**PART 1: IDENTIFYING MISSING I-9 FORMS**

**Step 1:** Pull all I-9 forms out of employee files and put in an **Active I-9 binder** in alphabetical order by employee’s last name.

**Step 2:** Generate a list of all active **and** terminated employees from your HRIS or Payroll system for last 3 years (LN, FN, Date of Birth, Date of Hire, Termination and Rehire)

**Step 3:** Highlight the employees that do not have an I-9 on file (I-9s are not needed for volunteers, independent contractors or consultants or anyone hired before November 6, 1986)

**Step 4:** Contact any active employees that don’t have an I-9 and have them come see you.

**Step 5:** Explain that you need for them to complete an I-9 **now**, give them the entire form with the instructions **which includes Lists A, B and C of acceptable documents** and ask them to bring you the necessary documents so you can review them

**Step 6:** Make sure you let the employee choose the documents to provide and that they’re not expired.

**Step 7:** Make sure employee **signs** **and dates Section 1** of I-9 Form

**Step 8:** Employer representative must **sign and date Section 2** of I-9 Form

**Step 9:** File completed I-9 form and supporting documentation along with a **memo** (What, Why and When) (*see sample memo in Bonus Section: I-9 Correction Memo*)

**Step 10:** No documentation?

**< 90 days** of employment: Consult immigration attorney

**>90 days**: Terminate or Unpaid Leave of Absence

**Step 11:** List terminated employees without an I-9 Form

**PART 2: REVIEW EXISTING I-9 FORMS**

**Step 1:** Download the Audit Log to document your findings as you review the existing I-9 Forms

**Step 2:** Section 1: Ensure name, other names used (If applicable), address, and date of birth are completed

**Step 3:** If you use e-verify, make sure the SSN is filled in as well

**Step 4:** Ensure employee has identified his/her immigration status and has signed and dated the I-9 Form

**Step 5:** Ensure that the proper document has been entered into the proper list – List A or B and C

**Step 6:** Ensure that **all** the required information is entered on the I-9 Form for each document and that none are expired

**Step 7:** Ensure that the certification has been completed and a representative of the company has **signed and dated** the form

**Step 8:** Complete Section 3 of I-9 Form **only** if employee’s work authorization **expired** or if the employee has been **rehired**

**Step 9:** Separate the I-9s into two piles

**Pile 1**: I-9 Forms with **errors**

**Pile 2**: I-9 Forms that are correct

**Step 10:** File all I-9s in Pile 2 in the Active Employee I-9 binder sorted in alphabetical order

**PART 3: CORRECTING ERRORS ON THE I-9 FORMS**

**Correcting Errors in Section 1**

**Step 1:** Tell the Employee there is an error and make sure the Employee is present to make the correction

**Step 2:** Have the Employee draw a line through the incorrect information

**Step 3:** Have the Employee enter the correct info

**Step 4:** Have the Employee initial and date the correction

**Correcting Errors in Section 2**

**Step 1:** Employer/Employer Rep:Draw a line through the incorrect information

**Step 2:** Employer/Employer Rep:Enter the correct information

**Step 3:** Employer/Employer Rep:Initial and date the correction

**Correcting Multiple Errors on the I-9 Form**

**Step 1:** This is very simple if there are only one or two minor changes to be made. However, if there are multiple corrections to be made, you may need to use a new I-9 form. For example, if an entire section was mistakenly left blank or if Section 2 was completed based on unacceptable documents, you cannot change the original I-9. In either of these situations, you would need to use a NEW, CURRENT VERSION of the I-9 to list the acceptable documents

**Step 2:** If you need to use a new I-9, you may redo the section with the error in it on a new form and attach it to the old form

**Step 3:** Include a note in the file regarding the change you made, the reason you made it and whether you made the change on the existing I-9 or used a new I-9 form

**Step 4:** Make a note on your audit log of the error and of the correction and how and when it was made

**Reasons to Use A New I-9 Form**

**Step 1:** There are so many errors that the original I-9 would be too messy and no one could read it

**Step 2:** Entire sections of the original I-9 were left blank

**Step 3:** Incorrect documents were used in Section 2 to verify work authorization