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Comment Submitted by Back Office People

Posted by the **U.S. Citizenship and Immigration Services** on Apr 1, 2022

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Comment

There are so many companies using the old versions of the I-9 because they are much easier to understand, and they have filled them out many times before. They are clueless that they need to fill out the new form every 3 years. Some employees filled out the form decades ago had have not done an update, and the company isn't clued in that they need to be done again, anyway.

I'm very glad that this form will be shorter and have less paper. THANK YOU!!

Comment ID

USCIS-2006-0068-0471

**Tracking Number**

11f-kbn6-n37j

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Comment Submitted by LBMC Employment Partners, LLC

Posted by the **U.S. Citizenship and Immigration Services** on Apr 1, 2022

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Comment

We agree with all proposed changes to the Form I-9. In particular, removing electronic PDF enhancements so that the Form I-9 can be completed and signed on all electronic devices - regardless of software - is an essential update for the growing remote workforce.

Comment ID

USCIS-2006-0068-0472

**Tracking Number**

l1g-p730-3czf

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Comment Submitted by Anonymous

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Comment

move the preparer/translator box (maybe above the signature line). People miss checking it off all the time, as they don't see if under the signature line.

Comment ID

USCIS-2006-0068-0430

**Tracking Number**

11d-v0n9-ijwf

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Comment Submitted by Anonymous

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Comment

I support the proposed recommendations for reduced paper use, digital review and completion, and document updates.

I ask for the agency to also consider on going remote verification of documentation that has been in place due to the COVID 19 pandemic to continue.

Comment ID

USCIS-2006-0068-0431

**Tracking Number**

l1d-v7xu-izm5

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Comment Submitted by Leading Technology Composites, Inc.

Posted by the **U.S. Citizenship and Immigration Services** on Mar 31, 2022

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Comment

Please remove the phone number and email information from Section 1. These are not relevant to employment verification.

Comment ID

USCIS-2006-0068-0432

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Comment Submitted by Anonymous

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Comment

Based off of feedback from candidates and new employees, the I-9 process is a bit daunting, especially for our remote workforce to complete. We would like to see a way for remote workers to have the I-9s completed without having to have someone physically examining the document as some states do not allow for Notaries to complete these on behalf of the employer.

Comment ID

USCIS-2006-0068-0433

**Tracking Number**

l1d-vjp6-url3

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Comment Submitted by Wolfgang Joseph

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Comment

Over the past 100 years, most of the presidential administrations and legislative classes turn a blind eye to the problem of illegal immigration. At the very least, nobody in the legislative branch is serious about addressing the problem; they would rather bandy the issue about for use as a talking point. This is tantamount to encouragement of illegal entry. Everyone knows that those people illegally entering the country need (and are willing) to work for a living. This is and has been deplorable behavior by lawmakers; however, it continues. Therefore, this charade of "verifying" people as legal to work should end and this form should be done away with completely.

Comment ID

USCIS-2006-0068-0434

**Tracking Number**

11d-vsh9-uiey

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Comment Submitted by Gulf South Services Inc.

Posted by the **U.S. Citizenship and Immigration Services** on Mar 31, 2022

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Comment

The e-verify process is not strong enough. e-verify should show a picture of every person that submits an i-9. for example, if using soc sec card and id, it does not show a picture. when using a work authorization card it shows a picture. I believe it should show a picture every time. This reduce risk for the employer and it insures proper vetting of the employee.

Comment ID

USCIS-2006-0068-0435

**Tracking Number**

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Comment Submitted by Bass Pro Shops

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Comment

1) Provide clarification, or perhaps another data field, on how/where to enter surname suffixes. For Example: John Smith, Jr.

Where is "Jr." supposed to be entered.

2) On Lists of Acceptable Documents, List B.

Clarify Item (1), Driver's License or [ID Card issued by a State] or outlying...

versus

Item (2), [ID card issued by] federal, [state], or local government agencies . . .

Comment ID

USCIS-2006-0068-0436

**Tracking Number**

l1d-w225-3wln

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Comment Submitted by Anonymous

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Comment

The ability to verify documents electronically to fulfill the I-9 requirements is highly desired.

Comment ID

USCIS-2006-0068-0437

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Comment Submitted by Tooele Technical College

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Comment

As an employer, I am supportive of compressing sections 1 and 2 to one page.
Changing section 3 to a supplemental as needed.
And removing the PDF enhancements so it is not software dependent.
These all sound like good improvements.

Comment ID

USCIS-2006-0068-0438

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Comment

While the current form I-9 is easily completed/filed, I have noticed software compatibility issues, yes. Reducing the amount of information required would also be beneficial for time constraint purposes.

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Comment Submitted by Ouro Custom Woodwork Inc.

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APPROVE OF ALL PROPOSED CHANGES TO I-9 FORM

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Comment Submitted by Caroline Hailey

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Comment

e-Docket ID number USCIS-2006-0068

I agree with the proposed changed to the Form I-9 as my employer is working towards being as paperless as feasibly possible. Revising the I-9 as proposed would certainly assist us in this endeavor.

Separating Section 3 from Sections 1 and 2 would be an awesome enhancement. The current form doesn't all sufficient room for the reverification and rehire information required. As stated in the proposal, this would also allow for better use of the form and for additional entries to be made without the need for printing additional forms.

The List of Acceptable Documents has changed over the years and having a link to the List C documents would eliminate any guess work in regards to the validity of the document choice.

Thank you for the opportunity to comment on this proposal.

Comment ID

USCIS-2006-0068-0441

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Comment Submitted by Anonymous

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Comment

FORMATTING for easy visual search:

Lighten fill-color for "Preparer...(check one)" section, denoting an area to be completed.

Keep "Section" boxes uniform causing them to stand out; maybe darker fill and white font. Visually allowing the eye to identify each section quickly.

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USCIS-2006-0068-0442

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Comment Submitted by Jennifer Wauthier

Posted by the **U.S. Citizenship and Immigration Services** on Mar 31, 2022

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Comment

Note on all sections of the form the completion requirements to provide simplified clarification for compliance.

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Comment Submitted by Rebecca Tipton

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Comment

I firmly agree that sections 1 and 2 should be compressed. Having the document length at an unnecessary 2-page length wastes paper and provides additional opportunities for an organization to fall out of compliance simply because one of the pages is misfiled or misplaced. The electronic enhancements on the online version also create an unnecessary headache as it is more often than not incompatible with the current software, so it is a waste of resources to provide.

While this is not included in the list of revisions, I would strongly request that consideration be given to allowing for virtual review of identification documents if the employee will not be working in the same location as the party responsible for I-9 verifications as the working environment is rapidly expanding beyond the traditional workspace. Having a department manager verify the documents in HR's stead is not the best solution

when trying to keep a tight control on access to employees' personal documents, and using notaries as authorized representatives is not a good option either as it leads to frustration and confusion for the employee trying to find someone to act as the representative as many notaries are either not familiar with how to complete section 2 of the I-9 or are not comfortable doing so. Then, if a mistake is identified from the notary completing section 2, it is infinitely harder to properly correct the mistake to have a fully compliant I-9 on file.

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Comment Submitted by Daily Herald Media Group

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Comment

As an HR department, it is very difficult to be able to collect the documents in person when the employee is a remote individual working from home. We need to find a way to make the ID collection easier without creating risk to the employer. It's hard to get the IDs certified in person when you don't work on site with them and the employees work exclusively at home.

Comment ID

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Comment Submitted by Jumpstart HR LLC

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Comment

Hello,

My name is Joey Price and I am the founder of Jumpstart:HR, a minority-owned small business Government Contracting Agency who also provides HR and training services to small businesses and startups across the US.

I am in favor of the consolidated Form I-9 for several reasons:

- We have seen incomplete hard copy I-9 files due to companies not filling out the entire employer portion.
- Anything that can be done to reduce the data/inputs required by both employers and employees will reduce the risk of data entry error when

completed by hand

I would also add the following recommendations:

- The ability for employers to permanently verify I-9 documentation electronically or via remote means. There is a trend of increased remote workers and dispersed teams. HR and Employers who are not co-located with the new employee may run the risk of a) non-compliance with Form I-9 verification b) lying about physical inspection of Form I-9 documentation and/or c) increased cost and complexity by requiring remote employees to confirm their documents with a notary.
- Create a helpful series of training videos that walk employers and employees through how to complete an I-9. There are times where the person guiding an employee through I-9 completion is simply unaware of the importance and has no idea how to complete the process. Additionally, more people tend to search for "how to" videos as opposed to reading documentation. It would be unreasonable to assume that all employers understand this document, the potential fines/fees for non-compliance, and how to successfully guide an employee through the process. Our company would be interested in creating this material since we create training material for employee and employer groups alike. We previously created training material for a Federal Agency that launched a new website and certification interface.

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Comment Submitted by Tammy Wasson, JLT Contracting, LLC

Posted by the **U.S. Citizenship and Immigration Services** on Mar 31, 2022

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Comment

I am in favor of these changes as it will expedite an applicants time to complete all of the employment application forms. Construction laborers typically don't read well, nor comprehend a lot of instructions even when they are a citizen of this country. This will help reduce the amount of time existing staff have to spend helping applicants complete the e-verify form, and reduce the amount of paper printed for the application as well as retaining the e-verify forms in their personnel files.

Thank you for this!

Tammy Wasson
JLT Contracting, LLC

Comment ID

USCIS-2006-0068-0447



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l1d-xq1m-bqy8

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Comment Submitted by KT Contracting Co Inc.

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Comment

I appreciate the effort to simplify the form and allow its use on electronic formats. Employees often miss the box that they personally filled out the form. This causes further delays. Thank you for reducing pages.

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Comment

Form I-9 is a burden that limits opportunities for employers to hire outside their home office location due to the in-person verification component of the I-9 process. DHS should allow employers to utilize UPS locations for candidates to complete in-person verification. Currently, americans can go to UPS stores to get their documents notarized. Why can't the same service be used to verify I-9 evidence documents?
Please consider this important change so we can increase employment opportunities in the United States.

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Comment

The enhancements in question all have promise to help employers and employees properly complete the Form I-9. I am in agreeance with all proposed enhancements.

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Unrelated Comment Submitted by Lynn Sparks

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Comment

I am a US born citizen I am a veteran and I am also disabled I suffer from traumatic brain injury as well as another neurological disorder I'm pretty sure a lot of the times but I'm a little confused when it comes to these consistent emails and text messages about immigration 99 forms I'm pretty sure I'm an American citizen please advise

Lynn Eric Sparks

Comment ID

USCIS-2006-0068-0451

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Comment Submitted by Mike Varkond

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Comment

What a JOKE! Are these I-9 forms being filled out currently at the southern boarder? It appears that approximately 2 million illegals have crossed the boarder since the current administration has been in office. Leading that fiasco on the boarder is the V.P., Kamala Harris, and Mr. Maorkis. What a pair. And the illegals just keep coming. And then there is the I-9.WHY? It doesn't seem to matter down south, so why would it matter everywhere else? This form, the I-9, is nothing but a BIG JOKE as long as this country allows illegals to enter at will, and then get moved around the country at government (tax payer) expense.

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Comment Submitted by James Gladbach

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Comment

I appreciate the desire to cut down on paperwork. However, the current two-page I-9 is arranged in a manner that prevents new employees from filling information beyond what is limited to them, thus saving paper by making fewer mistakes. The one-page I-9 revealed that many people: a) misunderstand what they are told, b) get momentum going and fill-in information beyond Section 1 even when they do not intend to, or c) do not listen. I believe the current I-9 is just right in size and is certainly less confusing. I will bet going back to a one-page I-9 will cause the same issues as the old one-pager, and prompt a return to a two-pager in fairly short order.

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Comment Submitted by Dana Frost, Southern Wesleyan University

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Comment

On behalf of my colleagues here at Southern Wesleyan University, in Central, South Carolina, we are excited about the prospective changes. Anything that can be done to streamline and make more efficient this process, without diminishing the compliance aspect, are welcome changes. Bringing this important employment verification document into the 21st century by making it compatible on multiple devices and platforms is essential in this digital age. Thank for the opportunity to submit comments.

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Comment Submitted by Army CID Company Dept

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Comment

California #.

Social Security # .

DOB .

Our Lady Of LIBERTY. God Bless America.

Comment ID

USCIS-2006-0068-0456

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PUBLIC SUBMISSION

Comment Submitted by Healed 4 This, LLC

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Comment

In Accordance with the paper reduction act, the proposed changes are appropriate and essential to reducing paper as well as saving time. I agree with streamlining the process by combining sections and reducing pages that require printing.

Comment ID

USCIS-2006-0068-0457

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Comment Submitted by Anonymous

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Comment

1. There is a huge disconnect, gap between employment, available for employment, employment eligibility and department of labor.
2. Providing employment to eligible US-Citizens must be the priority.
3. There are no-checks and balances to verify skills shortage and wages paid.
4. Workers are made to work up to 60-Hours per week and paid for 40-Hours per week.

5. Employer Job description can list up to 100 requirements but the actual work will be on 5 requirements, this practice is done so as to eliminate US Citizens from working.
6. There are no checks for thousands of overseas recruiters who work without any USA employment eligibility and take a big chunk of money from the US Citizens workers, do not pay any US Taxes or contribute towards US Social Security, medical insurance.
7. Lot of "Shell Companies" still use the paper-based system to collect I-9 information, days ahead of the start of employment at the actual work location and do not pay for that period.
8. The "Shell Companies" are completely abusing the system, denying jobs to US-Citizens, causing revenue loss to Federal Government, IRS and Social Security Administration.

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USCIS-2006-0068-0458

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Unrelated Comment Submitted by Anonymous

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Comment

- DHS is proposing Form I 9 be extended and revised as follows:
Compress Sections 1 and 2 from two pages to one page to reduce paper use and storage burden on employers. AGREE
- Change Section 3 to a Reverification and Rehire Supplement that provides three separate areas to enter reverifications and rehires within 3 years of the date of the initial execution of an employee's Form I 9. Employers would only print and use the supplement as needed, further reducing paper use and storage burdens on employers. AGREE
- Update the List of Acceptable Documents to include a link to List C documents issued by DHS and the acceptable receipts listed in 8CFR 274a.2(b)(1)(vi)(A-C). AGREE

- Reduce and simplify the instructions from 15 pages to 7 pages, further reducing paper usage. AGREE
- Remove electronic PDF enhancements to ensure that it can be completed on all electronic devices and is not software dependent. AGREE

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USCIS-2006-0068-0459

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Comment Submitted by Melissa Mayoral

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Comment

RE: proposed changes to I-9 form; OMB Control Number 1615-0047, U.S. Citizenship and Immigration Services, Docket ID USCIS-2006-0068:

As someone who has to e-verify the employees, the proposed changes would be much welcomed. The burden of printing so many pages for just 2 pages to be returned and filed is quite overwhelming at times. To be able to print just 8 pages (1 page form, 7 pages of instructions) cuts our paper usage in half. This is personally, work related and environmentally appealing to me.

I rarely need the revalidation section, so having that as a separate printable form to use as needed, with the additional space is a very wise move.

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USCIS-2006-0068-0460

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Comment Submitted by Anonymous

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Comment

Hello,

The following enhancements will greatly assist employers such as our institution to be more efficient, enable a more effective time management process, and fluidity with the completion of the documents by employees in allowing the electronic signatures more easily:

- Removing the PDF enhancements!!!!!!
- Combining Sections 1 & 2 to become 1 page

Note: In the future, possible making the language clearer (somehow) about providing a document from list B AND C. Employees still get confused or mistaken with the conjunction. Though it is very clear to most, there are so many misunderstandings with providing the 2 documents.

Thank you.

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USCIS-2006-0068-0461

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Comment Submitted by Blanchard Public Schools

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Comment

Add an area to state if this is a full-time position, part-time, etc., so the jobs report doesn't come out inflated for someone who is, for example, going to be a substitute at a school until they find a full-time position. Or if they want to work part-time only.

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USCIS-2006-0068-0462

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Comment Submitted by Lorraine Dorsey

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Comment

1. Section 1. Apt. Number to Apt#. Address - Need more space. Employee's E-mail address - needs more space. Change Employee's Telephone Number to Employee's Telephone #.

In the section for Alien authorization work

1. Alien Registraton Number / USCIS Number - change line to Boxes
2. Form I-94 Admission Number - change line to Boxes
3. Foreign Passport Number - change line to Boxes

Page 2: Additional Information: Link to upload documents such as passport phot page, driver license, school id etc

Thank you.

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Comment Submitted by Jeffrey Price

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Comment

As an employer and long-time user of the form I-9, it is my opinion that there is no need to change it from the employer point of view.

It is easily understood as-is. Changing it will create more work for those already familiar with the current version in the time spent learning the new version.

A user can print only the pages they need, thereby saving paper.

The instructions need not be printed at all, but rather read from the screen, thereby saving paper.

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Comment

It would be of enormous benefit to allow I-9s to be completed electronically- including document verification. We have hundreds of adjuncts who teach virtually from all over the country and it is a huge burden on them to complete their I-9s in person with a representative. They often spend their own money traveling to a representative who is miles away from their home. Additionally, our office spends countless hours each year instructing and correcting I-9s done by people who do not complete them regularly and are prone to many mistakes and follow-ups. I am in the process of self-auditing our I-9s and am correcting errors that are easily avoidable if our central office could complete I-9s for all new hires instead of only those locally.

Please consider making this change as it would greatly improve our process- arguably more so than any other change.

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Comment

As an HR Manager, putting Sections 1 & 2 on one page sounds good, but it's difficult to squeeze some info into the boxes as is, condensing it further will not help that problem.

Other than that, I like the direction you are headed with the other proposed changes.

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Comment Submitted by Kelly Ballou

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Comment

The proposed changes to form I-9 do not account adequately for the substantial changes to the world of work and general corporate operations that have arisen as a result of the COVID-19 pandemic. Many companies, my own included, have pivoted to a primarily remote workforce that is now distributed across all 50 states, and so greater flexibility is needed to allow these employers to comply with DHS requirements while also operating within this model and providing employment opportunities across the United States.

I formally request that the DHS considers additional flexibility, either by (a) permanently allowing remote I-9 document verification via digital images such as video chat or photocopies, or (b) allowing employers to utilize e-Verify in lieu of in-person document inspection.

My reasoning:

1. High administrative burden - my company and many other companies like ours have hired a primarily remote and distributed workforce during the last 2 years, and the practicality of asking employees to come into the office for physical document verification is both time-consuming, inefficient, and expensive. It is an unreasonable burden for employers to comply using this method.
2. Lack of compliance controls - if employers rely on authorized representatives in lieu of requiring employees to travel to worksites for verification, this also presents significant challenges: it may still result in additional costs and time requirements, but more importantly employers will have little control over the training or capability of their authorized representatives. Ultimately my confidence that an employee's roommate or family member, or even a notary public where permitted, can accurately verify I-9 documents in person is lower than my confidence that I can verify documents via video call or still image.
3. Inclusivity - employees who are unable to travel, either due to their physical condition, personal obligations (such as being a caregiver), or other circumstances, must be accommodated. If employers choose to generally require in-office verification of I-9 documents, this means that special arrangements must be made each and every time an employee is unable to meet this requirement. This contributes to a high and unreasonable ongoing administrative burden.
4. Consistency - considering all of the above, I believe most employers will find themselves exercising a combined method to comply with I-9 requirements, using both authorized representatives in the employee's location and doing in-person verification at a physical worksite. This lack of consistency in the method of verification is more likely to lead to missteps and compliance issues.
5. Compatibility with other systems - relying on authorized representatives is at odds with the feature set of most HRIS platforms and other digital tools used by many modern employers, which generally require the employee to complete form I-9 digitally during onboarding. Uploading a document that was completed by an authorized representative does not necessarily meet that platform requirement, and so employers may find themselves storing duplicate documents for some employees, one compliant and one non-compliant. Additionally, if the form I-9 must be completed outside of a standard digital tool, that tool may not be able to track expiration dates for List C documents, and employers are more likely to miss reverification deadlines as a result.

Considering all of the above, I urge the DHS to consider greater flexibility for employers to verify I-9 documents on a remote basis. It is crucial for the continuing operations of many businesses in our new world of work. Thank you for your consideration.

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USCIS-2006-0068-0467

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[Docket \(/docket/USCIS-2006-0068\)](/docket/USCIS-2006-0068) / [Document \(USCIS-2006-0068-0422\)](/document/USCIS-2006-0068-0422) / [Comment](#)



PUBLIC SUBMISSION

Comment Submitted by Check Technologies

Posted by the **U.S. Citizenship and Immigration Services** on Mar 31, 2022

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Comment

The proposed changes to form I-9 do not account adequately for the substantial changes to the world of work and general corporate operations that have arisen as a result of the COVID-19 pandemic. Many companies, Check Technologies included, have pivoted to a primarily remote workforce that is now distributed across all 50 states, and so greater flexibility is needed to allow these employers to comply with DHS requirements while also operating within this model and providing employment opportunities across the United States.

Check Technologies formally requests that the DHS considers additional flexibility, either by (a) permanently allowing remote I-9 document verification via digital images such as video chat or photocopies, or (b) allowing employers to utilize e-Verify in lieu of in-person document inspection.

Our reasoning:

1. High administrative burden - Check Technologies and many other companies like ours have hired a primarily remote and distributed workforce during the last 2 years, and the practicality of asking employees to come into the office for physical document verification is both time-consuming, inefficient, and expensive. It is an unreasonable burden for employers to comply using this method.
2. Lack of compliance controls - if employers rely on authorized representatives in lieu of requiring employees to travel to worksites for verification, this also presents significant challenges: it may still result in additional costs and time requirements, but more importantly employers will have little control over the training or capability of their authorized representatives. Ultimately our confidence that an employee's roommate or family member, or even a notary public where permitted, can accurately verify I-9 documents in person is lower than our confidence that our staff can verify documents via video call or still image.
3. Inclusivity - employees who are unable to travel, either due to their physical condition, personal obligations (such as being a caregiver), or other circumstances, must be accommodated. If employers choose to generally require in-office verification of I-9 documents, this means that special arrangements must be made each and every time an employee is unable to meet this requirement. This contributes to a high and unreasonable ongoing administrative burden.
4. Consistency - considering all of the above, we believe most employers will find themselves exercising a combined method to comply with I-9 requirements, using both authorized representatives in the employee's location and doing in-person verification at a physical worksite. This lack of consistency in the method of verification is more likely to lead to missteps and compliance issues.
5. Compatibility with other systems - relying on authorized representatives is at odds with the feature set of most HRIS platforms and other digital tools used by many modern employers like Check Technologies, which generally require the employee to complete form I-9 digitally during onboarding. Uploading a document that was completed by an authorized representative does not necessarily meet that platform requirement, and so employers may find themselves storing duplicate documents for some employees, one compliant and one non-compliant. Additionally, if the form I-9 must be completed outside of a standard digital tool, that tool may not be able to track expiration dates for List C documents, and employers are more likely to miss reverification deadlines as a result.

Considering all of the above, Check Technologies urges the DHS to consider greater flexibility for employers to verify I-9 documents on a remote basis. It is crucial for the continuing operations of many businesses in our new world of work. Thank you for your consideration.

Comment ID

USCIS-2006-0068-0468

**Tracking Number**

l1f-amji-ui7n

Comment Details**Received Date**

Mar 31, 2022

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[Docket \(/docket/USCIS-2006-0068\)](/docket/USCIS-2006-0068) / [Document \(USCIS-2006-0068-0422\) \(/document/USCIS-2006-0068-0422\)](/document/USCIS-2006-0068-0422) / [Comment](#)



PUBLIC SUBMISSION

Comment Submitted by ADF Logistics, LLC

Posted by the **U.S. Citizenship and Immigration Services** on Mar 31, 2022

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Comment

Agree with the proposed changes to reduce paper use and storage requirements for companies.

Comment ID

USCIS-2006-0068-0469

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11f-dcld-u2za

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Abdissa Integrated Community Development Organization

People's Economic Empowerment Project

March, 2022

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I. Project Summary

1. Project Title: poor people Economic Empowerment

2. General Objective

3. Type and Number of Beneficiaries

50 poor of the poorest women or Man house hold

4. Area of Operation: Oromia Regional State, Dukem Town and surrounding area.

5. Duration of the project: Three years

6. Time of Commencement

7. Implementing Agency: Abdissa Integrated Community Development Organizatin.

8. Contact Person

Name: Dejene Nigusie Hordofa

Position: Founder & Executive Director

Address: Mobile [REDACTED]

Email : [REDACTED]

9. Donor

10. Total Budget [REDACTED]

II Acronyms

AICDO Dukem Integrated Community Development Organization.

IGA Income generating Activity

NGO Non-Governmental Organization

III. Back Ground

Abdissa Integrated Community Development Organizations Non-Governmental organization established with the objective of to support and to improve the lives of Needy people like children, youth, women, elders and Commercial sex workers in Dukem town and surrounding area.

AICD takes a holistic approach to improve the lives of disadvantaged communities. The organization attains this goal by caring for the most vulnerable Children, elders, women and commercial sex workers in addition to this empowering women and families to achieve improved health of the community. We believe that the changes we make should be community-led and community based and sustainable. Individuals, Companies, families, communities, NGO& government agencies all play a role in our projects.

IV. Project Area Description

Dukem is a town Located in the Oromia Special Zone Surrounding Finfinne of the Oromia Region, 37 kilometers southeast of Addis Ababa and 10 kilometers northwest of Bishoftu. Dukem is situated along the Addis Ababa – DJibuti highway . It is also the location of an industrial park covering 40 hectares owned and developed by East African Group (Ethiopia) and home to Ethiopia’s first industrial park, the Chinese-owned Eastern Industrial Zone (EIZ), Dukem has an estimated total population of 1,000,000.

Dukem town has grown quickly due largely influx of people from farms and neighboring towns. The majority of households are factory workers, farmers, daily laborers and others .They earn low wages because of this Unable to afford food health care ,Schooling for the children. Study have shown that there are large number of orphans, vulnerable children and children who have been sexually abused or victims of trafficking in the community. Because of

the ever-escalating price of living condition and other factors in the city, many young girls and women are forced to join commercial sex work to subsist their daily life. Besides, economically disadvantaged groups of the community like women, youth and children are highly vulnerable to social crisis most importantly, the effects of HIV/AIDS.

The town of Dukem has numerous socio-economic problems such as unemployment, poor social services and social ills. These make the town to be incompatible with the booming population that is hungry for these services. Young population is becoming dominant population group in the town. This group is also the most affected group of society by the above stated socio-economic constraints. The young sect of society in the city is alarmingly increasing from time to time due to high rural influx to urban population, strategic location of the city or town and the presence of huge industrial park and other services. The accessibility of the town has resulted in high mobility of population from different directions to Dukem town where these all resulted in high unemployment and juvenile delinquency.

V. Problem Statement

Women's business competitiveness is limited as a result of which they become economically weak and vulnerable. This is partly due to the absence of enough women focused support services like livelihood skills training, access to finance, information and basic education that could foster their socioeconomic status. Income generation can help to overcome food insecurity when economic factors are a fundamental cause of food insecurity and when food is available in local market but lack of money is the main difficulty faced by the vulnerable population. The activity is to generate income for the family; the activities can include agriculture, livestock rising, and services. Income generating programs are directed towards an economic focus, and aim to increase the cash available to the family, improve the local economy, and strengthen the livelihood

strategies so that the population is less vulnerable IGA can be supported through training, improving access to productive assets and increasing sales channels. It is important to take into account that revolving fund is a means to improve the IGA of the vulnerable women, but it is not a goal in itself. Alone it cannot resolve the problems faced by the poor. According to the delivery of revolving fund has been as one of the antipoverty tool for the development of programs. This is because it helps unemployed Women become employed, thereby increasing their income and consumption. He farther emphasizes that improving credit access to the poor also facilitates economic growth by providing capital to start up new production or adoption of new technologies. Within the area of food security access to credit aim to help poor women to cover their basic needs and food needs through implementing or improving income generating activities.

VI. General Objective

- To empower women and enable them actively involve in development activities.

VII. Specific Objectives:

- To enable the poor and underprivileged women to play their vital role in improving the socio-economic conditions in the area of interventions.
- To liberate women from economic bondage / dependency and poverty and from marginalization so as to liberate them economically.
- To extend a Revolving Fund to members of the local communities of the economically active poor women, so as to empower them engage in income generating micro projects and businesses for their families.
- To empower poor women and their families economically

VIII. Expected Out Put

The long-term output:- Women of the project area are empowered economically and made able to participate equally and actively in development activities.

IX. Activities and Strategies

10.1 Details of Activities

- Improve d social income of women in Dukem Town
- Poor women provided with revolving fund and engaged in income generating.
- Enhance entrepreneurship and informal employment opportunities among women.
- Income generating schemes for disadvantaged women and youth

Strategies

- Submit proposal to the Companies around Dukem area for fund raising event.
- Mobilize money from internal sources both in kind and cash.
- Donation from rich individuals and/or business communities.
- Work with government organization, private sectors and NGO.
- Mobilization of local fund.

X. Beneficiaries Selection Criteria

- 50 Poor of the poorest women
- House hold women

XI. Beneficiaries Selection Mechanism

Beneficiaries will select in a participatory fashion by 'Community Care Coalition Committees', whose members were drawn from a range of social groups including women, young people, the elders, male household heads, and

religious representatives. These committees have been formally delegated by the Government to ensure all development expenditure including AICD is transparently deployed.

XII. Fund Distribution Plan

The AICDO will buy 100 sheep and distribute for 50 households women and for each house hold women 2 sheep will be given with Birr 2000. The one thousand birr for feeding sheep.

XII. Revolving Fund Payment Schedule

Each house hold has to pay the loan within 1 years , but the payment procedure is in three terms the first term after 18 months 40% the second term payment after 10 months 30% and third term or final payment after eight months 30 %.

XIII. Inputs (Material, Finance and Manpower)

13.1 Material input

The existed material is office furniture (Table, Chair and Computer)

13.2 Financial Input

Birr [REDACTED] Will be used in the one year project period

13.3 Manpower

To plan, implement, monitor and evaluate a project besides other resources human resource is very crucial. Therefore, for the effective implementation of this project and a field officer who will accomplish the day-to-day work AICDO will manage the project.

XIV. Key assumption and risks

14.1. Assumptions

- .willingness of Companies to collaborate with the organization in development affairs.

- willingness and interest of donors to support project.
- High commitment and collaboration of government office in the project implementation process.

14.2 Risks

- Insufficient budget for the planned activities.
- The beneficiaries consider Organization as provider of all necessities.

XV. Stakeholders Analysis

Abdissa Integrated Community development organization believes that the problem in the community can be solved by the collaboration of various stakeholders. The donors, government organization, beneficiaries and Abdissa Integrated Community development organization itself are the primary stakeholder group, but other stakeholders with specialized capacities and responsibilities are essential.

Stakeholder involvement is particularly important when interest groups are expected to play an active role in the implementation process and in operation. The involvement of organized representative stakeholder groups facilitates communication and participation.

XVI. MONITORING AND EVALUATION

As part of any project management, the activities of this project should be monitored and evaluated regularly to take prompt corrective measures when any problem occurs or to know the progress of the project. Monitoring and evaluation of the activities should also involve the community as is in the other stages of project management. Therefore the activities will be monitored in strong and close collaboration with all stakeholders; particularly line government offices and the community. The activities will be monitored and

evaluated through conducting review meetings with the community representatives, visits to the project sites, reporting to line concerned offices quarterly, biannually and annually. The AICDO will be responsible for coordination, planning, implementation, monitoring and evaluation of the day-to-day implementation of the project activities and other stakeholders will provide technical support where necessary.

XVII. Phase-Out and Sustainability Strategy

The sustainability of this project will be guaranteed because the project involves the participation and collaboration of all concerned line offices and community. These will involve from planning to evaluation of the project. The phasing out shall take place when the awareness of community to advocate for women rises and when the poor families are capable economically.

XVIII. Progress Reporting about the Project

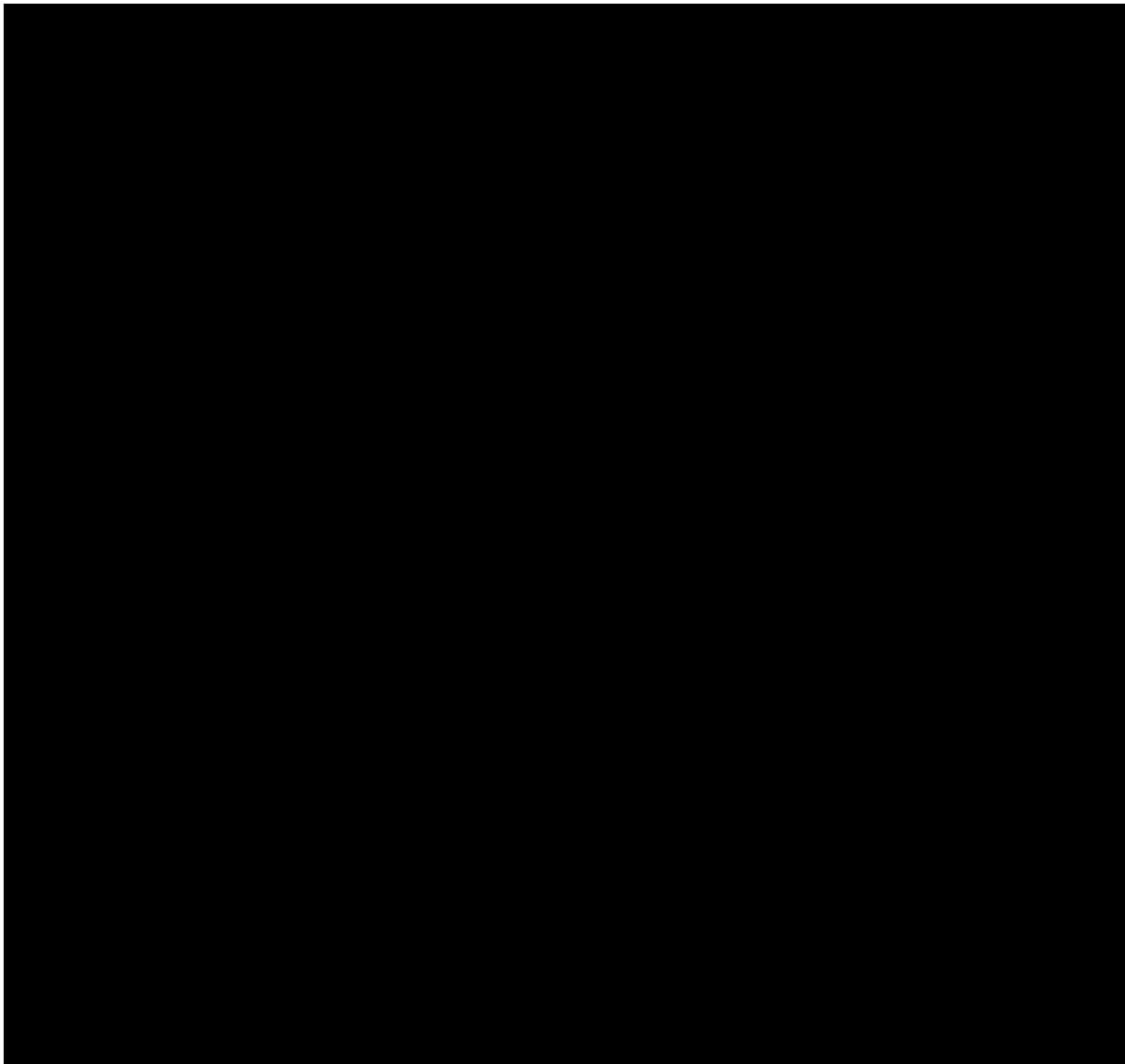
Project reporting requirements will largely include progress reports- quarterly and annual reports. Progress reporting about the project shall follow two processes namely; physical progress reporting and budget performance reporting. For physical progress reporting, all implementing agencies of the projects will submit activity progress reports based on the Plan M&E Reporting Matrix that will be developed.

These will be supplemented by Centre spot visits to ascertain value for money. On the other hand, Budget performance reports will cover quarterly and annual financial performance (revenue and expenditure) from the government and the Company.

XIX. Organization and Management

The highest governing body is the Board of Directors which is composed of 5 members.. The Executive Director, who is assigned by the Board of Directors, is responsible for the implementation and management activities of the Organization. There are two departments, namely, Programming and Administration and Finance. The departments are accountable to the Executive Director.

XX. Project Physical and Financial Plan



Abdissa Integrated Community Development Organization

**Eempowerment of women , girls and persons
with disabilities Project**

March 09, 2022

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XVII	Progress Reporting about the Project
XIX	Organization & Management

I. Project Summary

1. Project Title: Empowerment of women, girls and persons with disabilities

2. General Objective

3. Type and Number of Beneficiaries

150 poor of the poorest women and girls house hold

4. Area of Operation: Oromia Regional State, Mulo woreda Oromia special zone surrounding finfine area.

5. Duration of the project: continues

6. Time of Commencement

7. Implementing Agency: Abdissa Integrated Community Development Organizatin.

8. Contact Person

Name : Dejene Nigusie Hordofa

Position: Founder & General Assembly

Address: Mobile [REDACTED]

Email : [REDACTED]

Organization Account Number [REDACTED] Abyssinia bank of Oda nebe branch

9. Donor

10. Total Budget [REDACTED]

II Acronyms

AICDO Abdissa Integrated Community Development Organization.

