

From: Ron McCabe [mailto:mccaber@sosstaffing.com]

Sent: Tuesday, May 29, 2012 3:54 PM

To: uscisfrcomment@dhs.gov

Subject: Re: Agency Information Collection: Form I-9 Employment Eligibility Verification (OMB No. 1615-0047)

Sunday Aigbe, Acting Chief

Regulatory Coordination Division

Office of Policy and Strategy

U.S. Citizenship and Immigration Service

Department of Homeland Security

20 Massachusetts Avenue, NW

Washington, DC 20529

Re: Agency Information Collection: Form I-9 Employment Eligibility Verification (OMB No. 1615-0047)

The following comments are submitted on behalf of SOS Staffing Services, Inc. in response to the Notice published in the *Federal Register* on March 27, 2012, regarding proposed revisions to Form I-9, Employment Eligibility Verification.

SOS is one of the largest independent staffing firms in the U.S. and North America. Serving a diverse range of clients from small businesses to Fortune 500 companies, we provide employment for more than 70,000 temporary, temporary-to-hire and direct hire job seekers for more than 9,000 clients every year. SOS fully supports the correspondence sent by the American Staffing Association on May 10, 2012. However, we have a few items to add to the list.

Instructions

Page 1 of 9 - Date of Birth

The proposed change shows the DOB as "mm/dd/yyyy." While this is acceptable, is there a reason why the employee cannot show the spelled out name of the month, the day and the year? As an employer, it helps when auditing to verify dates. There are cases where the day and month can be confused such as 06/07/2012. Is this June 7, 2012 or July 6, 2012? New hires frequently confuse this issue. We believe it would be more appropriate to simply say, Month/Day/Year.

Page 1 of 9 - Email Address and Telephone Number

This is a new item that is voluntary. We believe that unless it is a mandatory that these blocks be removed and not added to the I-9.

Form I-9

Page 8 of 9 - List A, B, C expiration date

Why does the name need to appear at the top of this page again and why does it need to be in CAPS?

Page 8 of 9

When listing expiration dates in Lists A, B and C you show a box for the expiration date with the format example to the left of the box. We believe that instead of the box that you use the format, __ / __ / ____ instead. If you stick with the mm/dd/yyyy format throughout the I-9, then we would suggest using the format, __ / __ / ____ throughout the entire form.

Page 8 of 9 Employer Certification

There is not enough room for longer street addresses.

Conclusion

SOS supports USCIS' effort to provide employers with additional clarification and guidance for completing Form I-9. We appreciate your work over the last few years to clarify procedures through a well-thought Handbook for Employers. We do ask that once a new Form I-9 has been adopted that there is at least 30-days notice before implementation in order to allow employers to update policies, procedures and programming. This includes the publication of a new Form I-9 as well as the corresponding Handbook for Employers.

Respectfully,

Ron McCabe, PHR, CSP

Vice President - Compliance Officer

2650 Decker Lake Blvd., Suite 500

Salt Lake City, UT 84119

T. [801-483-4223](tel:801-483-4223)

F. [801-483-4290](tel:801-483-4290)

www.sosstaffing.com