



DEPARTMENT OF
CAREER SERVICES

Workforce Issuance

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☒ Policy ☐ Information

To: MassHire Workforce Board Chairs
MassHire Workforce Board Directors
MassHire Career Center Directors
MassHire Fiscal Officers
MDCS Operations Managers

cc: WIOA State Partners

From: Beth Goguen, Director
MassHire Department of Career Services

Date: August XX, 2025

Subject: **Work Authorization Verification in Grant Programs Administered by the Employment and Training Administration - Operational Guidance for TEGL 10-23, Change 2**

**REVIEW AND COMMENT – COMMENTS DUE BY COB ON
September 3, 2025**

EOLWD/MDCS will host a webinar to provide an opportunity for questions and discussion on Tuesday, August 26, at 2pm – invitation to follow.

Purpose: To notify MassHire Workforce Boards, MassHire Career Center Operators and other local workforce partners of new operational guidance outlined in TEGL 10-23, Change 2: Work Authorization Verification in Grant Programs Administered by the Employment and Training Administration

Background: TEGL 10-23, Change 2 clarifies and reinforces work authorization verification for grant programs administered by Department of Labor, Employment and Training Administration.

Under the Workforce Innovation and Opportunity Act (WIOA), individuals must be determined eligible before receiving participant-level services. Eligibility determination ensures that resources are directed toward individuals that meet the regulatory requirements to funding specific program funding streams.

Programs affected by TEGL 10-23, Change 2 include:

- WIOA Title I Adult, Dislocated Worker, and Youth
- Wagner-Peyser (Title III)
- National Farmworker Jobs Program (NFJP)
- YouthBuild (Sec. 171)
- Reentry Employment Opportunities (Sec. 169)
- H-1B Skills Training and other discretionary grants

Staff are required to collect and maintain appropriate source documentation that verifies eligibility criteria.

Accepted Eligibility Documentation

- U.S. Passport or Passport Card
- Permanent Resident Card (Green Card)
- Employment Authorization Document (EAD)
- Social Security Card + valid government-issued photo ID
- Other DHS-authorized documents
- Refer to the USCIS I-9 List of Allowable Documents
- Verification through USCIS' Systematic Alien Verification for Entitlements (SAVE)

Policy: MassHire Workforce Boards and Career Centers must ensure that an individual's eligibility aligns with participant level services. Eligibility must be verified and documented before an individual may receive participant level services.

Participant Level Services

Participant level services are beyond basic career self-services.

Basic career services include:

- Labor Market Information
- Information on Program/Services
- Program Referrals
- Self-Service Activities

Basic career services do not require verification of work authorization. Individuals enrolled in Wagner-Peyser Employment Services, that receive a

service other than self-service and information-only services, are considered to be receiving participant level services.

Participant level services that require verification of work authorization include “blue-bold services” in MOSES or individualized services such as:

- Career Center Seminar
- Assessments
- Career Planning
- Counseling
- Job Search Assistance
- Workshop Participation including virtual

Staff must provide individuals with a list of acceptable types of documents that can be used to establish their work authorization. The USCIS List of Acceptable Documents included on Form I-9 may be provided.

Documentation of Work Authorization

Staff must verify and document work authorization for individuals that are required to meet participant eligibility. Individuals who receive participant level services that include staff assisted services such as participation in career center workshops must demonstrate work authorization.

During intake or initial assessment, staff must determine if the individual seeking participant level services is work authorized. Individuals not seeking enrollment in WIOA funded programs do not need to meet additional eligibility criteria beyond proof of work authorization. Documentation of participant work authorization may be stored electronically or in hard copy files for a period of 3-years.

If the individual’s work authorization has already been verified by another Career Center and the documentation has been recorded in MOSES, this verification is valid. In these instances, the individual is not required to provide proof of work authorization again, provided that there is a clear record of the verification in MOSES.

Participation in Participant Level Virtual Services

For individuals participating in online participant level services, such as workshops, staff must verify work authorization prior to the individual’s participation. Work authorization must be confirmed and documenting in MOSES before access to the workshop is granted.

Process for Virtual Work Authorization Verification:

1. **Pre-Workshop Registration**
 - All individuals registering for online workshops must complete a Career Center Registration.
 - Review MOSES to determine whether the individual's work authorization has already been verified and documented.
2. **If Work Authorization is Already Verified**
 - Add a note in MOSES confirming that the work authorization documentation has already been verified.
 - Approve the individual for participation in the online workshop.
3. **If Work Authorization Has Not Been Verified**
 - Contact the individual prior to the workshop to arrange a virtual verification session.
 - Acceptable documentation must be reviewed virtually (via video conference or through secure email).
 - Document the work authorization verification in MOSES.
 - A copy of the document must be stored in the individual's file (hard copy or virtual).

Only individuals with verified work authorization documented in MOSES may attend online workshops including participation in online services that trigger blue-bold services. See attached Participant Level Services Chart for participant services that trigger blue bold services.