IGA Income generating Activity

NGO Non-Governmental Organization

II. Back Ground

Abdissa Integrated Community Development Organizations Non-Governmental organization established with the objective of to support and to improve the lives of training on the peace and security, Education civic and voters system Needs people like children, youth, women ,elders , Commercial sex workers and free workers Arbitrary persons in Mulo woreda and surrounding area.

AICD takes a holistic approach to improve the lives of disadvantaged communities. The organization attains this goal by caring for the most vulnerable Children, elders, women and commercial sex workers in addition to this empowering women and families to achieve improved health of the community. We believe that the changes we make should be community-led and community based and sustainable. Individuals, Companies, families, communities, and NGO& government agencies all play a role in our projects.

IV. Project Area Description

Mulo is a woreda Located in the Oromia Special Zone Surrounding Finfinne of the Oromia Region, 28kilometers North east of Addis Ababa . Mulo woreda is situated along the Addis Ababa – mulo gravel road away. It is also the location of not covering in industrials, not satisfy global farmers education by couch Mulo has an estimated total population of 35,138

Mulo wored has not grown quickly due largely influx of people from farms and neighboring wored. The majority of households are , farmers, daily laborers and others .They earn low wages because of this Unable to afford food health care ,Schooling for the children. Studies have shown that there are large number of orphans, vulnerable children and children who have been sexually abused or empowerment of women, girls and personal disabilities of peace and security and civic and voters giving training Education of the community. Because of the ever-escalating price of living condition and other factors in the

woreda, many young girls and women are forced to join commercial sex work to subsist their daily life. Besides, economically disadvantaged groups of the community like women, youth and children are highly vulnerable to social crisis most importantly, the effects of HIV/AIDS.

The woreda of Mulo has numerous socio-economic problems such as unemployment, poor social services and social ills. These make the town to be incompatible with the booming population that is hungry for these services. Young population is becoming dominant population group in the town. This group is also the most affected group of society by the above stated socio-economic constraints. The young sect of society in the city is alarmingly increasing from time to time due to high rural influx to urban population, strategic location of the city or town and the presence of huge industrial park and other services. The accessibility of the town has resulted in high mobility of population from different directions to Mulo woreda where these all resulted in high unemployment and juvenile delinquency.

V. Problem Statement

The empowerment of Women's, girls and personal disabilities business competitiveness is limited as a result of which they become economically weak and vulnerable. This is partly due to the absence of enough women focused support services like livelihood skills training, access to finance, information and basic education that could foster their peace and security , civic and voters and socioeconomic status. Income generation can help to overcome food insecurity when economic factors are a fundamental cause of food insecurity and when food is available in local market but lack of money is the main difficulty faced by the vulnerable population. The activity is to generate income for the family; the activities can include agriculture, livestock rising, and services. Income generating programs are directed towards an economic focus, and aim to increase the cash available to the family, improve the local economy, and strengthen the livelihood strategies so that the population is less

vulnerable IGA can be supported through training, improving access to productive assets and increasing sales channels. It is important to take into account that revolving fund is a means to improve the IGA of the vulnerable empowerment of women, girls and personal disabilities but it is not a goal in itself. Alone it cannot resolve the problems faced by the poor. According to the delivery of revolving fund has been as one of the antipoverty tool for the development of programs. This is because it helps unemployed Women become employed, thereby increasing their income and consumption. He farther emphasizes that improving credit access to the poor also facilitates economic growth by providing capital to start up new production or adoption of new technologies. Within the area of food security access to credit aim to help poor women to cover their basic needs and food needs through implementing or improving income generating activities.

VI. General Objective

- To empower women and enable them actively involved in development activities.
- **VII. Specific Objectives:**
 - To enable the poor and underprivileged women to play their vital role in improving the empowerment of women, girls and personal disabilities and socio-economic conditions in the area of interventions.
 - To liberate women from economic bondage / dependency and poverty and from marginalization so as to liberate them economically.
 - To extend a Revolving Fund to members of the local communities of the economically active empowerment women, girls and personal disabilities poor women, so as to empower them engage in income generating micro projects and businesses for their families.
 - To empower empowerment women, girls and personal disabilities , poor women and their families economically

VIII. Expected Out Put

The long-term output:- empowerment of women, girls and personal disabilities of the project area are empowered economically and made able to participate equally and actively in development activities.

IX. Activities and Strategies

10.1 Details of Activities

- Improve social income empowerment of women, girls and personal disabilities in Mulo woreda giving to training about peace and security, civic and voters education by schedules
- Empowerment of women, girls and personal disabilities Poor women provided with revolving fund and engaged in income generating.
- Enhance entrepreneurship and informal employment opportunities among empowerment of women, girls and personal disabilities.
- Income generating schemes for disadvantaged women and youth

Strategies

- Submit proposal to the Companies around Mulo woreda for fund raising event.
- Mobilize money from internal sources both in kind and cash.
- Donation from rich individuals and/or business communities.
- Work with government organization, private sectors and NGO.
- Mobilization of local fund.

X. Beneficiaries Selection Criteria

- 150 Poor of the poorest women
- House hold women person 15
- Empowerment of women, girls and personal disabilities

XI. Beneficiaries Selection Mechanism

Beneficiaries will select in a participatory fashion by 'Community Care Coalition Committees', whose members were drawn from a range of social

groups including empowerment of women, Girls and personal disabilities, young people, the elders, male household heads, and religious representatives. These committees have been formally delegated by the Government to ensure all development expenditure including AICD is transparently deployed.

XII. Fund Distribution Plan

The AICDO for 150 household's empowerment of women, girls and personal disabilities for each house hold women giving training about peace and security, civic and voter's education by woreda level kebele

XII. Revolving Fund Payment Schedule

1. Each house hold has to pay the loan within 5 years, but the payment procedure is in three terms the first term after 18 months 40% the second term payment after 10 months 30% and third term or final payment after eight months 30 %.
2. Free work arbitrary persons did not have any revenue we support legal advice and on meeting date gives incentive per one person 500 ETB by each week. These means in one week one person take per dam $500 \times 48 \times 6 = 144,000$ ETB per one years.
3. For the empowerment of women, girls and personal disabilities giving training about peace and security, civic and voters system education by woreda with government peace , police and support office with together by schedule.

II. Inputs (Material, Finance and Manpower)

13.1 Material input

The existed material is office furniture (Table, Chair and Computer)

13.2 Financial Input

Birr [REDACTED] Will be used in the one year project period

13.3 Manpower

To plan, implement, monitor and evaluate a project besides other resources human resource is very crucial. Therefore, for the effective implementation of

this project and a field officer who will accomplish the day-to-day work AICDO will manage the project.

XIV. Key assumption and risks

14.1. Assumptions

- .willingness of Companies to collaborate with the organization in development affairs.
- Willingness and interest of donors to support project.
- High commitment and collaboration of government office in the project implementation process.

14.2 Risks

- Insufficient budget for the plan activities
- The beneficiaries consider Organization as provider of all necessities.

XV. Stakeholders Analysis

Abdissa Integrated Community development organization believes that the problem in the community can be solved by the collaboration of various stakeholders. The donors, government organization, beneficiaries and Abdissa Integrated Community development organization itself are the primary stakeholder group, but other stakeholders with specialized capacities and responsibilities are essential.

Stakeholder involvement is particularly important when interest groups are expected to play an active role in the implementation process and in operation. The involvement of organized representative stakeholder groups facilitates communication and participation.

XVI. MONITORING AND EVALUATION

As part of any project management, the activities of this project should be monitored and evaluated regularly to take prompt corrective measures when any problem occurs or to know the progress of the project. Monitoring and evaluation of the activities should also involve the community as is in the other stages of project management. Therefore the activities will be monitored in

strong and close collaboration with all stakeholders; particularly line government offices and the community. The activities will be monitored and evaluated through conducting review meetings with the community representatives, visits to the project sites, reporting to line concerned offices quarterly, biannually and annually. The AICDO will be responsible for coordination, planning, implementation, monitoring and evaluation of the day-to-day implementation of the project activities and other stakeholders will provide technical support where necessary.

XVII. Phase-Out and Sustainability Strategy

The sustainability of this project will be guaranteed because the project involves the participation and collaboration of all concerned line offices and community. These will involve from planning to evaluation of the project. The phasing out shall take place when the awareness of community to advocate for empowerment of women, girls and personal disabilities rises and when the poor families are capable economically.

XVIII. Progress Reporting about the Project

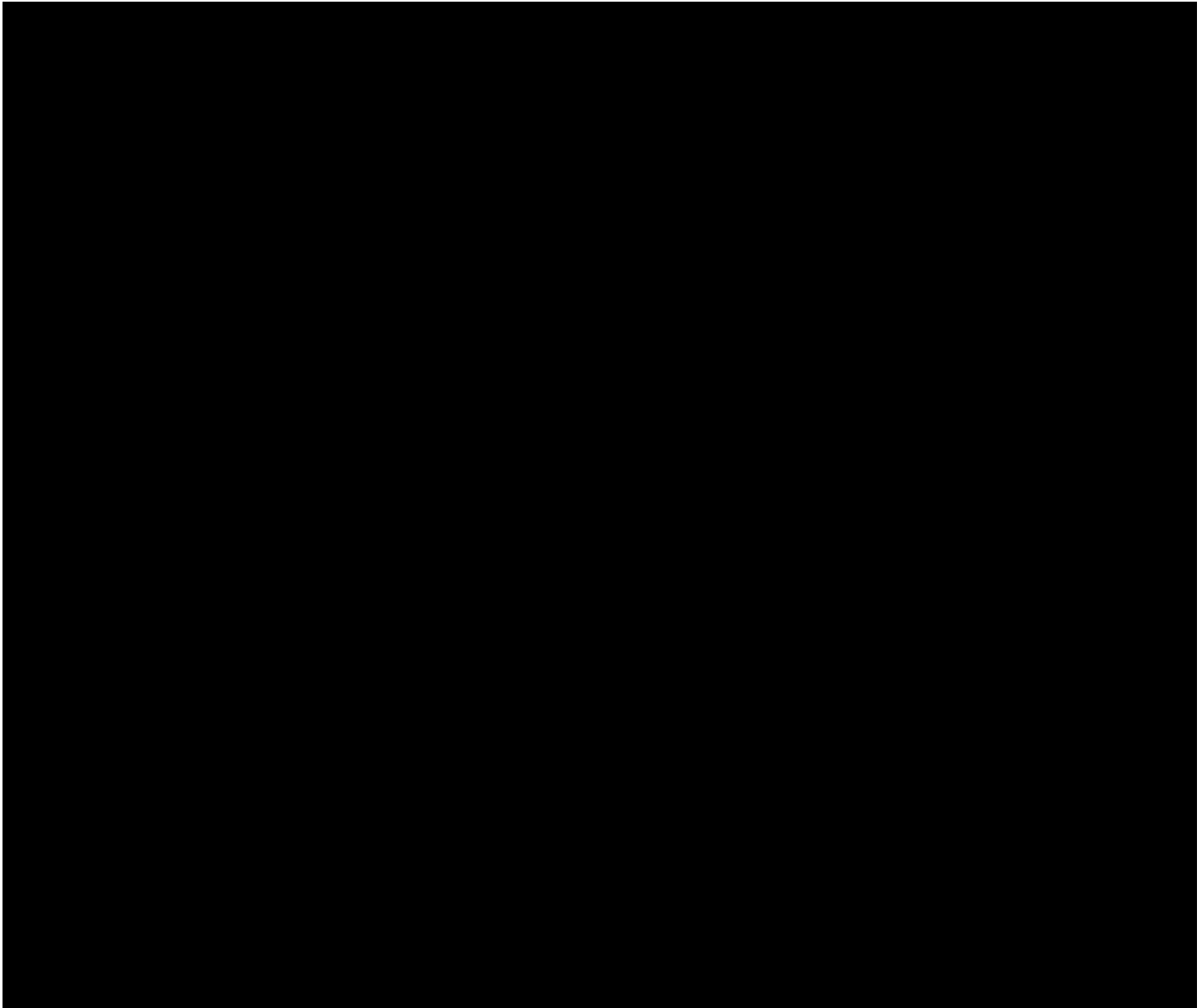
Project reporting requirements will largely include progress reports- the end Month, quarterly annual and yearly reports. Progress reporting about the project shall follow two processes namely; physical progress reporting and budget performance reporting. For physical progress reporting, all implementing agencies of the projects will submit activity progress reports based on the Plan M&E Reporting Matrix that will be developed.

These will be supplemented by Centre spot visits to ascertain value for money. On the other hand, Budget performance reports will cover quarterly and annual financial performance (revenue and expenditure) from the government and the Company.

XIX. Organization and Management

The highest governing body is the Board of Directors which is composed of 24 members. The Executive Director, who is assigned by the Board of Directors, is responsible for the implementation and management activities of the Organization. There are two departments, namely, Programming and Administration and Finance. The departments are accountable to the Executive Director.

XX. Project Physical and Financial Plan



Non-Profit Organization: Abdissa integrated community development Organization Charitable Society February, 2022

PROPOSAL FOR

FUNDRAISING PROJECT

Initiated by: Leadership of Abdissa integrated community development Organization Charitable Society

Person 1, Role: Dejene Nigusie Hordofa, Chair Person General Assembly

Person 2, Role: Huluagrash Tesow, Chair Person Directors

Person 3, Role: Bikila Gedisa, Board of Directors

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Summary of Fundraising Project

This project is being initiated to ***Improve Financial Basis of Abdissa integrated community development Organization*** to ensure that Abdissa integrated community development Organization attains self-sustainability and reduces its reliance on donor funding. The overall objective of this fundraising project plan is to not only ensure the sustainability of Abdissa integrated community development Organization, but most importantly builds on the gains of the trust sustainably provide adequate support services to Empowerment women girls, disabilities elderly people, mentally ill and t- 00rafficking. This objective is in line with the need to fully implement the Strategic Plan 2022-2027 formulated in collaboration with Korea Embassy at Finfine in Ethiopia.

The target group for this fundraising project plan is main beneficiaries of, which include the elderly people, the mentally ill and victims of human trafficking. The main partner organizations or stakeholders of the this fundraising project plan are among others Government Officials, Inter Religious Council, Embassies in Finfine, Development Partners (NGOs, Donors), Civil Society Organizations, Professional Associations, Business Communities, Media, Sports Men/Women, Artists, and the target communities. The immediate objective of this plan is to construct Geriatric/Mental Health Hospital, Elders', free working arbiter, fight Coved-19, for jobless youths create jobs, unemployment females created own business, depending our situation condition support about peace and annotation free with Ethiopia Government, announcement about life insurance for Ethiopia peoples, Village and Long-Lasting Rehabilitation Center, that will enables Abdissa integrated community development Organization improve its financial basis for future.

To achieve the immediate objective, various outputs have been identified. These include:

- ♣ Put in place a sound fundraising Plan by the end of 2021;
- ♣ Five business companies/people reached to raise ***ETB 1270,000 each*** year till the end of strategic plan year (2027);
- ♣ Three national fundraising events organized at Finfine to raise ***ETB 6680,000,000*** Each year till the end of strategic plan year (2027); The major strategies to be deployed are:

1. Public collection through various mechanisms: (Phase 1: 2022 - 2024)

- ♣ Organize sport festivals – “Sport for elders”, “Sports for Mental Health”, life insurgency , Sports Against Trafficking” “Sports for Life Saving” and “Sports to Build Future”;
- ♣ Organize Music-Consorts – “Music to Build Elder’s Future” “Music for Mental Health” “Music to Renew Victims of Trafficking” “Music to Rebuild Generation” and etc...;
- ♣ Organize Bazaars and Auctions – “Art Bazaar to Build Elder’s Future”, “Cultural Bazaar to Rebuild Generation”, “Religious Bazaar to Cure Mental Illness” and etc...;
- ♣ Lottery and Ticket Sales – “Tombola, Special Lottery, SMS, Mobile Banking, Game-card Membership Fee - Card, MasterCard for Old-age, Mobile Game and many others.
- ♣ Entrance Fee collection during each fundraising events;

- ♣ Sales of Materials on each fundraising events;

2. Cost Sharing through various mechanisms: (Phase 2: 2025 - 2027)

- ♣ Organize health service delivery system – “Mental/Geriatric health, Geriatric homecare”;
- ♣ Training, Counselling and Consultancy – “Mental/geriatric health training provision”;
- ♣ Supplies delivery system – “Medical Supplies/Equipment’s sales with reasonable costs”;

The project is planned as a part of annual plan of Abdissa integrated community development Organization to be implemented in six years’ time in order to improve the financial basis of the organization. The total budget required for the implementation of project activities stated above is [REDACTED] which is approximately [REDACTED]. The detailed action plan for each fundraising event will be developed during the implementation periods.

Introduction

About Abdissa integrated community Development Organization

Abdissa integrated community development Organization is a national non-governmental and non-profit making organization established in 2022 and re-registered in 2022 with FDRE Authority of civil society Organization as an Ethiopian Resident Charity Organization under certificate number _____

Vision

Abdissa integrated community development organization envisions empowered, renewed and rebuilt society of elders, mentally ill, , old women and men, Children , Jobless youths, unemployment females and victims of trafficking.

Mission

Abdissa integrated community development Organization is facilitating human development to improve the quality of life for victims of human trafficking, elderly people and the mentally ill by addressing their physical, emotional, mental, and spiritual needs and empowering them to meet their own needs by themselves.

Problem Analysis

Behind any successful program is the organizational foundation that makes it a reality. Here at Abdissa integrated community development Organization, everything is centered upon our vulnerable population: returnee victims of human trafficking, the mentally ill and the indigent elderly. Of course, the work is in progress, our approach to organizational design has been entirely focused on 1) understanding the needs of our population, 2) learning how we can help, and 3) designing and assembling the organization that makes all of this possible.

Given the focus on sustainable development, we'd like to turn the paradigm inward so as to ensure that Abdissa integrated community development organization is sustainable as an organization. We intend to establish fiscal self- sufficiency by maintaining the level of grant support we receive but also by expanding our individual donor base, mobilizing internal resource to establish long-lasting institutions that recycling the profits from our revenue ventures, and increasing the association's membership. Where a single organization falls short in the face of vast need, we would like to expand our capability to serve as an enabler for our partner organizations. We consider this catalyst, or proxy, function as one of our most critical.

Abdissa integrated community development organization has put in place the new Strategic Plan 2022-2027 to address these issues. One of the major programs of the organization is supporting elderly people, poor people's living on the road such as children has no mother and father, old women and men, jobless youths, unemployment females, with a view to seeing dignified and respected older people; the second is rendering adequate effective mental health services to those mentally affected and the third is rescue, rehabilitate and reintegrate victims of human trafficking. The strategic plan was aimed at to raise fund which is more than 35 Million Ethiopian Birr every year.

Despite the fact about 51% of the planned budget was financed by Korean Embassy in Ethiopia, Abdissa integrated community development Organization was facing a serious funding problem in the last one year. The underlying causes for poor funding were low interest of donors to support the elderly program, low government attention to the issue of the older people and Abdissa integrated community development organization didn't put in place local fund raising strategy.

Proposed Solution

This project is being initiated to ***Improve Financial Basis of Abdissa integrated community development organization*** to ensure that Abdissa integrated community development organization attains self-sustainability and reduces its reliance on donor funding. The overall objective of this fundraising project plan is not only to ensure the sustainability of Abdissa integrated community development organization, but most importantly builds on the gains of the trust sustainably provide adequate support services to elderly people, mentally ill, Jobless youths, unemployment females and victims of human trafficking. This objective is in line with the need to fully implement the Strategic Plan 2022-2027 formulated in collaboration with Korea Embassy at Finfine in Ethiopia.

The target group for this fundraising project plan is main beneficiaries of Abdissa integrated community development Organization, which include the elderly people, the mentally ill and victims of human trafficking. The main partner organizations or stakeholders of the this fundraising project plan are among others Government Officials, Inter Religious Council, Embassies in Finfine, Development Partners (NGOs, Donors), Civil Society Organizations, Professional Associations, Business Communities, Media, Sports Men/Women, Artists, and the target communities. The immediate objective of this plan is to construct Geriatric/Mental Health Hospital, Elders' Village and Long-Lasting Rehabilitation Center, that will enables Abdissa integrated community development organization improve its financial basis for future.

Why Funds are needed?

Abdissa integrated community development organization Charitable Society is a non-governmental organization that works for elderly support; mentally ill people and rescue, rehabilitate, empower and reintegrate victims of trafficking. We provide a residential rescue, rehabilitation and reintegration services to returnee women, children, and men victims of trafficking. We endeavor to provide a decent and dignified elder's hood, youth hood and childhood to those marginalized elders, adults, youth, adolescent and children. This proposal designed to raise funds that seek financial support for a project to support elders and mentally ill; to rescue, rehabilitate and reintegrate returnee women, children and men victims of trafficking.

The goals of this project is to raise funds that enable us rescue returnees from the control of traffickers, to expose the organized networks of human trafficking, to rehabilitate and reintegrate the rescued people, to create awareness on human trafficking, to provide life and vocational skill training programs for self-help groups and to influence community's attitude to anti-trafficking. ***To realize our goals, we need financial assistance to build six fundamental institutions (elders' village, rehabilitation center and the mental health hospital, announcement about peace, fight Coved-19 and giving training about life insures) that builds the elders' future and ensures future rescue operations of Victims of Trafficking.***

In addition, we also require funds to provide food, shelter, clothing, education, vocational skill training, health care and entertainment for the women, children and men and to pay the salaries of the staff for six years. The total budget required for the six strategic plan year including the initial construction costs of the planned institutions is [REDACTED] of which ETB [REDACTED] is program and [REDACTED] is admin costs. This means it requires us to raise more than 111 Million Ethiopian Birr each year.

Where Funds will go?

The funds will go to realize our goals, which are to build six fundamental institutions (elders' village, rehabilitation center, fights Covid-19, training about peace, life insurgency and the mental health hospital) that builds the elders' future and ensures future rescue of Victims of Trafficking. In addition, we also use funds to provide food, shelter, clothing, education, vocational skill training, health care and entertainment for the women, children and men and to pay the salaries of the staff for five years as stated above in line with the government's policies and regulation.

Demonstrating the Need for the Fundraising Project

Why we need to raise funds?

Objective 1: Building the Future of Eldercare



Objective 2: Building “The Green House” Rehabilitation Center of Abdissa integrated community development organization

What is a Green House?

- θ The Green House model is a revolutionary approach to traditional skilled nursing care;
- θ It creates an environment in which residents receive the personal care and clinical support they need in a living space designed as a private home;
- θ It focuses on the needs and desires of the resident, rather than the operational needs of the institution;
- θ physically and philosophically, The Green House model puts the *home* back into nursing home;

“The Green House” Plan



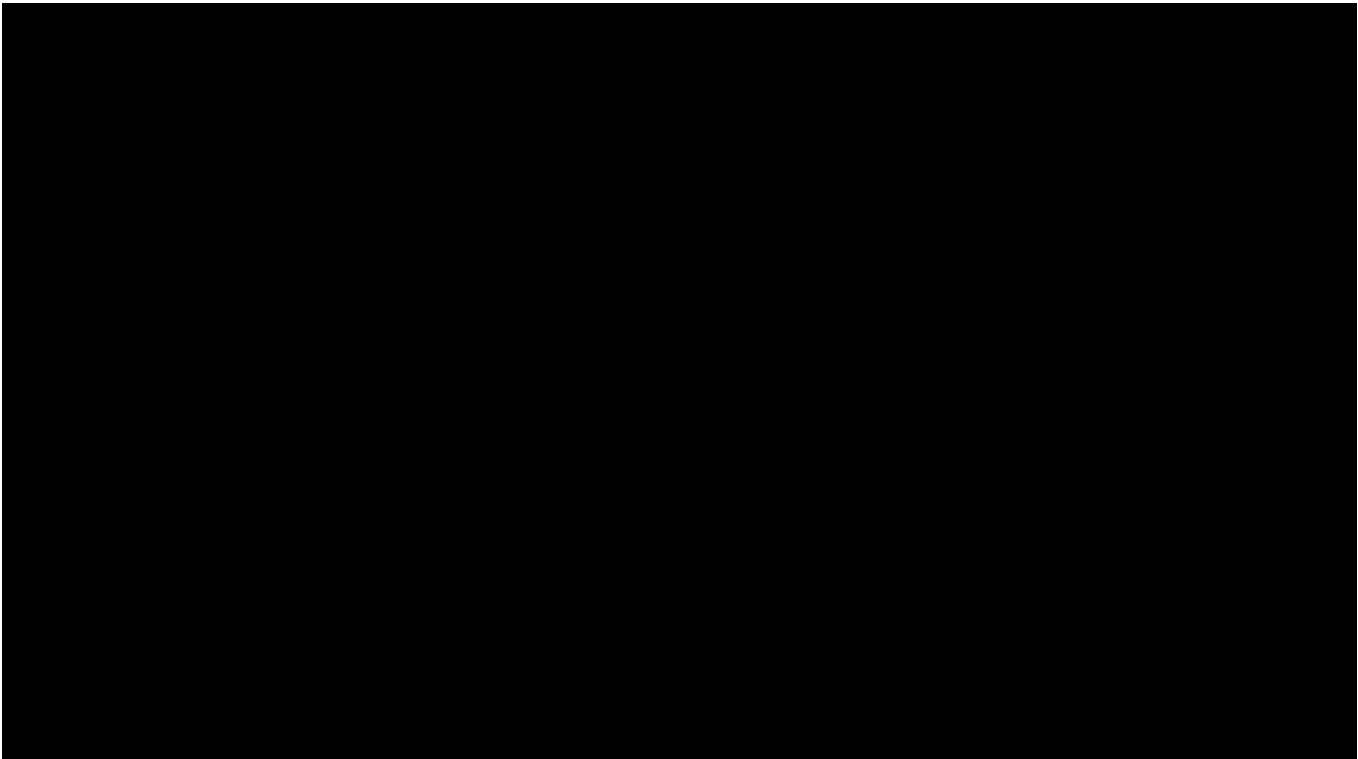
Objective 3: Running Programs:

- **Elderly Support Program (ESP)**

- ♣ Elders Rehabilitation Program (ERP)
 - ♣ Sponsor a Grandparent Raise a Grandchild (SaGRaG)
 - ♣ Vulnerable Elder Sponsorship Program (VESP)
 - **Trafficking Victims Reintegration Program (TVRP)**
 - ♣ Rehabilitation and Reintegration Program (RRP)
 - ♣ Life and Vocational Skills Training Program (LVSTP)
 - ♣ Reducing Human Trafficking Program (RHTP)
 - **Health Program (HP)**
 - ♣ Psychiatric and Geriatric Clinics
 - ♣ Health Training Centers
 - ♣ Medical Supplies and Pharmacies
- Coved-19 fight with together
Life insurgency teaching peoples

Where the Money will be distributed?

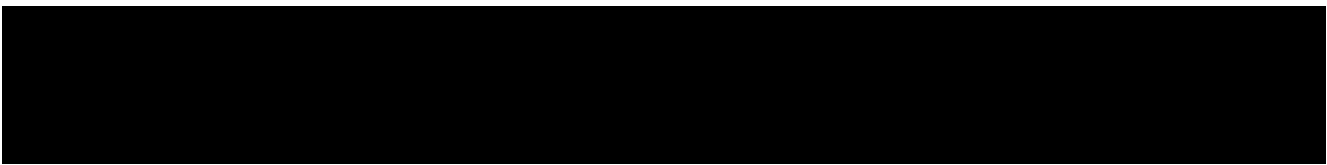
The money will be distributed among targeted beneficiaries based on planned program implementation for five years as follows:



How the Money will be distributed?

The money will be distributed in annual basis based on planned program implementation for the six years strategic plan attached herewith.

The total budget required each year is as follows





Strategic Objectives

Overview

The project is planned as a part of annual plan of Abdissa integrated community development Organization to be implemented in six years' time in order to improve the financial basis of the organization. The detailed action plan for each fundraising event will be developed during the implementation periods.

Objective 1: Public collection through various mechanisms: (Phase 1: 2022 - 2024)

Objective 2: Cost Sharing through various mechanisms: (Phase 2: 2025 - 2027)

Objective 3: Income Generating Scheme through various mechanisms: (Phase 3: 2027 -)

Activities to achieve objective 1:

- ♣ Organize sport festivals – “Sport for elders”, “Sports for Mental Health”, Sports against Trafficking” “Sports for Life Saving” and “Sports to Build Future”;
- ♣ Organize Music-Consorts – “Music to Build Elder’s Future” “Music for Mental Health” “Music to Renew Victims of Trafficking” “Music to Rebuild Generation” and etc...;
- ♣ Organize Bazaars and Auctions – “Art Bazaar to Build Elder’s Future”, “Cultural Bazaar to Rebuild Generation”, “Religious Bazaar to Cure Mental Illness” and etc...;
- ♣ Lottery and Ticket Sales – “Tombola, Special Lottery, SMS, Mobile Banking, Game-card Membership Fee - Card, MasterCard for Old-age, Mobile Game and many others.
- ♣ Entrance Fee collection during each fundraising events;
- ♣ Sales of Materials on each fundraising events (T-Shirts, Badge, Stickers, Beverages, water, cookies and etc.) ;

Activities to achieve objective 2:

- ♣ Organize health service delivery system – “Mental/Geriatric health, Geriatric homecare”;
- ♣ Training, Counselling and Consultancy – “Mental/geriatric health training provision”;
- ♣ Supplies delivery system – “Medical Supplies/Equipment’s sales with reasonable costs”;

Activities to achieve objective 3:

- ♣ Combination activities of the two objectives above;
- ♣ Build income generating institutions based on the feasibility study to be undertaken;
- ♣ Involving beneficiaries in income generating schemes;

Outline of the Fundraiser

Supplies Needed

- Decoration
- Food & Drinks/Refreshments
- Prizes
- Games/Entertainment
- Special Services including Permits
- More Services: (Handicapped consideration, Music, Entertainment, DJ, etc.)
- Security
- Vendor/Services
- Others
- Day of Event Tasks
 - ♣ Set-Up
 - ♣ Event Staffing
 - ♣ Decorating
 - ♣ Table/Chair/Furniture/Set-up
 - ♣ Equipment Set-up
 - ♣ Table/Booth Staffing
 - ♣ Announcing
 - ♣ Ticket-takers/Registration Table
 - ♣ Clean-Up

Space Needed

- Sports Fields (Stadium);
- Bazaar and Exhibition Centre;
- Consort Hall (Millennium Hall);

Fundraiser Description

Abdissa integrated community development organization is a charity organization that has re-registered as an Ethiopian Resident Charity on 01 ----- 2022 according to the new CSO law. The organization with a general assembly that constitutes seven members has an approved memorandum of association. This by law states the roles responsibilities of the general assembly, the general assembly committees, the board and the management, and the auditor. It also states meeting schedules of the general assembly and the board members election, membership fee and fiscal year, which is the European fiscal year.

General Assembly

The general assembly is the highest decision making organ and approves annual plan, budget and reports including audit report and makes all the strategic decision concerning the organization.

General Assembly committee

The general assembly committee constitutes three members: a chair person, vice chairperson and secretary. The board constitutes seven members; a chair person, vice chairperson, and five members. This committee is responsible for organizing the general assembly meeting and enforcing the decisions made by the general assembly.

Board of Directors

In concert with an independent auditor, Abdissa integrated community development organization's Board of Directors reports directly to the General Assembly of the Organization membership. As a whole, the board contributes profound executive experience accumulated through individual experience in the public, private, and non- profit sectors. Each director is elected to a four-year term.

Management

Currently Dejene Nigusie Hordofa serves as the General Assembly and Manager of Abdissa integrated community development organization. The executive director is the most responsible person in program and administrative matters of the organization. At present, the organization has 28 full-time staff, 3 part-time staff and more than 50 volunteers in delivering direct services and supports with multiple capacities related to programmatic and administrative service. The management committee has five members comprising executive director and four program managers.

Organizational Structure

Abdissa integrated community development organization, as it can be seen below in the organizational structure has followed the organizational structure that is recommended by the Charities and Societies law. The different management levels have different roles and responsibilities stated in the memorandum of association.

Human Resources for Fundraiser and

Roles Technical Implementers of this action

plan

Abdissa integrated community development organization one Fund Raising Officer and one Finance Officer will be assigned fully to perform the day-to-day activities of this action plan in collaboration with the program and finance officers by guidance from the Executive Director.

Essential Volunteers/Committee Chairs

Event Chair(s) - oversees all activities relating to event from start to finish.

→ General Duties:

- ♣ Oversee the event at-large
- ♣ Generate budget
- ♣ Appoint committee chairs
- ♣ Determine theme

- ♣ Maintain communication with staff or key member of the organization
- ♣ Most of the detail work will stay with the specific committee chairs below

Corporate Relations/Sponsorships - helps raise necessary seed money for early event expenses and help event tickets or tables to corporations

→ General Duties (Strong collaboration between Event Chair(s) on this):

- ♣ Identify potential sponsors/donors: corporate and individual
- ♣ Determine possible benefits for sponsors with the Event Chairs- (most sponsors will want something in return for their investment whether it's free tickets to the event or marketing and advertising for the company)
- ♣ Deliver the promised benefits to sponsors
- ♣ Identify potential sponsors for the event (Be sure to consider pro bono sponsors which will help alleviate expenses)
- ♣ Draft strategy for acquiring sponsors
- ♣ Understand what we need and what we plan to give back to the sponsor (benefits plan)
- ♣ Generate all necessary paperwork
- ♣ understand the traditional giving cycle of our target sponsor—don't ask for money too late! Research our prospects.

Volunteers Coordinator Chair - recruits and energizes volunteers for all committees

→ General Duties:

- ♣ Identify volunteer needs for each committee
- ♣ Communicate regularly with volunteers on behalf of the Event Chair
- ♣ Recruit more volunteers as necessary
- ♣ Delegate tasks on the day of event

Media & Public Relations Chair - promotes the event

→ General Duties:

- ♣ Develop the language for promoting the event
- ♣ Identify media sponsors
- ♣ Work with Corporate Relations/Sponsorship Chair regarding press releases
- ♣ Communicate through various methods (TV, print, radio, web, email)

Other areas to consider once "core" committee members are determined and appointed. Details covered in timeline.

Logistics Committee Chair - oversees the details and the flow on the day of the event

Invitation Committee Chair - oversees the designing and mailing the invitation

Decorations Committee Chair - determines necessary decorations based on theme

Auction Committee Chair - organizes all aspects of auction

Menu Committee Chair - works with the caterer on food and drink choices

Entertainment/Program Committee Chair - determines and contracts entertainment bands

Fundraiser Schedule

The fundraiser planned to organize three especial events every year at the same time in different settings.

Special Events Timeline

→ Four Months Before The Event:

- ♣ Appoint Event Chair(s)
- ♣ Determine the purpose of our event. (Fundraiser or donor development)
- ♣ Establish a theme for the event
- ♣ Establish the BUDGET: expenses and revenue
- ♣ Our event can be priced to attract fewer people at a higher price, or more people at a lower price.
- ♣ Sometimes exposing the organization to a broader group of people is more important than reminding our loyal patrons how wonderful we are.
- ♣ We must be sure to consider these costs:
 - ♣ Venue & service
 - ♣ Labour
 - ♣ Publishing costs
 - ♣ Special equipment
 - ♣ Entertainment
 - ♣ Decorations
 - ♣ Acknowledgment
- ♣ Event chairs determine and appoint Key Committee Chairs:
- ♣ Corporate Relations/Sponsorships Chair (immediately)
- ♣ Volunteer Coordinator Chair (no later than 3 months before event)
- ♣ Media & Public Relations Chair (no later than 3 months before event)
- ♣ Event Chair(s) - Appointing specific committee chairs helps distribute the work
However, event chairs guide the overall purpose and vision of the event and cannot avoid working closely with each chair.
- ♣ Schedule timeline:
 - ♣ Create a timeline highlighting the important aspects of the event
 - ♣ Determine absolute deadlines and plan accordingly to achieve them.
- ♣ Determine guest list. (This will influence price per person costs.)
 - ♣ We must be sure our guest list comprises appropriate people that will realize the purpose of our event. (Example: the more classy the event, the more affluent the guests.)

- ♣ Start spreadsheet tracking: formal names, addresses, and phone numbers.
- ♣ Determine Where and When
 - ♣ Establish location, time & date (this is vital to the planning)
 - ♣ Book venue: make deposits and sign contracts if necessary

— Three and Half Months before the Event

- ♣ Initial committee meetings begin
- ♣ Appoint last Committee Chairs
 - ♣ Logistics Committee Chair
 - ♣ Invitation Committee Chair
 - ♣ Decorations Committee Chair
 - ♣ Auction Committee Chair
 - ♣ Menu Committee Chair
 - ♣ Entertainment/Program Committee Chair

Individual committees begin to plan the details of each area and adhere to budget constraints determined by Event Chair(s)

- ♣ Logistics Committee
 - ♣ Determine flow and timing of event
 - ♣ Determine volunteers needed
 - ♣ Brainstorm ideas for new and unique experiences
 - ♣ Invitation Committee
 - ♣ Determine style (in-house? paper choice? professional print job?)
 - ♣ Choose design Identify printer
 - ♣ Choose and order paper. Be sure paper to be used will allow for the desired effect.
 - ♣ Determine whether you will mail invitations first class or bulk
 - ♣ Decorations Committee
 - ♣ Begin to determine theme
 - ♣ Start cost evaluations
 - ♣ Auction Committee
 - ♣ Identify financial goal
 - ♣ Determine milestones for success (Set realistic goals and evaluate them regularly.
 - ♣ Get lists of past merchant donors
 - ♣ Divide list among committee
 - ♣ Design a solicitation mailing for auction donations
- If goal is large:
- ♣ Include: Letter, Brochure, Return envelope
 - ♣ Determine postage needs
 - ♣ Be sure to use a clean address list
- If goal is modest:
- ♣ Identify desired items and donors
 - ♣ Divide solicitations among committee members based on their personal relationships
 - ♣ Start asking
- ♣ Menu Committee
 - ♣ Start brainstorming on menu ideas.
 - ♣ Work with caterer on costs

- ♣ Some caterers may invite you to taste a sample of the menu options to help with your decisions

- ♣ Entertainment/Program Committee

- ♣ Determine amount of time available for entertainment before or during the event.

