require work authorization?

**DWD-DET Response:**

Absolutely. The only intention of the work authorization verification requirements is to ensure participants do not delay starting services while awaiting work authorization documentation. The intent is also to help those who cannot show authorization still receive the allowable services as identified in the document.

4. What is considered a reasonable cost for program-funded supportive services to help obtain certain documents to verify Work Authorization? The cost for Work Authorization can be upwards of \$500.

**DWD-DET Response:**

Please see [8.6.6 Local WDB Policy Requirements \(wisconsin.gov\)](https://www.wisconsin.gov) for information on how to implement your supportive services policy.

5. Will there be something in place in ASSET to alert staff that work authorization needs to be verified when certain services such as Job Referral/Placement Assistant, Job Development, Out of Area Job Search Assistance, Out of Area Relocation Assistance, or Integrated Education and Training Programs are provided?

**DWD-DET Response:**

We are working with the ACMB to update ASSET with an alert for past expiration dates. Another project is only allowing services that need authorization to open if verified. We will work with ACMB in an attempt to implement these changes.

6. Does this mean that every time we provide services that require us to verify eligibility to work in the U.S, we would need to verify a participant's work authorization status, or it is that we verify once and it is good? For example, at the beginning of every semester, before we can fund a participant's semester, we must verify their eligibility to work.

**DWD-DET Response:**

Career planners are still required to track work authorization expiration dates, and this is necessary to reverify as the expiration date approaches.

7. Can a person lose eligibility for service if their eligibility to work in the US documents expires (Driver's License/ID expires) or once we verify it at the beginning of the services it is good for the duration of that service?

**DWD-DET Response:**

Same as question 6. Career planners are still required to track work authorization expiration dates, and this is only necessary to reverify as the expiration date approaches.

8. I am reaching out to clarify the DRAFT policy for chapter 8.2.2 (Dislocated Worker). I believe there is a mistake in the DRAFT because it references one of the criteria as "eligible to work in the United States" and not selective service. Is this a mistake?

**DWD-DET Response:**

The policy has already been updated to correct the mistake. Thank you for bringing this to our attention.