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| State of Alaska<br>Department of Labor & Workforce Development                                           |                                                                                        |
| <b>Division:</b> Alaska Workforce Investment Board (AWIB)                                                | <b>GAA:</b> FY27-004                                                                   |
| <b>To:</b> WIOA Youth program staff and subrecipients                                                    |                                                                                        |
| <b>Subject:</b> Rescission of GAA FY26-002 and Updated Work-Authorization Guidance                       | <b>Pages:</b> 2                                                                        |
| <b>References:</b> TEGL 10-23, Change 3; WIOA Section 188(a)(5); 29 CFR Part 38; USCIS Form I-9 Guidance | <b>Effective Date:</b><br>Immediately upon issuance<br>Issuance Date: Pending Approval |

## Purpose

Effective upon issuance of this advisory, GAA FY26-002, Verification of Work Authorization for WIOA Title I-B Youth Participants, issued July 10, 2025, is rescinded in full and must no longer be used as current Alaska Workforce Investment Board guidance. This rescission aligns AWIB guidance with Training and Employment Guidance Letter (TEGL) 10-23, Change 3.

Effective immediately upon issuance, WIOA Youth staff and subrecipients must discontinue the universal pre-service work-authorization verification, recurring three-month reverification, and automatic-exit procedures established solely by GAA FY26-002.

**Policy direction:** GAA FY26-002 is rescinded in full. Continue applying WIOA Title I eligibility requirements and current approved AWIB source-documentation guidance; do not continue the additional Change 2 verification procedures.

## Background

On July 10, 2025, the U.S. Department of Labor Employment and Training Administration issued TEGL 10-23, Change 2. AWIB then issued GAA FY26-002 based on that federal guidance. The GAA required work-authorization documentation before enrollment or participant-level services and established recurring reverification and exit procedures.

On March 18, 2026, ETA issued TEGL 10-23, Change 3 and expressly rescinded Change 2. Because Change 2 is no longer active federal guidance, GAA FY26-002 must no longer be used as authority for its additional verification and reverification procedures.

## Requirements That Are Rescinded

- **Universal pre-service verification.** Do not require a separate work-authorization review before every participant-level service solely under GAA FY26-002.
- **Form I-9 document lists as the required WIOA method.** Do not require applicants to produce documents from the Form I-9 Lists of Acceptable Documents solely to satisfy the rescinded GAA.
- **SAVE verification based solely on the GAA.** Do not initiate SAVE verification merely because GAA FY26-002 previously encouraged or permitted it.
- **Three-month reverification.** Discontinue recurring checks every three months unless a separate, current, approved requirement applies.

- **Automatic exit or service termination.** Do not suspend services, close a case, or exit a participant solely because the participant did not complete a reverification required by GAA FY26-002.

### **Requirements That Remain in Effect**

- **Apply WIOA Title I participation requirements.** Determine and document eligibility consistent with WIOA Section 188(a)(5), applicable program-specific requirements, and current approved AWIB eligibility and source-documentation guidance.
- **Use approved documentation standards.** Collect and retain only the documentation required by current AWIB guidance. GAA FY26-002 is no longer an independent documentation standard.
- **Protect equal opportunity and privacy.** Apply 29 CFR Part 38, request only information necessary for WIOA administration, and protect sensitive information from unnecessary access or disclosure.
- **Base services on the participant's program record.** Continue service decisions based on WIOA eligibility, the Objective Assessment, Individual Service Strategy, documented need, and applicable program rules.

### **WIOA Eligibility Is Not Employer Form I-9 Verification**

A WIOA eligibility determination and an employer's Form I-9 employment-verification responsibility are separate processes. When a participant is actually hired for a paid work experience, on-the-job training, or other employment, the employing or payroll entity must complete Form I-9 as required by federal employment law.

The employer's Form I-9 responsibility does not reinstate the rescinded GAA FY26-002 process and does not, by itself, authorize WIOA eligibility staff to copy Form I-9 documents into AlaskaJobs or the participant file. Follow current approved AWIB documentation and records-management requirements.

### **Required Implementation Action**

1. Distribute this advisory to intake, eligibility, case-management, supervisory, work-experience, and records staff.
2. Stop scheduled three-month reverification and remove GAA FY26-002 procedures from current checklists, scripts, desk aids, and local procedures.
3. Review any pending suspension, denial, closure, or exit based solely on GAA FY26-002 before taking action. Contact AWIB when individualized program direction is needed.
4. AWIB Internet staff must remove GAA FY26-002 from the AWIB website, including the current Grant Agreement Advisory selections and public download location.
5. Post GAA FY27-004 as the controlling advisory and public notice that GAA FY26-002 was rescinded. Do not retain or present GAA FY26-002 as current or archived website guidance.

### **Authorities and Official Sources**

- [TEGL 10-23, Change 3 - Rescission of Change 2](#)
- [WIOA Section 188](#)
- [29 CFR Part 38 - WIOA Nondiscrimination and Equal Opportunity](#)
- [USCIS Form I-9 Central](#)
- [AWIB Grant Agreement Advisories](#)

Questions regarding this Grant Agreement Advisory should be directed to Leslie Vines, Program Coordinator I, at (907) 269-8158 or [leslie.vines@alaska.gov](mailto:leslie.vines@alaska.gov).