

SAN JOAQUIN COUNTY WORKNET EMPLOYMENT AND ECONOMIC DEVELOPMENT DEPARTMENT POLICIES AND PROCEDURES DIRECTIVE

DIRECTIVE NO.	EFFECTIVE DATE	APPLICABILITY	PAGE
25-01	July 1, 2025	CMD	1 of 4
SUBJECT: WORK AUTHORIZATION VERIFICATION POLICY			

I. PURPOSE

The purpose of this directive is to establish procedures for verifying work authorization for participants enrolled in services under the Workforce Innovation and Opportunity Act (WIOA) Title I. These procedures are designed to follow applicable federal guidance and promote consistent implementation across all partner programs.

II. GENERAL INFORMATION

All programs under WIOA Title I must verify that participants are legally authorized to work in the United States. Verification must align with [U.S. Citizenship and Immigration Services \(USCIS\) Form I-9](#) requirements and follow the procedures outlined in [WSD18-03](#) and related guidance. Employment and Economic Development Department (EEDD) is responsible for ensuring that participants meet this requirement before accessing certain services.

References

- [Workforce Innovation and Opportunity Act \(WIOA\) \(Public Law 113-128\), Section 188\(a\)\(5\)](#)
- [USCIS Form I-9](#)
- [WSD18-03](#)

III. POLICY

Verification Process

Work authorization must be verified using documents that meet the requirements of the [USCIS Form I-9](#). Verification must occur during the intake process and prior

to the provision of staff-assisted individualized career services, training services, or any employer-involved service.

Period of Participation

Participants officially begin their period of participation upon receiving a staff-assisted basic, individualized career, or training service.

Triggers for Verification

Work authorization must be verified prior to the delivery of the following services:

- Job referrals
- Work experience or subsidized employment
- Employer-based training
- On-the-job training

These triggers align with the "Authorization to Work Service Flow Chart" provided in [WSD18-03](#).

Work Authorization Verification Timing

While this work authorization verification is required, EEDD staff will consider the needs and circumstances of the participant prior to verifying work authorization and beginning the participation period. The following factors may be considered:

- Whether the participant is actively awaiting work authorization.
- Barriers to document access, particularly for priority populations such as:
 - Youth in foster care
 - Homeless youth or adults
 - Individuals reentering the community from incarceration
 - Individuals impacted by disasters
- The nature and urgency of services to be provided.
- The anticipated duration of services.
- The need for expedited service delivery.
- Opportunities for co-enrollment with Title II adult education programs.

- The cost associated with the services or training.

Job Referrals and Employment Preparation

To support participants in becoming job-ready and to maintain positive engagement with employers, staff must:

- Inform participants of federal employment laws that require employers to verify work authorization.
- Verify a participant's work authorization documentation prior to making any job referral to an employer.

All participants will be informed during intake that legal authorization to work in the U.S. is required to receive job referrals or employer-involved services. This information will be reiterated during eligibility review, development of the Individual Employment Plan (IEP) for adult participants or Individual Service Strategy (ISS) for youth participants, and/or objective assessment. This approach ensures legal compliance, supports equitable access to services, and prepares participants for successful employment outcomes.

Differentiating Self-Service and Staff-Assisted Services

Verification of work authorization is not required for individuals to access only self-services. However, verification is mandatory before providing any staff-assisted career service that involves employer interaction or subsidized employment.

Partner Coordination

EEDD will collaborate with AJCC partners and other relevant entities to establish a joint policy for verifying work authorization. This includes identifying a consistent point of verification and ensuring uniformity in documentation and procedures.

Consistency Across Programs

All programs operating under WIOA Title I will follow this directive to ensure consistent application of verification procedures. Coordination efforts will be maintained to improve participant access and reduce duplication.

Point of Verification

Authorization to work in the U.S. must be verified before any employer-related service is initiated. Staff must review and confirm documentation prior to making referrals or enrolling participants in work-based learning opportunities.

IV. PROCEDURE

1. During intake, participants will be advised of the work authorization requirement. Staff will provide a list of acceptable documents per [USCIS Form I-9](#).
2. Staff will verify and upload all required documentation to CalJOBS with appropriate labeling and confidentiality protections.
3. Staff must complete all CalJOBS data entry and case notes regarding verification status and update the eligibility application accordingly.
4. Participants will not receive job referrals or employer-involved services until verification is completed.

V. QUESTIONS REGARDING THIS DIRECTIVE

May be referred to the Executive Director of EEDD via Managers or designee.

VI. UPDATE RESPONSIBILITY

The Executive Director of EEDD and/or designee shall be responsible for updating this directive, as appropriate.

VII. APPROVED



PATRICIA VIRGEN
EXECUTIVE DIRECTOR

PV:vf