**CRITICAL MESSAGE re: I-9 FORMS FOR ALL NEW HIRES**

**BACKGROUND:**

Since 1986, federal regulations have required all employers to complete a **Form I-9** on every individual hired.

**REQUIREMENTS:**

The **individuals** themselves must complete **Part 1** of the I-9 Form -- **on or before** their **FIRST** day of employment.

Then **Vanderbilt**, as the employer, must review the individual’s **official documents** that establish the person’s identity and eligibility to work in the U.S and complete **Part 2** of the Form I-9, **on** or **before** the **THIRD** day of employment.

In recent Internal Audit reviews, material compliance challenges were identified across campus, and it has been determined that HR/Payroll will not process hire actions in the HR System without both a fully-completed **I-9 form** (for every hire, **including students**) and a **background check clearance** (for all hires other than currently-enrolled students).

Because Form I-9s cannot be retroactively dated, **hire dates also cannot be retroactive**. The earliest hire date in the HR System can be no earlier than the third day preceding the date that the I-9 Part 2 is verified by HR.

HR will not be able to process retroactive hire dates; it is thus critical that **no individual commences work** until the I-9 and background check processes are complete.

**FOR HIRING SUPERVISORS and UNIT HR TRANSACTION PROCESSORS:**

Please note that both Part 1 and Part 2 of Form I-9 can be – and in fact are strongly recommended to be –completed **before** the first day of employment; even 30 days in advance is fine.

**WHAT AND WHERE:**

With many new faculty, staff, and student workers starting employment in August, please ensure that the hire completes Form I-9 Part 1 -- AND that they present their official documents to **University HR** (*10th Floor Baker Building, 110 21st Ave S.)* for completion of Part 2, ideally **BEFORE** the first date of employment. (\**And the sooner you send them, the shorter the line they will stand in*.)

**ORIGINAL DOCUMENTS**

Communicate with them in advance, before they arrive, to **have their original documents available** immediately for review. (*Otherwise, such documents are sometimes packed away when moving – or left at home with Mom.* ***Copies*** *of official documents are* ***not*** *acceptable.* )

You may **not** dictate which documents the individual should present. They may present **any** document or combination of documents that are authorized by USCIS.

**List A** documents establish both Identity and Employment Authorization

**List B** documents establish Identity +

**List C** documents establish Employment Authorization

The individual must present either a document from List A

Or one from List B **plus** one from List C

The federal **USCIS website** provides a resource for the acceptable documents, here:

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

**SUMMARY:**

**Please ensure that all hiring supervisors in your areas understand that no individual (faculty, staff, grad assistant, student worker, post-doc, or temp) may commence work until the I-9 Form – and background checks as needed – are complete.**

**QUESTIONS:**

Direct your questions to me (XXX) and I will coordinate as necessary with Central University HR.

*Last Updated: 08/11/17*