- ♣ Determine use of band

- Identify band
 - Check availability
 - Book ASAP (Some bands require a deposit)

- ♣ Select Speaker/Auctioneer/Master of Ceremonies

- Identify personality
 - Check availability
 - Book ASAP
 - Start drafting script

Event chair finalizes all deadlines in each committee and recruits volunteers for their committee.

- ♣ Corporate Relations/Sponsorships Chair

- ♣ Begin sponsorship solicitations

- Mail packets and meet potential sponsors in person
 - Get high powered, influential people involved in the ask
 - Follow-up bi-weekly until we get an answer
 - If corporations are uninterested in sponsoring the event at-large, ask them to commit to purchase a table at the event or several tickets

— Three Months Before The Event

- ♣ Event Chair(s)

- ♣ Begin monthly meetings for all Committee Chairs (Keep this a standing date to insure attendance.)

- ♣ Each committee reports progress and expresses needs

- ♣ Reconcile Budget

- Go over budget with the Committee Chairs keeping close tabs on what each Committee spends

- ♣ Corporate Relations/Sponsorships Chair

- ♣ Continue with sponsorship solicitations and table/ticket sales

- ♣ Start to collect sponsor logos for use in P.R. and signage

- ♣ Ask sponsors to participate in volunteering for event

- ♣ Media & Public Relations Chair

- ♣ Write press releases

- Continue to hold monthly committee meetings
 - Include Date, Time, Location, name of organization holding event, volunteer groups involved, purpose of event, celebrities involved, contact information, sponsors
 - Working with the Auction Committee Chair actively solicit large auction donations
 - Items such as cars, trips, art, etc. usually require formal requests

— Two and Half Months Before The Event

- ♣ Event Chair(s)
 - ♣ Start early ticket sales with board members and high end donors- use their names on the invitation later (be sure to get their permission)
 - Send letter with benefits of early purchase if necessary
 - If we plan to list on invitation, we must be sure to list a deadline for printing purposes
 - ♣ Continue to hold monthly committee meetings
 - Go over budget with the Committee Chairs keeping close tabs on what each Committee spends
- ♣ Media & Public Relation Chair
 - ♣ Fax press releases to all newspapers, radio stations & T.V. stations
- ♣ Corporate Relations/Sponsorships Chair
 - ♣ Mail second invoices to corporate sponsors (if necessary)
- ♣ Invitation Committee Chair
 - Plans invite to drop in the mail 4-5 weeks before the event
 - ♣ Begin working with invitation design
 - Choose and order paper (be sure paper to be used will allow for the desired effect)
 - If we are using bulk mail be wary of busy mailing times: Christmas, Mother's Day, Valentine's Day; this could slow down our mailing
 - Including a return envelope will make the RSVP process easier for guests, but will increase expense of invitation.
 - Mailing envelope should have a "return service requested" statement. This will be more expensive, but all erroneous addresses will be returned to organization for correction.

— Two Months before the Event

- ♣ Event Chair(s)
 - ♣ Begin cleaning up mailing list for invitations
 - ♣ Visit event venue
 - ♣ Continue holding monthly committee meetings
 - ♣ Go over budget with the Committee Chairs keeping close tabs on what each Committee spends
- ♣ Corporate Relations/Sponsorship Chair
 - ♣ Report your progress to sponsors
- ♣ Decoration Committee Chair
 - ♣ Order necessary decorations
 - ♣ Finalize decoration details with Event Chair
 - ♣ Order necessary party favors
- ♣ Auction Committee Chair

- ♣ Start collecting donated auction items
- ♣ Keep an excel spread sheet going with all collected items and information
- ♣ Make sure to keep all props to return to the donors

→ **One and Half Months before the Event**

- ♣ Event Chair(s)
 - ♣ Start bi-weekly Committee meetings
 - ♣ Go over budget with the Committee Chairs keeping close tabs on what each Committee spends
- ♣ Media & Public Relation Chair
 - ♣ Fax second round of press releases
 - ♣ Report progress to sponsors
 - Include any new/ early ticket or table buyers
- ♣ Logistics Committee Chair
 - ♣ Get volunteers committed for the day of the event
 - ♣ Clarify any parking issues that might be attached to using the venue
- ♣ Invitation Committee Chair
 - ♣ Finalize invitation designs- last chance for early sponsor opportunities and tickets purchases!
 - Send to printer within two weeks
 - Allow one week for proofing and approval by committee and organization
 - Start early label printing if necessary
- ♣ Auction Committee Chair
 - ♣ Continue to collect the auction items
 - Determine bidding procedure for larger items:
 - Live - be sure to book an auctioneer
 - Sealed - start promoting items to guests
 - Send out booklet of items collected before the event
 - Silent - Generate bid sheets and determine minimum bids on all items
- ♣ Menu Committee Chair
 - ♣ Begin to focus on menu options
 - Work closely with caterer
 - Don't forget to consider special dietary needs of guests
 - Make menu match the season
 - Set up time for tasting of the menu if necessary
- ♣ Entertainment/Program Committee Chair
 - ♣ Final considerations
 - Sound systems
 - Transporting heavy objects
 - Get all information to the invitation committee for publication

→ **One Month Before The Event**

- ♣ Event Chair(s)

- ♣ Continue with bi-weekly committee meetings
- ♣ Go over budget with the Committee Chairs keeping close tabs on what each Committee spends
- ♣ Invitation Committee Chair
 - ♣ Get invitation volunteers together to assemble
 - ♣ Check on available postage first class bulk o Mail invitations
- ♣ Entertainment/Program Committee
 - ♣ Confirm entertainment

→ **Two Weeks Before The Event**

- ♣ Event Chair
 - ♣ Begin collecting reservations
 - ♣ Seat guests according to their priority. This can be determined by donation level, profile in the community, etc.
 - ♣ Final arrangements made and approved for decorations
 - ♣ Reconcile budget
 - ♣ Volunteer coordinator should meet with each committee chair to determine needs
 - ♣ Reconcile Budget
- ♣ Corporate Relations/ Sponsorship Chair
 - ♣ Start to design signs for sponsors
 - Be sure to use the most updated logo
 - ♣ Report progress to sponsors
- ♣ Media & Public Relations Chair
 - ♣ Send another round of press releases
 - Be sure to get local society reporters to cover the event (you may need to comp their tickets)
- ♣ Decorations Committee Chair
 - ♣ Order flowers
 - ♣ Make sure decorations have been finalized
- ♣ Auction Committee Chair
 - ♣ Continue to collect auction items
 - ♣ Print all necessary bid sheets for the auction
 - ♣ Mail mini-auction booklet to confirmed guests to promote items (if budget allows)
- ♣ Menu Committee Chair
 - ♣ Confirm menus with the caters
 - Be sure all rentals have been requested
 - Make sure all beverages are set including non-alcoholic beverages

→ **The Week of The Event**

- ♣ Event Chair

- ♣ Fill empty seats with potential donors/sponsors, dedicated committee members or staff from the organization
- ♣ Finalize the seating chart
- ♣ Call each committee chair to check status

- ♣ Logistics Committee Chair
 - ♣ Confirm volunteers - tell them where to be and when
- ♣ Decoration Committee Chair
 - ♣ Coordinate final plan to deliver decorations
- ♣ Auction Committee Chair
 - ♣ Account for all auction items and bid sheets
- ♣ Menu Committee Chair
 - ♣ Confirm catering
- ♣ Entertainment/program Committee Chair
 - ♣ Confirm entertainment
 - ♣ Confirm arrival times
 - Entertainment
 - Volunteers

→ A Day Before The Event

- ♣ Event Chair
 - ♣ Print out guest list in alphabetical order for the check-in volunteers
 - ♣ Generate checks for entertainment and caterer if required
- ♣ Media & Public Relations Chair
 - ♣ Deliver signage to event site (any other items that can be delivered early should arrive in the late afternoon)
- ♣ Entertainment/Program Committee Chair
 - ♣ Be sure all necessary sound equipment is delivered early on the day of the event in case of problems

→ The Day of The Event

- ♣ All Event & Committee Chairs
 - ♣ Arrive for set up
 - ♣ Work in shifts
 - ♣ Be sure all aspects are in place before leaving to get ready
 - ♣ Return to the event (dressed for the evening) 45 minutes before guests arrive
- ♣ Logistics Committee Chair
 - ♣ Have volunteer coordinator lead his/her troops
 - ♣ Keep timeline close at hand all evening to check the status
- ♣ Decoration Committee Chair
 - ♣ Check the quality of the decorations
- ♣ Menu Committee Chair

- ♣ Walk through event one final time with the caterer
- ♣ Entertainment/Program Committee Chair
 - ♣ Have feature entertainment and speakers in place 20 minutes before we need them

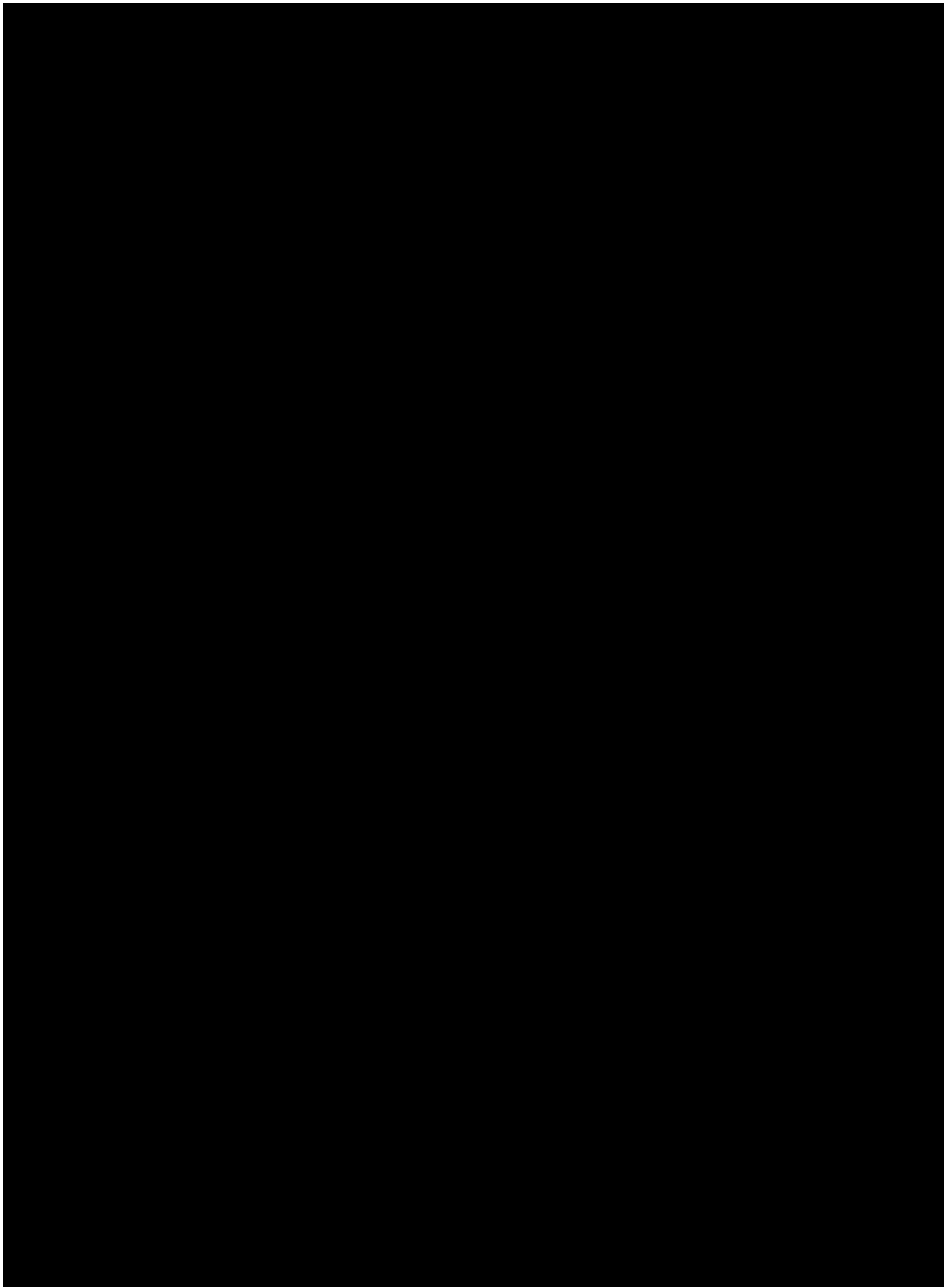
→ **Post-Event Follow Up**

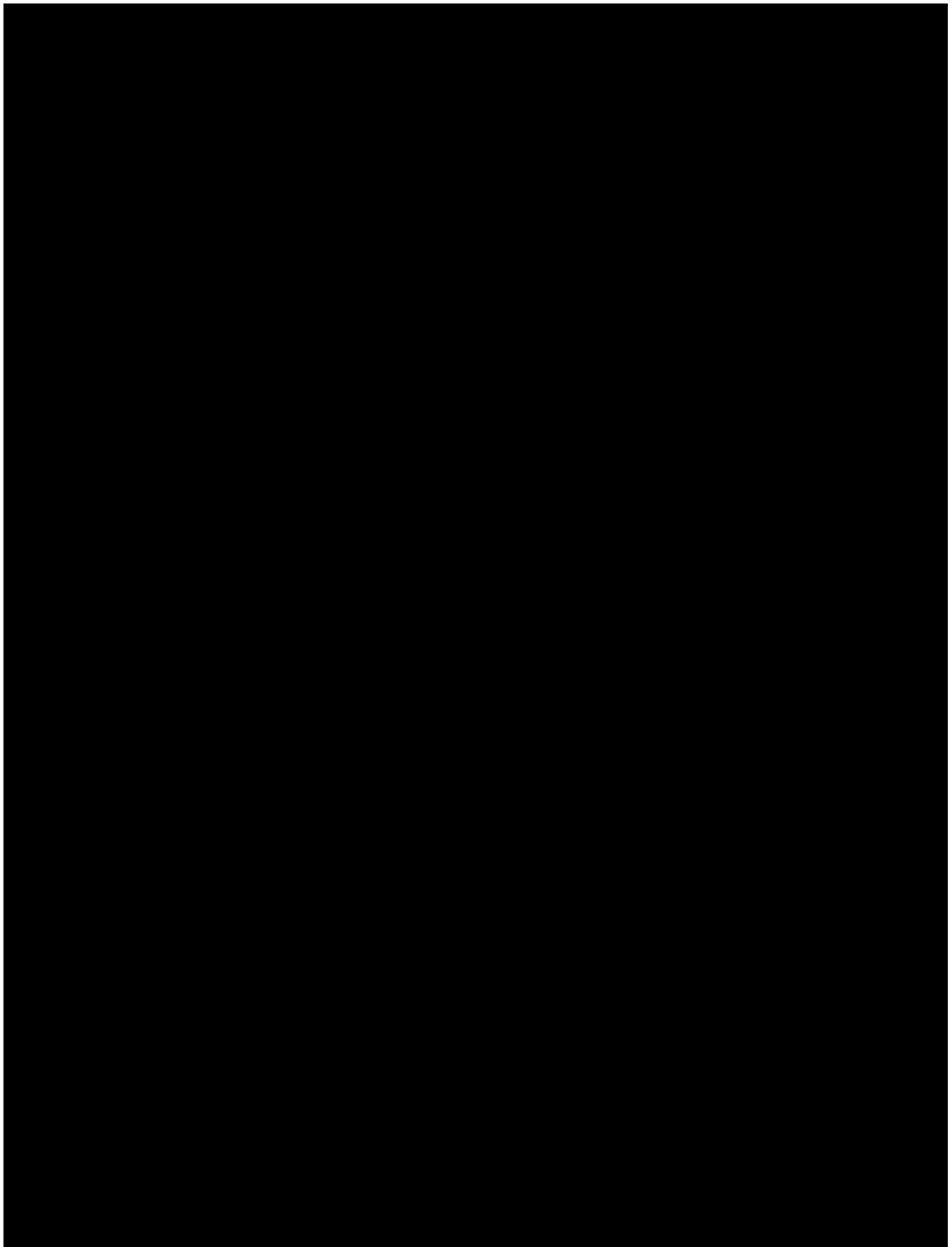
We take time to evaluate our event especially if we plan to repeat it! Don't forget one of the most important aspects of our event: saying "Thank you" to everyone that participated in the event.

♣ Event Chair

- ♣ Reconcile budget
 - Collect any outstanding money or pledges
 - Mail or deliver all expenses from event
- ♣ Send thank you notes to all committee members
- ♣ Send a report to all sponsors with a thank you
 - Consider having a follow-up thank you party for everyone who participated
- ♣ Send follow-up communications to all special guests encouraging them to continue to support the organization
- ♣ Collect all articles and press clippings
- ♣ Meet with individual committees 2 to 5 days after the event for evaluation
 - Discuss all successes and challenges of event
 - Offer suggestions to remedy problems
 - Offer explanations as to why certain things did and did not work
 - Evaluate whether the event served its purpose
 - Decide whether you would do the event again
- ♣ Save all notes and compile a notebook for reference to future chairs
 - Include all budget to actual information
 - Include receipts
 - Include planning notes from each committee chair
 - Include all press releases
 - Include sample letters sent to sponsors
 - Include sample invitations
 - Include guest lists

Fundraiser Budget





Potential Fundraiser Risks and Setbacks

Risk	Mitigation Measures	Likelihood H/M/L	Significance
Individual and institutional resistance to local fund raising due to lack of awareness on funding regulation of Ethiopia	The various training programs outlined will equip them with enough information to increase their local funding regulation will lead to attitudinal change	Medium	Low
Lack of commitment from institutional heads and political leaders	The project will be streamlined with existing structures. This is to cater for institutional/political ownership of the project	Low	Low
The legal framework has been enacted recently for NGOs working in Ethiopia is posing some challenges	Enhancing stakeholders' involvement in general and the government officials in particular deploying accountability dialogue tool to put in place the legitimacy, accountability and transparency	Medium	Medium

Sponsors

- θ The Korea Embassy;
- θ Embassy of Finland;
- θ International Organization for Migration;
- θ International Labour Organization;
- θ Business Companies;
- θ Relevant Government Ministries (MoLSA, MoFA, MoWCYA and MoH)
- θ Individuals, Artists, Sports Men and Women;

Evaluation Methods

To ensure the proper implementation of any project and to ascertain that the targeted vulnerable groups are reached, program monitoring and evaluation is very essential. Abdissa integrated Community development organization proposed programs will be monitored and evaluated by target beneficiaries, government line offices, and Abdissa integrated community development Organization s staff. Possible efforts will be made to assess intermediate results and possible impacts of the programs against fulfilling the objectives and results set in the long run. The head office will do regular monitoring, process evaluation and make corrective measures if implementation directions are not in line with the project plan. In addition to these, the local government structures have roles in assisting and making follow-ups of the project.

A mid-term review and an end of strategic plan evaluation will be conducted by external consultants using a participatory approach. Results from the mid-term evaluation will be used to adjust the strategic plan accordingly and to document lessons learned. All findings will be shared with all stakeholders. In addition, financial auditing will be made at the end of each project year and reported to all funding partners and government offices. Abdissa integrated community development Organization will submit the quarterly, biannual, and annual activity and financial report to the funding partners as deemed necessary.

Plan for Promotion of Fundraising

Fund Raising Planning Checklists

Planning an event is easy if we're organized. Use these step-by-step checklists to ensure we don't forget anything that could help make our event a success!

Before our event

- Brainstorm fundraising ideas – refer to our Fundraising Ideas to get started
- Check into any possible safety or legal issues such as whether permits are required
- Determine how many people we will need to help us execute our plan
- Enlist volunteers – friends, family, colleagues or other motivated people
- Let ChSA know about our event
- Plan our budget
- Find a suitable location
- Schedule our event
- Promote our event, ensuring all materials with our name/logo approved prior to use

During our event

- Assign someone to be responsible for handling the donations
- Have Abdissa integrated community development organization Pledge Form handy for donations of ETB 100 or more
- Display and/or distribute Abdissa integrated community development organization brochures

Events we want to organize

- Celebrate Ethiopian Patriots' day combining with football sport and selling tickets (Finfine BoLSA & Finfine Sport Commission, Oromia Region Bishoftu , Adama Dukem and Mulo,Holeta, Burayu, Kolobo, Ambo, Walega, Jimma)
- Organize Bazaar and Art Exhibition at Exhibition Center (Sebastopol Cinema and/or Century Promotion Service)
- Organize Consort at Oromo culture Hall and Sheraton ()

How to organize events we want

- Outsource to event organizers
- Find sponsorships
- Collect in kind supports for selling

How to promote events we want

- Find media sponsorships (ZAMI, SHEGER, AATV, EBS, EBC, OTV,OBN, OBS)
- Outsource radio spots (EBC, FM radios)

Post-Fundraising Steps

After our event

- Collect the funds
- Thank our donors, use our Acknowledgement Letter Template
- Complete the Financial Summary Form
- Compile all of our donation forms and money collected.
- Learn from our mistakes ... and successes! Evaluate our event and take note of what worked and what didn't. Keep notes of useful contacts and share our learning experiences with Abdissa integrated community development Organization and other fundraisers by completing the Event Feedback Form.



ቁጥር 36/Asso/6696

Ref. No.

ቀን 28 ጥቅምት 2014

Date

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ከሰላምታ ጋር
TAKELE DIRIBSA GUTA
Registration & Document
Team Leader

ግልባጭ

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The right to association, humanity, maximum public benefit!!!



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Comment Submitted by Anonymous

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Comment

Remove APT. Number and include it in address so it reads as follows:

Address (Street Number, Name and/or Apt Number). This will help reduce errors on I-9's

Remove Email and Telephone Number

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USCIS-2006-0068-0473

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Comment

Hello,

I think turning the Rehire area into a supplement is a good idea. I would be interested to see just how small the print area would be if compressed to 1 page. It seems to me that there is a lot of information to reduce to 1 page. For larger employers, who would have the most storage burden I presume that they would most likely have the ability to print front and back, automatically reducing the amount of storage needed. Doing this would leave the formatting and space the same. Thank you,

Comment ID

USCIS-2006-0068-0474

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Thank you for trying to improve the I-9 form. Most changes are welcome. However, limiting the number of documents to 2 documents in Section 2, List A is not sufficient. Many foreign nationals provide 3 documents for work authorization: foreign passport, I-94 with DS in the expiration date, and I-20 which has the work authorization expiration date. Suggesting that the 3rd document information be added in the "Additional Information" section is not a workable solution. Electronic I-9 systems designed to capture work authorization expiration dates to enable timely re-verification cannot capture this information in a free-form area which can be used for other notes. Please consider adding the third document information into List A.

Removing the document title, issuing authority, document number and expiration date from List B and List C will result in inappropriate entries. It is not intuitive that those identified rows in List A are the same across List B and List C. A common error is users mistakenly write the issuing

authority or document title on the wrong line. Please consider eliminating the column with the document information on the side of List A and adding the required information such as "document title" in small print in each of the appropriate boxes for List A, B and C. Alternatively, you could duplicate the header column and insert it next to or between List B and List C. Thank you.

Comment ID

USCIS-2006-0068-0475

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PUBLIC SUBMISSION

Comment Submitted by Anonymous

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Comment

As an HR professional much of my time is spent on employment eligibility verification forms. The proposed suggestions are all great, especially consolidating Section 1 and 2 and moving Section 3 to it's own stand alone supplemental form. These suggestions will definitely make an impact if approved.

Comment ID

USCIS-2006-0068-0476

**Tracking Number**

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VIA ELECTRONIC SUBMISSION

April 5, 2022

RE: Docket No. USCIS-2006-0068, 87 FR 18377

I am an attorney in private practice who represents numerous work-authorized non-citizens in their immigration matters. I frequently find that employers are confused about what documents may be acceptable for I-9 verification, and I also want to provide some suggestions to prevent severe immigration consequences for non-citizens who unintentionally make false claims to U.S. citizenship.

LIST C OF ACCEPTABLE DOCUMENTS IS INCOMPLETE

First, List C of acceptable documents on page 3 of Form I-9 is incomplete. For example, DHS has recently announced that U visa holders who apply for adjustment of status may present their green card application receipt as a List C document. To correct this issue, I suggest amending the language in item 7 of List C to read:

"7. Employment authorization issued by the Department of Homeland Security on other than Form I-766, Employment Authorization Document.

For examples, see Sections 6 and 12 of the M-274 on uscis.gov/I-9-central.

The Form I-76, Employment Authorization Document, is a List A, Item Number 4. document, not a List C document."

WARNING ABOUT FALSE CLAIM TO U.S. CITIZENSHIP

Second, DHS should adopt language warning of the severe penalties of making a false claim to U.S. citizenship on Form I-9. To that end, I urge that DHS add the following language to be added to page 1 under the selection for "1. A citizen of the United States":

"WARNING: Falsely claiming you are a citizen of the United States, even unknowingly, has serious immigration consequences, including potentially making you deportable, inadmissible, or permanently ineligible for future immigration relief. Be sure that you are a citizen before checking this box, especially if you were born outside the United States."

False claims to citizenship can have serious immigration consequences for noncitizens including making individuals deportable, inadmissible, or ineligible for relief. For example, under 8 USC 1182(a)(6)(C)(ii)(I), a noncitizen who "falsely represents, or has falsely represented, himself or herself to be a citizen of the United States for any purpose or benefit" is inadmissible. Similarly, under 8 USC 1227(a)(3)(D), a noncitizen who falsely claims citizenship is deportable. To naturalize, a lawful permanent resident must have been admissible at the time of adjustment. Consequently, if an individual was inadmissible as a result of a false claim to citizenship and was able to successfully adjust status, that individual would still be precluded from naturalizing.

Moreover, courts have found that falsely claiming citizenship through the I-9 constitutes a false claim to citizenship and renders an individual inadmissible. For example, the BIA has held that falsely claiming to be a citizen through the I-9 triggers inadmissibility. See *Matter of Bett*, 26 I&N Dec. 437, 437-38 (BIA 2014). Under current BIA precedent, these severe, and often permanent, immigration consequences can even be triggered if an individual mistakenly believes themselves to be a U.S. citizen. See *Matter of Zhang* 27 I&N Dec. 569 (BIA 2019).

Given the complexity of immigration law, it is extremely common for individuals to sincerely—but incorrectly—believed they were U.S. citizens. For example, it is not uncommon for immigrants who married U.S. citizens to erroneously believe they automatically became U.S. citizens upon marriage. Many immigrants who are lawful permanent residents may even refer to themselves as citizens and not be cognizant of the difference. This is especially true where an individual does not possess a high level of education or where the individual was not well-informed by his or her legal provider, if any. Finally, individuals who were brought to the United States as very young children may have been kept in the dark about their immigration status, which under the current interpretation of the law does not shield them from the severe immigration consequences of a false claim to U.S. citizenship.

Providing a warning about the consequences of making a mistake is especially important in light of USCIS and EOIR's position that an honest mistake does not excuse a person from the severe consequences of a false claim to citizenship, except for the very narrow exception provided by statute.

DECLARATION UNDER PENALTY OF PERJURY

Third, I strongly object to the new language on page 1, Section 1, of the proposed Form I-9, which reads "I attest, under penalty of perjury, that this information, including my selection of the box attesting to my citizenship or immigration status, is true and correct." Immigration law has been likened in complexity to the tax code. See *Castro-O'Ryan v. INS*, 821 F.2d 1415, 1419 (9th Cir. 1987). Therefore, it is entirely unreasonable to call on the average member of the public to attest to their immigration status with any degree of certainty, much less under penalty of perjury.

In fact, I have encountered numerous individuals who DHS detained for immigration removal (deportation) proceedings only to find that they were actually U.S. citizens by operation of law. If DHS cannot even reliably determine a person's citizenship and immigration status, it is not fair or reasonable to expect the average member of the public to do so.

DHS estimates 75,295,000 individuals will complete the Form I-9, many of whom will likely not be U.S. citizens. As the I-9 represents one of the most common mediums for noncitizens to erroneously or accidentally claim they are U.S. citizens, it is incumbent on USCIS to provide some sort of warning or notice to the potential consequences of falsely claiming citizenship. Notably, preventing noncitizens from falsely claiming citizenship will preserve their eligibility for future naturalization. Moreover, by preventing individuals from falsely claiming citizenship and becoming inadmissible and deportable, USCIS will reduce the future adjudication burden of U.S. Immigration and Customs and Enforcement (ICE). Preventing false claims to citizenship

would reduce the amount of individuals subject to enforcement proceedings and allow ICE to use its limited resources more efficiently.

Yours Truly,

/s/ John F. Flanagan

John F. Flanagan



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Comment Submitted by Francesca Jones

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Comment

As an HR professional, I am in support of the changes proposed - particularly the elimination of the N/A requirement for fields that do not apply and the incredibly lengthy instructions and the burden they create if you are not paperless, that even a trained professional gets overwhelmed by, let alone an employee. These are two areas that feel more like a way for the government to say "gotcha!" when there are errors that do little to advance the actual purpose of the document - employment eligibility verification.

I support any effort to make compliance with federal regulations easier for practitioners on the ground! Thank you for these proposed changes!

Comment ID

USCIS-2006-0068-0478

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PUBLIC SUBMISSION

Comment Submitted by Danielle Endler

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Comment

I think the biggest change needs to come when the employer is completing Section 2. In the new work environment we find us in, requiring the Section 2 to be completed with the new hire/employee physically present and the original documents is becoming more and more troublesome. Making use of an authorized representative is almost impossible because it is difficult to find individuals willing to sign off on Section 2 and be held responsible for any issues that may arise. The temporary solution that was allowed during COVID (virtual review of documents) should be considered as a permanent option. If an employer can do a web based meeting (zoom, teams, etc.) and see the new hire/employee plus have the individual show the original documents, that should now be considered as an acceptable option for completing Section 2.

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USCIS-2006-0068-0479

**Tracking Number**

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Comment Submitted by Anonymous

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Comment

Employers need a better way to do the I9 document verification remotely, perhaps allow companies to review documents by video. With so many employees working from home and remotely, requiring employers to view I9 docs in person is not practical.

Comment ID

USCIS-2006-0068-0480

**Tracking Number**

11n-qqxl-8vz3

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Comment

I would like to submit a request to allow for virtual I-9 inspection indefinitely. With more remote hires being hired around the US, physical inspection has proven to be extremely difficult and inconvenient.

Comment ID

USCIS-2006-0068-0481

**Tracking Number**

11n-qrjn-jug5

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Comment

Remove the burden of employment eligibility from the employer and place it on the employee. Therefore, the employee would complete section 1 and submit that to DHS along with copies of the ID, where it is kept on file. The process should be a matter between an individual and the government agency who is charged with enforcing the regulations.

Comment ID

USCIS-2006-0068-0482

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l1n-qth4-oef8

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Comment

Is an HR representative required to physically see the documentation in person or can we accept electronic versions of their required documentation?

Comment ID

USCIS-2006-0068-0483

**Tracking Number**

11n-qwcx-y4n0

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Comment

We agree with another commenter who suggested eliminating the email and phone number requirement in section 1. In addition, as an employer of remote employees in many different states, we support the continuation of allowing hiring managers or HR to review I-9 documents via video as has been the practice during the COVID-19 pandemic. 75% of our workforce never comes into our corporate offices. If we have to revert to in-person review of I-9 documents, we will have to employ a third-party vendor to assist with that at an added expense. It is our opinion that E-Verify negates the need for our hiring managers to physically hold the employee's documents in their hands and review them. We request that live video review of the presented documents be considered an acceptable means of verification when combined with E-Verify.

Comment ID

USCIS-2006-0068-0484

**Tracking Number**

l1n-zlin-3h3t

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Comment

I am excited to see the proposed changes to the Form I-9, and would like to see something added to the form to prompt the employee and employer to complete the required information. In the past I have used a yellow highlighter to show these fields, but have been told we are not to do that. I have also been told that we should NEVER complete a field electronically so this will be a most welcomed change should it be instituted.

Comment ID

USCIS-2006-0068-0485

**Tracking Number**

l1n-zks3-x6rv

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Comment

Anything you can do to make the form more remote-worker friendly would be appreciated, including allowing us to examine documents via video rather than having a person local to the employee attest that they look valid. We use e-verify also, so we think the risk to allowing that is quite low.

Comment ID

USCIS-2006-0068-0486

**Tracking Number**

11n-qwi3-m4f5

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Comment

It would be most helpful to allow virtual inspection of Form I9 documents.
Thanks for considering,

Comment ID

USCIS-2006-0068-0487

**Tracking Number**

l1n-y3bo-mffc

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Comment Submitted by Kai-Lukas Barlow

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Comment

Thank you for the time and effort involved in revising/simplifying the I-9 form. As an HR professional for more than 20 years, this is long overdue and the proposed changes will only help us use this form correctly in the future.

Comment ID

USCIS-2006-0068-0488

**Tracking Number**

11n-xdxo-sdk6

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Comment Submitted by East Coast Assemblers, Inc. dba National Assemblers, Inc.

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Comment

Concern: Moving Section 3 to a separate Reverification and Rehire Supplement, making it "a stand-alone section, which only is accessed if needed,"

How will it be cross referenced with the original Section 1 and 2?

Comment ID

USCIS-2006-0068-0489

**Tracking Number**

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Comment

RE: proposed changes to I-9 form; OMB Control Number 1615-0047, U.S. Citizenship and Immigration Services, Docket ID USCIS-2006-0068

As employers are required to utilize E-Verify and for those who do not utilize an "eI-9" version;
why not have Form I-9 tied directly into (generated from) the E-Verify system?

And potentially generate the Form I-9 itself?

This is a timesaver, again for those who do use paper versions.

Comment ID

USCIS-2006-0068-0490

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Comment

With the growing number of fully remote workers and even companies, it would be helpful if the requirement to view in person could be removed. Particularly if you have reviewed the documents via a video conference call and/or when you are using e-verify.

Comment ID

USCIS-2006-0068-0491

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Comment

I like the idea of not having to put "N/A" on optional fields.

Comment ID

USCIS-2006-0068-0492

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Comment

It would be nice if the collection/verification of identification documents electronically was made into a proper process, not just a temporary COVID procedure. Verifying the identity of a person and their documents in an increasingly digital world is becoming more and more inconvenient, especially with companies that hire in multiple states or remote workers.

Comment ID

USCIS-2006-0068-0493

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l1n-uhms-cx13

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Comment

As employer we do both E-Verify and the I-9 form. Suggestion: have the E-Verify Authorization as accepted documentation for I-9 form.

Comment ID

USCIS-2006-0068-0494



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l1n-qwox-yf83

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Comment Submitted by Amy Moynihan

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Comment

Given the recent pandemic along with the changing landscape of how employers and employees work, please consider adopting a fully remote and virtual I9 process. This could include recording a video showing that you saw the documentation using one of the many videoconferencing tools that all employers are using today.

Comment ID

USCIS-2006-0068-0495

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l1n-ugmp-58et

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Comment

Please consider a permanent change to allowing remote document verification. So many more workers and new hires live in other states than their onboarding/HR managers and in person ID verification is no longer feasible.

Comment ID

USCIS-2006-0068-0496

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Comment

It would be nice to be able to verify documents via zoom instead of having to do it in person. There are so many companies that are working remotely it is giving business a undue hardship on getting documents verified

Comment ID

USCIS-2006-0068-0497

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Comment

I work for a University and some of our student employees do not have immediate access to their original List C documents. Most of them leave those important documents at home with their parents when they go away to school, and it can take weeks before they can get the documents, delaying their employment. Perhaps considering an exception for out-of-state college students might be appropriate. An example of that exception might be that, if they can provide an unexpired, government issued List B document (Driver's License, State Issued ID Card, etc.) and if their information passes through E-Verify, then the List C document may not be required. Just a thought...

Comment ID

USCIS-2006-0068-0498

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l1n-toyf-gc99

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Comment

The I-9 Verification process should be modified to allow remote completion in all situations - even when only part of the workforce is remote (not all) and outside of pandemic situations. It's currently a large hassle to do remote verification and it's not permitted unless the entire workforce is remote, which is hard when we recruit and hire nationally for some positions (office based positions) but need other positions to be onsite for hands-on task requirements as part of our business.

