



Campus Administrative Policy

Policy Title: Employment Eligibility Verification (Form I-9)

Policy Number: 4022 Functional Area: Human Resources

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 Department I-9 Procedures Documentation and
 Administrative Memorandum A-36 effective
 (November 1, 2001)
 Downtown Campus I-9 Verification Process

Approved by: Teresa Berryman
 Vice Chancellor for Administration and Finance

Prepared by: Human Resources Director
 Reviewing Office: Human Resources
 Responsible Officer: Human Resources Director

Applies to: CU Denver Campus
 CU Anschutz Medical Campus

A. INTRODUCTION

In accordance with the Immigration Reform and Control Act of 1986 (IRCA), employers are required to verify the identity and eligibility for employment of all persons hired on or after November 6 , 1986 and to maintain documentation of employment verification. Employment eligibility must be documented using the U.S. Department of Justice, Immigration and Naturalization Service, Employment Eligibility Verification Form I-9. The University of Colorado Denver and the University of Colorado Anschutz Medical Campus (“university”) will comply with the IRCA which provides that it is illegal for employers to hire persons who are not authorized to work in the United States.

The Immigration Reform and Control Act (IRCA) applies to ALL new employees (and returning employees who need to re-verify), regardless of job title. The IRCA stipulates that the employment verification process be completed in person, and that verification Form I-9 be completed by close of business on the first day of employment. Penalties for

non-compliance can be significant. The Human Resource (HR) Department is responsible for managing the employment verification process for the university, and requires Form I-9 to be submitted within three (3) days of the first day of employment. Only authorized personnel in departments may sign Form I-9 on behalf of the university. Individuals with such authority must receive training on Form I-9 reporting requirements and identification of falsified identification. The Human Resource Department will provide such training as well as maintain a master list of employees authorized to sign Form I-9.

B. PROCEDURES

The Form I-9 is available from the Human Resource office. The form is to be completed in part by the employee and the employer (department or HR) reviews and finalizes. The Form I-9 must be completed within three (3) working days of the beginning of employment regardless of title. The Form I-9 can be completed in one of three ways:

1. The department/unit can send the employee to HR to complete the form.
2. The department/unit Administrator, Human Resource Coordinator or Payroll/Personnel Liaison can complete the form assuming they have attended the required training. After completion, the original Form I-9 and copies of documents used to verify employment eligibility must be send to HR.
3. The employee can complete the Form I-9 at New Employee Orientation only if they attend within three (3) days of their start date.

Details of the procedure for Form I-9 completion can be found below in Section F. The employee completes and signs Section 1, “Employee Information and Verification” with the employer. The employer must complete Section 2, “Employer Review and Verification” by examining evidence of identity and employment eligibility within three (3) business days of the date employment begins. Employers must record the document title used for identity and eligibility, issuing authority, document number and expiration date, if any, and the date employment begins. Employers must sign and date the certification. The completed Form I-9 is sent to HR, with copies of the original documents, and HR will maintain the Form I-9 as required by law and for federal auditing purposes.

C. COMPLIANCE

The penalties for non-compliance are significant. Failure to complete the Form I-9 process within the three (3) days of the start of employment may result in a fine being imposed on the University. Any such fines will be the responsibility of the employing department. The employee will be notified in writing (copy to the employer) by the Human Resource Office if Form I-9 has not been received. Failure to submit the Form I-9 and required documentation may result in termination of the employee.

D. SUPPLEMENTAL INSTRUCTIONS

Section I: “Employee Information and Verification”

The employee is responsible for completing this section, filing in name, address, date of birth and social security number.

The employee must check the appropriate box as to citizen of United States; alien with permanent residence (must give alien number), or alien authorized by INS to work in the United States (must give alien number or admission number and expiration date, if any). HR is responsible for tracking expiration dates, because these employees will need to update and re-verify their employment eligibility with current/valid documentation on or before the recorded expiration date.

The employee must sign and date the form, attesting that documents of identify and employment eligibility provided are genuine and relate to the employee.

Note: If someone completes the form other than the employee, that person must complete and sign the “Preparer/Translator Certification.”

Section II: "Employer Review and Verification"

The employee must provide the employer original documents (not copies) establishing identity and eligibility. The employer verifies the original documents and makes a copy of each. The back of the I-9 has a list of acceptable documents. List B establishes identity alone and List C establishes employment eligibility alone. List A establishes both identity and employment eligibility. If the employee does not provide a document from List A, they must produce one from both List B and List C.

For persons under age 18 who are unable to present a document listed above they may use a school record or report card.

The certification by the employer is the final step before the Form I-9 is submitted to HR. The employer examines the original documents (not copies) presented by the employee and records and copies the documents, then signs in Section II, “EMPLOYER REVIEW AND VERIFICATION”, of the Form I-9. The Form I-9 and copies of the supporting documents are then forwarded to HR.

Note: Employees should NOT be entered into the Human Resource Management System (HRMS) until all necessary documents, including the Form I-9 are submitted.

Notes

1. Dates of official enactment and amendments:
September 1, 2005: Adopted by Vice Chancellor for Administration and Finance
May 8, 2019: Modified
2. History:
May 8, 2019: Modified to reflect a Campus-wide effort to recast and revitalize Campus policy sites into a standardized and more coherent set of chaptered policy statements organized around the several operational divisions of the university. Article links, University branding, and formatting updated by the Provost’s office.
3. Initial Policy Effective Date: September 1, 2005

4. Cross References/Appendix:
 - Immigration Reform and Control Act of 1986