



Strategic|HR|Partnerships

## I9 Audit Checklist

### Needed for Audit

- List of current employees hired since November 6, 1986.
- List of employees terminated in 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).
- I-9 Employer Handbook* published by the USCIS (optional).

### I-9 Document

#### *Section 1*

- Name, address, maiden name and date of birth are completed.
- Social Security number is voluntary, except for employers who participate in the E-Verify program.
- Employee identified his or her citizen/immigration status.
- Employee signed and dated the form on the date of hire.
- Preparer or translator section is completed if someone other than the employee completed Section 1 on behalf of the employee.

#### *Section 2*

- One document from List A is listed and completed or one document from List B and one from List C are listed and completed.
- Proper document has been entered into the proper list. List B item is, in fact, listed under list B and not List C or List A.
- Certification has been completed, and a representative of the company has signed and printed his or her name and dated the form within three days of date of hire.
- Business name and full address are completed.

#### *Section 3*

- Completed if the employee's work authorization expired or if the employee was rehired.



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### Missing I-9s

- Compare lists of current and terminated employees with I-9s to identify whether the I-9 is on file for each employee. Employees hired before November 6, 1986, are not required to have completed I-9s.
- For current employees, require employee to present documentation and complete I-9 with current dates. Date of hire will be the employee's actual date of hire, which may have been years earlier. Attach memo to the I-9 explaining the discrepancy between the date of hire and the date for completion of the I-9.
- For former employees, note the absence of the I-9 with a memo to the file and retain it with other I-9 forms.

### I-9s With Errors

- If the I-9 is easily corrected, corrections have been made on the I-9 form. Errors are crossed out with one line, corrected information is noted and initialed by the person making corrections.
- If the I-9 is not easily corrected, employee completed a new I-9.
- The old I-9 is attached to the new I-9. Do not throw away the old I-9.
- Photocopies of List 2 documents, if they exist, are attached to the I-9 and are readable. It is not mandatory to make photocopies, but if they are made, they must be kept. And if photocopies are made for one, they must be made for all.
- Memo is completed, dated and attached to I-9s for any terminated employees with missing or incorrect I-9 information. (Documenting this shows the employer made a good faith effort to have correct I-9s by performing an audit.)
- Memo is completed with current date and explanation that an I-9 audit was completed and what was done to correct the I-9. Attach this memo to each I-9 that is corrected.
- The list of the I-9s containing errors is completed. (This is the audit log that shows you have made a good faith effort to ensure I-9 compliance. The log should contain three columns: employee's name, the errors and what actions were taken to rectify the error.)
- The I-9 is filed in proper official I-9 file (either current employee or terminated employee).

*Checklist provided in part by SHRM.*