CRITICAL MESSAGE re: I-9 FORMS FOR ALL NEW HIRES

BACKGROUND:
Since 1986, federal regulations have required all employers to complete a Form I-9 on every individual hired.

REQUIREMENTS:
The individuals themselves must complete Part 1 of the I-9 Form -- on or before their FIRST day of employment.

Then Vanderbilt, as the employer, must review the individual’s official documents that establish the person’s identity and eligibility to work in the U.S and complete Part 2 of the Form I-9, on or before the THIRD day of employment.

In recent Internal Audit reviews, material compliance challenges were identified across campus, and it has been determined that HR/Payroll will not process hire actions in the HR System without both a fully-completed I-9 form (for every hire, including students) and a background check clearance (for all hires other than currently-enrolled students).

Because Form I-9s cannot be retroactively dated, hire dates also cannot be retroactive. The earliest hire date in the HR System can be no earlier than the third day preceding the date that the I-9 Part 2 is verified by HR.

HR will not be able to process retroactive hire dates; it is thus critical that no individual commences work until the I-9 and background check processes are complete.

FOR HIRING SUPERVISORS and UNIT HR TRANSACTION PROCESSORS:
Please note that both Part 1 and Part 2 of Form I-9 can be – and in fact are strongly recommended to be –completed before the first day of employment; even 30 days in advance is fine.

WHAT AND WHERE:
With many new faculty, staff, and student workers starting employment in August, please ensure that the hire completes Form I-9 Part 1 -- AND that they present their official documents to University HR (10th Floor Baker Building, 110 21st Ave S.) for completion of Part 2, ideally BEFORE the first date of employment. (*And the sooner you send them, the shorter the line they will stand in.*)
Communicate with them in advance, before they arrive, to **have their original documents available** immediately for review. *(Otherwise, such documents are sometimes packed away when moving – or left at home with Mom. **Copies of official documents are not acceptable.**)*

You may **not** dictate which documents the individual should present. They may present **any** document or combination of documents that are authorized by USCIS.

**List A** documents establish both Identity and Employment Authorization

**List B** documents establish Identity +

**List C** documents establish Employment Authorization

The individual must present either a document from List A

Or one from List B **plus** one from List C

The federal **USCIS website** provides a resource for the acceptable documents, here:


**SUMMARY:**

Please ensure that all hiring supervisors in your areas understand that no individual (faculty, staff, grad assistant, student worker, post-doc, or temp) may commence work until the I-9 Form – and background checks as needed – are complete.

**QUESTIONS:**

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