Comment ID

USCIS-2006-0068-0499

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Comment

I'm writing to comment on some of the proposed changes for the Form I-9. As an HR professional for over 15 years, I whole-heartedly support the change to remove the "N/A" requirement. That requirement required a lot of follow-up with employees because they had a hard time understanding that EVERY BLANK required the "N/A." Currently, my employees use an automated system through our payroll company that autofills the blanks with "N/A," but if I change services and have to go back to employees completing a paper form, it would save so much time if the "N/A" requirement was gone.

I also believe it would be helpful to move the Preparer and/or Translator certification above the employee signature. Once an employee signs the document, they aren't expecting to have to do any thing more on the form. If a preparer or translator is used, the information about the

preparer/translator should be below the employee's signature, like it is now, but where the employee says whether or not they used on should be above their signature.

Thank you for your time.

Comment ID

USCIS-2006-0068-0500

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l1n-sswg-bm1m

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Comment Submitted by Allison Chiarizio-Lord

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Comment

Eliminate in person verification of documents for Part II. Allow digital copies to be verified.

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USCIS-2006-0068-0501

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l1n-so7m-ixxq

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Comment Submitted by Keri Elizabeth

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Comment

The option for remote verification of documents should be permanently allowed in this post-COVID world.

Comment ID

USCIS-2006-0068-0502

**Tracking Number**

l1n-qzlm-bdts

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Comment Submitted by Bridget Johnson

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Comment

To Whom it May Concern,

I have been working with I-9's on a regular basis at two separate companies during my Human Resources professional career. What I have realized is that I type my name and company information WAY too much. With any change to I9's I would expect to see a smaller more efficient area for internal company information. The company address does not seem necessary to repeat on every single form. Also, my information is almost as much as the new hires information. PLEASE NO. That is distracting and a waste of time. I would also like to add that electronic proof of identification should be accepted now. With the use of systems like Paylocity, Zenefits, or any other HRIS the electronic forms are very confidential, efficient, and in conjunction with E-Verify there should be no reason or legal concern for these to be electronically authorized.

Thank you for considering.
Bridget Johnson

Comment ID

USCIS-2006-0068-0503

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Comment Submitted by Courtney Imhoff

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Comment

Please permanently allow remote/electronic verification of documents. That has been such a nice thing to have during covid, when people are remote. My company has locations multiple hours away from our HQ, and as the only HR person, it would be nice to be able to do it this way forever. Managers make mistakes and I prefer to be able to do this all within HR.

Comment ID

USCIS-2006-0068-0504

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Comment

We are in a virtual work world and in some cases may never see an employee face to face. Some states will allow an employee to take their I-9 to a 3rd party to be notarized but many states won't allow it (CA). Visual inspection isn't always possible in person - we need to be able to have a way to meet the standards of the inspection if not in person. For many of my client companies (I'm an HR consultant) they can't afford to purchase a plane ticket just to have the employee come onsite simply to look at their document. This needs to be revisited. In my 30 year career I have never touched a document and thought it was fake so why keep requiring us to physically touch it. Many of clients are small companies who aren't going to set up the Everify program. Please update this program to match the new remote work environment.

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Comment

After reading today's 4/06/2022 DHS update to the I-9 form, we appreciate the proposed changes. Thank you for your time and help with this.

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USCIS-2006-0068-0506

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Comment

I think the proposed changes are appropriate. I would also ask the Agency to continue the use of remote verification of documents. With today's technology, it is easy to view documents and the person via Zoom, Teams, or other technology. Remote verification supports the increase of employing remote workers.

Comment ID

USCIS-2006-0068-0507

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Comment Submitted by Arnita Heyerly

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Comment

The 3 day deadline to verify a potential new hire is sometimes a struggle to comply. Can this be extended longer to allow more time. Thank you.

Comment ID

USCIS-2006-0068-0508

**Tracking Number**

11n-r8sj-6wyp

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Comment

Make the I-9 a national database so it is not maintained locally, and links to INS/SS records to instantly validate employees. The ongoing validation of forms and cards that "appear" to be valid by HR professionals is less than ideal.

Comment ID

USCIS-2006-0068-0509

**Tracking Number**

11n-r9nu-lkvj

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Comment

Allow for virtual verification of documents for section 2 of form I9. This would make the process easier than finding an authorized representative like personnel officers, foremen, agents, or notary publics. I have had issues with finding an authorized representative like these and have even been denied services. Although an authorized representative can be anyone who the employer assigns it has been difficult to getting new hires and someone that we assign to meet and then having to work with that designee to ensure the form is completed correctly.

Also, providing examples of the different documents employees can present to employers. For example, the manual does not provide adequate examples regarding how to input information from certain documents like a birth certificate or even a driver's license. I have come across driver's

licenses that have multiple numbers or birth certificates that vary from state to state and not knowing where to look for a document number because the manual does not provide enough examples.

Comment ID

USCIS-2006-0068-0510

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l1n-rdmp-zhcp

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Comment Submitted by West End UMC

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Comment

I like the proposed I9 changes including eliminating the need to write N/A, list of acceptable documents, and making section 3 a stand-alone. Thanks!

Comment ID

USCIS-2006-0068-0511

**Tracking Number**

11n-rlat-xv27

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Comment Submitted by Rossy Roman

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Comment

eliminating the "N/A requirement" would be very helpful specially for those completing a paper form

Comment ID

USCIS-2006-0068-0512

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11n-s76i-r90f

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Comment

Simplifying the form to sections 1 and 2 on one page is great.

Please consider options/opportunities for virtual review of I9 documentation.

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USCIS-2006-0068-0513

**Tracking Number**

l1n-v64n-41i4

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Comment

For the proposed changes on the Form I-9, please clarify whether we are required to keep color copies of the employee's IDs or not. I have been told to keep them for all employees or to keep them for none. I also just started a position wherein the former HR person kept the copies but kept them separate from the form and filed the copies in the employee's file.

Comment ID

USCIS-2006-0068-0514

**Tracking Number**

l1n-zzvn-9q1m

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Comment

Update the incoming paycheck shipping to and ship my stimulant check and get paycheck in mail to this address soon as possible to this address

Comment ID

USCIS-2006-0068-0515

**Tracking Number**

11g-q8ju-my2m

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Comment

Currently, the temporary Remote Document Inspection policy is scheduled to end on April 30, 2022. This policy has been very helpful during the Pandemic. As more companies begin to utilize video conferencing tools (i.e. skype, zoom, Microsoft Teams, etc.), it would be beneficial for the DHS to permanently allow an option for remote document examination. Particularly those companies who also utilize E-Verify. The question is, what is truly the difference between seeing the documents in person rather than over zoom? It is archaic to think employers are required to physically inspect documents instead of using technology that is readily available. Furthermore, there should be added protection when Form I-9s are processed through E-Verify.

Comment ID

USCIS-2006-0068-0516

**Tracking Number**

11o-2qc8-xxce

Comment Details**Received Date**

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Comment

I would encourage the idea of shrinking it down to one page and definitely add the links.

Comment ID

USCIS-2006-0068-0517

**Tracking Number**

11o-2xg5-cjq7

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Comment

Please consider doing away with the in-person ID verification entirely, and allow employers to validate IDs via Zoom, Teams, FaceTime, or similar. Remote work is here to stay. As an employer with a workforce all over the US (due to COVID but will continue) it would simplify the I9 process for both the company and the new employee. Thank you for your consideration.

Comment ID

USCIS-2006-0068-0518

**Tracking Number**

l1o-3y62-4dl5

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Comment

Thank you for your efforts to simplify Form I-9 requirements.

I am concerned that the additional information box will be used to capture documents that contain the work authorization expiration date that employers are required to track, e.g. I-20 or DS-2019. Our electronic I-9 system will not be able to capture tracking dates from a free-form field. It would be better to have a third field under List A or only require foreign passport and I-20/DS-2019 for those employees.

Likewise, it would be easier if any auto-extensions of EAD cards could be captured as a Section 3 entry instead of a notation in the Additional Information box so that our HRIS system can track expiration dates. This continues to be a manual process.

If possible, can noncitizens be required to provide the A-number instead of being given the choice of foreign passport or I-94? The A number is

required for EAD E-verify submissions.

I appreciate the removal of the Preparer/translator check box and the reduction of the Form I-9 to 1 page.

Comment ID

USCIS-2006-0068-0519

**Tracking Number**

I1o-70ka-bdww

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Comment

When revising the Form I-9, please consider enlarging the space for the company name. The current box is so small that I have difficulty entering our company name. Thank you

Comment ID

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l1o-ytxh-97cz

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Comment

Please reduce the paper. The form in its entirety, is too long and too much to read for the new hire.

Comment ID

USCIS-2006-0068-0521

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11o-zker-4sed

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Comment

Hello, given the times and technology of current day and I believe that A, B & C documents should be verifiable electronically. We have been doing this with the COVID exception over the last couple of years and I suggest that we just continue and not go back to review the physical copies of documents over the past couple of years.

Comment ID

USCIS-2006-0068-0522

**Tracking Number**

l1o-zmhw-rywu

Comment Details**Received Date**

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Comment Submitted by Anonymous

Posted by the **U.S. Citizenship and Immigration Services** on Apr 7, 2022

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Comment

The US government does not need an employee's email or telephone number on the form I-9. Take those off and save some space.

Comment ID

USCIS-2006-0068-0523



Tracking Number

l1p-11lx-1rzg

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Comment

It's imperative that the process get revamped to be able to do the entire I9 process virtually.

Comment ID

USCIS-2006-0068-0524

**Tracking Number**

11p-4dtw-2pp6

Comment Details**Received Date**

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Comment

Please remove the N/A requirement. It is cumbersome and feels unnecessary.

Please remove the requirement to check the "I did not need a translator" box. If someone needs a translator the translator should fill out their information without needing everyone else to check the box.

Please make a list of "these items will get you fined" for us. Right now we have to dig through the 15 pages of instructions or attend several webinars to try our best to catch what is crucial (will get fined if N/A's are missing from key sections...or all lines...or some lines) and what is an instruction (enter your legal last name) which is more obvious and in line with the other forms we do.

Minimize the form and make it much more online user friendly, especially with AdobeSign and other electronic signatures. Clarify clearly expectations for getting an I-9 from a remote employee when there is no physical office within 25 miles.

Extend the number of days the Form I-9 can be completed from 3 - 5. The first week is very full with paperwork, onboarding, and other items and it can be challenging to get everything in 3 days, especially when you are doing same day hiring.

Please allow us to complete E-Verify after the 3 day period of the Form I-9 completion. Often I can get the I-9 completed in time, but sometimes it's coming in from a different time zone after end of business in my time zone on the third day. It would be so very helpful to have at least 5 business days from date of hire to complete e-Verify.

Generally allow more flexibility.

Thank you!

Comment ID

USCIS-2006-0068-0525

**Tracking Number**

l1p-4ho2-vpd0

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Comment

Move everything to an electronic form accessible for all and allow electronic signatures with timestamps/IP address on the form for the individual verifying the information. Allow copies of acceptable documents to be emailed into the individual verifying the form for electronic storage.

Comment ID

USCIS-2006-0068-0526

**Tracking Number**

I1p-52vu-kwhk

Comment Details**Received Date**

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Comment Submitted by Sevenson Environmental Services, Inc.

Posted by the **U.S. Citizenship and Immigration Services** on Apr 7, 2022

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Comment

Do not condense sections 1 and 2 of the I-9. There will not be enough room to write everything that is needed. Leave these on two separate sheets.

Comment ID

USCIS-2006-0068-0527

**Tracking Number**

l1p-9y7k-en9q

Comment Details**Received Date**

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Comment Submitted by Stephanie Avery

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Comment

Allow electronic versions of identification to be acceptable as long as they are not expired. Other financial transaction are completed without a person physically touching an identification document. The document should be photographed both on front and back and check for any holograms.

Comment ID

USCIS-2006-0068-0528

**Tracking Number**

l1p-hdns-q24p

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Comment Submitted by DATAMARK Inc.

Posted by the **U.S. Citizenship and Immigration Services** on Apr 8, 2022

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Comment

A built in flag if the submitted work authorization document will require reverification due to an entered expiration date.

Comment ID

USCIS-2006-0068-0529

**Tracking Number**

l1p-itqa-wx0g

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Comment

I think we can all agree that virtual verification of I-9 documentation has been incredibly helpful during the pandemic. Now that fully remote work has become the standard, we strongly encourage DHS to allow employers to review documentation virtually, indefinitely.

If 15 pages of I-9 instructions are being condensed to 7 pages, audits conducted by government agencies should also be condensed to not be so picky over minor technical errors.

Lastly, please see the attached Proposed Changes document with comments.

Attachments 1

Comments on Proposed Changes

Download (https://downloads.regulations.gov/USCIS-2006-0068-0530/attachment_1.pdf)

Comment ID

USCIS-2006-0068-0530



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l1q-krfb-we7c

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TABLE OF CHANGES – FORM
Form I-9, Employment Eligibility Verification
OMB Number: 1615-0047
02/17/2022


Reason for Revision: Revision
Project Phase: 60 Day


Legend for Proposed Text:


- Black font = Current text
- **Red font** = Changes

Expires 10/31/2022

Edition Date 10/21/2019

Current Page Number and Section	Current Text	Proposed Text
Page 1, START HERE	<p>[Page 1]</p> <p>START HERE: Read instructions carefully before completing this form. The instructions must be available, either in paper or electronically, during completion of this form. Employers are liable for errors in the completion of this form.</p>	<p>[Page 1]</p> <p>START HERE: Employers must ensure the form instructions are available to employees when completing this form. Employers are liable for errors in the completion of this form.</p>
Page 1, ANTI-DISCRIMINATION NOTICE	<p>[Page 1]</p> <p>ANTI-DISCRIMINATION NOTICE: It is illegal to discriminate against work-authorized individuals. Employers CANNOT specify which document(s) an employee may present to establish employment authorization and identity. The refusal to hire or continue to employ an individual because the documentation presented has a future expiration date may also constitute illegal discrimination.</p>	<p>[Page 1]</p> <p>ANTI-DISCRIMINATION NOTICE: All employees can choose which acceptable documentation to present for Form I-9. Employers cannot ask employees for documentation to verify information in Section 1, or specify which acceptable documentation employees must present for Section 2 or the Supplement. Treating employees differently based on their citizenship, immigration status, or national origin may be illegal.</p>
Page 1, Section 1. Employee Information and Attestation	<p>[Page 1]</p> <p>Section 1. Employee Information and Attestation (<i>Employees must complete and sign Section 1 of Form I-9 no later than the first day of employment, but not before accepting a job offer.</i>)</p> <p>Last Name (Family Name) First Name (Given Name)  Middle Initial Other Last Names Used (if any) Address (Street Number and Name) Apt. Number</p>	<p>[Page 1]</p> <p>[no change]</p> <p>Middle Initial (if any)</p> <p>Address (Street Number and Name, and Apartment Number, if any)</p>

	<p>City or Town State ZIP Code Date of Birth (mm/dd/yyyy) U.S. Social Security Number Employee's E-mail Address Employee's Telephone Number</p> <p>I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form.</p> <p>I attest, under penalty of perjury, that I am (check one of the following boxes):</p> <p>[new]</p> <p>1. A citizen of the United States 2. A noncitizen national of the United States (see instructions) 3. A lawful permanent resident (USCIS or A-Number) _____ 4. An alien authorized to work until (expiration date, if applicable, mm/dd/yyyy): _____ Some aliens may write "N/A" in the expiration date field. (See Instructions) Aliens authorized to work must provide only one of the following document numbers to complete Form I-9: An Alien Registration Number/USCIS Number OR Form I-94 Admission Number OR Foreign Passport Number.</p> <p>Signature of Employee Today's Date (mm/dd/yyyy)</p> <p>Preparer and/or Translator Certification (check one): I did not use a preparer or translator. A preparer(s) and/or translator(s) assisted the employee in completing Section 1. (Field below must be completed and signed when preparers and/or translators assist an employee in completing Section 1.) I attest, under penalty of perjury, that I have assisted in the completion of Section 1 of this form and that to the best of my knowledge the information is true and correct</p> <p>Signature of Preparer/Translator Today's Date (mm/dd/yyyy) Last Name (Family Name) First Name (Given Name) Address (Street Name and Number) City or Town State ZIP Code</p>	<p>[no change]</p> <p>I am aware that federal law provides for imprisonment and/or fines for false statements, or the use of false documents, in connection with the completion of this form. I attest, under penalty of perjury, that this information, including my selection of the box attesting to my citizenship or immigration status, is true and correct.</p> <p>[deleted]</p> <p>Check one of the following boxes to attest to your citizenship or immigration status:</p> <p>1. A citizen of the United States 2. A noncitizen national of the United States (see instructions)  3. A lawful permanent resident (USCIS or A-Number) _____ 4. A noncitizen (other than Item Number 2. or 3. above) authorized to work until (exp. date, if any): _____ Enter USCIS or A-Number, I-94 Number, or Foreign Passport Number and Country of Issuance:</p> <p>Signature of Employee Today's Date (mm/dd/yyyy)</p> <p>Preparer and/or Translator Certification (If applicable): I attest, under penalty of perjury, that I helped the above-named employee to complete Section 1 of this form and that, to the best of my knowledge, the information noted in Section 1 above is true and correct.</p> <p>[no change]</p> <p>Address (Street Name and Number, Apt. Number, City or Town, State, ZIP Code)</p>
--	---	---

<p>Page 1, Section 2.</p>	<p>[Page 1] Section 2. Employer or Authorized Representative Review and Verification <i>Employers or their authorized representative must complete and sign Section 2 within 3 business days after the employee's first day of employment. You must physically examine one document from List A OR a combination of one document from List B and one document from List C as listed on the "Lists of Acceptable Documents."</i>)</p> <p>List A Identity and Employment Authorization</p> <p>Document Title Issuing Authority Document Number Expiration Date (if any) (mm/dd/yyyy) Document Title Issuing Authority Document Number Expiration Date (if any) (mm/dd/yyyy)</p> <p>OR</p> <p>List B Identity</p> <p>AND</p> <p>List C Employment Authorization</p> <p>Additional Information</p> <p>[Page 2]</p> <p>Certification: I attest, under penalty of perjury, that (1) I have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) appear to be genuine and to relate to the employee named, and (3) to the best of my knowledge, the employee is authorized to work in the United States.</p> <p>The employee's First Day of Employment (mm/dd/yyyy): (See instructions for exemptions)</p> <p>Signature of Employer or Authorized Representative Today's Date (mm/dd/yyyy) Title of Employer or Authorized Representative Last Name of Employer or Authorized Representative</p>	<p>[Page 1] Section 2. Employer Review and Verification  <i>Employers or their authorized representative must complete and sign Section 2 within three business days after the employee's first day of employment, and must physically examine documentation from List A OR a combination of documentation from List B and List C. Enter any additional documentation in the Additional Information box; see Instructions.</i></p> <p>List A</p> <p>Document Title Issuing Authority Document Number (if any) Expiration Date (if any) (mm/dd/yyyy) Document Title Issuing Authority Document Number (if any) Expiration Date (if any) (mm/dd/yyyy)</p> <p>OR</p> <p>List B [deleted]</p> <p>and</p> <p>List C [deleted]</p> <p>Additional Information</p> <p>[Page 1]</p> <p>Certification: I attest, under penalty of perjury, that (1) I have examined the documentation presented by the above-named employee, (2) the above-listed documentation appears to be genuine and to relate to the employee named, and (3) to the best of my knowledge, the employee is authorized to work in the United States.</p> <p>First Day of Employment (mm/dd/yyyy):</p> <p>Signature of Employer or Authorized Representative Today's Date (mm/dd/yyyy) Last Name, First Name and Title of Employer or Authorized Representative [Deleted]</p>
----------------------------------	---	--

	First Name of Employer or Authorized Representative Employer's Business or Organization Name Employer's Business or Organization Address (Street Name and Number) City or Town State ZIP Code [new]	Employer's Business or Organization Address, City or Town, State, ZIP Code [Deleted] Employers must document reverification(s) and rehire(s) on the Reverification and Rehire Supplement to Form I-9 on www.uscis.gov/I-9.
Page 2, Reverification and Rehires Supplement to Form I-9	[new]	[Page 2] Reverification and Rehires Supplement to Form I-9
	[Page 2] Employee Name from Section 1: Last Name (<i>Family Name</i>) First Name (<i>Given Name</i>) Middle initial (if any)	[Page 2] [deleted] Last Name (<i>Family Name</i>) from Section 1. First Name (<i>Given Name</i>) from Section 1. Middle initial (if any) from Section 1.
	[new]	Instructions: Only use this page if your employee requires reverification, is rehired within three years of the date the original Form I-9 was completed, or provides proof of a legal name change. Enter the employee's name in the fields above. Use a new section for each reverification or rehire. Review the Form I-9 instructions before completing this page. Keep this page as part of the employee's Form I-9 record. Additional guidance can be found in the Handbook for Employers: Guidance for Completing Form I-9 (M-274).
	[Page 3] Section 3 Reverification and Rehires (To be completed and signed by employer or authorized representative.) A. New Name (<i>if applicable</i>) Last Name (Family Name) First Name (Given Name) Middle Initial B. Date of Rehire (if applicable) Date (<i>mm/dd/yyyy</i>) C. If the employee's previous grant of employment authorization has expired, provide the information for the document or receipt that establishes continuing employment authorization in the space provided below.	[Page 2] [deleted] Date of Rehire (<i>if applicable</i>) Date (<i>mm/dd/yyyy</i>) New Name (<i>if applicable</i>) Last Name (Family Name) First Name (Given Name) Middle Initial Reverification: If the employee's employment authorization requires reverification, your employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.

	<p>Document Title Document Number Expiration Date (if any) (mm/dd/yyyy)</p> <p>I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I examined appear to be genuine and to relate to the individual.</p> <p>Signature of Employer or Authorized Representative</p> <p>Today's Date (mm/dd/yyyy)</p> <p>Name of Employer or Authorized Representative</p> <p>[new]</p>	<p>[no change]</p> <p>I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.</p> <p>[no change]</p> <p>Additional Information (Initial and date each notation.)</p>
	<p>[Page 3]</p> <p>Date of Rehire (if applicable)</p> <p>New Name (if applicable)</p> <p>Date (mm/dd/yyyy)</p> <p>Last Name (Family Name)</p> <p>First Name (Given Name)</p> <p>Middle Initial</p> <p>C. If the employee's previous grant of employment authorization has expired, provide the information for the document or receipt that establishes continuing employment authorization in the space provided below.</p> <p>Document Title Document Number Expiration Date (if any) (mm/dd/yyyy)</p> <p>I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I examined appear to be genuine and to relate to the individual.</p> <p>Signature of Employer or Authorized Representative</p> <p>Today's Date (mm/dd/yyyy)</p> <p>Name of Employer or Authorized Representative</p>	<p>[Page 2]</p> <p>[no change]</p> <p>Reverification: If the employee's employment authorization or documentation requires reverification, your employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.</p> <p>[no change]</p> <p>I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.</p> <p>[no change]</p>

	[new]	Additional Information (Initial and date each notation.)
	<p>[Page 3]</p> <p>Date of Rehire (if applicable)</p> <p>New Name (<i>if applicable</i>)</p> <p>Date (<i>mm/dd/yyyy</i>)</p> <p>Last Name (Family Name)</p> <p>First Name (Given Name)</p> <p>Middle Initial</p> <p>C. If the employee's previous grant of employment authorization has expired, provide the information for the document or receipt that establishes continuing employment authorization in the space provided below.</p> <p>Document Title</p> <p>Document Number</p> <p>Expiration Date (if any) (<i>mm/dd/yyyy</i>)</p> <p>I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I examined appear to be genuine and to relate to the individual.</p> <p>Signature of Employer or Authorized Representative</p> <p>Today's Date (<i>mm/dd/yyyy</i>)</p> <p>Name of Employer or Authorized Representative</p> <p>[new]</p>	<p>[Page 2]</p> <p>[no change]</p> <p>Reverification: If the employee's employment authorization requires reverification, your employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.</p> <p>[no change]</p> <p>I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.</p> <p>[no change]</p> <p>Additional Information (Initial and date each notation.)</p>
Page 3, Lists of Acceptable Documents	<p>[Page 3]</p> <p>LISTS OF ACCEPTABLE DOCUMENTS</p> <p>All documents must be UNEXPIRED.</p> <p>Employees may present one selection from List A, or a combination of one selection from List B and one selection from List C.</p> <p>Examples of many of these documents appear in the Handbook for Employers (M-274).</p>	<p>[Page 3]</p> <p>[No change]</p>
Page 3, LIST A	[Page 3]	[Page 3]

	<p>LIST A</p> <p>Documents that Establish Both Identity and Authorization</p> <ol style="list-style-type: none"> 1. U.S. Passport or U.S. Passport Card 2. Permanent Resident Card or Alien Registration Receipt Card (Form I-551) 3. Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine- readable immigrant visa. 4. Employment Authorization Document that contains a photograph (Form I-766). 5. For an individual temporarily authorized to work for a specific employer because of his or her status or parole: <ol style="list-style-type: none"> a. Foreign passport; and b. Form I-94 or Form I-94A that has the following: <ol style="list-style-type: none"> (1) The same name as the passport; and (2) An endorsement of the individual's status or parole as long as that period of endorsement has not yet expired and the proposed employment is not in conflict with any restrictions or limitations identified on the form. 6. Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI. <p>OR</p>	[No change]
Page 3, List B	<p>[Page 3]</p> <p>LIST B</p> <p>Documents that Establish Identity</p> <ol style="list-style-type: none"> 1. Driver's license or ID card issued by a State or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address. 2. ID card issued by federal, state, or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address. 3. School ID card with a photograph 4. Voter's registration card 5. U.S. Military card or draft record 6. Military dependent's ID card 7. U.S. Coast Guard Merchant Mariner Card 	<p>[Page 3]</p> <p>[No change]</p>

	<p>8. Native American tribal document</p> <p>9. Driver's license issued by a Canadian government authority</p> <p>For persons under age 18 who are unable to present a document listed above:</p> <p>10. School record or report card</p> <p>11. Clinic, doctor, or hospital record</p> <p>12. Day-care or nursery school record</p> <p>AND</p>	
Page 3, List C	<p>[Page 3]</p> <p>LIST C</p> <p>Documents that Establish Employment Authorization</p> <p>1. A Social Security Account Number card, unless the card includes one of the following restrictions:</p> <ul style="list-style-type: none"> (1) NOT VALID FOR EMPLOYMENT (2) VALID FOR WORK ONLY WITH INS AUTHORIZATION (3) VALID FOR WORK ONLY WITH DHS AUTHORIZATION <p>2. Certification of report of birth issued by the Department of State (Forms DS-1350, FS-545, FS-240)</p> <p>3. Original or certified copy of birth certificate issued by a State, county, municipal authority, or territory of the United States bearing an official seal.</p> <p>4. Native American tribal document</p> <p>5. U.S. Citizen ID Card (Form I-197)</p> <p>6. Identification Card for Use of Resident Citizen in the United States (Form I-179)</p> <p>7. Employment authorization document issued by the Department of Homeland Security.</p>	<p>[Page 3]</p> <p>[no change]</p> <p>7. Employment authorization document issued by the Department of Homeland Security. For examples, see Section 12 of the M-274 on uscis.gov/i-9-central. The Form I-766, Employment Authorization Document, is a List A, Item Number 4, document, not a List C document.</p>
Page 3, Refer to the instructions for more	<p>[Page 3]</p> <p>Refer to the instructions for more information about acceptable receipts.</p>	<p>[Page 3]</p> <p>Acceptable Receipts</p>

information about acceptable receipts.		May be presented in lieu of a document listed above for a temporary period. For receipt validity dates, see the M-274.
	[new]	<ul style="list-style-type: none"> • Receipt for a replacement of a lost, stolen, or damaged List A document. • Form I-94 with “RE” notation or refugee stamp issued to a refugee. • Form I-94 that contains an I-551 stamp issued to a lawful permanent resident and that contains a Form I-551 stamp. <p>OR</p> <p>Receipt for a replacement of a lost, stolen, or damaged List B document.</p> <p>Receipt for a replacement of a lost, stolen, or damaged List C document.</p>



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Comment

Support suggested changes to Form I-9. Will make process and compliance much more efficient and environmentally sound.

Comment ID

USCIS-2006-0068-0531

**Tracking Number**

11q-l7hl-04ci

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Comment

I'd like to comment on another comment that's been posted here (from an anonymous commenter posted on April 7) about their suggestion that "Other Last Names Used" be changed to "Other Names Used" instead. The latter was indeed the way the field was presented on the 2013 version of I-9 (after a bunch of complaints from women that the term "Maiden Name" used on prior versions was "sexist"), and it was very unpopular with members of the transgender community because it made disclosing their "deadname" (the term used in the community for a name associated with their assigned at birth gender) mandatory and thus effectively forced them to out themselves when completing the I-9 (even if all documentation being presented was under the current legal name). After such complaints the "Other Last Names Used" language was used on the 2016 and subsequent versions of I-9, which alleviated the "deadnaming" concern while still requiring previous last names, like maiden names, to be disclosed.

Therefore I am strongly opposed to that commenter's proposal unless either (assuming that all documentation being presented, as well as the employee's Social Security record if E-Verify is used, have been updated to show the changed given name(s)):

1. The instructions clearly state that providing former given names is strictly optional, or
2. The instructions clearly state that providing former given names changed due to gender identity issues (including transgender, non-binary, intersex, etc. employees) is strictly optional.

I realize that some commenters are trying to provide suggestions to make the form more "inclusive"; but you need to be careful and not mandatorily require the disclosure of information that may be of a sensitive/private nature and/or lead to discrimination which is not needed to verify an employee's work eligibility (as what happened with the seemingly innocent change in 2013).

Comment ID

USCIS-2006-0068-0532

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l1r-viuw-8exb

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Comment Submitted by Anonymous (2nd Comment)

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Comment

Another thought regarding the comment from an anonymous commenter on April 7 regarding changing how the name fields are presented: If their intent is asking to provide a field where an employee who (currently) prefers to go by a name different than their legal one to be able to specify it on the I-9, I have no problem whatsoever with that (and that would be welcome to another segment of the transgender community - those who haven't legally changed their name yet). However that should not be conflated with a field asking for former legal names (which is what the current "Other Last Names Used" field is intended for) - and as I said in my other comment the I-9 should not be changed in a way that would require transgender people who have legally changed their name and updated all relevant documentation to provide former given names which are indicative of their transgender status/sex assigned at birth.

Comment ID

USCIS-2006-0068-0533

**Tracking Number**

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Comment

Allow for processing on-line for remote workers.

Comment ID

USCIS-2006-0068-0534

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11u-no46-4n4d

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Comment

I like the ideas to compress Sections I & II and especially like moving Section III to a stand alone.

Comment ID

USCIS-2006-0068-0535

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Comment

About 90% of our employee population is 100% remote. Would love a virtual method for completing the verification section. The authorized agent section almost always comes back incorrect and delays the process significantly.

Comment ID

USCIS-2006-0068-0536

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I1u-pizl-uc3l

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Comment

With remote hires, the ID check is both a burden and non-efficient in its current state. Giving the option of using e-verify as an alternative, or giving more clear directions on how to make it work for remote employees not near another employee would be incredibly helpful.

Comment ID

USCIS-2006-0068-0537

**Tracking Number**

l1u-q0y6-v3ni

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Comment

Allow me to share my experience with this form. At my previous position, at a college, we hired online instructors who worked throughout the US. One of our new instructors actually worked for USCIS/Homeland Security. I asked if she could have someone at her agency sign as our authorized representative for the I9. When I received the executed form from the authorized representative - a person who works for the agency that CREATED the form, it was completed incorrectly. I jokingly said that I wanted dispensation from any errors I may have made on past I9s because if the agency who wrote the form couldn't complete it properly, what chance did I have to do it correctly?! If your own employees can't complete the form - the rest of us are doomed.

Comment ID

USCIS-2006-0068-0538

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Comment Submitted by Joseph Brumley

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Comment

With the rise of a more remote workforce, the physical verification of IDs is our biggest challenge. Several times we've hired individuals who do not live near any other current employee, and while verification over video camera worked during Covid, it's expired, and we're back to having to authorize another individual to verify IDs and sign on our behalf. Even when we do have another employee near a new hire, we have to train them to complete the form each time, rather than having the trained experts in HR handle the forms. We still verify each form before submitting for eVerification, but its become time consuming working through others. It would be much simpler if HR could complete all I9s by being able to verify IDs over a video call.

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Comment

please allow a virtual inspection of documents.

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Comment

DHS needs to make it easier to hire remote workers by implementing Federal remote I9 compliance measures. It hinders hiring by requiring in person id verification. If employers wish to hire remote workers, a business either needs to travel to the new hire, have the new hire travel to them, or hire an outside agent to remain in compliance. This does not help to create jobs.

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There should be wider margins on the form to allow more space to initial and date changes, if applicable.

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Comment

In addition to the proposed changes on the Form I-9, please also consider allowing virtual verifications of documents as a permanent process. With so many employees now working remotely because of the pandemic, I feel allowing the virtual verifications will keep employers in better compliance.

Comment ID

USCIS-2006-0068-0543

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Comment

I-9 VERIFICATION FOR REMOTE EMPLOYEES

I have many clients that have 100% remote employees across the country. I have to assume that there are many employers that are moving to the same structure.

While the in-person verification was waived during the Covid pandemic and is set to expire 4/30/22, employers need a more long term solution and guidance.

There are several companies that are trying to charge employers for servicing in person verifications, but cannot deem themselves to be acceptable under federal regulations, and it is unclear if even this type of verification would be acceptable or create undue liability - AND not all of them covers all 50 states in all areas of each state.

Please provide guidance in this next release and update of the I-9 form and instructions.

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Comment

Please make it clear if employers should retain copies of supporting documents.

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USCIS-2006-0068-0545



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Comment

Please allow for remote I9 document verification. Perhaps remote allowed as long as Everify is completed? As a fully remote company it is difficult to make this work the way it is currently.

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Comment

For the "Signature of Employee" section on page one, I suggest putting the signature of the employee box beneath the "Preparer and/or Translator Certification". This is because new employees often fail to put in their check mark as they consider their part as finished once they signed and dated the form in the box above the "Translator Certification" section.

Suggestion for completing the form on paper for the "List of Acceptable Documents": The descriptions for some of the acceptable documents are fairly long, therefore it would be beneficial to include a "short title" which suits the space in the form (for those who are filling the form out by hand and don't see the auto generated suggestions online).

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Comment

On Page 2, why do you need 'citizenship/immigration' status at the top of the page? Since you only need one document for List A, why have space for additional documents? You don't need that. However, if you must have space for additional information, you could use the space until List A once eliminating the option for additional List A documents.

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Comment

We respectfully ask the agency to review remote capabilities for Form I-9 as our workforce is moving to this set-up and we as employers want to ensure compliance and legal hiring methods.

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Comment

Hello, it would be helpful to clarify the authorized representative definitions. The COVID exception allowed for household members as authorized representatives. Will this continue after the exception period is over?

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Comment

I prefer section 1 and 2 on different sheets of paper. However, I'm all for eliminating the N/A, as well as eliminating the instructions for date formatting. I feel like month/date/year should be suffice and the formatting of mm/dd/yyyy should be eliminated.

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USCIS-2006-0068-0551

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Comment

I am an HR manager, and I think it would be a great idea to simplify the instructions...15 pages is just way too long. Or have 2 sets, a detailed and then a general. Would like to see more specifics on which documents can and can't be expired. I think condensing the form to 1 page (which I think it was many years ago), would be helpful and then the list of acceptable documents on the back. Be able to save a tree when printing the forms for my new hire packets.

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Comment

Virtual completion and verification of identification documents should be acceptable when in person is not possible.

During the pandemic, I was able to accurately and virtually verify documents with no problem or issue, simply by examining them via video. Going back to all 900+ individuals to reverify was a time consuming effort, and it feels unnecessary to continue to require this in person when I know how effective this can be in a virtual environment.

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Comment

I agree with comments I've seen, and would like to just reiterate the need for either removing or enlarging the boxes for the email address and telephone numbers, moving the Preparer and/or Translator box to above the employee signature, and extending the time for submission from 3 days to 5 days. This could also be relevant but possibly excluding the specific date format, as getting a new employee to enter the date a specific way (mm/dd/yyyy) doesn't work all the time.

Comment ID

USCIS-2006-0068-0554

**Tracking Number**

l1w-cikd-iy8l

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Comment Submitted by Dania Zapata

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Comment

On the I9 form when using an electronic version, if a mistake is made in the certification section (manager's name), it does not allow for correction with out re-setting the entire form in order to re-sign it. Often autofill / auto correct / auto caption will change this and can not be corrected. I don't know if this is the way the form is set up electronically or the hiring/ onboarding platform used settings.

Comment ID

USCIS-2006-0068-0555

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Comment Submitted by Jefferson County Commission

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Comment

I would like to see instructions provided for Form I-9 and the built in instructions for the fillable PDF explain how to handle employees with a suffix as part of their legal name (e.g., Jr., III).

Comment ID

USCIS-2006-0068-0556

**Tracking Number**

l1x-o90t-nbio

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Comment Submitted by Anonymous

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Comment

- 1) Add field for E-Verify Case Number and Purge Date. As trained professionals, we know where this is inserted but the form itself is not intuitive on where to place this information.
- 2) If completing electronically through E-Verify, have the Citizenship status auto-populate on the Employer Section.
- 3) Add field for name suffixes (Jr., III, etc.) as this is part of a person's legal name.

