

Diocese of Owensboro

Checklist: I-9 Audit

General Instructions:

Employers must have an I-9 on file for every active employee hired after November 6, 1986.

Employers must have an I-9 on file for terminated employees for three years following date of hire or one year following date of termination—whichever is later.

The current version of the I-9 form as of the date of hire or reverification must be used.

Items Needed for Audit:

- List of current employees hired since November 6, 1986.
- List of employees terminated in the past three years.
- Original or electronic copies of all I-9 forms (both current employee forms, as well as forms for terminated employees within current retention requirements).
- Current version of Form I-9
- Audit Log - List of current employee and employees terminated in the previous three years. Log should include SS#, name, DOH, DOB and DOT.

Review I-9 Forms by Section:

Section 1

- Name (Including other last names used, past or present), address and date of birth are completed.
- Social Security number is entered.
- Appropriate citizen/immigration status box is checked.
- Lawful permanent residents have provided their seven- to nine-digit Alien Registration Number (A-Number) or USCIS Number.
- Aliens have provided an Alien Registration Number/USCIS Number or Form I-94 Admission Number or Foreign Passport Number.
- Employee signed and dated the form no later than the first day of employment.
- Preparer or translator section is completed if someone other than the employee completed Section 1 on behalf of the employee. – Supplement A

Section 2

- Employee's name is entered as it appears in Section 1.
- The number is entered that correlates with the citizenship or immigration status box the employee selected in Section 1.
- One document from List A is listed and completed, or a combination of one document EACH from List B and List C are listed and completed.
- Documents have been entered into the correct section (e.g., List B item is, in fact, listed under list B and not List C or List A).
- If photocopies of documents are kept, copies of documents are maintained for all employees.**
- The employee's first day of employment is entered.
- All information in the certification section has been entered and a representative of the company has signed and printed his or her name and dated the form within three days of the employee's first day of employment.
- The business name and full address are entered.

Supplement A

- This supplement must be completed by any preparer or translator who assists an employee in completing Section 1.

Supplement B

- Section 3 is completed if the employee's work authorization expired or if the employee was rehired within three years from the date the I-9 form was previously completed.
- If the employee's name changed, the new name is entered in the reverification block.

Correct Errors:

Section 1 Errors

If the employer discovers an error in Section 1 of an employee's Form I-9, the employer should have the employee correct the error as follows:

- Draw a line through the incorrect information. Do not use correction fluid or black out any information.
- Enter the correct information.
- Initial and date the correction.

Employees needing assistance to correct Section 1 can have a preparer and/or translator help with the correction. The preparer and/or translator should:

- Make the correction or help the employee make the correction by drawing a line through the incorrect information and entering the correction information.
- Have the employee initial and date the correction.
- Initial and date the correction next to the employee's initials.

Section 2 and Supplement A and B Errors

When correcting Section 2 or Supplement A and B, the employer should:

- Draw a line through the incorrect information. Do not use correction fluid or black out any information.
- Enter the correct information.
- Initial and date the correction.

Multiple Recording Errors

- Complete the section containing errors on a new I-9 form.
- Ensure the current version of the I-9 form is used.
- Attach the new I-9 form to the original I-9 form.
- Attach an explanation describing why the employer made the changes and completed a new form.

Missing I-9 Forms

- Have the employee complete section 1 of the current version of the I-9 form immediately.
- Inspect the employee's original documents and complete Section 2.
- Use current dates; do not backdate the form except that the employee's original hire date should be entered in Section 2.
- Do not re-create the I-9 form without the employee's presence or without examining the employee's original documents.
- Do not re-create the I-9 form for terminated employees; rather, complete a note to file with an explanation.

Complete the Audit Log Entry and File the Corrected Form I-9:

- Complete the audit log of the I-9 forms containing errors.
- File the I-9 form in proper I-9 file (either current employee or terminated employee).

Employers do not need to complete or retain a Form I-9 for the following circumstances:

- Employees hired on or before Nov. 6, 1986, and are still always employed and have a reasonable expectation of employment.

Once an individual's employment has terminated, the employer must keep the former employees completed Form I-9 on file:

- If they worked for less than two years, retain their form for three years after the date you entered in the First Day of Employment field.
- If they worked for more than two years, retain their form for one year after the date they stop working for you.