Acceptance of Eligibility Documentation Verified by WIOA Partner Agencies

To ensure efficiency and to reduce duplication, staff may accept eligibility documentation that has already been verified by another WIOA partner agency that has been verified within the past six (6) months. In these instances, there must be a clear paper trail in the participant's file (hard copy or virtual) showing:

- the agency that conducted the verification,
- the date the verification occurred and,
- the specific documentation or data source used.

Staff contact designated WIOA partner agency staff to confirm that the work authorization has already been determined. A note must be added in MOSES that the work authorization has been previously verified by another agency.

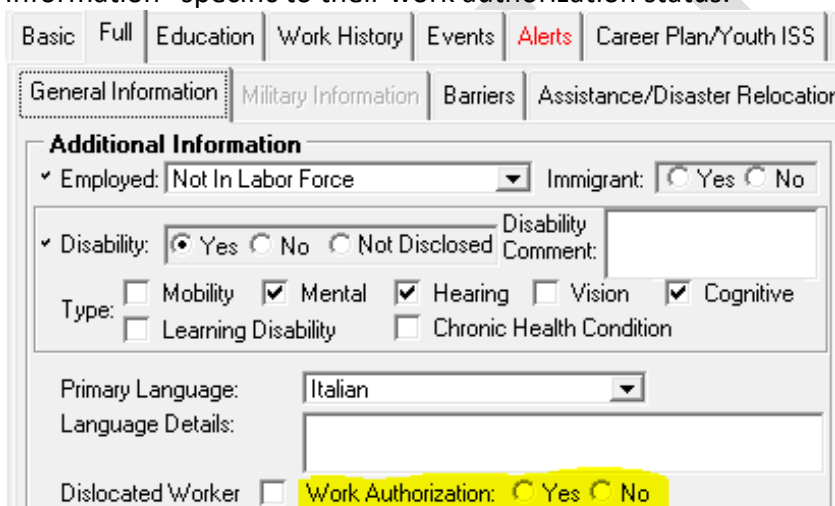
Review of Participant Enrollment with Temporary Work Authorization Status

Staff must verify and document valid work authorization using a unique identifier (e.g., EAD card number) and record the expiration date in case notes in MOSES. To conduct ongoing review of active work authorization, staff should set calendar reminders or alerts in MOSES no later than every 90 days to review temporary work authorization expiration dates.

Data Entry and Documenting Work Authorization in MOSES

To document an individual's work authorization status in MOSES, staff must do the following:

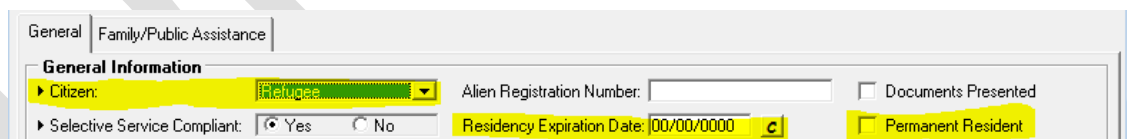
1. Go the "Full Tab" and enter the individual's information under "General Information" specific to their work authorization status.



The screenshot shows the MOSES interface with the 'Full' tab selected. The 'General Information' section is active. The 'Additional Information' section is expanded, showing the following fields:

- Employed: ☐ Not In Labor Force
- Immigrant: ☐ Yes ☐ No
- Disability: ☒ Yes ☐ No ☐ Not Disclosed
- Disability Comment: [Text Field]
- Type: ☐ Mobility ☒ Mental ☒ Hearing ☐ Vision ☒ Cognitive
- ☐ Learning Disability ☐ Chronic Health Condition
- Primary Language: Italian
- Language Details: [Text Field]
- Dislocated Worker: ☐
- Work Authorization: ☐ Yes ☐ No

2. Go to the "Eligibility Criteria Tab" and enter the individual's information under "General Information" specific to their Citizen status.



The screenshot shows the MOSES interface with the 'Eligibility Criteria' tab selected. The 'General Information' section is active. The 'Citizen' field is highlighted in yellow, showing 'Refugee'. Other fields include:

- Alien Registration Number: [Text Field]
- Documents Presented: ☐
- Selective Service Compliant: ☒ Yes ☐ No
- Residency Expiration Date: 00/00/0000
- Permanent Resident: ☐

It is important for staff to consistently and accurately document work authorization status in MOSES to ensure compliance with WIOA eligibility requirements and for monitoring and auditing purposes.

Exiting Participants from MOSES with Expired Work Authorization

If a participant's work authorization is no longer valid, staff must allow the participant to auto-exit from MOSES. The auto-exit process occurs when participant level or blue bold services are not provided for 90 days. Staff should add a note in MOSES indicating that the participant's work authorization has

expired and stop providing services to the participant. Please note this will not exclude the participant from performance measures.

Action

Required: Please ensure managers, staff and partners are aware of the details in TEGL 10-23, Change 2 in reference to Work Authorization for customers receiving Participant Level Services.

Effective: September 10, 2025

Inquiries: Please email all questions to PolicyQA@mass.gov. Please indicate Issuance number and description.

Attachment: Participant Level Services Chart

References: [TEGL 10-23, Change 2](#)
[TEGL 10-16, Change 3, Attachment VII: Participation Level Services Charts](#)