Comment ID

USCIS-2006-0068-0557

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Duplicate Comment Submitted by Anonymous

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Comment

- 1) Add field for E-Verify Case Number and Purge Date. As trained professionals, we know where this is inserted but the form itself is not intuitive on where to place this information.
- 2) If completing electronically through E-Verify, have the Citizenship status auto-populate on the Employer Section.
- 3) Add field for name suffixes (Jr., III, etc.) as this is part of a person's legal name.

Comment ID

USCIS-2006-0068-0558

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Comment Submitted by Candy Russell

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Comment

The proposed changes appear to truly simplify/reduce the space being used and are very welcome.

One item not listed as revised is the Preparer and/or Translator Certification. If it is possible to skip the "I did not use a preparer or translator" box it would be incredibly helpful. Once a new hire signs their name they believe the form is completed. Perhaps the Prepared/Translator checkboxes along with the "Fields below must be completed . . ." instruction can be relocated to below the proposed attestation and citizenship/immigration status spaces but above the employee signature line.

I am aware that federal law Check one of the following boxes

I did not use a preparer or translator. A preparer and/or translator(s) assisted

(Fields below must be completed and signed when prepares and/or translators assist

Signature of employee Today's Date

Thank you for considering the changes.

Comment ID

USCIS-2006-0068-0559

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l1x-v4kd-9ajn

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Comment

It would be helpful to also allow employers the opportunity to verify I9 documents via a video call. Or the ability to use some sort of software to verify the documents are valid. CA EDD does this to verify identity. With more and more employers going to a remote workforce, this would be helpful. Not all employees live in a metropolitan area with easy access to resources.

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l1y-2vs8-a2ru

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Comment

The pandemic has show us how difficult it is to comply with the physical inspection of documents requirement for remote workers. Allowing for inspection [of documents] via video or photo (different from photo copy) still enables you to verify authenticity and validate that the person you are hiring is the person represented by the photo ID.

Comment ID

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Comment Submitted by Jane Martin

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Comment

When the E-Verify system has technical issues, the user should receive notification when the system is back on track, in order to not be penalized for a delay (past 3 days) in supplying I9 documentation.

Comment ID

USCIS-2006-0068-0562

**Tracking Number**

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Comment Submitted by Reinsurance Group of America

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Comment

1) In today's virtual world, it has become increasingly more difficult to physically inspect the employee's identity and eligibility documents. We are having to depend on non-employee employer representatives to inspect the documents and complete section 2 of the Form I-9, which leads to other errors and compliance issues. We are an E-Verify employer. Since E-Verify is validating the authenticity of the documentation provided by the employee, I wonder if it's still necessary to see the physical documents in person. It would be amazing if an employer who uses E-Verify to validate the documentation could accept a virtual review or copy of the documents instead of the original. E-Verify would need to be required for such an exception. If an employer didn't want to use E-Verify, they would need to continue performing a physical inspection of the documentation. The company could note the E-Verify number on the Form I-9. Maybe even create a special field for this information.

2) One common oversight by the employee in Section 1 is the Preparer/Translator selection. If this question/item could be moved above the signature line, it would be less likely to be overlooked.

3) We truly appreciate the proposal to remove the "N/A" requirement for blanks. When we receive Form I-9 section 1 from new employees, more times than not they have left blanks and we have to follow-up with them back and forth to ensure all blanks are completed. When the employee is virtual, it adds another level of complexity to the back and forth.

Thank you for the opportunity to provide feedback on the new Form I-9. I look forward to the update!

Comment ID

USCIS-2006-0068-0563

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Comment

Please permanently allow remote/electronic verification of documents.
Also, remove the telephone number and email box. It is not needed.

Going back to a one page I9 is exciting!

Comment ID

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I20-lto8-nxoz

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Comment

Each version of the Form I-9 has had a corresponding Handbook for Employers M-274. It would be extremely helpful if the next Handbook for Employers M-274 had page numbers like rev. 1/22/2017. The current and prior two (2) versions have had no page numbers.

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Comment

Remove the checkbox that states that "I did not use a preparer or translator" from page 1. The Preparer and/or Translator Certification portion of Section 1 is completed when a preparer or translator is used, so why create an extra step for the employee when there are times that they miss checking this box off if they are completing the form manually.

Remove the N/A requirement in option fields.

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Comment

Yes, please remove the N/A requirement. Unnecessary and causes far too much trouble.

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Comment Submitted by Brazos County

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l24-uqxq-ijh5

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Comment Submitted by Anonymous

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Comment

permanently allow remote ID verification. With growing remote employee populations, the burden for verifying in person (or going back for all the remote hires during Covid) is high. asking workers to find a notary and go through that process is high. remote verification has been successful and should be allowed permanently.

Comment ID

USCIS-2006-0068-0569

**Tracking Number**

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Comment Submitted by APC

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Comment

With the explosion of remote work and many employees do not live near the office to provide documents in person, the current verification process is quite cumbersome. Trying to line up a designated representative and provide them with instructions, within the timeframe allotted is almost impossible. I recommend that a virtual verification system of some kind be put in place, or at the very least, give a longer timeframe to complete the process.

Comment ID

USCIS-2006-0068-0570

**Tracking Number**

l25-1zp7-4nmw

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Comment Submitted by Oracle

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Comment

Ability to use an updatable pdf for employees. We currently have the Form I-9 online for employees to complete, anytime DHS changes the Form I-9, we have to RECREATE the form I-9 online, it would save us a lot of time (and money) to be able to use the delivered form i-9 is it was updatable for employees to use online. We have thousand of customers using Oracle's software for tracking employee's I-9.

thank you,
Julie

Comment ID

USCIS-2006-0068-0571

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Comment Submitted by Anonymous

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Comment

Reducing the length of the document is great! I also believe that the new-hire's email address and phone number should be removed from the form, as they are optional anyway.

I find it amusing that there are classes offered on how to complete an I-9 the proper way. Yet, there are such loose guidelines on remote verification. If I have to take a class to learn how to fill out and retain a form that is literally used just to verify that a person is legal to work in the US, doesn't that mean the form is too complex?

With so many people working remotely, and so many businesses finding they are able to keep their businesses productive using remote

employees, some kind of remote verification should be an ongoing process. However, I believe there should be a defined and universal set of guidelines for whom the "authorized representative" can be, especially if the employer is legally responsible for the accuracy and legitimacy of the document. Currently, the remote guidelines are so wishy-washy that some states allow a notary public (without notarizing) to verify documents, while other states allow a relative of the new-hire to verify documents. If the employer does not know the authorized rep, but the new-hire does, what's the point of the whole verification anyway? Wouldn't that make the employer want to ID the rep, too?

Comment ID

USCIS-2006-0068-0572

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Comment

The employment eligibility verification process should keep up with current trends. We should continue reviewing documents virtually as more people are working remotely. This should be a permanent change.

Comment ID

USCIS-2006-0068-0573

**Tracking Number**

I25-tlyz-e39k

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Comment Submitted by Anonymous

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Comment

Can we please do away with the in-person verification requirement? If someone is submitting a document we have every reason to believe that it is in fact genuine, especially when that information is already going to be verified within the E-verify/DHS database anyway. The government already knows who is authorized to be employed in the US; why is the onus placed on the employer to attest that documents appear to be genuine? We are a largely remote company with offices in a handful of states; verifying the documents of people that don't live close to on of our offices is very cumbersome and tedious.

Comment ID

USCIS-2006-0068-0574

**Tracking Number**

l29-7md3-aoda

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Comment Submitted by Alyson Hines

Posted by the **U.S. Citizenship and Immigration Services** on Apr 22, 2022

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Comment

There needs to be better options for remote hires. Many people are not coming back to work in an office and Notaries/ authorized representatives are grossly undertrained to complete these forms. There needs to be a workable remote option for employers.

Comment ID

USCIS-2006-0068-0575

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Comment Submitted by North Central College

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I support this action and think it is not only a reasonable change but a necessary change.

Comment ID

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Comment Submitted by Taylor Walsh

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Comment

Please permanently allow remote/electronic verification of documents. This has been such a nice thing to have during COVID. My company has locations multiple hours away from our HQ, and as the only HR person, it would be nice to be able to do it this way forever. Managers make mistakes and I prefer to be able to do this all within HR.

Comment ID

USCIS-2006-0068-0577

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Comment Submitted by Employment Verification Resources, Inc.

Posted by the **U.S. Citizenship and Immigration Services** on Apr 25, 2022

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Comment

This comment is submitted regarding OMB Control Number 1615-0047 , USCIS and Docket ID USCIS-2006-0068. Please consider removing the Citizenship/Immigration Status box in Section 2. If you are moving towards a one-page document for Sections 1 and 2, it would be redundant since the employee is making this selection in Section 1. The requirement for the employee to insert N/A for Middle Initial, Other Last Names Used and Apt. # is overly burdensome. Consider making these an optional field and not mandatory. Move the checkbox in the Preparer/Translator Section above this section and before the Signature Line for the employee. This is often misunderstood as something the Preparer/Translator is supposed to check off. Thank you for your consideration of these comments.

Comment ID

USCIS-2006-0068-0578

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Comment Submitted by United Church of God

Posted by the **U.S. Citizenship and Immigration Services** on May 5, 2022

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Comment

I've had trouble with employees going ahead and completing portions of section 2 themselves. This was easier to remedy when section 2 was on the back of the page. It would be good if the boxes around each section made a clearer delineation for where the employee should STOP entering information. In the draft, the box for section 2 joins to the section above it, which creates additional confusion. Perhaps a nice thick solid line above section 2 might help make a clearer break.

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USCIS-2006-0068-0579

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Comment Submitted by Anonymous

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Comment

I have worked in Human Resources for a number of years and have completed hundreds of Form I-9s. As it turns out, I worked for an organization in the past that forced me, due to their lack of compliance, to research all regulations about the form. With that knowledge in mind, my comments are below.

I have worked in several organizations and each of them completed the Form I-9 differently. I have had to come in and overhaul numerous processes to make it compliant. I have seen organizations only copy documents instead of completing a pg. 2. I have seen one person view the document and another person sign the form, despite the language at the bottom of the form and threat of penalty of perjury. I have seen copies made and the form completed at a later date. I have seen the employer make corrections to pg. 1 even though only the employee can. More often

than not, I have seen organizations use documents that are unacceptable to complete the form, but it still goes through E-verify. The list goes on. I can guarantee that most organizations are not completing the form in the exact way that USCIS intends it to be completed. The form is not the primary issue - the process is.

I know it says that we are not expected to be document experts, but there are so many, constantly changing rules and regulations related to the form and immigration. Needless to say, it is difficult to keep up with it. Having to see original documents aside, the 3-day rule can be challenging to meet, especially due to confusion from new employees or simple administrative errors. On top of that, the fact that employers can be fined for small mistakes when there is no formal training process other than for E-verify is, in my opinion, unfair. If the idea of the Form I-9 is to be an administrative burden, I can confirm that it is; this can be evidenced by the entire, robust website made just to explain how to complete a 2 page form and a customer service number solely for employers to call to ask questions about the form/documents. That, in my opinion, is ridiculous.

Personally, I would love if the process of confirming employment eligibility was more definitive and easier for employers to handle. Yes, it would be easier if we did not have to see physical documentation as many have suggested, but what would be even easier would be for a new hire to be confirmed by an expert prior to starting, whether that means visiting a designated site with experts who approve their documents, similar to how a notary does with paperwork; or if we only had to complete E-verify instead of the form (although I have seen E-verify make mistakes many times...); or if there was a way to verify without using the burdensome form. I think it would eliminate the administrative and retention issues organizations hold now.

I know some organizations outsource the process of the form to reduce issues, but not all of them can afford that option. In Human Resources, we have so many laws and regulations to follow and keep up with. The Form I-9 seems like an outdated one that can be easily re-vamped to meet organizational needs in 2022.

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USCIS-2006-0068-0580

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Comment

Form I-9: In-person verification of employment documentation

Please consider making the temporary flexibility in requirements related to Form I-9 compliance permanent (see <https://www.ice.gov/news/releases/dhs-announces-flexibility-requirements-related-form-i-9-compliance>). The current flexibilities in place since the beginning of COVID have allowed companies to verify employment documents remotely, which has significantly decreased the overall verification burden and significantly reduced the amount of paper wasted (as all related activities have been able to be completed remotely). Electronic verification has allowed for easier and faster compliance, better record keeping, significantly reduced overhead costs, and higher employment of remote employees.

Please consider that most Government security clearances do not require physical examination of identification documents, as they are able to access online databases to verify the information.

Lastly, please consider that the e-Verify system effectively removes the requirement for physical document examination, as this system immediately verifies the legitimacy and accuracy of the information contained on employment documents. For example, a picture of the employee's passport is shown during verification in e-Verify for the employer to compare against.

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USCIS-2006-0068-0581

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Comment

Please eliminate the need to put N/A on the form in blanks that are optional.

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Comment Submitted by Leah Wright

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Comment

The current I-9 form is overly convoluted. The company I work for is approximately 2/3 remote. The remaining employees work in brick-and-mortar locations, but are serviced by a remote HR department. Too much time is spent with HR coaching managers at the locations on how to properly complete the forms and working with them to complete edits for trivial details, such as N/A not being input into specific fields by the employee.

For our remote employees, we pay \$65 per new employee to a company who walks the employee and a designated representative through the verification process, confirms the form is compliant, then forwards it and the proof copies to us. Because the employees are always remote and will never report to a physical location, which would allow us to verify the documentation in person at a later time, the existing COVID waver is not applicable to our organization. With the prevalence of remote work, I would like to formally request that DHS implement permanent remote

verification procedures that would allow businesses to reduce costs, remain compliant, and verify the documentation by video or photo, even if eVerify is required as a companion process when verifying remotely.

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USCIS-2006-0068-0583

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I31-nbnp-t5tr

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Comment

Hello,

I have a couple of questions on the proposed version of the Form I9.

In section 1 of the I9 within the section of Check one of the following boxes to attest to your citizenship or immigration status you now have one field for the following

Enter USCIS or A-Number, I-94 Number, or Foreign Passport Number and Country of Issuance.

My question is what is permitted in this field to separate these documents. Can these be separated by a comma? or can they be separate by a space?

Next Question: The current I9 will be expired on October 31st of this year. What will be the final date permitted to use the current I9. This is important to our company as we need to make necessary updates and adjust our business processes.

Thank you

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USCIS-2006-0068-0584

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Please remove the need for N/A on the form!

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USCIS-2006-0068-0585

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I30-9ljb-wna9

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Comment

I like the updates to the form. I think that we need to move forward and get rid of the in-person document verification. As you state we are not experts and are to accept the document if we think its valid. It is also unnecessary for companies that do E-Verify. It is just creating more work in our increasing remote work environment.

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USCIS-2006-0068-0586

**Tracking Number**

I39-88dt-v1pq

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Comment

Is there any plan on making the I-9 completion virtually? This should be reviewed especially after COVID-19. It has been impossible to get workers to a location to complete the I-9s in person.

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USCIS-2006-0068-0587

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I3b-nbaf-3ras

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Comment

Considering that COVID-19 has drastically changed the American workforce, employers are currently facing unprecedented challenges finding workers to fill available jobs. The shortage of workers has caused a shift in our labor force causing an increase in hiring of remote workers. As a result, will USICS add an area to the updated I-9 that addresses a process for documenting and memorializing remote hires I-9 processing? If so, will remote employees hired after March of 2020 be required to follow the pre-covid guidelines for document authorization? Specific guidance regarding what is considered an acceptable process, and an updated I-9 form to document these changes is greatly needed.

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USCIS-2006-0068-0588

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Comment

As an HR compliance professional for over 16 years, I have been involved in the Form I-9 process throughout my career. As we look to create the next and latest Form I-9, I would like to propose making it easier for employers and employees to complete the Form I-9 remotely. Many employees now work remotely on a permanent basis, and are hired from day one remotely. Allowing the remote completion of Form I-9 would help to reduce the burden employers face today in I-9 completion for remote employees. I will reference the IRS' (and other US government entities) use of the "ID.me" tool, a helpful and innovative tool to verify identity and identification documents, a seemingly perfect application for completion of Form I-9 as it would verify an individual's identity and ID documents for Section 2. Thank you for your consideration!

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The removal of N/A for blank fields would make the completion of the form much easier. In addition, the date format seems to be a continuous problem as most people do not pay attention to writing it in the required mm/dd/yyyy.

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Comment Submitted by Lee Wlodarczyk

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Comment

I am in favor of the proposed changes to the Employment Eligibility Verification Form. Over the years, we have seen the form go from 1 page to 2 pages, and the instructions go from 3 pages to 15. While the form and the information provided on the form is important, the form/instructions have become burdensome. I hope the decision is made to reduce the number of pages to 1 and reduce the instructions from 15 pages.

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USCIS-2006-0068-0591

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Request that the email address and phone number fields are removed from the form. They are optional so why are we spending the time filling in this information when it is not required? When you complete hundreds of forms a month it is a lot of time spent explaining to the employee they can provide it but it's not required. And if they don't provide it we must enter N/A.

The E-Verify manual states employee's are notified by email if records don't match but my employees are not receiving these emails. Why are they not receiving emails if I am entering the information in E-Verify?

What phone number is an employee suppose to provide their work number, home, cell and who from USCIS is going to call them, for what reason?

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 **PUBLIC SUBMISSION**

Comment Submitted by Erica Thurman

Posted by the **U.S. Citizenship and Immigration Services** on May 24, 2022

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The Form I-9 is currently very burdensome. It is difficult for many new hires to understand, especially those from other countries. The instructions can definitely be condensed and putting them in more common language would also help, especially those for whom English is not their first language.

Additionally, with the significant increase in remote workers, I fully support and advocate for allowing virtual review of documents to become a permanent process without a required physical inspection to follow. The reason for this is that, since the company is ultimately responsible for the validity of the documents, I have more confidence in a virtual review by my company's hiring managers than I do an authorized representative,

which can be anyone at all. When reviewing documents, whether in-person or virtually, the authorized representative has no liability or compelling reason to be truthful whereas the employee of the company does.

Comment ID

USCIS-2006-0068-0593

**Tracking Number**

l3j-3voh-jmul

Comment Details**Received Date**

May 23, 2022

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PUBLIC SUBMISSION

Comment Submitted by Debra Fowler

Posted by the **U.S. Citizenship and Immigration Services** on May 26, 2022

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Remote review of identifying documentation should be allowed for verification of work authorization. Everything else related to onboarding for new hires can be done remotely, why can't this form? This enables companies to hire out of state and opens up a wider pool of candidates and more work opportunities.

Comment ID

USCIS-2006-0068-0594

**Tracking Number**

I3I-s8x3-x27d

Comment Details**Received Date**

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Comment Submitted by Foundation Finance Company

Posted by the **U.S. Citizenship and Immigration Services** on May 27, 2022

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The COVID-19 Pandemic created a need for our business to not only deploy our staff remotely, but to begin recruiting remotely as well. The current workforce we are trying to build is dependent on the ability to hire across the United States. We currently do not verify via Zoom or remote measures, but let me digress on the nightmare of the current I-9 verification process for the employees trying to accurately get these forms filled out.

Notary Publics / banking institutions do NOT want to sign these forms. They will type up a form indicating they've substantiated the authentic documents, but the forms are rarely filled out, and if they are filled out, they are done incorrectly. Employees two time zones away are scurrying to find a way to get this completed before the three day time period has lapsed. We send instructions, sample filled out I-9's, and even print

everything out for them. Still, these are either not filled out correctly or not filled out at all.

Please allow for electronic verification for the I9, and consolidate the necessary information.

Comment ID

USCIS-2006-0068-0595

**Tracking Number**

I3n-iml4-o1c8

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Comment Submitted by Anonymous

Posted by the **U.S. Citizenship and Immigration Services** on May 27, 2022

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To: U.S. Citizenship and Immigration Services, Department of Homeland Security, Form I-9 feedback

Re: Request for Public Input: OMB Control Number 1615-0047; Docket ID USCIS-2006-0068

Thank you for the opportunity to provide feedback about the Form I-9 process. Please see below answers to the questions provided.

- We are proposing that the requirement of employers to physically verify identification and complete the I-9 form be permanently removed. This should be replaced with the requirement for all employers to participate or register for an E-Verify account as it verifies the legitimacy and

accuracy of the information provided as well as photo matching. Note: Please consider that most Government security clearances do not require physical examination of identification documents, as they are able to access online databases to verify the information in which E-Verify centralizes the data from the government databases.

- Please consider removing the Citizenship/Immigration Status box in Section 2. If you are moving towards a one-page document for Sections 1 and 2, it would be redundant since the employee is making this selection in Section 1. Also move the checkbox in the Preparer/Translator Section above this section and before the Signature Line for the employee. This is often misunderstood as something the Preparer/Translator is supposed to check off.
- Please eliminate the need to list N/A in fields that are not required or applicable. The requirement for the employee to insert N/A for Middle Initial, Other Last Names Used and Apt. #, etc. is overly burdensome.
- We agree with the decision to move Section 3 as a supplemental option if needed.
- Consider the possibility that reducing the pages from 15 to 7 creates room for error if the pages that are removed are pertinent in ensuring the I-9 form is completed accurately.

Thank you for your consideration and the opportunity to participate.

Attachments 1



image



Download (https://downloads.regulations.gov/USCIS-2006-0068-0596/attachment_1.png)

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Comment Submitted by Julie

Posted by the **U.S. Citizenship and Immigration Services** on May 27, 2022

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Comment

please employers to use an updatable pdf version. Currently employee enter their Form I-9 information online (we do not use paper) and we had to recreate the form I-9 for employees to complete because we can't use an updatable pdf version.

thank you, Julie

Comment ID

USCIS-2006-0068-0597

**Tracking Number**

l3n-ige5-zb8g

Comment Details**Received Date**

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May 25, 2022

Samantha L. Deshommes
Chief, Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746
www.regulations.gov

Re: Form I-9 Proposed Revisions: Request for Public Input; Docket ID USCIS-2006-0068; OMB
Control Number 1615-0047

Dear Chief Deshommes:

Automatic Data Processing (“ADP”) appreciates the opportunity to comment on the proposed revisions of the Form I-9, Employment Eligibility Verification. ADP supports the proposed revisions and respectfully submits the following comments, noting positive aspects of the proposed changes, along with some potential challenges.

I. Overview

ADP is the nation’s largest payroll and human resources service provider, providing a range of solutions to over 800,000 clients in the U.S., including electronic Form I-9 and E-Verify management (together, “ADP eI-9”).

ADP eI-9 offers employers an effective combination of service and compliance expertise with an integrated technology solution to address the intricacies and the evolving legal landscape of Form I-9 completion and employment verification through E-Verify. ADP eI-9 assists clients via a cloud-based solution, helping clients through every step of the employment verification process. ADP began offering an electronic Form I-9 solution to clients in 1996, and currently serves employers of every size and industry.

ADP has chosen to address a small selection of the proposed revisions presented in USCIS’ Request for Public Input, where ADP believes it can offer the most insight.

II. Positive Impacts

ADP eI-9 clients of all sizes will benefit from the following changes, principally because these changes will mitigate user confusion:

- Combining Sections 1 and 2 into one page and separating out Section 3 will prevent users from erroneously completing Section 3 when it does not apply. Many users mistakenly

believe that Section 3 needs to be completed in all cases simply because it is on the same page as Section 2. Segregating it from Section 2 will help eliminate this problem.

- Eliminating the requirement to enter “N/A” in certain fields and allowing the user to leave them blank will reduce error. For example, many users who do not have a middle name do not know to enter “N/A”, resulting in an incorrectly completed Form I-9. Allowing fields to be left blank when there is nothing to be included in the field is more intuitive and will result in fewer incorrectly completed forms.
- The proposed streamlining of instructions will be beneficial, particularly adding informational links about “List C” documents; List C documents seem to generate the most confusion among users.

III. Potential Challenges

While ADP strongly supports consolidating Sections 1 and 2 into one page, it has some concern about the proposed spacing for certain fields. For instance, the proposed spacing for the Additional Information and Document detail fields could require a font size that is potentially illegible to many and difficult to complete. Additionally, the proposed fields appear disproportionately small compared to other fields, such as name and signature in Section 1, which will almost certainly not require the number of characters as the Additional Information and Document detail fields will.

Finally, given the significance of the changes to the form and instructions, ADP believes employers will need a transition or grace period of at least six months in order to adjust successfully to the new Form I-9. ADP recommends, therefore, that employers be required to use the new Form I-9 no sooner than April 30, 2023 (six months after the October 31, 2022 expiration date of the current version).

Thank you for the opportunity to submit the comments above. We welcome the chance to discuss the comments in greater detail or to answer any questions you may have.

Yours sincerely,

/s/ Mindy O'Toole
Mindy O'Toole
GM, Talent Solutions

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 **PUBLIC SUBMISSION**

Comment Submitted by Jan Harrold

Posted by the **U.S. Citizenship and Immigration Services** on May 31, 2022

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Comment

The real question we should be asking is not the revising of the I-9, but the elimination of the I-9. This form has become more symbolic than anything else and serves no useful purpose by todays standards, other than punishing and fining America's employers. It's simply a revenue generator for our own government. There are 15 million undocumented individuals in the United States, with more arriving everyday, most of whom claim they are here in search of a better life. Furthermore, Americans have become so lazy and entitled, employers find it more and more difficult to find and retain reliable employees.

Our government fails to recognize what could be the answer to Americas "labor shortages". If these undocumented workers are here to work, put them to work and get them off of Americas welfare rolls. Allow them the opportunity to get on an employers payroll were they are forced to pay

taxes like the rest of the employed population. Instead of welfare handouts, provide tax incentives for employers to provide training for these individuals, to include perhaps a citizenship assistance program.

This makes far more sense then allowing many of the undocumented to remain living on the American tax payer dollar year after year, and forcing employers to have to validate and vet their work eligibility, when our own government refuses to follow the rules when allowing them in too the USA in the first place.

God forbid WE make a mistake on an I-9!

Comment ID

USCIS-2006-0068-0599

**Tracking Number**

l3o-t7ia-9lk1

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May 27, 2022

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May 27, 2022

Regarding: Docket Number USCIS-2006-0068

OMB Control Number 1615-0047

On behalf of: The National Payroll Consortium (NPRC)

The National Payroll Consortium (NPRC) is a non-profit professional trade association whose members organizations provide payroll processing and related services over 3 million U.S. employers, representing over 48% of the US workforce. Payroll service providers have long served an important role as a conduit between employers and government authorities. Payroll service providers provide services for completing Form I-9 and E-Verify as a part of the employee onboarding process.

In response to the request for public input regarding DHS Docket No. USCIS-2006-0068, *Agency Information Collection Activities; Revision of a Currently Approved Collection: Employment Eligibility Verification*, we submit the following in response to the questions provided.

- a. The current Form I-9 processes and procedures are heavily reliant on paper record completion and retention. There is an opportunity to integrate current technology to streamline the Form I-9 process. This would be an improvement for employers, third party providers, and USCIS.
 - i. Increased automation of the form may be feasible due to increased security of current technology, this will decrease the total time spent completing Form I-9. Current policies that prohibit auto-population of the Form I-9 are overly restrictive given that most employers have previously collected the same data from employees included in Section 1 Employee Information and Attestation, including name, address, phone, and email. This data can be securely collected from the individual completing Form I-9 and can be edited by the individual for accuracy prior to signing the document.
- b. Additional information on completing section 1 and 2 would be beneficial to employers. Suggestions to decrease the instructions appears to be detrimental to employers. As it stands today you must navigate to the USCIS website to understand the responsibilities of employees and employers in completing the form.
 - i. Suggestions include:
 - 1. Indicating on the form that the Employees Email address, Employee's Email Address, and Employee's Telephone Number are voluntary, either within the box in parenthesis (*voluntary*) or by adding a footnote at the bottom of section 1.
 - 2. Eliminating the "N/A" requirement for the Employee Information. These fields should be left blank.
 - 3. Including the number of digits for Alien Registration Number/USCIS Number and I-94 Admission Number. Additionally, removing the N/A requirement, if one field is populated it is unnecessary for the remaining fields to be populated.
 - 4. In section 2, The employee Info from Section 1 could use additional clarification as to what information should be provided in the

Citizenship/Immigration status box. Perhaps this should state:
Citizenship/immigration status No. 1-4.

- c. Greater clarity on accepted documents; again, decreasing the instructions would be detrimental.
 - i. Questions are frequently asked regarding the forms accepted under List C, number 7, "Employment Authorized Document".
- d. Removing Section 3 from page 2 of the I-9 and separating it into a separate page or form.
 - i. Section 3 is frequently used several months, if not years, after section 1 and 2 are completed, which typically results in a different version of Form I-9 being required regardless.
 - ii. Many employers choose to complete a new Form I-9 for rehires, as opposed to completing section 3 of the I-9, as this creates consistent onboarding practices for all new hires.
 - iii. As the forms do not get sent to USCIS, this would not increase paperwork for the agency. Additionally, forms are typically stored digitally, so this would not increase the paperwork burden on many employers.

We thank you for this opportunity to provide our feedback and experiences in remote verification and would look forward to additional opportunities to provide such feedback and comment on other I-9 and E-Verify processes in the future.

Molly Pruitt, MHR

National Payroll Reporting Consortium, Inc.

859-414-2084

Nprc@nprc-inc.org

www.nprc-inc.org

WASHINGTON DC OFFICE
2112 Pennsylvania Avenue, N.W.
Suite 640
Washington, D.C. 20037
United States
Tel +1 571 536 6700
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May 27, 2022

Samantha Deshommes
Regulatory Coordination Division Chief
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
U.S. Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Re: Revision of a Currently Approved Collection: Employment Eligibility Verification
Department of Homeland Security Docket No. USCIS-2006-0068

Dear Ms. Deshommes:

Berry Appleman & Leiden LLP (BAL) is the leading corporate immigration law firm representing companies and their employees around the world. For four decades, our practice has been devoted to corporate immigration, and our experienced attorneys deliver top-notch, comprehensive immigration services through our proprietary, award-winning technology, Cobalt®. The firm represents some of the world's largest and most complex immigration programs for a wide range of Fortune and Global 500 companies. Using a consultative and strategic approach and best-in-class program management, we not only provide counsel and legal expertise—we power human achievement by providing an experience that makes a positive difference in people's lives.

BAL is pleased to comment on the proposal U.S. Citizenship and Immigration Services (USCIS) published on March 30, 2022 to revise the Form I-9, Employment Eligibility Verification. BAL supports the agency's efforts to streamline the Form I-9. The firm respectfully requests that USCIS update its Lists of Acceptable Documents and continue to modernize the Form I-9 process.

SUPPORT FOR AGENCY FLEXIBILITIES

In March 2020, U.S. Immigration and Customs Enforcement (ICE) provided flexibility to employers operating remotely due to the COVID-19 pandemic and temporarily waived the requirement to review employees' identity and employment authorization documents in the employee's physical presence.¹ The agency has updated and extended the guidance multiple times, and it is now scheduled to expire October 31, 2022. USCIS provided instructions for employers on how to properly annotate the Form I-9 under the

¹ *DHS announces flexibility in requirements related to Form I-9 compliance*, U.S. Immigration and Customs Enforcement (March 20, 2020), <https://www.ice.gov/news/releases/dhs-announces-flexibility-requirements-related-form-i-9-compliance>; see also *ICE announces extension, new employee guidance to I-9 compliance flexibility*, U.S. Immigration and Customs Enforcement (March 31, 2021), <https://www.ice.gov/news/releases/ice-announces-extension-new-employee-guidance-i-9-compliance-flexibility>; *ICE announces extension to I-9 compliance flexibility*, U.S. Immigration and Customs Enforcement (Dec. 15, 2021), <https://www.ice.gov/news/releases/ice-announces-extension-i-9-compliance-flexibility-3>;

policy.² BAL thanks USCIS for providing these instructions and urges both USCIS and ICE to continue to provide guidance to employers as they navigate these unprecedented circumstances.

POLICY RECOMMENDATIONS

USCIS should implement this proposal to simplify the Form I-9 and provide more clarity to employers and employees.

BAL supports the agency's efforts to revise the Form I-9, which is currently scheduled to expire on October 31, 2022, in a way that reduces burdens on employers and employees. The firm appreciates the reduction in length of the form and instructions, which USCIS claims will reduce the overall time needed to complete the form. Consolidating Sections 1 and 2 of the Form I-9 onto one page will also reduce administrative burdens associated with retaining the Form I-9 for many employers. BAL welcomes the agency's proposal to add information about acceptable receipts and the M-274 Handbook for Employers to the Lists of Acceptable Documents on the Form I-9. These additions are helpful reminders to both employers and employees of the other sources of USCIS guidance on acceptable I-9 documents.

BAL supports the agency's proposal to discontinue the use of the term "alien" in the citizenship status attestation in Section 1, in line with the Biden administration's policy goals. However, the similarity between the language in Item Number 2 – "A noncitizen national of the United States (see instructions)" – and Item Number 4 – "A noncitizen (other than **Item Number 2.** and **3.** above) authorized to work until (exp. date, if any)" – may create confusion for individuals who should check Item Number 4 and may not be aware of the definition of "noncitizen national." We recommend taking steps to provide clarity on the form to minimize incorrect attestations by employees (e.g., by including language defining "noncitizen national" on the form, or using the term "foreign national" instead of "noncitizen" in Item Number 4).

USCIS should update its Lists of Acceptable Documents to accept electronic documents.

BAL respectfully requests that USCIS continue to explore options to provide flexibility to employers and employees. USCIS generally requires employees to present original, hard copy documents, with very limited exceptions. BAL encourages the agency to revisit this policy to account for the fact that USCIS and other agencies commonly issue documents electronically.

Particularly during the pandemic, USCIS has been delayed in mailing physical approval notices and other documents because of both agency and postal delays. The firm proposes that USCIS issue guidance and update the M-274 Handbook for Employers to expand the ability of employers to accept certain reliable electronic documents. For example, the electronic approval notice issued by USCIS should constitute an

² *Form I-9 Examples Related to Temporary COVID-19 Policies*, U.S. Citizenship and Immigration Services (Nov. 24, 2020), <https://www.uscis.gov/i-9-central/form-i-9-examples-related-to-temporary-covid-19-policies>.

acceptable document evidencing work authorization for Form I-9 purposes. This action would prevent gaps in employment for employees who have received an electronic approval notice from USCIS, but due to delays outside their control have not yet received the hard-copy notice. In addition, USCIS should issue guidance clarifying that documents that originate electronically – for example, the Form I-20 issued by the Student and Exchange Visitor Program (SEVP) – do not need to be printed out in order to be valid for I-9 purposes.

USCIS should modernize the Form I-9 process by transitioning to an electronic environment.

We understand the agency has longer-term goals to modernize the Form I-9 process. The current Form I-9, Employment Eligibility Verification process is outdated and requires employers to verify the identity and employment authorization of hires in the U.S. by physically reviewing original documents in the employee's presence. Though many companies complete the Form I-9 using software providers, employers generally must continue to rely on a paper-based process that requires physical review of original documents. Employers enrolled in E-Verify must then separately create a case in that system using the information from the Form I-9.

BAL encourages the agency to modernize the Form I-9 process and transition to an electronic environment. We thank USCIS for issuing its Request for Public Input in October 2021 to gather feedback about employers' experiences conducting I-9 verifications remotely during the COVID-19 pandemic. We are encouraged that the agency's regulatory agenda includes a proposed regulation, "Optional Alternative to the Physical Examination Associated With Employment Eligibility Verification (Form I-9)."

Multiple companies that have relied on the temporary ICE policy provided positive feedback to BAL about their experiences conducting verifications remotely (e.g., over video link, fax or e-mail, etc.). They expressed strong support for making remote verification available permanently, to improve the process for both employers and employees. Employers' ability to centralize Form I-9 processing within their HR department, where trained I-9 experts can review employees' documents and complete Sections 2 and 3 of the form, provided significant benefits.

Employers that relied on the "authorized representative" option, either for the initial or subsequent in-person review of documents, faced multiple administrative challenges and burdens which we described in our response to the RFI. Both employers and employees generally had a better experience with the virtual verification than the authorized representative model, and employers found that the accuracy and integrity of their I-9 programs remained intact.

Finally, employers that remain eligible to rely on the "virtual" inspection option have concerns about their ability to physically review documents within 3 days of termination of the policy, as many have onboarded thousands of employees during the pandemic. The agencies should provide additional guidance about this requirement and consider waiving it. In multiple other sensitive settings, government entities and other institutions have transitioned away from in-person requirements (e.g., court proceedings, medical

appointments). BAL encourages USCIS to similarly adapt the Form I-9 process, while maintaining its integrity.

CONCLUSION

BAL thanks USCIS for proposing these needed revisions to the Form I-9 and for engaging in longer term efforts to improve and modernize the employment eligibility verification process. We appreciate the agency's consideration of the above comments. Please contact our Government Strategies team at BALGov@bal.com if you have any questions.

Sincerely,

BERRY APPLEMAN & LEIDEN LLP (BAL)



Comments on U.S. Citizenship and Immigration Services Revision of a Currently Approved Collection: Employment Eligibility Verification

May 31, 2022

Workday is pleased to provide comments to the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS) on its [Revision of a Currently Approved Collection: Employment Eligibility Verification](#) (OMB Control Number 1615-0047, USCIS Docket ID USCIS-2006-0068).

