

Sample Action Plan for In-Person Inspection of Form I-9

- 1. Document processes, workflows, and tracking for the physical inspection of the Form I-9 for all new hires and employees hired remotely since March 2020.
- 2. Create a plan to notify employees what is required of them, the timing to complete, the consequences of not complying, and where and who will be examing the documents.
- 3. Pull a list of your employees from the Questco Portal.
 - a. Reports Client Report Data Retriever
 - b. Include Last Name, First Name, Employment Status, Last Hire Date, Resident City, Resident County, Resident State, Resident Zip Code, Work Email Address
 - c. Identify active employees that have been hired remotely since March 2020.
- 4. Download the I-9's of the employees that need documents examined. Use the Advance Search feature in the Questco Portal. Instructions are included on page 5 of the Document Management User Guide. Clients can contact our Customer Care Center at 1-800-256-7823 for further guidance. Clients can also provide a list of affected employees to their Client Success Manager who will request the I-9's to be downloaded for the client.
- 5. Ensure the employees and company authorized representatives who are physically examing the documents are trained to do so. Provide samples of completed and updated I-9's from the USCIS website for direction.
- 6. Provide the original completed I-9's to the employees or company authorized representatives who are physically examining the employee documents. Also provide blank copies of the Form I-9 in case there is a need to complete a new Section 2.
- 7. Ensure all E-Verify queries were processed at hire, if applicable. Do not E-Verify again.
- 8. Once the physical inspections have been completed, follow the directions in the Document Management User Guide on page 2 for uploading the updated I-9's into the employee documents section in the Questco Portal.
- 9. Ensure that you have a written Remote Onboarding and Teleworking Policy for remote employees. Contact your Questco HR partner for assistance if needed.

Putting your Action Plan in place and completing the physical inspections will help mitigate non-compliance and avoid penalties by US Immigration and Customs Service. Fines have increased in 2023 for paperwork violations; these fines range from \$252-\$2,701. Penalties will be based on size and good faith of the employer, seriousness of the violation, if the individual was an unauthorized alien, and any history of previous violations.

