



MSEC I-9 SELF-AUDIT

Prior I-9 Compliance History:

1. Have you received any ICE (or INS) citations since 1986? **Yes** **No**
If so, how were those citations resolved?

2. Have there been any “raids” by ICE or INS at your work site(s) since 1986?
Yes **No**
3. Has the Employer been the subject of any DOL or OFCCP audits? **Yes** **No**
If so, were I-9 issues addressed during the audit(s)? **Yes** **No**

Current IRCA Compliance:

For each audited I-9, answer the following:

1. Was Section 1 of each I-9 form completed at the time of the employee’s hire?
Yes **No**
2. Were verification documents provided by the employee no later than the third business day from the date of hiring? **Yes** **No**
3. For documents of work authorization that expire, are receipts which evidence current work authorization being accepted and placed in a re-verification system (see receipt rule)? **Yes** **No**
4. Has the appropriate person completed Section 2 of the I-9 form within three business days of the date an employee is hired? **Yes** **No**
5. What are your practices regarding correction of I-9s?

Are corrections documented? **Yes** **No**

For Your Overall I-9 Practices:

1. Who is responsible in your organization for completing the I-9 process (HR, Payroll, managers)? _____
 Have these people been trained in I-9 practices and procedures? **Yes** **No**
2. Do the people responsible for completing the I-9 have someone to call with questions?
Yes **No** If Yes, Who? _____
3. What resources do the people responsible for the I-9 process have (I-9 training, information for the USCIS, etc.)? _____

4. Is the I-9 process being handled properly? **Yes** **No**
 If not, what areas of the I-9 process are failing your organization? _____

Managing the I-9 Process:

1. Has the Employer trained managers to ensure that as a matter of policy, employees are not required to produce specific documents or more documents than the law requires?
Yes **No**
2. Do you have an adequate system in place to ensure that employees whose work authorization will expire are re-verified appropriately? **Yes** **No**
3. Have you trained applicable managers and HR staff to ensure that employees with permanent resident status (also known as alien registration, alien resident or green card) are not included in the re-verification system? **Yes** **No**
4. What has your practice been regarding new employees who cannot provide verification documentation or have suspect documentation? _____

5. What has your practice been regarding employees whose I-9 has required verification?

 Have the re-verifications been completed in a timely fashion? **Yes** **No**
6. What has your practice regarding employees whose I-9 has required verification but the employee has been unable to provide new verification documents? _____

7. What is your practice regarding employees providing new verification documentation with a significant change in name, change in social security number, etc.? _____
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Retention of I-9 Forms:

1. Do you have an I-9 on file for every active employee hired after November 6, 1986?
Yes No
2. Do you have a consistent practice in regard to retaining the verification documentation with the I-9 (either keeping or not keeping the verification documentation)?
Yes No
3. If your practice of keeping versus not keeping verification documentation is not consistent, is there a rationale or reason for the inconsistency? Yes No
What is that rationale? _____
4. Do you keep the I-9 forms apart from the general personnel files of the employees?
Yes No
5. Do you have filing system in place for I-9s? Yes No
6. Upon an employee's termination, are I-9 forms retained for the requisite period of time (one year after the employee's employment ends or three years from their hire date, whichever is longer)? Yes No
7. Are I-9 forms that are not falling into these categories purged from your records?
Yes No
8. Do you have a secure system in place to ensure purged I-9s are not recoverable for identity theft purposes (i.e. shredding of forms)? Yes No