[Workday](#) is a leading provider of enterprise cloud applications for finance and human resources, helping customers adapt and thrive in a changing world. Workday applications for financial management, human resources, planning, spend management, and analytics have been adopted by thousands of organizations around the world and across industries—from medium-sized businesses to more than 50% of the *Fortune* 500. Workdays serves more than 9,500 customers globally, with a customer community representing over 60 million workers.

Through our flagship human capital management (HCM) suite, we offer electronic Form I-9 services to our enterprise customer-employers. We offer comments based on our experience working with approximately 2,000 medium and large enterprise customers to develop, deliver, and maintain electronic Form I-9 services in Workday software.

Thank you for the opportunity to provide our feedback. If you have any questions or if we can provide further information, please do not hesitate to contact Lev Sugarman, Workday Legal, Compliance, & Corporate Affairs, at lev.sugarman@workday.com.

I. Allow adequate time for electronic Form I-9 providers to adopt the revised form.

As it has for past Form I-9 revisions, **USCIS should provide at least a 6-month grace period to adopt the revised version of Form I-9.** This time is especially crucial for electronic Form I-9 providers to enable a successful transition of customers from the current form to the new version, a process that can be complex and lengthy for electronic Form I-9 providers like Workday. To transition to a new Form I-9, we must develop new software functionality for a new form, provide adequate time for customer testing of the new functionality in a separate testing environment, provide ample time for customers to manage “in-flight” forms, release the functionality to customers, and provide adequate time for customer adoption of the new functionality itself. Additionally, technical implementation complexities involving printing, audit

compliance, and old form Section 3 completions further increase the need for at least a 6-month grace period for revised form adoption.

Providing such a grace period would be in line with past USCIS policy. For example, upon release of the 2019 Form I-9 revision, the 2017 form was set to expire on August 31, 2019—yet employers were able to continue using the 2017 form until April 30, 2020. Further, the substantial nature of the proposed revisions especially necessitates such an accommodation.

II. Some revisions could increase paper usage for electronic Form I-9 providers.

We understand that while the USCIS information collection notice is undertaken in accordance with the Paperwork Reduction Act of 1995, the scope of the notice additionally includes the practical utility of the proposed Form I-9 changes and their potential burden on the public, including, e.g., actual paper usage and waste. For electronic Form I-9 providers, certain revisions could *increase* paper usage and waste.

Form I-9 revisions that reduce the number of fields or otherwise combine existing fields would create challenges for implementing the revised form in electronic format. For example, when more than one Section 1 Preparer/Translator is used, the revised form no longer offers a supplemental form. Rather, for each additional Preparer/Translator used, the information must be added to an altogether new Form I-9. Therefore, for Form I-9 processes requiring printing (e.g., auditing and document retention), if more than a certain number of Preparers/Translators are used, the revised form would necessitate printing additional pages per worker, with each subsequent form after the first being entirely blank except for the Preparer/Translator section. This could result in more paper usage and practical complexity than the current supplemental form, which consolidates any number of additional Preparers/Translators in a single page.

To decrease complexity and burden on respondents, **USCIS should consider the impact of this change on the number of pages printed when multiple Preparer/Translators are used, and if net more printing would result, consider retaining the current Preparer/Translator supplemental form.**

III. Some revisions could increase errors and incorrect entries on Form I-9.

Based on our experience in helping thousands of employer-customers correctly complete Form I-9, we see the potential for certain revisions to increase the number of errors and incorrect entries on the form.

For example, the revised form's removal of the List A(3) document section may increase confusion among respondents that List A(3) documentation must be provided for a given employee, because there is no space to specifically enter this information. Even if a respondent correctly identifies the "Additional Information" section to enter List A(3) documentation, there remains a heightened risk of errors or incomplete information due to the lack of specific instructions detailing exactly what information is required for this category of documentation. Further, the "Additional Information" section does not provide fields for document expiration dates, which are crucial for ensuring eligibility of List A(3) documentation.

USCIS should consider retaining the List A(3) documentation section, or at least provide specific guidance for providing such documentation, along with creating expiration date fields in the revised "Additional Information" section.

The increased potential for such errors resulting from the form revisions can cause significant delays in processing Form I-9, and could even result in an inaccurate "Employment Not Authorized" status for an employee. While the proposed revisions may streamline the form's length, they should not come at the expense of diminished form clarity, increased error rates, and an overall higher burden on employees, employers, and electronic Form I-9 providers.

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[Docket \(/docket/USCIS-2006-0068\)](/docket/USCIS-2006-0068) / [Document \(USCIS-2006-0068-0422\) \(/document/USCIS-2006-0068-0422\)](/document/USCIS-2006-0068-0422) / [Comment](#)



PUBLIC SUBMISSION

Comment Submitted by Tina Spears

Posted by the **U.S. Citizenship and Immigration Services** on May 31, 2022

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Comment

Changes to Federal Form I9 appear concise however, there may be cause for confusion in the following areas:

Section One:

Combining the areas where the employee places either a USCIS or A-Number, I-94 Number, or Foreign Passport Number and Country of Issuance may be overlooked or completed incorrectly if the HR representative or designee is not alert and remembers this must be completed for those identifying as a "Noncitizen authorized to work - formerly, Alien Authorized to Work)

Section 2

For F1 students there are typically three forms they present (I-20, I-94 and the Foreign Passport) however, there are only three areas for document collection on the form under List A. Leaving "Additional Information" to capture the third document may result in confusion and incorrectly completed forms.

Comment ID

USCIS-2006-0068-0603

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l3t-zd6o-wau8

Comment Details**Received Date**

May 31, 2022

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Comment Submitted by Anonymous

Posted by the **U.S. Citizenship and Immigration Services** on May 31, 2022

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2 things that I do not like

Citizenship status number 4 previously Alien Authorized to Work now being a noncitizen (other than Item Number 2. and 3. above) - using this change in language is going to make the I9 even more confusing and lead to a lot more errors on the employees part now since you have two categories that are so similar in name. this should stay Alien Authorized to Work

In Section 3 there are only 2 List A documents instead of the three that there used to be. if and Alien Authorized to Work is working and the docs are Foreign Passport, I94, and I20. the note states that all additional docs should be put in the additional information box. I know you guys still

believe that everyone does a paper I9 or provides guidance only dealing with paper, but employers that use electronic I9 storage are potentially not going to be able to capture I20 expiration date for the purposes of reverification. Especially if the I94 expiration date is D/S. How would you recommend these dates be stored in order to make sure we are properly reverifying on time?

Comment ID

USCIS-2006-0068-0604

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l3u-7a3r-xmco

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Comment Submitted by New Mexico State University

Posted by the **U.S. Citizenship and Immigration Services** on Jun 1, 2022

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We applaud the intention to reduce the amount of paper involved with completing I-9s for employees. However, upon review of the form, we noticed that the compression of the form created several issues that would impede the accurate completion of I-9s.

There is little visual separation between the sections, making it difficult for employees/employers to determine which section they should complete. In a quick test, 5 out of 7 employees went on to complete the preparer/translator certification and 3 of those employees started to fill out section 2. This was in an office that processes I-9s daily, so it will be much more difficult it will be for employees who are not used to completing this document. Clearer definition between the sections would reduce this issue.

Removing the third document option from the Section 2 List A documents makes it difficult to have complete and correct information for our international employees. As a university we hire a large number of international students, and most are required to present three documents. Having to write the information in the Additional Information box makes it harder for our I-9 system to track the expiration date, and cuts down on the room available for extensions, and necessary comments. As the Additional Information box is already greatly reduced in size, it becomes difficult for us to fit all the required information.

Perhaps the largest issue that this form faces, there is no room for corrections. Of the seven employees that did a quick test, all of them had issues with correcting the form. Any document with a long name, or issuing authority took up the entire line, and since the lines are so narrow, there is no room to provide any corrections. If corrections need to be made to any information in section 2, it would require a second Section 2 completed due to having no room to make corrections.

The updated Acceptable Document list is much more readable and the list of acceptable receipts is nice to have present to be able to provide to an employee. The shortening of the instructions is also a good change as it makes it easier for our employees to read and comprehend what they should do, especially those for whom English is not their native language.

We like many other commenters would appreciate having the ability to permanently remotely view documents for our employees not living in the area.

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USCIS-2006-0068-0605

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l3u-clsb-r6vl

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Comment Submitted by Anonymous

Posted by the **U.S. Citizenship and Immigration Services** on Jun 1, 2022

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I am glad you shortened the instructions so maybe more New employees will read them and it will be less work for my HR staff to get these forms completed in 3 days. My staff also likes that Section 3 was removed and Sections 1/2 are on one page now.

Ways to improve Section 1:

It doesn't make sense that the email field is OPTIONAL on Form I-9 but required in E-Verify and when my HR staff enters the email address in E-Verify - as required- the New employees do not receive any notifications. Can you explain this government requirement?

The Form I-9 instructions, Page 3 of 15, state Employee's E-mail Address (Optional) and Employee's Telephone Number (Optional) but Optional is not shown in Section 1 in the field boxes. The same for this new version, Optional is not in the field boxes. USCIS should remove these fields from the form if they are optional or at least have Optional on the Form I-9 in the boxes and not hidden in the instructions. The new instructions state if you give the email address and telephone number in Section 1 you will receive notifications for E-Verify cases but which employees will receive notifications and it does not specify mobile phone number.

Ways to improve Section 2:

My staff uses an electronic form now but sometimes have to use paper forms as a back up and those boxes for the document information seem really small and hard to read. We also use the Additional Information box a lot and it also looks smaller then the current one can you not make it smaller.

Move the Employer signature date to the right side of the page so that all dates are on the right side.

Ways to improve the Supplement:

Move the Employer signature date to the right side of the page so that all dates are on the right side.

Thank you for allowing for comments.

Comment ID

USCIS-2006-0068-0606

**Tracking Number**

l3u-d8y9-y3xf

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Via Federal eRulemaking Portal: www.regulations.gov

Samantha L Deshommes, Chief
Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
5900 Capital Gateway Drive
Camp Springs, MD 20746

Re: Comments of the Center for Workplace Compliance on U.S. Citizenship and Immigration Services' Proposed Revision of the Current Form I-9 (OMB Control Number 1615-0047, USCIS-2006-0068)

Dear Ms. Deshommes:

The Center for Workplace Compliance (CWC) welcomes the opportunity to provide the following comments regarding the U.S. Citizenship and Immigration Services' (USCIS) proposed revision of the current Form I-9 before its expiration on October 31, 2022, as published in the *Federal Register* on March 30, 2022.¹

As described in more detail below, CWC supports the changes proposed by USCIS that will streamline the Form I-9 and provide additional details that will help employers ensure compliance when completing the form. In addition, CWC reiterates its strong support for USCIS' efforts to make permanent the option for employers to review employee identity and work authorization documents remotely while completing the Form I-9. CWC encourages the agency to consider including information related to remote verification in both the Form I-9 itself as well as in the accompanying instructions.

Statement of Interest

CWC² is the nation's leading nonprofit association of employers dedicated exclusively to helping its member companies develop practical and effective programs for ensuring compliance with fair employment and other workplace requirements. Formed in 1976, CWC's membership includes approximately 200 major U.S. employers, collectively providing employment to millions of workers. CWC's members are firmly committed to nondiscrimination and equal employment opportunity.

All CWC member companies are subject to the employment eligibility verification requirements contained in 8 U.S.C. § 1324a. In addition, the vast majority are also federal contractors subject to the mandatory E-Verify requirements imposed by Executive Order 13465. As such, CWC members have extensive practical knowledge and experience in completing the Form I-9.

CWC Supports Proposed Revisions of Form I-9

USCIS has proposed several revisions to the Form I-9. While each proposed revision is relatively modest, because the Form I-9 is used for every new hire in the United States even minor improvements in

¹ 87 Fed. Reg. 18,377 (March 30, 2022).

² Formerly the Equal Employment Advisory Council (EEAC).

clarity and function will have a significant beneficial impact and enhance compliance. CWC is pleased to support the proposed revisions. Specifically, the revisions CWC supports include the following:

Compressing Sections 1 and 2 – USCIS has proposed revising the Form I-9 so that Sections 1 and 2 will be on the same page and Section 3 will now be contained in a separate supplement to be utilized only when necessary. For employers that complete paper I-9s, this will lessen the record retention burden.

Simplifying Instructions – USCIS has proposed to shorten the Form I-9 instructions from 15 pages to 7 pages by eliminating unnecessary and sometimes confusing instructions. This proposed change will save both time and resources by those who must read and potentially print out the instructions while also improving the clarity of the instructions.

Enhanced Utility – USCIS has proposed removing electronic PDF enhancements to ensure that the Form I-9 is not software dependent and can be completed on all electronic devices. Most CWC members use electronic versions of Form I-9 and the proposed changes would be a welcome update.

Updated List of Acceptable Documents – USCIS has proposed updating the List of Acceptable Documents to include a link to List C documents (documents that establish employment authorization) issued by DHS. USCIS has also proposed adding descriptions of acceptable receipts that may be used as List A, List B, or List C documents.³ These proposed changes will make it easier for employers to comply with the verification requirement.

Remove Requirement to Enter “N/A” – USCIS has proposed eliminating the current requirement for employees and employers to enter “N/A” in each field that is not applicable or for which there is no information. This is a sensible update to the current instructions under which employers and employees are required to include N/A in every blank field or risk non-compliance and potential penalties.

CWC Encourages USCIS To Include Information on Remote Document Examination in the Form I-9 and Accompanying Instructions Should the Agency Ultimately Make That Option Permanent

On December 27, 2021, CWC responded to USCIS’ Request for Public Input (USCIS-2021-0022) expressing strong support for the option of being able to continue to utilize a remote process for I-9 documentation verification and we encouraged the agency to make this policy permanent. In that response, CWC emphasized how such a policy would greatly relieve the administrative burden on both employers and employees during the onboarding process for remote positions, especially when the individual is physically located far from the employer’s nearest administrative office. As more and more employers elect to keep positions in their company in a permanent remote posture or designate newly created positions permanently remote, having the option for remote document examination would greatly improve the efficiency of Form I-9 completion.

If this option is adopted, CWC encourages USCIS to include information about the remote verification option in both the Form I-9 itself as well as in the accompanying instructions. For example, the I-9 should be updated to include a separate section that solicits information on whether an employer used the remote

³ The receipts are listed in 8 C.F.R. § 274a.2(b)(1)(vi)(A)-(C).

Samantha Deshommes
May 31, 2022
Page 3

option, and if so by what method. Likewise, including information on how best to remotely verify employee documents in the I-9 instructions would help ensure compliance.

Conclusion

CWC appreciates the opportunity to offer these comments regarding USCIS' proposed revision of the current Form I-9. Please do not hesitate to contact me if we can provide further assistance as you consider these important issues.

Sincerely,



Michael P. Bracken
Assistant General Counsel
Center for Workplace Compliance



May 31, 2022

Samantha Deshommes
Chief, USCIS, Office of Policy and Strategy
Regulatory Coordination Division
U.S. Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Submitted via www.regulations.gov
e- Docket ID number USCIS–2006–0068.

RE: Agency Information Collection Activities; Revision of a Currently Approved Collection: Employment Eligibility Verification, OMB Control Number 1615-0047, USCIS Docket No.: USCIS-2006-068 – Proposed Changes to Form I-9, Employment Eligibility Verification

Dear Ms. Deshommes:

[SHRM](#), the Society for Human Resource Management, is the foremost expert, convener and thought leader on issues impacting today's evolving workplaces. With 300,000+ HR and business executive members in 165 countries, SHRM impacts the lives of more than 115 million workers and families globally. SHRM advocates for policies that promote efficiency and fairness in the workplace and support businesses in optimizing their talent pool.

We appreciate the invitation from the U.S. Citizenship and Immigration Services (“USCIS”) and the U.S. Department of Homeland Security (“DHS”) to comment on its proposed update to the Form I-9. With the vast transformation of information technology since the Form I-9 was first promulgated, SHRM believes the employment-verification system should reflect the modern American workplace. In designing an updated Form I-9, SHRM believes DHS has an opportunity to help honest, law-abiding employers avoid both technical and substantive paperwork violations, so that the U.S. Immigration and Customs Enforcement (“ICE”) can focus its resources on exploitative, bad-faith actors in the labor market. This objective is in alignment with Secretary Mayorkas’ October 12, 2021, memorandum on worksite enforcement ([Policy Statement 065-06](#)), that DHS’s immigration agencies focus their efforts on prioritizing worker protection and the U.S. labor market. Therefore, SHRM respectfully submits this comment on behalf of our 300,000+ members many of whom regularly use the Form I-9 when employing workers legally authorized to work in the United States.

1. Permanent Virtual Completion of the Form I-9

SHRM urges DHS and USCIS to align its Form I-9 revisions to enable permanent virtual completion of the Form I-9, eliminating the current USCIS requirement of in-person inspection of documents to identity and employment authorization documents. Due to the increased utilization of electronic I-9 systems, SHRM asks that USCIS consider this trend when updating Form I-9, particularly as the agency currently does not offer an I-9 electronic signature and storage solution directly.

As noted in SHRM’s [response](#) to USCIS’ [Request for Public Input on Remote Document Examination for Form I-9, Employment Eligibility Verification](#), we strongly urge USCIS to create a centrally located, comprehensive and easily accessible catalog of acceptable documents. Despite reluctance to integrate newly permitted or temporarily acceptable document combinations in the Lists of Acceptable Documents (“LOAD”) itself, SHRM believes the employment verification process would vastly improve with a centralized, searchable and well-indexed repository for all information updates and specimens relating to acceptable documents.

2. Overview Review of the Proposed Updates to the Form I-9

Mindful of the broader objective of effectuating a Form I-9 process that offers employers the most efficient and least burdensome processes to verify employment eligibility, while also protecting workers from unlawful discriminatory practices, SHRM offers the following comments on the proposed updates to the Form I-9:

a. Reduction of Form Size

While we recognize that the proposed reduction of the Form I-9 from two pages to one page is intended to improve the experience of employers and employees in preparing the Form, we are concerned that this step may take away needed space to ensure the clarity, efficiency and accuracy of the information entered by users. We ask that USCIS consider the following justifications for having more space on the Form I-9:

1. Spreading out the information greatly assists HR professionals in understanding the information required and the appropriate fields in which to enter the information. Particularly in Sections 2 and 3 of the Form I-9.
2. Conversely, concentrating the Form I-9 in the proposed manner will increase confusion and the risk of errors.
3. It may be difficult for electronic I-9 software vendors to put all the necessary information in smaller spaces due to font size and character limitations.

b. Additional Information to Comply with Anti-Discrimination Notice

We agree with USCIS' updates to the anti-discrimination notice on the Form I-9 advising employers to accept any acceptable document or combination of documents. However, information on the specific acceptable documents and document combinations must be included in the Form I-9. This will assist employees and employers to avoid discrimination as both parties will be well informed with sufficient information to comply.

c. Access to Information on Instructions

We agree with streamlining the Form I-9 instructions as the current 15-page length is excessive. We suggest also directing employers to a dedicated webpage maintained by USCIS as a "single source of truth" as this will give the public two reliable and regularly updated reference options for instructions.

In addition, including consolidated information on E-Verify is welcomed; however, this section requires further updates, including references to when an E-Verify case must be "held" due to recording a receipt, a missing social security number, etc. Additionally, the guidance referencing the mandatory retention of certain documents should detail the requirement of copying and maintaining all List A documents.

Further, the statement "Form I-9 may be generated, signed and retained electronically, in compliance with the Department of Homeland Security Regulations at 8 CFR 274.a.2" should include a reminder to employers creating or storing I-9s "electronically", to review the standards for electronic retention of Form I-9 data including electronic signature, security, and documentation requirements.

d. Lists of Acceptable Documents

We applaud USCIS for adding the Acceptable Receipts Category on page 3 of the proposed Form I-9. We request for the form to also mention the ability to accept temporary documents including auto extensions and certain expired documents (or combinations).

Currently, the LOAD does not include policy changes to acceptable documents creating confusion and enhancing the prospect of unwarranted scrutiny in investigations by the U.S. Department of Justice's Immigrant and Employee Rights (IER) section. Many times, IER investigations of unfair documentary practices often occur when employers and other I-9 completers, simply did not recognize and accept a particular acceptable document that was not listed in the LOAD, including innocent rejection of an expired document that has been automatically extended through USCIS communications.

This concern is heightened because the form clearly states in bold letters:

LIST OF ALL ACCEPTABLE DOCUMENTS
All documents must be UNEXPIRED

For example, an acceptable List A Document is an expired Permanent Resident Card presented along with an I-797C, Notice of Action for the Form I-90, however, the current LOAD suggests that it would not be acceptable. Other examples include employees with automatic extended Employment Authorization Documents (“EADs”) who may be informed the expired EAD is not an acceptable document even after presenting the expired EAD card with a qualifying I-797C notice.

In addition, there are significant gaps in the instructions that are not effectively captured in the LOAD, such as temporary authorization documents, and USCIS guidance that affects the acceptability and application of presented documents, including various COVID-19 temporary guidance and the USCIS’ [recent policy update](#) to increase automatic extension period of work permits for certain applicants.

e. Proposed Updates to Section 1 of the Form I-9 Form

We offer the following updates to section 1 of the Form I-9 Form:

- **Email Address/Telephone Number:** We request that these boxes are labeled as optional for clarity, as there are employees that may not have access to an email address and/or a telephone.

Social Security Numbers: We suggest maintaining the boxes for each social security number to ensure that the correct number of digits is entered. Clarification that “dashes” are optional would be welcomed.

- **Citizenship/Immigration Status Box 4 Noncitizen:** In this citizenship/immigration status section, consider including a box for an employee to check if they are authorized to work indefinitely, thereby replacing the instruction for certain employees to enter N/A in the expiration date field.
- **Citizenship/Immigration Status nomenclature:** With the change of “Alien authorized to work” to “A noncitizen authorized to work,” we anticipate employees may be confused as to which immigration status they should select. Many employees already inaccurately select “A noncitizen national of the United States,” and the new similarity in the terminology will likely only increase such confusion. While the new proposed Form includes “(see Instructions)” and “(other than Item Number 2 and 3 above),” USCIS should consider adding language to Item 2 on the Form itself such as, “including individuals born in American Samoa, certain former citizens of the former Trust Territory of the Pacific Islands, and certain children of noncitizen nationals born abroad” or some shortened version of same.
- **“Noncitizen Authorized to Work” Field:** We anticipate problems in the way “noncitizen authorized to work” information is requested. Specifically, including only one field for entering the USCIS or A-number, I-94 number, or Foreign Passport Number and Country of Issuance will likely result in missing information. We suggest that the form continue to offer separate fields so that the employee is provided with each applicable option, to ensure the employee does not record too little or too much information. The current format with the “or” between the choices should remain. In addition, for electronic I-9s, the combination of these fields into one “blank” negatively affects validation technology put in place to ensure employees cannot unintentionally record invalid numbers and would be a step backward for compliance-focused employers.

a. Proposed Updates to Section 2 of the Form I-9 Form

We offer the following updates to section 2 of the Form I-9 Form:

- **Start Time:** Consider adding clarifying language to confirm Section 2 may be completed prior to the employee’s first day of work for pay or when an offer and acceptance have been completed.

Category Code: Add a field in List A for EAD category code, if applicable, and include a directive in the instructions to record what has become a very important data point for verifications based on auto-extensions. Or in the alternative consider adding space for this in the Additional Information Box.

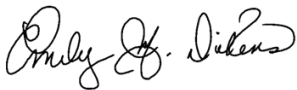
- **In-person Signature Section:** Consider adding a second box for signature, to accommodate all of the COVID-19 updates that will be made when employees return to worksites and present documents in person. This second

certification box could also be used for I-9 completers making substantive corrections/updates to Section 2 of the I-9 and augment instructions to “initial and date”.

- **PDF Fillable Dropdowns:** Ensure the List A, B, and C dropdown boxes (at a minimum, following the [USCIS Who is Issued this Document Matrix](#)) are still offered. This assistance is critical to decreasing errors.
- **In-person Indicator:** The Certification can also have a check box to confirm if the documents were reviewed virtually or in person, especially in light of the potential ability to complete a Form I-9 remotely in the future.
- **Changed Start Dates:** A requirement to update the *First day of Employment* field when an employee’s start date shifts is an elective USCIS policy and not a regulatory mandate. Since the I-9 can be completed after an offer and acceptance is made, we ask USCIS to consider maintaining this field optional. In certain industries, employees often delay their start date, often multiple times. In addition for ICE audits, internal audits, payrolls and rosters calculating the date of late completions rather than the date on the form, would make the start date less critical.

We thank DHS and USCIS for this invitation to comment on the updated Form I-9. We hope that our comments will offer a roadmap leading to a modernized Form I-9 that enhances the ability of employers to comply fully with employment verification requirements. SHRM is ready to continue partnering with DHS and USCIS to offer expertise and the collective experience of our membership to ensure the final regulation reflects the reality of today and tomorrow's U.S. workforce, HR processes, and current and emerging technology.


Sincerely,




Emily M. Dickens
*Chief of Staff, Head of Government Affairs
& Corporate Secretary*



NATIONAL OFFICE

 6400 Arlington Blvd, Ste 400
Falls Church, VA 22042

 Justice@tahirih.org

 571 -282 -6161 (p)
571 -282 -6162 (f)

May 31, 2022

Submitted via <https://www.regulations.gov/>

Re: Comments in Response to Agency Information Collection Activities; Revision of a Currently Approved Collection: Employment Eligibility Verification, 87 Fed. Reg. 18,377 (March 30, 2022); OMB Control Number 1615-0047; Document Number: 2022-06687; Docket No. USCIS-2006-0068

The Tahirih Justice Center¹ (Tahirih) submits the following comments to the Department of Homeland Security (DHS) in response to the Form I-9 extension listed above.² Tahirih appreciates the proposed revisions to Form I-9, Employment Eligibility Verification. However, we urge DHS to update Form I-9 and its instructions to clarify that both the I-94 card given to people who have received asylum and the Employment Authorization Document coupled with a receipt notice providing for its extension are valid forms of work authorization.

I. Introduction

Tahirih is a national, nonpartisan policy and direct services organization that has served more than 30,000 survivors of gender-based violence and their families since its inception in 1997. Our clients are survivors of gender-based violence, including domestic violence, rape and sexual torture, forced marriage, human trafficking, widow rituals, female

¹ <https://www.tahirih.org/>.

² All sources cited in this comment—including, but not limited to, court opinions, legislative history, and secondary sources—are to be considered part of the administrative record.

genital mutilation/cutting (FGM/C), and so-called “honor” crimes.³

Tahirih provides free legal and social services to help our clients find safety and justice as they engage in the daunting, courageous, and rewarding work of rebuilding their lives and contributing to their communities as illustrated by our clients’ stories. Since its founding, Tahirih has also served as an expert resource for the media, Congress, policymakers, and others on immigration remedies for survivors fleeing gender-based violence. See, e.g., Tahirih Justice Center, *Tahirih in the News*;⁴ Tahirih Justice Center, *Congressional Testimony*;⁵ Tahirih Justice Center, *Comments*.⁶

II. The Form I-9 Should Clarify That People with Asylum Are Authorized to Work

People with asylum are inherently authorized to work, 8 C.F.R. § 274a.12(a)(5), yet the lack of clarity in Form I-9 leads many employers to mistakenly reject legitimate asylee documentation of work authorization. Form I-9 and its instructions should be corrected to reflect that evidence of asylum status is sufficient to prove an asylee’s eligibility to work.

An asylee’s I-94 card is a qualified List C document,⁷ but employers frequently reject an asylee I-94 because it is not identified as a List C document on Form I-9 itself. Form I-9 and List C currently include a cursory explanation that “Some employment authorization documents issued by DHS include but are not limited to Form I-94 Arrival/Departure Record issued to asylees or work-authorized nonimmigrants” See Form I-9, List C Documents, at “Employment authorization documents issued by the Department of Homeland Security (DHS).”⁸ However, many asylees report that employers reject their I-94 card as evidence of work authorization. Instead, employers frequently require asylees to present a current I-766 Employment Authorization Document (EAD).

This common misunderstanding exacts severe costs on asylees, who must then apply

³ For background information on these types of gender-based violence, see, e.g., UNHCR, *Guidelines on the Protection of Refugee Women* 17, <https://www.unhcr.org/3d4f915e4.html>; UN Women, *Defining “honour” crimes and “honour” killings*, <https://endvawnow.org/en/articles/731-defining-honourcrimes-and-honour-killings.html>; https://en.wikipedia.org/wiki/Female_genital_mutilation; https://en.wikipedia.org/wiki/Forced_marriage; <https://www.widowsrights.org/>.

⁴ <https://www.tahirih.org/news-media/latest-updates/?tab=tahirih-in-the-news>.

⁵ https://www.tahirih.org/pubs/?qmt%5Bpub_cat%5D%5B%5D=131.

⁶ https://www.tahirih.org/pubs/?qmt%5Bpub_cat%5D%5B%5D=261.

⁷ <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents>.

⁸ <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents>.

for an EAD at a steep cost⁹ and with exceedingly long processing delays.¹⁰ The cost is even higher if an asylee seeks the support of an attorney—a reasonable step given the complexity of the Form I-765 Application for Employment Authorization. The asylee then must wait, often longer than a year, to receive the renewed I-766. During this wait, an asylee is vulnerable to mistaken termination of employment or rejection from opportunities from employment, leading to loss of income, housing instability, food insecurity, and vulnerability to exploitation and retraumatization. For trauma survivors, the loss of self-determination and access to self-support is particularly damaging.

When asylees are forced to provide EADs to prove their right to work, this imposes a burden on USCIS as well, as it increases the number of applicants for EADs and increases an already enormous backlog and excessive wait for work authorization.

Clarification of the Form I-9 and the associated instructions is essential to protect asylees' right to work. Simply correcting the form would reduce the cost, time, and stress on asylees as well as the burden on an already overstressed system at USCIS.

III. The Form I-9 Should Clarify That Receipt Notices for I-766 Renewals Qualify as Acceptable Documents for Work Authorization

Form I-9 and the associated instructions should be revised to reflect accurately the policy that a receipt notice serves to extend the validity of I-766 pending renewal. At this time, Form I-9 includes an unambiguous statement in bold lettering that “All documents must be UNEXPIRED.” See Form I-9, at 3. This statement is flatly incorrect. It leads employers to reject employment authorization cards that are expired on their face but the validity of which are extended automatically upon timely submission of a renewal application with USCIS. That incorrect and misleading statement should be removed to prevent erroneous rejection of an EAD receipt notice as evidence of the continuing validity of a facially expired EAD.

The online instructions for Form I-9 further compound the misunderstandings and erroneous terminations of employment. Form I-9 List A indicates that the employment authorization card “will remain valid until the expiration date shown on the card.” See Form I-9, List A Documents, at Form I-766, Employment Authorization Document Card.¹¹ This statement mischaracterizes the validity of Form I-766. The EAD remains valid despite the passage of the expiration date shown on the card if the holder of the card has filed a timely renewal application and received a receipt notice automatically extending the validity of the card. 8 C.F.R. § 274a.13(d). The automatic extension of validity pending renewal of the card has recently been extended from 180 days to 540 days, in response to extreme delays in processing EAD renewals at USCIS. See Temporary Increase of the Automatic Extension

⁹ The fee for Form I-765 is currently \$410 plus \$85 for biometrics. See Form I-765 and Instructions, available at <https://www.uscis.gov/i-765>. Moreover, the I-766 Employment Authorization Document must be renewed every two years for the same fee.

¹⁰ According to the USCIS website, 80% of Forms I-765 for asylees are processed within 10 months or 15 months, depending on the service center. See <https://egov.uscis.gov/processing-times/>.

¹¹ <https://www.uscis.gov/i-9-central/form-i-9-acceptable-documents>.

Period of Employment Authorization and Documentation for Certain Renewal Applicants, 87 Fed. Reg. 26,614 (May 4, 2022). Yet the List of Acceptable Documents does not unambiguously explain to employers that the receipt notice is sufficient evidence of a valid EAD. Updating the instruction to reflect the rule is essential to protect survivors' right to work.

The misstatements on Form I-9 and the associated instructions regularly lead employers to terminate or refuse initial employment with survivors who are legally authorized to work. Job loss is closely connected to housing instability and food insecurity. For survivors who support children and other family members, the loss of a job can be deeply destabilizing and dehumanizing.


One survivor, Angelica¹², timely applied to renew her EAD. She received a receipt notice providing an automatic extension, which she showed to her employer. But her employer did not recognize that the receipt notice served to extend the validity of Angelica's EAD, and her employment was terminated. Her employer provided her with a letter stating that, but for the expired EAD, he would have continued Angelica's employment. As a result, Angelica spent several months looking for employment and was eventually forced to accept a job at a much lower wage than she had previously earned. This is just one of countless examples of the problems caused by the current instructions.

In order to fully protect survivors' right to work, Form I-9 and all associated instructions must be revised to reflect accurately that facially expired EAD cards are valid through the date indicated on a receipt notice.

Conclusion

For the reasons above, the I-9 should be revised to clarify that asylees are authorized to work and that an EAD renewal receipt notice coupled with an expired EAD is sufficient evidence of a current work authorization.

Sincerely,



Richard Caldarone
Senior Litigation Counsel
Tahirih Justice Center



Rachel Sheridan
Litigation Counsel
Tahirih Justice Center

¹² Names have been changed to protect confidentiality.



AMERICAN
IMMIGRATION
LAWYERS
ASSOCIATION

May 31, 2022

Samantha L Deshommes,
Chief, Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
5900 Capital Gateway Drive
Camp Springs, MD 20746

Submitted via www.regulations.gov
e-Docket ID number USCIS-2006-0068.

Re: Comment to Proposed Revision of a Currently Approved Collection: Employment Eligibility Verification (Form I-9); OMB Control Number 1615 0047

Dear Ms. Deshommes:

The American Immigration Lawyers Association (AILA) respectfully submits the following in response to the above-referenced 60-day notice and request for comments on proposed changes to Form I-9, Employment Eligibility Verification, as published in the Federal Register on March 30, 2022.¹ Specifically, we provide information regarding the nature of the information collection, the estimated burden (i.e. the time, effort, and resources used by the respondents to respond), the estimated cost to the respondent, and the actual information collection instruments.

Established in 1946, AILA is a voluntary bar association of more than 16,000 attorneys and law professors practicing, researching, and teaching in the field of immigration and nationality law. Our mission includes the advancement of the law pertaining to immigration and nationality and the facilitation of justice in the field. AILA members regularly advise and represent businesses, U.S. citizens, U.S. lawful permanent residents, and foreign nationals regarding the application and interpretation of U.S. immigration laws. Our members' collective expertise and experience makes us particularly well-qualified to offer views that will benefit the public and the government.

Introduction

¹ [1](https://www.federalregister.gov/documents/2022/03/30/87-fr-18377) 87 FR 18377 (March 30, 2022).

AILA appreciates the efforts of USCIS to simplify the completion of Form I-9 for employees and employers. Our comments are intended to provide recommendations for further improvements for USCIS to consider in this effort. The Form I-9 was introduced in 1986 as a means of minimizing the hiring of unauthorized workers by employers. It was never intended to be a primary means of penalizing well intentioned and compliance-focused employers for paperwork errors. Hence, the 1997 Virtue Memorandum² effectuated the Good Faith Amendment to the Immigration Reform and Control Act by providing 10 days to correct minor errors which were not likely to lead to the hiring of unauthorized workers. More recently, the Department of Homeland Security (DHS) Secretary Mayorkas' Memorandum of 2021³ prioritizes enforcement towards "unscrupulous employers" as opposed to employers making good faith efforts to comply and undocumented workers who are contributing to their communities. Accordingly, we believe that any changes to Form I-9 should begin with the goals of simplifying compliance and easing procedural burdens on employers

Having said that, we agree, as a basic concept, AILA believes that a shorter form with fewer instructions would seem to be an improvement, as long as such reduction will ensure clarity, be more comprehensible, and eliminate redundancy. However, thirty-six years of experience counseling employers grappling with the complexity of changing requirements leads inexorably to the conclusion that efforts to decrease the length of the form may lead inevitably to a corresponding increase in confusion and mistakes.

The Form I-9 has been a two-page form for almost a decade. For more than the prior two decades, it had been a one-page form. Therefore, we have direct practical experience with both one-page and two-page versions of Form I-9s. In our extensive and collective experience, the change from one-page to two pages had the very real effect of reducing the number of inadvertent errors made by both foreign nationals and employers because the respective responsibilities of employers and employees are clearly delineated on two separate pages and there is adequate space for all relevant information.

As USCIS noted on its [website](#), the stated need for this revision to Form I-9 is to "compress sections 1 and 2 from two pages to one page to reduce paper use and storage burden on employers" as well as to "simplify the instructions from 15 pages to 7 pages, further reducing paper usage." Electronic form preparation and retention has existed for many years and it is reasonably foreseeable that more employers will continue to gravitate toward electronic Forms I-9. Broader utilization of electronic forms will reduce paper use and storage burden, as well as provide greater flexibility to provide useful completion guidance. We believe the government's focus would better be placed on the promotion and facilitation of electronic versions of Form I-9. Additionally, as explained in more detail below, we believe the compression of the form from two pages to one page does not improve quality, utility, clarity, or reduce the effective burden of the Form I-9. The

² Memorandum: Interim Guidelines: Section 274A(b)(6) of the Immigration and Nationality Act Added by Section 411 of the Illegal Immigration Reform and Responsibility Act of 1996. Immigration and Naturalization Service, Office of Programs. HQIRT 50/5.12 (March 6, 1996).

