# Identify I-9 process potential risks or compliance gaps



# **FORM COMPLETION**

Are all I-9s **completed accurately** and **in full**?

Is Section 1 **completed by the employee** on or before the first day of work?

Is Section 2 **completed by the employer** within three business days of the start date?

Is the **most current version** of Form I-9 being used for each hire?



# **DOCUMENT VERIFICATION**

Are **original documents reviewed** (not copies)?

Are acceptable documents **listed in the correct columns**?

Are **documents verified in person**—or through DHS-approved remote procedures for eligible E-Verify participants



# REVERIFICATION

Is there a **process for tracking** work authorization expiration dates?

Are reverifications **completed before** work authorization expires?

Is Section 3 **used properly** for rehires and reverification?



# STORAGE AND ACCESS

Are I-9s **stored securely**—either on paper or electronically?

Are I-9s **retained for the required period**—one year after termination or three years after hire, whichever is later?

Can all I-9s be **produced within three business days** of an official request?



### POLICY AND TRAINING

Is there a **designated compliance owner** or team responsible for I-9s?

Are HR and **onboarding teams trained** on I-9 procedures and document requirements?

Are **remote verification procedures** documented and applied consistently?

