



July 13, 2015

Submitted via:

Federal eRulemaking Portal Web Site at www.regulations.gov under e-Docket ID number USCIS-2007-0023;

Subject:

OMB Control Number 1615-0092
Department of Homeland Security, U.S. Citizenship and Immigration Services
e-Docket ID USCIS-2007-0023

Dear Chief Dawkins,

PeopleMatter submits these comments on the "60-Day Notice of Information Collection" OMB Control Number 1615-0092 published on June 8, 2015. This notice includes changes to the E-Verify program and employer requirements.

PeopleMatter began working with E-Verify as an Employer Agent using Web Services in November 2011 and has completed 6 upgrades with E-Verify. Through PeopleMatter's onboarding platform, thousands of service-industry employer store locations verify the employment eligibility status of newly hired employees. Many of these organizations have tens of thousands of employees and do significant hiring because turnover rates can be 100% or more. Thus, these organizations are significant users of E-Verify's services through our platform.

We appreciate the opportunity to comment on this notice and believe that our expertise as a seasoned Employer Agent using Web Services makes us well-qualified to offer views that will benefit the public and government during this process.

Estimate the Burden of Proposed Collection of Information

When changes are made to E-Verify's program, software vendors must upgrade to the latest version of web services and incorporate the changes into the software, as well as train users on the changes. This process requires product management, interaction design, engineering, and quality assurance resources. The burden estimates in the documentation of this notice discusses the impact to employers using these proposed changes in E-Verify's web portal, as well as to the government. But, the cost to Employer Agents using Web Services should also be considered.





There are four changes requiring development. PeopleMatter has worked with E-Verify through six upgrades and is confident in the estimates below based on past experience:

Feature Development Costs

- Streamline TNC Process = \$10,035
- Formal Final Nonconfirmation Review Process = \$76,266
- E-Verify for Reverification of Employees after MOU signed = \$90,315
- E-Verify for Reverification of Employees prior to MOU signed = \$106,371
- Total cost per Employer Agent Using Web Service: \$282,987

Training Development Costs

As required by the [E-Verify Training Requirements and Guidelines for Web Services Users](#), Employers Agents using Web Services are required to train and test employers on the changes with each upgrade, as well as update the initial training content for future users.

- Training development and deployment costs (per upgrade): \$9,259
- Assuming 2 upgrades for proposed changes: \$18,518

Total Impact to Employer Agents using Web Services




Assuming E-Verify deploys the new features across two upgrades, the total cost per Employer Agent using Web Services is **\$301,505**. Assuming E-Verify has 50 Employer Agents using Web Services, the total cost to the industry is **\$15,075,227**. This number should of course be adjusted based on the actual number of Employer Agents using Web Services.

Additionally, many Employer Agents using Web Services have product offerings beyond E-Verify. These vendors, like PeopleMatter, have roadmaps with future features for continued growth. The opportunity costs to support the proposed changes are significant as these changes take away from other planned initiatives and in turn negatively impact employers through decreased development spend on features that help them operate their businesses.





Recommendations:

- 1  Provide a 12-18 month runway for software vendors to complete each web services upgrade from the time the upgrade documentation (Interface Control Agreement) is available.
-  Do not require employers to complete E-Verify cases for Reverification. This process places additional burden on employers and vendors.
 - a. Requiring E-Verify for retroactive scenarios is especially challenging because the I-9 was completed prior to the employer MOU date which corresponds with when the employer started using its current electronic I-9 system. There will be a heavier lift on employers to manually enter data in this scenario, as well as increased opportunities for errors. **At a minimum**, we strongly recommend not requiring reverification for employees prior to the employer MOU date.
-  In order to eliminate the need for the proposed Formal Final Nonconfirmation Review process, consider alternate ways to solve the problem. For example, increasing employee and employer education during the steps of the Tentative Non-Confirmation (TNC) could solve this problem and reduce the cost burden on employers and vendors.

Conclusion:

Thank you for the opportunity to provide feedback on the proposed changes for E-Verify, and we look forward to continuing a dialog on future changes.

Sincerely,

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