³ Memorandum: Worksite Enforcement: The Strategy to Protect the American Labor Market, the Conditions of the American Worksite, and the Dignity of the Individual. Department of Homeland Security Policy Statement 065-06 (October 21, 2021).

compressed form will send employers back in time to an era full of inadvertent but costly errors, and occasionally may lead to the unintentional hiring of unauthorized workers.

We provide the following comments with sincere appreciation for the efforts of USCIS to initiate this conversation and we look forward to being partners with USCIS in modernizing not only the Form I-9, but also the entire employment verification compliance system in a manner that encourages employer compliance and minimizes the hiring of unauthorized workers.

General Information Regarding the Nature of the Information Collection,

From a legal, technical and practical perspective, the Department of Homeland Security's proposal to return to a one-page Form I-9, rather than the current two-page form is unnecessary because the Form I-9 is not burdensome and the change will likely create more problems for employers and employees than it solves. Our reasons for this belief are as follows:

1. Error rates, particularly paperwork errors, were substantially reduced when the USCIS introduced the two-page Form I-9 on March 8, 2013. Based on our direct experience auditing and advising employers on their Form I-9 compliance programs, we observed a considerable drop in error rates on the part of both employers and employees. Notably, the bifurcation of the Form into two sections in which only the Employee (Section 1, located on page 1) or Employer (Section 2, located on page 2) is permitted to enter data significantly enhanced the integrity of data being entered. We believe that reverting to the one-page Form I-9 is likely to cause an increase in instances in which the employer inadvertently makes entries/edits to the Form in a section in which only the employee should enter data. Moreover, the instructions for the proposed Form I-9 do not explicitly state that the employer is prohibited from typing/entering any data in Section 1 on behalf of the employee.
2. Creating a one-page Form I-9 that will increase error rates, both substantive and technical, by well-meaning employers, as opposed to "bad actor" employers, is contrary to the intent of Mayorkas' Memo. In the memorandum, Secretary Mayorkas says DHS will pursue "unscrupulous employers", who "exploit their employees' immigration status and vulnerability to removal by, for example, suppressing wages and maintaining unsafe working conditions." Employers who make inadvertent errors on Form I-9 are not "unscrupulous employers."
3. The technical errors that will inevitably increase with a reduction in clarity of the Form is also contrary to the previously mentioned Virtue memo, which prioritized mistakes that "are likely to lead to the hiring of an unauthorized [worker]." In the overwhelming majority of circumstances, paperwork errors will not typically lead to an unauthorized worker being hired. Rather than creating a new and confusing version of the Form I-9 to facilitate paper-based completion of the employment verification process, USCIS would better serve the public by creating an electronic employment verification system that provides ease of access and reduces the burdens and obligations on employers attempting to comply in good faith with the law.

The Estimated Burden: Impact on the Burden to Prepare

Again, based on our several decades of experience advising employers on the proper completion of the form, we believe the stated time estimates do not reflect the actual burden and time required to fully comply with the form's requirements. A stated objective to the current proposed revisions is to shorten the written form's instructions that employers must provide to all employers. Putting aside for the moment the obvious concern that shorter instructions may negatively impact compliance, even if a shorter set of instructions is provided, review of the instructions and the actual completion of the Form I-9 will be largely unaffected by this change and, in any event, will take significantly longer than currently estimated.

It is imperative that sufficient time is acknowledged by USCIS to set realistic expectations for employers in terms of resourcing the employment verification process, as the form is signed under penalty of perjury with possibly significant penalties for noncompliance. To that end, we respectfully submit that the language on the face of the form should be revised to clearly reflect the seriousness of noncompliance for both the employee and employer signatories. Our proposed language is as follows: "NOTE: Information provided on this form may be used against you in future immigration proceedings."

As a result of the changes to the employment environment due to COVID, it is reasonable to anticipate that employers will likely have a significantly higher need for use of agents to complete the form for new hires working remotely.⁴ USCIS's instructions should make clear to potential agents the risks assumed when requested to complete the form so agents can make fully educated decisions on whether to sign Section 2 of the form and take all necessary steps to ensure compliance. Most importantly, to effectively reduce the burden on employers and to align the actual burden with the estimated .33 hours per form, a permanent virtual verification option, where a well-trained and centralized Human Resources (HR) team may complete the employer sections and review the content provided by the employee in real time, is essential.

Finally, we note that the Federal Register notice indicates that "[t]he estimated total annual cost burden associated with this collection of information is \$0. Any requirements to support the verification process are already available through other approved collections of information that may be employment related or occur as a part of the hiring process. There is no submission to USCIS of materials which eliminates mailing and photocopying costs." This wholly unrealistic language suggests that there are no costs associated with Form I-9 preparation or compliance as employers are developing form information in the onboarding process, separate from the specific process of Form I-9 completion. While employers may develop some of the information necessary for completion of Form I-9 independent of the employment verification process, this overly broad statement fails to recognize the tens of millions of dollars that employers spend annually on training, implementation, oversight and auditing of their employment verification records.

⁴ A simpler and more employer-friendly solution to the changes created by the Covid-19 pandemic would involve allowing for a virtual Form I-9 verification process on a permanent basis.

Recommendations

To ensure that the Form I-9 is easy to use by employers and employees to ensure full compliance, AILA makes the following recommendations.

1. Nature of the Information Collection and the Information Collection Instrument

We appreciate the USCIS revisions that allow for the easier completion of the Form I-9 by both the employee and employer. Specifically, the proposed revised version of the Form I-9 includes some beneficial changes, such as the following:

- The removal of the requirement to insert “N/A” into the blank fields will assist both employees and employers when it is logical to imply that a blank field generally means, not applicable, especially when a field such as “Other Last Names Used” in Section 1 specifically states “(if any)”. Requiring employees to write in “N/A” in such a field is redundant. The same is true with respect to the fields in Section 2 that require “Expiration Date (if any)”. Requiring employers to add “N/A” to such fields is also redundant.
- The consolidation of all the attestation language for Section 1 in one location makes it easier for the employees to complete Section 1 with fewer errors.
- The proposed attestation to be completed by the employee in Section 1 is clear.
- The removal of the check boxes for the “Preparer/Translator” certification also reduces the likelihood of errors by employees when completing Section 1, especially when a Preparer/Translator was not used.
- The change in the reference of “document” or “documents” to “documentation” on both the Form I-9 and in the Instructions makes it clearer for the employer, as well as the employee when completing the fields in the Form I-9.
- The additional information referencing the M-274 in List C of the list of Acceptable Documents is a much welcome addition as it provides both employees and employers with guidance as to where to find the information on the USCIS website.
- The “Acceptable Receipts” section that has been added to the List of Acceptable Documents is also a welcome addition that should assist employers when completing the Form I-9 as this has often been confusing and some employers have not known where to find specific guidance related to the acceptance of “receipts”.

2. Suggested improvements to the proposed revised Form I-9 if both Section 1 and Section 2 are on the Same Page

While there have been welcome changes to the Form I-9 and the instructions, there have been many changes that have increased the likelihood of mistakes to be made by the employer and employee that cannot be justified on the basis of efficiency.

We suggest the following improvements to the proposed Form I-9, should it remain with both Section 1 and Section 2 on the same page:

I. Section 1

- a. Retaining the separate field for the “Apartment Number (if any)” as it is more likely that employees will fail to include the Apartment Number if it is included in the same field as the “Street” Address.
- b. Adding boxes for the digits to be entered for the Social Security Number should be included in the U.S. Social Security Number field.
- c. Indicating “Optional” on the fields for “Employee’s E-mail Address” and “Employee’s Telephone Number” as this information is not required and will otherwise create confusion.
- d. Restoring the three separate fields in Section 1, “Check one of the following boxes to attest to your citizenship or immigration status” under #4 (Alien Registration Number/USCIS Number; Form I-94 Admission Number; Foreign Passport Number and Country of Issuance). The proposed change not only requires an employee to squeeze the information into a narrowly condensed space, but also makes it unclear as to who is to complete this field as it is a “floating” line on the form and could be interpreted by an employee to be a requirement to be completed by all employees.
- e. Changing the language for Section 1, Box #4 to “A nonimmigrant authorized to work” and add two boxes for the employee to select (A) without expiration or (B) temporarily (expiration date (mm/dd/yyyy)) to make it clear whether the employee is authorized to work indefinitely or with limitation.
- f. Keeping the three types of documents in Section 1, Box #4 on separate lines with “OR” between them so that the employee knows to complete this information only if checking Box #4 as his/her status.
- g. Adding the following language to the attestation so that employees understand how this information may be used against them – “NOTE: Information provided on this form may be used against you in future immigration proceedings.”
- h. Relocating the Preparer/Translator Certification to the top of Page 2 in Section 2. This will allow for more room for the employer to properly complete the information pertaining to the required documentation for Lists A, B and C. Also, adding a line, if deemed necessary for compliance purposes, immediately after the signature block of Section 1 indicating, “If a Preparer or Translator assisted in the completion of Section 1 of this form, that person is required to complete the Preparer and/or Translator Certification on Page 2.’

AILA has drafted a “one-page” version of Form I-9 with proposed revisions to Section 1 that is included with this comment.

II. Section 2

- a. Increasing the size of the lines on the Form I-9 for the employer to insert the information for the relevant documentation for Lists A, B and C, as the proposed lines are extremely small and will create errors by employers, not to mention making it difficult for internal employer auditors and the government to review.

- b. Restoring the fields for the third requirement documentation in List A as its elimination will lead to additional errors by employers, by either failing to include the information related to the third required document or failing to include all of the required information for the third document if required to squeeze the information into the margins and/or the “Additional Information” box.
- c. Increasing the size of the box for “Additional Information” as it is too small and will not provide sufficient space for the additional information that is required for explaining common circumstances, such as automatic extensions, etc.
 - i. A further challenge with the Additional Information box is that the line appears to allow for three options, which is problematic for electronic Form I-9 providers as they need to know how to report this information and typically need a field for every different category of response. A long blank line with multiple options does not allow these vendors to enable a rule to follow for this entry and does not allow for the use of Artificial Intelligence (AI) for the entry.
- d. Moving the “Preparer/Translator Certification” section to the top of the Reverification and Rehire Supplement to Form I-9, as this would permit more room for the “Additional Information” section. The Supplement should then be renamed “Preparer/Translator, Rehire, Update and Reverification Supplement to Form I-9”.
- e. Including checklists for the employer in the Additional Information⁵ section, which should include fields for the employer to add specific information relating to:
 - i. Automatic Extensions;
 - ii. Optional Tracking Details (such as EAD category code and TPS country);
 - iii. Optional E-Verify Details; and
 - iv. Receipts: including fields for this specific information, employers will be able to better understand when a receipt is required/acceptable and under what List of Acceptable Documents the information should be placed.
- f. Adding “in the U.S.” after “Employee’s First day of Employment” in the box requesting this information in order to clarify request relates to the first day of employment in the U.S. when employees may have transferred to the U.S. from the employer’s offices abroad.

AILA has drafted a “one-page” version of Form I-9 with recommended changes to Section 2 that is included with this comment.

III. The Reverification and Rehire Supplement for Form I-9.

- a. As noted previously, given the increased likelihood that employees and employers will make errors in Sections 1 and 2 if the Form I-9 is condensed to one page, moving the “Preparer/Translator Certification” section to the Reverification and Rehire Supplement to Form I-9 and renaming the Supplement “Preparer/Translator, Rehire,

⁵ Note that, for electronic systems, open ended data field in the Additional Information field is problematic as vendors have no ability to monitor or apply rules to the data potentially added here, leading to a more chaotic data field than an efficient Form I-9 management system.

update and Reverification Supplement to Form I-9”. This will allow for significant additional room for the employee and employer to more accurately complete Sections 1 and 2.

- b. Adding the following instruction: “Use this section if someone assisted your employee in completion of the Form I-9” to the Preparer/Translator Certification in this Supplement
- c. Defining more clearly the “Reverification, Update, Rehire, or Name Change” section of the Supplement with the specific heading and providing clear instructions to the employer about when and how to complete this Supplement with the required information. (See the proposed “Preparer/Translator, Rehire, update and Reverification Supplement to Form I-9” included with this comment.)

AILA has drafted a proposed Supplement to Form I-9 for the “one-page” version of Form I-9 that is included with this comment.

With the proliferation of alternative acceptable employment authorization documents, typically those listed at Column C, item #7, an area that now more than ever confuses employers, employees and Form I-9 vendors, it is important that USCIS provide a simpler and more user-friendly method of completing Form I-9 in this scenario. The substantial number of document combinations makes it hard for employers, and employees, to know what to use, when to use it and how and what to track for the expiration date. This expanding numbers of items is also creating greater difficulty for Form I-9 technology vendors and increases the potential for non-substantive technical errors and the appearance of discrimination. In this context, we believe that maintaining an accurate and up to date list of acceptable documents in a prominent location on the USCIS I-9 Central website, combined with specific instructions on how Form I-9 is to be completed with this information and how expirations dates should be tracked, is a prerequisite for ensuring that all stakeholders know how to properly document employment authorization in these complicated scenarios.

3. Suggested improvements to the proposed revised Form I-9 if the Form I-9 remains a two-page form with Section 1 and Section 2 on separate pages.

The creation of the Form I-9 as a two-page document with Section 1 and Section 2 each on their own page was a welcome change for all parties involved in employment verification compliance as it made it easier to determine which party completed which section and allowed for space to provide all required information. The reduction of the Form I-9 to a single page that contains both Section 1 and Section 2 is unlikely to accomplish the primary purpose of the form (enhanced employment verification) and will increase the likelihood of mistakes, not only technical errors and substantive errors, but more importantly the hiring and/or retention of individuals without valid work authorization, therefore AILA recommends that Section 1 should remain as its own separate Page 1 and Section 2 should remain in its own separate Page 2. To that end, AILA makes the following recommendations:

I. Page 1, Section 1

- a. Leaving the separate field for the “Apartment Number (if any)” as it is more likely that employees will fail to include the Apartment Number if it is included in the same field as the “Street” Address.
- b. Including the boxes for the digits to be entered for the Social Security Number in the U.S. Social Security Number field.
- c. Indicating “Optional” on the fields for “Employee’s E-mail Address” and “Employee’s Telephone Number” as this information is not required and removing the word will create confusion.
- d. Restoring the three separate fields in Section 1, “Check one of the following boxes to attest to your citizenship or immigration status” under #4 (Alien Registration Number/USCIS Number; Form I-94 Admission Number; Foreign Passport Number and Country of Issuance).. The proposed change not only requires an employee to squeeze the information into a narrowly condensed space, but also makes it unclear as to who is to complete this field as it is a “floating” line on the form and could be interpreted by an employee to be a requirement to be completed by all employees.
- e. Changing the language for Section 1, Box #4 to “A nonimmigrant authorized to work” and add two boxes for the employee to select (A) without expiration or (B) temporarily (expiration date (mm/dd/yyyy)) to make it clear whether the employee is authorized to work indefinitely or with limitation.
- f. Keeping the three types of documents in Section 1, Box #4 on separate lines with “OR” between them so that the employee knows to complete this information only if checking Box #4 as his/her status.
- g. Adding the following language to the attestation so that employees understand how this information may be used against them – “NOTE: Information provided on this form may be used against you in future immigration proceedings.”
- h. Delineating the Preparer/Translator Certification on Page 1 so that it is clear that this Certification only needs to be completed if a preparer and/or translator assisted with the completion of Section 1.
- i. Adding an optional box entitled: “OPTIONAL: RETENTION CALCULATOR” for employers to complete once the employee’s employment has been terminated. This will increase the likelihood of employers retaining the Form I-9 for the required period of time, facilitate both internal corporate and government audits and creates a more uniform way to indicate the retention date information on the Form I-9.

AILA has drafted a “two-page” version of the form with proposed revisions to Page 1, Section 1 that is included with this comment.

II. Page 2, Section 2

- a. Retaining Section 2 of the Form I-9 as its own section on Page 2 of the form just as it is in the current version of the Form I-9.
 - i. This structure provides a clear delineation about which party is to complete each section of the form.

- ii. It also allows for sufficient room for the employer to include all required information for the documentation provided by the employee to prove identity and work authorization, as well as for both internal auditors and government agents to review.
- b. Retaining the Section 2 fields for the third document that is required in certain circumstances for List A documentation in order to alleviate inadvertent errors and/or omissions by employers.
 - i. Without the third document fields, employers will likely fail to include the information related to the third required document or fail to include all of the required information for the third document.
 - ii. The prior “one-page” version of Form I-9 with fields for only two documents in List A led to employers having to squeeze the information into the margins and/or the “Additional Information” box and, in many instances, led to increased errors.
- c. Enhancing the “Additional Information” box to include checklists to provide employers with much needed guidance related to these confusing situations. Such checklists should include fields for the employer to add information about:
 - i. Automatic Extensions
 - ii. Optional Tracking Details (such as EAD category code and TPS country)
 - iii. Optional E-Verify Details
 - iv. Receipts: including this additional detail will better enable employers to understand when a receipt is acceptable and under what List of Acceptable Documents the information should be placed.
- d. Adding “in the U.S.” after “Employee’s First day of Employment” in the box requesting this information in order to clarify request relates to the first day of employment in the U.S. when employees may have transferred to the U.S. from the employer’s offices abroad.
- e. Reorganizing the Rehire, Reverification, Update Section into separate sections to aid employers.
 - i. Section 3(A) Rehires is a section recommended on Page 2 under the Employer Certification for Section 2. This section would be used solely for rehires and would provide specific guidance for employers to compete when necessary.
 - ii. The Update and Reverification portion would best be included in a separate Supplement to Form I-9. Please see information below.

AILA has drafted a “two-page” version of Form I-9 with a proposed revisions Page 2, Section 2 that is included with this comment.

III. Update and Reverification Supplement for Form I-9

- a. Incorporating additional guidance to assist employers in determining when to “update” and when/how to “reverify” work authorization into a new Supplement to Form I-9 on Page 3.
- b. Adding multiple “Update or Reverification” fields on this Page 3 to make it more employer friendly.

- c. AILA has drafted a proposed Page 3, Update and Reverification Supplement, for the “two-page” version of the form that is included with this comment.

While reducing paper usage and form storage requirements are generally worthwhile concepts, AILA believes it is of paramount importance that USCIS provide employers and employees with a Form I-9 that is intuitive, easy to complete and incorporates comprehensive and readily understandable guidance. We believe our proposed version of Form I-9 will help prevent errors that not only lead to fines, but also the employment of individuals without valid work authorization, the overarching goal of this process.

Minimizing the burden of information collection through use of automation technology.

In our professional opinion, the emphasis on reducing the length of Form I-9 so that it's paper version can consist of only one page seems misplaced and runs counter to the overall direction of USCIS toward facilitating the use of technology to engage stakeholders. A more consistent and, in fact, more environmentally sensitive approach would be to invest in expanding access to an electronic Form I-9 processing system that is widely available and requires no paper.

This USCIS goal of returning to a one-page form (for section 1 and 2), seems disconnected from the trending toward software-based Form I-9 solutions, as the number of physical pages is irrelevant in an electronic environment. Regardless, if, as per federal regulations, the electronic Form I-9 is to mirror whatever form design USCIS adopts, compliance will be more difficult in the proposed compressed format.

Rather than attempting to facilitate greater use of a paper version of Form I-9, we believe USCIS should consider enhancing its electronic Form I-9 guidelines (e.g., audit trail requirements, correction procedures, etc.) to provide additional clarity and certainty for users, thus encouraging even greater use of software-based compliance solutions. Given the inexorable migration to electronic Forms I-9, this guidance would be a significant, forward-looking approach.

Enhanced reliance upon electronic Forms I-9 would also more closely align employment verification with the Administration's modernization goals for the U.S. immigration system. Focusing primarily to electronic verification tools would have the added benefit of facilitating the integration of technological enhancements in AI such as Intelligent Automation, which is a combination of Robotic Process Automation and AI technologies that empowers rapid end-to-end business process automation and accelerates digital transformation. For modernization to occur in the manner and at the pace envisioned by the Administration, the Form I-9, like most government data collection forms, should be designed and built to leverage this functionality. For the Form I-9, this path forward is clear as many private Form I-9 solution providers apply Intelligent Automation to their systems, but it must be included into the design's building blocks.

We also understand that the proposed changes to Form I-9 are significant from a vendor software development perspective in that they will require, particularly at the new Section 3, completely new programming and a new workflow. Generally, this increased difficulty is because

electronic systems can more easily map existing fields to a new form but it is much more difficult to allow reporting across new forms and old forms if they use new or different fields. This is particularly the case if USCIS modifies a field's meaning or content, in which case systems need to determine if and how reporting is to be allowed across the old and new fields at the same time. If USCIS proceeds with this proposed revision to Form I-9, we encourage the agency to invite Form I-9 software representatives to discuss the impact and implementation timeline of the new form well in advance of publication, as vendors will need adequate time to adjust their software accordingly.

Again, we believe the best strategy for enhancing compliance is not creating a condensed and potentially more confusing one page Form I-9, but rather maintaining the current two-page architecture while simultaneously enhancing the design and functionality of electronic employment verification. Since the inception of the employment verification process in 1987, a clear and consistently stated objective of this process is not unduly burdening employers with the performance of a primarily governmental function (i.e. ensuring that all foreign workers have government authorization to be employed in the U.S.).⁶ Accordingly, as USCIS moves to a more fully digital interface with its user community, we believe the employment verification process should be at the forefront of this effort and we encourage USCIS to focus on the efficiencies and environmental advantages of electronic employment verification.

Conclusion

AILA appreciates the opportunity to provide feedback to the agency regarding its proposed revisions to Form I-9. AILA looks forward to a continuing dialogue with USCIS on this and related matters.

Please address any concerns or questions to AILA Director of Government Relations Sharvari Dalal-Dheini at SDalal-Dheini@aila.org.

Sincerely,

THE AMERICAN IMMIGRATION LAWYERS ASSOCIATION

⁶ As previously noted, another enhancement to the employment verification process that would reduce the burden on employers would be the permanent implementation of the virtual verification of employment authorization. Given the dramatic changes to the nature of work resulting from the Covid-19 pandemic and the corresponding acceleration of remote work options, it is critically important that employers continue to have the flexibility to fulfill their Form I-9 obligations in a virtual environment.



Employment Eligibility Verification
Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-9
OMB No. 1615-0047
Expires MM/DD/YYYY

▶ **START HERE:** Employers must ensure that the form instructions are available to employees when completing this form.

ANTI-DISCRIMINATION NOTICE: All employees can choose which acceptable documentation to present for Form I-9 purposes. Employers must not ask employees for documentation to verify information in Section 1 or specify which acceptable documentation employees must present for Section 2 or the Supplement. Treating employees differently based on their citizenship, immigration status, or national origin may be illegal.

Section 1. Employee Information and Attestation (Employees must complete and sign Section 1 of Form I-9 no later than the **first day of employment**, but not before a job offer.)

Last Name (Family Name)		First Name (Given Name)		Middle Initial (if any)	Other Last Names Used (if any)	
Address (Street Number and Name)			Apt. Number (if any)	City or Town		State ZIP Code
Date of Birth (mm/dd/yyyy)	U.S. Social Security Number [][][] - [][][][][]		Employee's E-mail Address (Optional)		Employee's Telephone Number (Optional)	

NOTE: Information provided on this form may be used against you in future immigration proceedings.

ATTESTATION: I am aware that federal law provides for imprisonment and/or fines for false statements, or the use of false documents, in connection with the completion of this form. By my signature below, I attest, under penalty of perjury, that this information, including my selection of the box attesting to my citizenship or immigration status, is true and correct.

Check one of the following boxes to attest to the basis for your employment authorization in the U.S.:

- ☐ 1. A citizen of the United States
- ☐ 2. A noncitizen national of the United States (See instructions)
- ☐ 3. A lawful permanent resident (A number/USCIS Number): _____
- ☐ 4. A nonimmigrant authorized to work ☐ (A) without expiration ☐ (B) temporarily (expiration date (mm/dd/yyyy)): _____
- Check a box to the right and add enter:
1. Alien Registration Number/USCIS Number: _____
OR
2. Form I-9 Admission Number: _____
OR
3. Foreign Passport Number: _____
and
Country of Issuance: _____

Signature of Employee	Date of Signature (mm/dd/yyyy)
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*If a preparer and/or translator assisted in the completion of Section 1, that individual must complete the attestation below.

PREPARER/TRANSLATOR CERTIFICATION

I attest, under penalty of perjury, that I have assisted in the completion of Section 1 of this form and that to the best of my knowledge the information is true and correct.

Signature of Preparer or Translator		Today's Date (mm/dd/yyyy)	
Last Name (Family Name)		First Name (Given Name)	
Address (Street Number and Name)		City or Town	State ZIP Code

OPTIONAL: RETENTION CALCULATOR

Employers must retain the Form I-9 for 3 years from the first day of employment or 1 year from the last date of employment, whichever is later.)

First Date of Employment: _____ + 3 years = _____	Later of the two dates: _____	Retention Period Ends: _____
Date Employment Terminated: _____ + 1 year = _____		



Employment Eligibility Verification
Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-9

OMB No. 1615-0047
Expires MM/DD/YYYY

Section 2. Employer Review and Verification

Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee's first day of employment and must physically examine documentation from List A OR a combination of documentation from List B and List C. The Lists of Acceptable Documents (Attached) is incomplete. Please refer to the M-274 Handbook for Employers and/or USCIS.gov/I-9central for details about acceptable receipts, automatic extensions, and other acceptable documentation.

Employee Info from Section 1	Last Name (Family Name)	First Name (Given Name)	M.I.	Citizenship/Immigration Status
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List A
Identity and Employment Authorization

OR

List B
Identity

AND

List C
Employment Authorization

Document Title	Document Title	Document Title
Issuing Authority	Issuing Authority	Issuing Authority
Document Number	Document Number	Document Number
Expiration Date (if any) (mm/dd/yyyy)	Expiration Date (if any) (mm/dd/yyyy)	Expiration Date (if any) (mm/dd/yyyy)
Document Title	Additional Information	
Issuing Authority	Automatic Extension =	
Document Number	<input type="radio"/> 540-Day Extension (EAD)	
Expiration Date (if any) (mm/dd/yyyy)	<input type="radio"/> 240-Day Extension (Pending Ext.)	
Document Title	<input type="radio"/> 180-Day Extension (EAD)	
Issuing Authority	<input type="radio"/> 180-Day STEM Extension (EAD)	
Document Number	<input type="radio"/> 120-Day Extension	
Expiration Date (if any) (mm/dd/yyyy)	<input type="radio"/> TPS Extension (mm/dd/yyyy)	
Document Title	<input type="radio"/> AC-21	
Issuing Authority	<input type="radio"/> Cap Gap	
Document Number	<input type="radio"/> OTHER: _____	
Expiration Date (if any) (mm/dd/yyyy)	Optional E-Verify Details	
	Case Number: _____	
	Result: _____	
	Visa Number: _____	
	Optional Tracking Details	
	<input type="radio"/> EAD Category Code _____	
	<input type="radio"/> TPS Country: _____	
	Receipts*	
	<input type="radio"/> Lost, Stolen, Damaged (A/B/C)	
	<input type="radio"/> LPR Card + I-751 Receipt (List C)	
	<input type="radio"/> Temporary I-551	
	<input type="radio"/> Refugee I-94 ("RE")	
	<input type="radio"/> COVID-19 List B	
	<input type="radio"/> OTHER: _____	
	*LPR Card + I-90 Receipt = not a receipt	
	*Temporary Driver License = not a receipt	

Certification: I attest, under penalty of perjury, that (1) I have examined the documentation presented by the above-named employee, (2) the above-listed documentation appears to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

Employee's first day of employment in the U.S. (mm/dd/yyyy): _____

Signature of Employer or Authorized Representative	Date of Signature (mm/dd/yyyy)	Title of Employer or Authorized Representative	
Last Name of Employer or Authorized Representative	First Name of Employer or Authorized Representative	Employer's Business or Organization Name	
Employer's Business or Organization Address (Street Number and Name)		City or Town	State ZIP Code

Section 3(A). Rehires: If an employee is rehired within 3 years of the original I-9 completion, this Section may be used. If the rehire date is more than three years after the original I-9 completion, a new Form I-9 is required. If the employee's previous grant of employment authorization was temporary and has expired, or if a receipt was presented and the Form I-9 was not updated, you must also complete the Update and Reverification supplement.	Date of Rehire (mm/dd/yyyy)
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Signature of Employer or Authorized Representative	Date of Signature (mm/dd/yyyy)	Name of Employer or Authorized Representative
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Update and Reverification Supplement to Form I-9

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-9

OMB No. 1615-0047
Expires MM/DD/YYYY

Last Name (Family Name) from Section 1.	First Name (Given Name) from Section 1.	Middle initial (if any) from Section 1.
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Instructions: Only use this page if your employee requires an update or reverification. Enter the employee's name in the fields above. Use a new section for each reverification or update. Review the Form I-9 instructions before completing this page. Keep this page as part of the employee's Form I-9 record. Additional guidance can be found in the [Handbook for Employers: Guidance for Completing Form I-9 \(M-274\)](#).

Reverification: If the employee's employment authorization or documentation requires reverification, the employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.

- Reverification is required only for an employee classified as a #4 "nonimmigrant authorized to work."
- Initial reverification is required on or before the expiration date listed in Section 1 or the expiration date of the employment authorizing document recorded in Section 2, whichever is earlier.
- Subsequent reverification is required if the employee presents a time-limited employment authorization document for reverification.

Update: If the employee's I-9 requires a documentation update, the employee can choose to present any acceptable documentation covering the category (identity and/or employment authorization) requiring the update. For example, if an employee presented a receipt for replacement of a lost driver license (a List B identity document), they may present any List A or B documentation (both of which prove identity) for the update.

A. New Name (if applicable)

Last Name (Family Name)	First Name (Given Name)	Middle Initial
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Update or Reverification

Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)
Additional Information		
I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.		
Signature of Employer or Authorized Representative	Date of Signature (mm/dd/yyyy)	Name of Employer or Authorized Representative

Update or Reverification

Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)
Additional Information		
I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.		
Signature of Employer or Authorized Representative	Date of Signature (mm/dd/yyyy)	Name of Employer or Authorized Representative

Update or Reverification

Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)
Additional Information		
I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.		
Signature of Employer or Authorized Representative	Date of Signature (mm/dd/yyyy)	Name of Employer or Authorized Representative

**AILA PROPOSED REVISIONS
DO NOT USE**

Update or Reverification 1

Reverification: If the employee's employment authorization or documentation requires reverification, your employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.		
Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)
I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.		
Signature of Employer or Authorized Representative	Today's Date (mm/dd/yyyy)	Name of Employer or Authorized Representative

Update or Reverification 2

Reverification: If the employee's employment authorization or documentation requires reverification, your employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.		
Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)
I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.		
Signature of Employer or Authorized Representative	Today's Date (mm/dd/yyyy)	Name of Employer or Authorized Representative

Update or Reverification 3

Reverification: If the employee's employment authorization or documentation requires reverification, your employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.		
Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)
I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.		
Signature of Employer or Authorized Representative	Today's Date (mm/dd/yyyy)	Name of Employer or Authorized Representative

AILA PROPOSED REVISIONS
 DO NOT USE

Reverification:

Reverification is required only for an employee classified as a #4 "nonimmigrant authorized to work."

Initial reverification is required on or before the expiration date listed by the employee in Section 1 or the expiration date of the employment authorizing document recorded in Section 2.

Subsequent reverification is required if the employee presents a time-limited employment authorization document for reverification.

AILA PROPOSED REVISIONS
DO NOT USE

► **START HERE:** Employers must ensure that the form instructions are available to employees when completing this form.

Section 1. Employee Information and Attestation *(Employees must complete and sign Section 1 of Form I-9 no later than the first day of employment, but not before a job offer.)*

Last Name (Family Name)		First Name (Given Name)		Middle Initial (if any)	Other Last Names Used (if any)
Date of Birth (mm/dd/yyyy)		U.S. Social Security Number (Optional for Non-E-Verify Employers)		<input type="checkbox"/> SSN applied for Date SSN Added: _____	
		<div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> </div>			
ATTESTATION: I am aware that federal law provides for imprisonment and/or fines for false statements, or the use of false documents, in connection with the completion of this form. By my signature below, I attest, under penalty of perjury, that this information, including my selection of the box attesting to my citizenship or immigration status, is true and correct.		Check one of the following boxes to attest to the basis for your employment authorization in the U.S.			
		<input type="checkbox"/> 1. A citizen of the United States			
		<input type="checkbox"/> 2. A noncitizen national of the United States (See instructions)			
		<input type="checkbox"/> 3. A lawful permanent resident (A-Number/USCIS Number): _____			
		<input type="checkbox"/> 4. A nonimmigrant authorized to work <div> <input type="checkbox"/> (A) without expiration <input type="checkbox"/> (B) temporarily (expiration date (mm/dd/yyyy)): _____ </div>			
		Check a box to the right and add enter:			
		1. Alien Registration Number/USCIS Number: _____ OR			
		2. Form I-94 Admission Number _____ OR			
		3. Foreign Passport Information			
		Passport Number _____		Country of Issuance _____	
Signature of Employee		Date of Signature (mm/dd/yyyy)			

Section 2. Employer Review and Verification

List A Identity and Employment Authorization	OR	List B Identity	AND	List C Employment Authorization
Document Title		Document Title		Document Title
Issuing Authority		Issuing Authority		Issuing Authority
Document Number		Document Number		Document Number
Expiration Date (if any) (mm/dd/yyyy)		Expiration Date (if any) (mm/dd/yyyy)		Expiration Date (if any) (mm/dd/yyyy)
Additional Information				
Document Title		<u>Automatic Extension =</u> <input type="checkbox"/> 540-Day Extension (EAD) <input type="checkbox"/> 240-Day Extension (Pending Ext.) <input type="checkbox"/> 180-Day Extension (EAD) <input type="checkbox"/> 180-Day STEM Extension (EAD) <input type="checkbox"/> 120-Day Extension <input type="checkbox"/> TPS Extension: _____ (MM/DD/YYYY) <input type="checkbox"/> AC-21 <input type="checkbox"/> Cap Gap <input type="checkbox"/> OTHER: _____		
Issuing Authority		<u>Optional Tracking Details</u> <input type="checkbox"/> EAD Category Code _____ <input type="checkbox"/> TPS Country: _____		
Document Number		<u>Receipts*</u> <input type="checkbox"/> Lost, Stolen, Damaged (A/B/C) <input type="checkbox"/> LPR Card + I-751 Receipt (List C) <input type="checkbox"/> Temporary I-551 <input type="checkbox"/> Refugee I-94 ("RE") <input type="checkbox"/> COVID-19 List B <input type="checkbox"/> OTHER: _____		
Expiration Date (if any) (mm/dd/yyyy)		*LPR Card + I-90 Receipt = not a receipt *Temporary Driver License = not a receipt		
Document Title		<u>Optional E-Verify Details</u> Case Number: _____ Result: _____ Visa Number: _____		
Issuing Authority				
Document Number				
Expiration Date (if any) (mm/dd/yyyy)				

Certification: I attest, under penalty of perjury, that (1) I have examined the documentation presented by the above-named employee, (2) the above-listed documentation appears to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

Employee's first day of employment in the U.S. (mm/dd/yyyy):

Signature of Employer or Authorized Representative		Date of Signature (<i>mm/dd/yyyy</i>)	Title of Employer or Authorized Representative
Last Name of Employer or Authorized Representative	First Name of Employer or Authorized Representative	Employer's Business or Organization Name	



Preparer/Translator, Rehire, Update, and Reverification
Supplement to Form I-9

USCIS
Form I-9

OMB No. 1615-0047
Expires MM/DD/YYYY

Last Name (Family Name) from Section 1.	First Name (Given Name) from Section 1.	Middle initial (if any) from Section 1.
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Preparer/Translator:

Use this section if someone assisted your employee in completion of the Form I-9.

PREPARER/TRANSLATOR CERTIFICATION			
I attest, under penalty of perjury, that I have assisted in the completion of Section 1 of this form and that to the best of my knowledge the information is true and correct.			
Signature of Preparer or Translator		Today's Date (mm/dd/yyyy)	
Last Name (Family Name)		First Name (Given Name)	
Address (Street Number and Name)		City or Town	State ZIP Code

Reverification, Update, Rehire, or Name Change:

Instructions: Only use this section if your employee has been rehired, requires an update, or requires reverification. Enter the employee's name from the Form I-9 in the fields above. Use a new section for each reverification or update. Review the Form I-9 instructions before completing this page. Keep this page as part of the employee's Form I-9 record. Additional guidance can be found in the [Handbook for Employers: Guidance for Completing Form I-9 \(M-274\)](#).

Reverification: If the employee's employment authorization or documentation requires reverification, the employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.

- Reverification is required only for an employee classified as a #4 "nonimmigrant authorized to work."
- Initial reverification is required on or before the expiration date listed in Section 1 or the expiration date of the employment authorizing document recorded in Section 2, whichever is earlier.
- Subsequent reverification is required if the employee presents a time-limited employment authorization document for reverification.

