

April 12, 2011

FORM I-9 SELF-AUDIT CHECKLIST

I. GATHER THE DOCUMENTS.

- A. Keep I-9s separately from other documents.
- B. Get current Payroll Records which show all current employees and employees within one year.

II. COMPARE PAYROLL RECORD WITH FORM I-9s and separate I-9s into the following folders:

- A. CURRENT EMPLOYEES
- B. TERMINATED EMPLOYEES – STILL WITHIN THE RETENTION PERIOD – use retention calculator on half sheet attached – to show what dates the I-9s should be kept until.
- C. DESTROYED I-9 RECORDS – For those I-9s and supporting documents which were destroyed, keep the Retention calculation sheet but discard all other documents.

III. CHECK EACH I-9 for COMMON MISTAKES:

- A. Check the completion date of the I-9 and the hiring date of the employee – **Employee must complete the Form I-9 on the first date of hire.**
- B. Look for expired or temporary work authorizations that require re-verification.
- C. Section 1 common mistakes:
 - 1. Employee did not sign or date the form
 - 2. Employee did not complete Section 1 on the first date of hire
 - 3. Employee did not check one of the 4 boxes (or checked more than one)
 - 4. Employee checked the wrong box
 - 5. Employee did not list an Alien Number, Admission Number or expiration date.

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D. Section 2 – Common Mistakes:

1. Employer did not sign Section 2
2. Employer did not date Section 2
3. Employer did not fill the date of hire
4. Employer photocopied employee documents but did not keep copies of the form.
5. Employer signing the form is not the same person who reviewed the original documents
6. Employer accepted unacceptable documents or put them in wrong column
7. Employer accepted documents that did not “reasonably relate” to employee (eg. different names, dates of birth).
8. Employer accepted too many documents – (concerns: discrimination).
9. Employer is not consistent on whether he/she kept copies of supporting documents.

E. Section 3 – Common Mistakes:

1. Employer did not complete the information required in Section 3
2. Employer did not sign section 3.

IV. CORRECT I-9s that need to be corrected.

A. Recommend that changes be made by crossing out information, initialing and dating the change. Recommend inserting notation eg. – “Corrected during Self-Audit, [Date]”.

B. Don’t use “white out”.

C. Completion Date error ie. not same as date of hire – Training Issue

D. Some mistakes cannot be corrected. If so, make a list of these mistakes and keep it with the instructions for completing Form I-9s so that can show that you have learnt from your mistakes.

