

# I-9 Audit Guide

## Steps on how to conduct an internal I-9 audit

1. Locate I-9 folder.
2. Compare current payroll to I-9 Forms. Make sure that you have an I-9 Form for each current employee. (Note: I-9 Forms are not necessary for employees who were hired before November 7, 1986 and have been continuously employed since then).
3. If any current employee does not have an I-9 Form, ask the employee to complete Section 1 of a new I-9 Form immediately. Give the employee 3 business days to produce documents of his/her choice for Section 2. Documents must be of the types listed on the I-9 Form. Attach a note to the form indicating that the original could not be located during an audit.
4. Take I-9 Forms for any terminated employees out of the I-9 folder. Place them in separate folders by year of termination.
5. Subject to company document retention policy, discard or shred I-9 Forms of former employees if it has been more than 3 full years since their termination. Do not throw these I-9 Forms away until your supervisor has confirmed that the forms no longer need to be retained.
6. Review all I-9 Forms for completeness and errors. Any deletions from I-9 Forms should be made with a neat cross out which leaves the original information readable (do not white out). All deletions and additions must be initialed and dated with the date of the correction. Do not backdate any I-9 Form.
7. If there is an error in Section 1, it must be corrected and initialed and dated by the employee. If there is an error in Section 2, it must be corrected and initialed and dated by the HR representative.
8. If there is an error in information provided for List A, B, or C, the correction must be made by the HR representative who originally completed the form to keep the Certification true. If that HR representative is no longer available, a different HR representative can make the correction in Section 3 or on a new I-9 Form.
9. If the error is in the HR representative's title or the company's business address in Section 2, a different HR representative can make the correction and initial and date. The signature in Section 2, however, must be that of the HR representative who saw the original documents submitted by the employee.
10. Items to check:
  - Did employee complete all applicable Section 1 items?
  - Did employee check one of the boxes for immigration status?
  - Did employee sign and date Section 1?
  - Was Section 2 completed by HR representative?
  - Did HR representative complete List A OR List B AND List C?
  - Did HR representative insert work start date in Certification paragraph?
  - Did HR representative sign and date the form and complete the company information boxes?
  - Was Section 3 or Supplement B completed if a work authorization had to be reverified? (Note that U.S. Passports and Permanent Resident Cards have to be valid when originally presented but do not need to be reverified when they expire. Also, do not reverify List B documents.)

11. If the review of the I-9 Forms reveals that appropriate documentation was not presented or a required reverification was not completed, request further documentation from the employee as soon as possible.
12. If proper verification or reverification cannot be completed within 3 days, consult with your supervisor regarding the suspension or termination of employees.
13. If there are errors on I-9 Forms for terminated employees which must still be retained, do not correct errors in Section 1 since the employee is no longer available, but correct errors in Section 2.

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