Update: If the employee's I-9 requires a documentation update, the employee can choose to present any acceptable documentation covering the category (identity and/or employment authorization) requiring the update. For example, if an employee presented a receipt for replacement of a lost driver license (a List B identity document), they may present any List A or B documentation (both of which prove identity) for the update.

Date of Rehire (if applicable)	New Name (if applicable)		
Date (mm/dd/yyyy)	Last Name (Family Name)	First Name (Given Name)	Middle Initial
Update or Reverification			
Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)	
Additional Information			
I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.			
Signature of Employer or Authorized Representative	Date of Signature (mm/dd/yyyy)	Name of Employer or Authorized Representative	



ASYLUM SEEKER ADVOCACY PROJECT

May 31, 2022

Submitted via www.regulations.gov

Samantha Deshommes, Chief
Regulatory Coordination Division, Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue, NW
Washington, D.C. 20529-2140

Re: OMB Control No. 1615-0047; DHS Docket No. USCIS-2006-0068, Comments in Response to Notice of Revision of a Currently Approved Information Collection Activity: Employment Eligibility Verification

Dear Chief Deshommes,

The Asylum Seeker Advocacy Project (ASAP) respectfully submits the following comments in connection with U.S. Citizenship and Immigration Services' (USCIS) above-referenced notice entitled *Agency Information Collection Activities; Revision of a Currently Approved Collection: Employment Eligibility Verification*, 87 Fed. Reg. 18377 (Mar. 30, 2022). Based on the experiences of its members, ASAP requests that USCIS amend the I-9 and its instructions to adequately explain to employers that certain receipts automatically extend the expiration date of USCIS-issued Employment Authorization Documents (EADs).

The Asylum Seeker Advocacy Project (ASAP) believes that asylum seekers can make great change by standing together. We provide our membership of asylum seekers with legal and community support. And we work with our members — over 320,000 asylum seekers — to build a more welcoming United States. ASAP members come from more than 175 countries and live in every U.S. state and territory. Since the fall of 2020, ASAP staff have responded to over 5,000 inquiries from members concerning related employment authorization issues.

Many ASAP members have raised issues related to a prospective or current employer intending to take adverse employment action because the employer does not

believe that a receipt notice can extend the expiration date on the face of an EAD card. ASAP believes that a clear, succinct explanation of USCIS's automatic extension rules will alleviate employer confusion and prevent work-authorized asylum seekers from losing employment opportunities. As USCIS recently recognized, gaps in employment authorization "have a highly detrimental impact on noncitizen workers and their U.S. employers," especially "at a time when such employers already are facing unprecedented workforce disruptions due to the COVID crisis."¹ USCIS should revise Form I-9 so as to remove unnecessary obstacles to the hiring and retention of authorized workers.

I. Background

Federal law requires that every employer who recruits, refers for a fee, or hires an individual for employment in the U.S. must complete Form I-9, Employment Eligibility Verification.² Form I-9 requires employees to present specified documentation of their authorization to work in the United States.³ Noncitizens who are not authorized to work incident to status must present an unexpired Form I-766, Employment Authorization Document (EAD) during the employment eligibility verification process.⁴

Applicants for asylum are eligible to obtain EADs.⁵ However, in recent years, the processing times to renew EADs in the asylum applicant category have ballooned. Even though USCIS will generally only accept an EAD renewal application six months prior to the expiration of the current EAD, the agency's estimated processing time for such a renewal is 13 months.⁶ Anticipating that undesirable gaps in employment authorization are possible when processing times are lengthy, the Department of Homeland Security (DHS) amended its regulations in 2016 to provide that certain applications to renew an EAD would automatically extend the expiration date of the EAD by 180 days.⁷ Earlier

¹ *Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Renewal Applicants*, 87 Fed. Reg. 26614, 26629 (May 4, 2022).

² See 8 U.S.C. §§ 1324a(a)(1)(B), (b); 8 C.F.R. § 274a.2.

³ See *id.*

⁴ See 8 C.F.R. § 274a.2(b)(1)(v) (requiring unexpired documents); 8 C.F.R. § 247a.12(c) (listing categories of noncitizens who must apply for EADs to prove work authorization).

⁵ 8 C.F.R. §§ 208.7; 274a.12(c)(8).

⁶ See U.S. Citizenship & Immigration Serv., *Processing Time for Application for Employment Authorization (I-765) at Potomac Service Center*, <https://egov.uscis.gov/processing-times/> (accessed May 11, 2022). The Potomac Service Center only processes renewals in the C8 category whereas other USCIS Service Centers process both initial and renewal applications. The 13-month estimate for renewal processing is also consistent with the experience of ASAP's members.

⁷ See *Retention of EB-1, EB-2, and EB-3 Immigrant Workers and Program Improvements Affecting High-Skilled Nonimmigrant Workers*, 81 Fed. Reg. 82398, 82454–55, 82492–93 (Nov. 18, 2016) (codified at 8 C.F.R. § 274a.13(d)).

this month, DHS published a temporary final rule extending the length of such automatic extensions to 540 days.⁸

Under the regulations, “[a]n Employment Authorization Document (Form I-766) that has expired on its face is considered unexpired when combined with a Notice of Action (Form I-797C), which demonstrates that the requirements [for automatic extension of an EAD] have been met.”⁹ However, in practice, a typical employer is unfamiliar with the Code of Federal Regulations, and the proposition that a receipt can “automatically extend” a facially expired identification document seems implausible.

ASAP members regularly encounter employers who are unwilling to accept a facially expired, but actually extended, EAD as evidence of employment authorization—often with serious consequences for the worker.

II. The Proposed Form I-9 Continues to Employ Confusing Language Regarding the Acceptability of EAD Renewal Receipts.

The proposed Form I-9 instructions will continue to generate confusion among prospective employers of work-authorized asylum applicants. This confusion principally arises from three aspects of the proposed form and instructions.¹⁰

First, the proposed Form I-9 will continue to confuse employers if a Notice of Action (Form I-797C), commonly known as a receipt notice, is not listed under “Acceptable Receipts.” As reflected in the figure on the next page, USCIS’s proposed form amends the List of Acceptable Documents to reflect certain categories of “Acceptable Receipts” without discussing the acceptability of a “receipt notice.”

⁸ See *Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Renewal Applicants*, 87 Fed. Reg. at 26651–52.

⁹ 8 C.F.R. § 274a.13(d)(4).

¹⁰ The screenshots used throughout this comment are taken from the draft documents posted on Regulations.gov, which use red type to indicate revisions from previous editions of the form. See Form I-9 Instructions for Form I-9, Employment Eligibility Verification (Mar. 30, 2022), <https://www.regulations.gov/document/USCIS-2006-0068-0424>; Form I-9 Employment Eligibility Verification (Mar. 30, 2022), <https://www.regulations.gov/document/USCIS-2006-0068-0428>.

Acceptable Receipts May be presented in lieu of a document listed above for a temporary period. For receipt validity dates, see the M-274.			
<ul style="list-style-type: none"> Receipt for a replacement of a lost, stolen, or damaged List A document. Form I-94 with "RE" notation or refugee stamp issued to a refugee. Form I-94 that contains an I-551 stamp issued to a lawful permanent resident and that contains a Form I-551 stamp. 	OR	Receipt for a replacement of a lost, stolen, or damaged List B document.	Receipt for a replacement of a lost, stolen, or damaged List C document.

Second, the proposed Form I-9 will continue to confuse employers if the List of Acceptable Documents continues to state in bold and capitalized type that "[a]ll documents must be **UNEXPIRED**."

LISTS OF ACCEPTABLE DOCUMENTS

All documents must be **UNEXPIRED**

Employees may present one selection from List A or a combination of one selection from List B and one selection from List C.

Examples of many of these documents appear in the Handbook for Employers (M-274).

Finally, the proposed Form I-9 instructions will continue to confuse employers if there is not a clearer explanation of automatic extensions in the context of work authorization. While the proposed instructions do mention automatic extensions of work authorization for the first time, such automatic extensions are mentioned only in passing, and critically, the instructions do not explain what documentation is acceptable to demonstrate that a facially expired EAD has been automatically extended.

4. **A noncitizen (other than Item Numbers 2. and 3. above) authorized to work:** An individual who has authorization to work but is not a U.S. citizen, noncitizen national, or lawful permanent resident.

If you select this box, enter the date that your employment authorization expires, if any, in the space provided. In most cases, your employment authorization expiration date is found on the document~~ation~~ evidencing your employment authorization. If your employment authorization documentation has been automatically extended, enter the expiration date of the automatic extension in this space.

Taken together, these aspects of the proposed form and instructions can leave a reasonable reader or employer with the impression that a prospective employee must present a facially unexpired EAD card, and that a receipt notice demonstrating that they

have timely filed for renewal of their EAD is not an acceptable receipt in the employment eligibility verification process. This confusion is not in the best interest of asylum seekers, other immigrant workers with EAD cards, or employers. It is also most definitely not in the best interest of USCIS, which has gone to great lengths to extend the period of work authorization for individuals who have applied to renew their work permits through issuing a Temporary Final Rule.¹¹

III. USCIS should add language to the I-9 and its instructions that clearly describes the acceptability of documents extending the validity of an EAD.

Given DHS's reliance on automatic extensions of certain categories of EADs as a tool to manage its own backlogs,¹² it is critically important that employers are properly instructed on how to complete Form I-9 for an employee with an automatically extended EAD. The potential for confusion described above can be significantly reduced by including explanations of the automatic extension process in the form instructions and in the List of Acceptable Documents.

First, USCIS should add the Notice of Action (Form I-797C) or "receipt notice" to the list of "Acceptable Receipts." This is an important signal to employers that the receipt notice is a valid document and can prove instructive in determining whether an individual is authorized to work.

Second, USCIS should add a paragraph to the form instructions that informs employers about the circumstances under which it considers an EAD to be unexpired. ASAP proposes adding the following paragraph to the definitions section on Page 1 of the Form I-9 Instructions:

Unexpired: A document is unexpired if it is before the expiration date stated on the face of the document or if the document does not contain an expiration date. Additionally, an Employment Authorization Document (Form I-766) that has expired on its face is automatically extended for 540 days, and therefore considered unexpired, when it is combined with a Notice of Action (Form I-797C), which demonstrates that the applicant properly filed a qualifying application to renew their Employment Authorization Document. For more information about the circumstances under which an Employment Authorization Document is automatically extended, see <https://www.uscis.gov/eadautoextend>.

¹¹ See *Temporary Increase of the Automatic Extension Period of Employment Authorization and Documentation for Certain Renewal Applicants*, 87 Fed. Reg. at 26651–52.

¹² See n.1, *supra*.

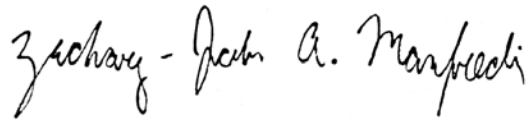
Finally, given the possibility of employer confusion, the List of Acceptable Documents should state "*See Instructions for definition of 'unexpired'*" immediately underneath the statement that "All documents must be **UNEXPIRED.**"

Thank you for your careful attention to these matters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Conchita Cruz".

Conchita Cruz
Co-Executive Director

A handwritten signature in black ink, appearing to read "Zachary - John A. Manfredi".

Zachary Manfredi
Litigation Director

A handwritten signature in black ink, appearing to read "Bradley Jenkins".

Bradley Jenkins
Senior Litigation Counsel

A handwritten signature in black ink, appearing to read "Ming Tanigawa-Lau".

Ming Tanigawa-Lau
Staff Attorney & Justice Catalyst Fellow



May 31, 2022

Ms. Samantha Deshommes
Chief, Regulatory Coordination Division
Office of Policy and Strategy, USCIS
5900 Capital Gateway Dr.
Camp Springs, MD 20746

Submitted via www.regulations.gov

RE: “Agency Information Collection Activities; Revision of a Currently Approved Collection: Employment Eligibility Verification,” OMB Control Number 1615-0047; Docket ID USCIS-2006-0068.

Dear Ms. Deshommes:

On behalf of ASISTA, I respectfully submit this comment in response to the “Agency Information Collection Activities; Revision of a Currently Approved Collection: Employment Eligibility Verification,” published in the Federal Register on March 30, 2022¹ and open for 60 days for public comments. We appreciate this opportunity to provide comments.

The mission of our agency is to advance the dignity, rights, and liberty of immigrant survivors of violence. For over 15 years, ASISTA has been a leader on policy advocacy to strengthen protections for immigrant survivors of domestic violence, sexual assault, human trafficking and other crimes that were created by the Violence Against Women Act (VAWA) and the Trafficking Victims Protection Act (TVPA). We assist advocates and attorneys across the United States in their work on behalf of immigrant survivors and submit this comment based on our guiding principles and our extensive experience.

These comments will focus on two recommendations:

1. The Form I-9 instructions should be clarified to permit recipients of U-1, U-2, U-3, U-4, U-5, and T-1 visas to present evidence of their visa status as proof of work authorization;

¹ U.S. Citizenship and Immigration Services, Department of Homeland Security, “Agency Information Collection Activities; Revision of a Currently Approved Collection; Employment Eligibility Verification: 87 FR 18377 (March 30, 2022), available at <https://www.federalregister.gov/d/2022-06687>.

2. The Form I-9 List of Acceptable Documents should be clarified to permit noncitizens in U-1 or T-1 status to establish employment authorization by presenting an unexpired Form I-797 containing an unexpired I-94 card in U-1 or T-1 status, and for noncitizens in U-2, U-3, U-4, or U-5 status to establish employment authorization by presenting an unexpired Form I-797 containing an unexpired I-94 card in U-2, U-3, U-4, or U-5 status and a Form I-797 receipt notice evidencing their pending application for employment authorization.

Background:

The Immigrant Reform and Control Act (IRCA) established the employment verification system that requires employers to verify the identity of their employees and their authorization to work in the United States, and also requires them to complete and retain an Employment Eligibility Verification Form I-9 for each employee.^[1] IRCA includes an anti-discrimination provision under which an employer's "request ... for more or different documents than are required under such section or refusing to honor documents tendered that on their face reasonably appear to be genuine shall be treated as an unfair immigration-related employment practice if made for the purpose or with the intent of discriminating against an individual."^[2] Accordingly, the Form I-9 instructions state that "[e]mployers CANNOT specify which document(s) an employee may present to establish employment authorization." And that "[t]he employer must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9."

Immigrant survivors of violence who achieve T-1 or U-1 status, and the derivative family members of U-1 principals who receive U-2, U-3, U-4, and U-5 visas ("U derivatives"), are by regulation authorized to work based on their status alone.² Thus, U-1 and T-1 principals do not need to apply for an employment authorization document (EAD) in order to establish their eligibility to work. U derivatives are required by regulation to *apply* for an EAD, but are not required to present it to establish their eligibility for work.³

The recently published section of the [Handbook For Employers M-274: 6.8 T and U Nonimmigrant Status](#) (the Handbook For Employers) recognizes that employees in T-1, U-1, and U derivative status are authorized to work incident to their status.⁴ In relevant part, the Handbook instructs that:

When completing Section 1 of Form I-9, employees with T or U nonimmigrant status should check "An alien authorized to work" and enter their EAD "Card

² See 8 C.F.R. §274a.12(a) (categories of noncitizens who are employment authorized incident to status), (a)(16) (T principals), (a)(19) (U principals), and (a)(20) (U derivatives).

³ See 8 C.F.R. §274a.12(a) ("Any [noncitizen] who is within a class of [noncitizens] described in... (a)(20) of this section, and who seeks to be employed in the United States, must apply to U.S. Citizenship and Immigration Services (USCIS) for a document evidencing such employment authorization.") Category (a)(20) is for U derivatives. See 8 C.F.R. §274a.12(a)(20).

⁴ UNITED STATES CITIZENSHIP AND IMMIGRATION SERVS., HANDBOOK FOR EMPLOYERS M-274, EVIDENCE OF STATUS FOR CERTAIN CATEGORIES, 6.8: T AND U NONIMMIGRANT STATUS (hereinafter "Handbook for Employers"), available at <https://www.uscis.gov/i-9-central/form-i-9-resources/handbook-for-employers-m-274>.

Expires” date or their Form I-94, Arrival Departure Record “Admit Until Date” in the Expiration Date field.

For Section 2, employees with T or U nonimmigrant status may choose to present their EAD, which is an acceptable List A document. *Employees whose Form I-94 indicates a class of admission of T-1, U-1, U-2, U-3, U-4, or U-5 may instead choose to present their Form I-94 as a List C #7 document and must also present a List B identity document.*⁵

The Form I-9 and instructions should be made consistent with the section of the Handbook addressing the work authorization of nonimmigrants in T and U visa status. Amending the the form and instructions to clearly state that T-1 and U-1 and U derivative nonimmigrants are work authorized incident to status would ensure the protections of the IRCA anti-discrimination provision is honored.

Currently, the Form I-9 List of Acceptable Documents does not reference nonimmigrants in T and U status who are authorized to work by showing their I-94 as a List C #7 document.. Clarification of the Form I-9 instructions and List of Acceptable Documents would greatly facilitate the completion of these forms by T and U nonimmigrants authorized to work incident to their status.

Impact of the Failure of the Form I-9 and Form I-9 Instructions to Reflect Work Authorization Incident to Status of T and U Nonimmigrants:

The absence of clarifying language in the Form I-9 to address the work authorization of T and U nonimmigrants delays their ability to access this important benefit of their status, compounds their victimization, and contributes to incursions of their privacy if they are required to engage in a lengthy back and forth with potential employers who don’t understand that they are eligible to work based on their valid I-94 documents.

Although T and U nonimmigrants *may* apply for EADs, some have not been able to afford the I-765 filing fee, and must wait for extended periods of time before their I-765s are issued. The failure of the Form I-9 to reflect T and U nonimmigrants authorization to work causes them to miss out on economic opportunities and contribute to their communities. It also impedes their ability to establish stability, which for some has long been elusive. T and U visa holders are by definition survivors of violence, including intimate personal violence, trafficking, and any of the qualifying crimes for which U visas may be issued.

Moreover, without more clear guidance on the Form I-9 and instructions, T and U visa recipients will need to educate the employers about their status and ability to work. Although EAD processing delays that make it necessary to rely on evidence of T and U status already violates the confidentiality protections of these statuses, putting T and U visa recipients in the position of needing to affirmatively explain the significance of their status exponentially further erodes their privacy. Clearly including their visa types in the List of Acceptable Documents would curtail

⁵ *Id.* (Emphasis added).

these privacy incursions by reducing the back and forth between employers and T and U nonimmigrants who need to explain that their visa status authorizes them to work.

One of ASISTA's members provided an example of the difficulties experienced by T and U visa recipients who are authorized to work but do not possess currently valid EADs. This person said that working legally was very important to them, "since it is the law in this great country," which has "opened its doors" to them. Moreover, the member noted that her client faced difficulty renewing their food stamps, as the state agency that processes those requests in Texas would not accept an I-914 approval or I-485 or I-765 receipt as proof of their immigration status. The client, who had filed their I-485 and I-765 in April 2021, still has not received their initial EAD. The client said (in their own words) that since January:

It has been very difficult for me in these times of the pandemic, and economic inflation, very hard times, to not have a valid work permit and not be able to get a job. Where you knock on doors and they are closed for not having a valid work permit. Where you know that if you do not get a job you could be evicted from your home. Getting food is also very difficult.⁶

Although immigration practitioners (our organization's members, in particular), understand that T and U visa recipients are authorized to work, many non-attorneys and other members of the public, including employers, do not. ASISTA applauds the recent publication of the new Section 6.8 of USCIS Employer Handbook for T and U nonimmigrant status, and hopes that employers use it to educate themselves about the documentation acceptable to establish work authorization for noncitizens in T and U status.

Recommended Changes to the Form I-9 Instructions:

- 1. The form and instructions should be clarified to permit recipients of U-1, U-2, U-3, U-4, U-5, and T-1 visas to present evidence of their visa status as proof of work authorization.**

As noted above, noncitizens in U-1, U-2, U-3, U-4, U-5, and T-1 visa status are authorized to work by the terms of their nonimmigrant visa status.⁷ U-1 principals and T-1 principals are not required to possess an employment authorization document as evidence of their authorization to work. U derivatives (those in U-1, U-2, U-3, U-4, and U-5 status) are required to *apply* for employment authorization if they wish to work, but are also not required to possess a valid, unexpired employment authorization document in order to accept employment.⁸ The absence of language in the proposed Form I-9 revision that reflects the employment authorization of U principals, U derivatives, and T principals causes them to unjustly suffer the denial or loss of

⁶ Client example provided by an ASISTA member representing a T-1 nonimmigrant who is struggling to find work without a valid EAD. The ASISTA member provided the client's own words for use in this comment.

⁷ See 8 C.F.R. § 274a.12(a) (categories of noncitizens who are employment authorized incident to status), (a)(16) (T principals), (a)(19) (U principals), and (a)(20) (U derivatives).

⁸ See 8 C.F.R. §274a.12(a) ("Any alien who is within a class of aliens described in... (a)(20) of this section, and who seeks to be employed in the United States, must apply to U.S. Citizenship and Immigration Services (USCIS) for a document evidencing such employment authorization."). Category (a)(20) is for U derivatives. See 8 C.F.R. 274a.12(a)(20).

employment, and compounds their marginalization, making them vulnerable to further victimization.

ASISTA is concerned about the impact of this omission on noncitizens in U status, and their derivatives, and noncitizens in T-1 status, because many of the affected noncitizens will not be able to educate employers about the specific permissions attached to their visa status without revealing the basis for their immigration status, which compromises their confidentiality and leaves them at greater risk of discrimination due to stigma or false assumptions related to trafficking and survivors of violence.

Recommended language:

The proposed I-9 form instructions should be amended to read (recommended changes in blue; changes already proposed by USCIS in red):

Step 2: Attest to your citizenship or immigration status.

You must select one one box to attest to your citizenship or immigration status.

[Items 1-3 omitted]

4. **A noncitizen (other than Item Numbers 2. and 3. above) authorized to work: An individual who has authorization to work but is not a U.S. citizen, noncitizen national, or lawful permanent resident.** If you select this box, enter the date that your employment authorization expires, if any, in the space provided. In most cases, your employment authorization expiration date is found on the documentation evidencing your employment authorization. **If your employment authorization documentation has been automatically extended, enter the expiration date of the automatic extension in this space.**
 - **Refugees**, asylees, and certain citizens of the Federated States of Micronesia, the Republic of the Marshall Islands, or Palau, and other noncitizens authorized to work whose employment authorization does not have an expiration date, should enter N/A in the Expiration Date field.
 - **Noncitizens in U-1, U-2, U-3, U-4, U-5, and T-1 visa status are authorized to work and should enter the expiration of their visa status in the Expiration Date field.**
2. **The Form I-9 List of Acceptable Documents should be clarified to permit noncitizens in U-1 or T-1 status to establish employment authorization by presenting a Form I-797 containing an unexpired I-94 card in U-1 or T-1 status, and for noncitizens in U-2, U-3, U-4, or U-5 status to establish employment authorization by presenting a Form I-797 containing an unexpired I-94 card in U-2, U-3, U-4, or U-5 status and a Form I-797 receipt notice of their pending application for employment authorization.**

Noncitizens in U-1, U-2, U-3, U-4, U-5, and T-1 status should be able to establish their eligibility to work by providing proof of their identity as set forth in List B “Documents that Establish Identity” in the List of Acceptable Documents, and proof of their immigration status, and in the case of U derivatives, proof of a pending I-765 application for employment authorization. As currently formulated, List C “Documents That Establish Employment Authorization” does not include evidence of these statuses as forms of documentation evidencing employment authorization. For List C to accurately reflect the documentation that establishes employment authorization and be consistent with the Handbook for Employers, it must be amended to include proof of immigration status for which employment authorization is incident to status.

Pro se job seekers in particular may be dissuaded by the omission of these type of documents as proof of employment eligibility and may believe that they are unable to work. Explaining that they may establish their employment authorization by relying on their proof of immigration status would help to ensure that survivors of abuse can access the protections Congress created for them.

USCIS should clarify the List of Acceptable Documents contained in the Form I-9 to state that noncitizens with U-1 and T-1 nonimmigrant visa status may provide proof of their status along with proof of their identity to establish their authorization to work. For noncitizens with U-2, U-3, U-4, U-5 nonimmigrant status, the Form I-9 should be amended to state that they may establish their authorization to work by additionally providing proof of a pending I-765 application for work authorization.

Recommended language:

The I-9 form List of Acceptable Documents should be amended to add a section in List C that includes documentation of unexpired U-1, U-2, U-3, U-5, and T-1 status to establish employment authorization:

8. Form I-797 containing an unexpired I-94 card admitting the noncitizen to the United States in one of the following classifications: U-1, U-2, U-3, U-4, U-5, and T-1.

- Noncitizens in U-2, U-3, U-4, and U-5 status should also present documentation showing that they have applied for employment authorization. Such documentation can be either a Form I-797 receipt showing a pending I-765 application for employment authorization.

Conclusion

For the reasons above, we urge USCIS to clarify the instructions for Form I-9 so that noncitizens in U and T status, and U derivatives, are able to establish their employment authorization by providing proof of their visa status without possessing an unexpired employment authorization document.

Thank you for your consideration of these comments. Please address any questions you may have about our recommendations to me at cristina@asistahelp.org.

Respectfully submitted,

Cristina Velez
Legal and Policy Director
on behalf of ASISTA Immigration Assistance



May 31, 2022

Ms. Samantha Deshommes
Chief, Regulatory Coordination Division
Office of Policy and Strategy, USCIS
5900 Capital Gateway Dr.
Camp Springs, MD 20746

Submitted via www.regulations.gov

RE: “Agency Information Collection Activities; Revision of a Currently Approved Collection: Employment Eligibility Verification,” OMB Control Number 1615-0047; Docket ID USCIS-2006-0068.

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Background:

The Immigrant Reform and Control Act (IRCA) established the employment verification system that requires employers to verify the identity of their employees and their authorization to work in the United States, and also requires them to complete and retain an Employment Eligibility Verification Form I-9 for each employee.^[1] IRCA includes an anti-discrimination provision under which an employer's "request ... for more or different documents than are required under such section or refusing to honor documents tendered that on their face reasonably appear to be genuine shall be treated as an unfair immigration-related employment practice if made for the purpose or with the intent of discriminating against an individual."^[2] Accordingly, the Form I-9 instructions state that "[e]mployers CANNOT specify which document(s) an employee may present to establish employment authorization." And that "[t]he employer must allow the employee to choose the document to be presented from the Lists of Acceptable Documents, found on the last page of Form I-9."

Immigrant survivors of violence who achieve T-1 or U-1 status, and the derivative family members of U-1 principals who receive U-2, U-3, U-4, and U-5 visas ("U derivatives"), are by regulation authorized to work based on their status alone.² Thus, U-1 and T-1 principals do not need to apply for an employment authorization document (EAD) in order to establish their eligibility to work. U derivatives are required by regulation to *apply* for an EAD, but are not required to present it to establish their eligibility for work.³

The recently published section of the [Handbook For Employers M-274: 6.8 T and U Nonimmigrant Status](#) (the Handbook For Employers) recognizes that employees in T-1, U-1, and U derivative status are authorized to work incident to their status.⁴ In relevant part, the Handbook instructs that:

² See 8 C.F.R. §274a.12(a) (categories of noncitizens who are employment authorized incident to status), (a)(16) (T principals), (a)(19) (U principals), and (a)(20) (U derivatives).

³ See 8 C.F.R. §274a.12(a) ("Any [noncitizen] who is within a class of [noncitizens] described in... (a)(20) of this section, and who seeks to be employed in the United States, must apply to U.S. Citizenship and Immigration Services (USCIS) for a document evidencing such employment authorization.") Category (a)(20) is for U derivatives. See 8 C.F.R. §274a.12(a)(20).

⁴ UNITED STATES CITIZENSHIP AND IMMIGRATION SERVS., HANDBOOK FOR EMPLOYERS M-274, EVIDENCE OF STATUS FOR CERTAIN CATEGORIES, 6.8: T AND U NONIMMIGRANT STATUS (hereinafter "Handbook for Employers"), available at <https://www.uscis.gov/i-9-central/form-i-9-resources/handbook-for-employers-m-274>.

When completing Section 1 of Form I-9, employees with T or U nonimmigrant status should check “An alien authorized to work” and enter their EAD “Card Expires” date or their Form I-94, Arrival Departure Record “Admit Until Date” in the Expiration Date field.

For Section 2, employees with T or U nonimmigrant status may choose to present their EAD, which is an acceptable List A document. *Employees whose Form I-94 indicates a class of admission of T-1, U-1, U-2, U-3, U-4, or U-5 may instead choose to present their Form I-94 as a List C #7 document and must also present a List B identity document.*⁵

The Form I-9 and instructions should be made consistent with the section of the Handbook addressing the work authorization of nonimmigrants in T and U visa status. Amending the the form and instructions to clearly state that T-1 and U-1 and U derivative nonimmigrants are work authorized incident to status would ensure the protections of the IRCA anti-discrimination provision is honored.

Currently, the Form I-9 List of Acceptable Documents does not reference nonimmigrants in T and U status who are authorized to work by showing their I-94 as a List C #7 document.. Clarification of the Form I-9 instructions and List of Acceptable Documents would greatly facilitate the completion of these forms by T and U nonimmigrants authorized to work incident to their status.

Impact of the Failure of the Form I-9 and Form I-9 Instructions to Reflect Work Authorization Incident to Status of T and U Nonimmigrants:

The absence of clarifying language in the Form I-9 to address the work authorization of T and U nonimmigrants delays their ability to access this important benefit of their status, compounds their victimization, and contributes to incursions of their privacy if they are required to engage in a lengthy back and forth with potential employers who don’t understand that they are eligible to work based on their valid I-94 documents.

Although T and U nonimmigrants *may* apply for EADs, some have not been able to afford the I-765 filing fee, and must wait for extended periods of time before their I-765s are issued. The failure of the Form I-9 to reflect T and U nonimmigrants’ authorization to work causes them to miss out on economic opportunities and contribute to their communities. It also impedes their ability to establish stability, which for some has long been elusive. T and U visa holders are by definition survivors of violence, including intimate personal violence, trafficking, and any of the qualifying crimes for which U visas may be issued.

Moreover, without clearer guidance on the Form I-9 and instructions, T and U visa recipients will need to educate the employers about their status and ability to work. Although EAD processing delays that make it necessary to rely on evidence of T and U status already violate the confidentiality protections of these statuses, putting T and U visa recipients in the position of needing to affirmatively explain the significance of their status exponentially further erodes their

⁵ *Id.* (Emphasis added).

privacy. Clearly including their visa types in the List of Acceptable Documents would curtail these privacy incursions by reducing the back and forth between employers and T and U nonimmigrants who need to explain that their visa status authorizes them to work.

One of ASISTA's members provided an example of the difficulties experienced by T and U visa recipients who are authorized to work but do not possess currently valid EADs. This person said that working legally was very important to them, "since it is the law in this great country," which has "opened its doors" to them. Moreover, the member noted that her client faced difficulty renewing their food stamps, as the state agency that processes those requests in Texas would not accept an I-914 approval or I-485 or I-765 receipt as proof of their immigration status. The client, who had filed their I-485 and I-765 in April 2021, still has not received their initial EAD. The client said (in their own words) that since January:

It has been very difficult for me in these times of the pandemic, and economic inflation, very hard times, to not have a valid work permit and not be able to get a job. Where you knock on doors and they are closed for not having a valid work permit. Where you know that if you do not get a job you could be evicted from your home. Getting food is also very difficult.⁶

Although immigration practitioners (our organization's members, in particular), understand that T and U visa recipients are authorized to work, many non-attorneys and other members of the public, including employers, do not. ASISTA applauds the recent publication of the new Section 6.8 of USCIS Employer Handbook for T and U nonimmigrant status, and hopes that employers use it to educate themselves about the documentation acceptable to establish work authorization for noncitizens in T and U status.

Recommended Changes to the Form I-9 Instructions:

- 1. The form and instructions should be clarified to permit recipients of U-1, U-2, U-3, U-4, U-5, and T-1 visas to present evidence of their nonimmigrant status as proof of work authorization.**

As noted above, noncitizens in U-1, U-2, U-3, U-4, U-5, and T-1 nonimmigrant status are authorized to work by the terms of their status.⁷ U-1 principals and T-1 principals are not required to apply for an employment authorization document. U derivatives (those in U-1, U-2, U-3, U-4, and U-5 status) are required to *apply* for employment authorization if they want an EADk, but are also not required to possess a valid, unexpired employment authorization document in order to accept employment.⁸ The absence of language in the proposed Form I-9 revision that reflects the employment authorization of U principals, U derivatives, and T

⁶ Client example provided by an ASISTA member representing a T-1 nonimmigrant who is struggling to find work without a valid EAD. The ASISTA member provided the client's own words for use in this comment.

⁷ See 8 C.F.R. § 274a.12(a) (categories of noncitizens who are employment authorized incident to status), (a)(16) (T principals), (a)(19) (U principals), and (a)(20) (U derivatives).

⁸ See 8 C.F.R. §274a.12(a) ("Any alien who is within a class of aliens described in... (a)(20) of this section, and who seeks to be employed in the United States, must apply to U.S. Citizenship and Immigration Services (USCIS) for a document evidencing such employment authorization."). Category (a)(20) is for U derivatives. See 8 C.F.R. 274a.12(a)(20).

principals causes them to unjustly suffer the denial or loss of employment, and compounds their marginalization, making them vulnerable to further victimization.

ASISTA is concerned about the impact of this omission on noncitizens in U status, and their derivatives, and noncitizens in T-1 status, because many of the affected noncitizens will not be able to educate employers about the specific permissions attached to their visa status without revealing the basis for their immigration status, which compromises their confidentiality and leaves them at greater risk of discrimination due to stigma or false assumptions related to trafficking and survivors of violence.

Recommended language:

The proposed I-9 form instructions should be amended to read (recommended changes in blue; changes already proposed by USCIS in red):

Step 2: Attest to your citizenship or immigration status.

You must select one one box to attest to your citizenship or immigration status.

[Items 1-3 omitted]

4. **A noncitizen (other than Item Numbers 2. and 3. above) authorized to work:** An individual who has authorization to work but is not a U.S. citizen, noncitizen national, or lawful permanent resident. If you select this box, enter the date that your employment authorization expires, if any, in the space provided. In most cases, your employment authorization expiration date is found on the documentation evidencing your employment authorization. If your employment authorization documentation has been automatically extended, enter the expiration date of the automatic extension in this space.
 - Refugees, asylees, and certain citizens of the Federated States of Micronesia, the Republic of the Marshall Islands, or Palau, and other noncitizens authorized to work whose employment authorization does not have an expiration date, should enter N/A in the Expiration Date field.
 - Noncitizens in U-1, U-2, U-3, U-4, U-5, and T-1 visa status are authorized to work and should enter the expiration of their nonimmigrant status in the Expiration Date field.
2. **The Form I-9 List of Acceptable Documents should be clarified to permit noncitizens in U-1 or T-1 status to establish employment authorization by presenting a Form I-797 containing an unexpired I-94 card in U-1 or T-1 status, and for noncitizens in U-2, U-3, U-4, or U-5 status to establish employment authorization by presenting a Form I-797 containing an unexpired I-94 card in U-2, U-3, U-4, or U-5 status and a Form I-797 receipt notice of their pending application for employment authorization.**

Noncitizens in U-1, U-2, U-3, U-4, U-5, and T-1 status should be able to establish their eligibility to work by providing proof of their identity as set forth in List B “Documents that Establish Identity” in the List of Acceptable Documents, and proof of their immigration status, and in the case of U derivatives, proof of a pending I-765 application for employment authorization. As currently formulated, List C “Documents That Establish Employment Authorization” does not include evidence of these statuses as forms of documentation evidencing employment authorization. For List C to accurately reflect the documentation that establishes employment authorization and be consistent with the Handbook for Employers, it must be amended to include proof of immigration status for which employment authorization is incident to status.

Pro se job seekers in particular may be dissuaded by the omission of these type of documents as proof of employment eligibility and may believe that they are unable to work. Explaining that they may establish their employment authorization by relying on their proof of immigration status would help to ensure that survivors of abuse can access the protections Congress created for them.

USCIS should clarify the List of Acceptable Documents contained in the Form I-9 to state that noncitizens with U-1, U-2, U-3, U-4, U-5, and T-1 nonimmigrant visa status may provide proof of their status along with proof of their identity to establish their authorization to work.

Recommended language:

The I-9 form List of Acceptable Documents should be amended to add a section in List C that includes documentation of unexpired U-1, U-2, U-3, U-5, and T-1 status to establish employment authorization:

8. Form I-797 containing an unexpired I-94 card admitting the noncitizen to the United States in one of the following classifications: U-1, U-2, U-3, U-4, U-5, and T-1.

Conclusion

For the reasons above, we urge USCIS to clarify the instructions for Form I-9 so that noncitizens in U and T status, and U derivatives, are able to establish their employment authorization by providing proof of their status without possessing an unexpired employment authorization document.

Thank you for your consideration of these comments. Please address any questions you may have about our recommendations to me at cristina@asistahelp.org.

Respectfully submitted,

Cristina Velez
Legal and Policy Director
on behalf of ASISTA Immigration Assistance