



To: All Golden Sierra Staff and Subrecipients
Subject: Authorization to Work
Effective Date: January 1, 2019
Revision Number: (1) November 16, 2020

#### Purpose

To establish a local authorization to work policy that identifies the point(s) during the period of participation when America's Job Center of California (AJCC) staff must verify a participant's right to work documentation. The following procedures were developed in coordination with the Title III partner, the California Employment Development Department (EDD) to ensure compliance with Workforce Services Directive (WSD) 18-03.

#### "Period of Participation" Guidance

For Workforce Innovation and Opportunity Act (WIOA) Title I and Title III participation starts when an individual receives a Staff-Assisted Basic Career service, Individualized Career service, or Training service. Authorization to work verification is not required for Basic Career services that are self-service or information-only activities. When verifying authorization to work, staff must retain copies of the individual's Form I-9 documents. These documents shall be uploaded to the individual's CalJOBS profile.

#### Authorization to Work Service Flow Chart

The following chart is intended to establish a local policy on when to ask for authorization to work documents. The flow chart takes into account which services trigger participation as well as which services impact the relationship with employers. Where a service triggers participation and necessitates the coordination of services with an employer, Golden Sierra staff, partners, and subrecipients shall verify the individual's work authorization documents.

Service	Triggers Participation	Authorization to Work
Basic Career Services (Self-Service and Information-Only)	No	No
Basic Career Services (Staff-Assisted)	Yes	Staff is <u>not required</u> to verify for activities such as initial assessment, resume preparation, UI claims assistance, or career development workshops.
		Staff <u>must</u> verify for services that require coordination with an employer, such as job referrals and job placement assistance.
Individualized Career Services	Yes	Staff is <u>not required</u> to verify for the provision of supportive services to help an individual obtain authorization documents.
		Staff <u>must</u> verify for all other individualized career services.
Training Services	Yes	Staff <u>must</u> verify for all training services.

#### Data Collection and Maintenance

Revision 1 establishes a new required practice for staff to scan right to work documentation for electronic storage in CalJOBS. Hard copies of right to work documentation can still be retained in the participant's case file. Such documentation shall be collected, used, and stored in a manner that ensures it will not be accessible to anyone not authorized to access it. All staff, partners, and subrecipients shall strictly adhere to state and federal regulations pertaining to privacy, confidentiality, and record security.

#### References

WIOA (Public Law 113-128) Section 188(a)5

WSD18-03

WSD19-06