

I-9 INTERNAL AUDIT CHECKLIST

Use this checklist to proactively review Form I-9 compliance and identify corrective actions.

Employee Information

- ☐ Obtain a current employee roster
- ☐ Identify all active employees hired after November 6, 1986
- ☐ Verify Form I-9 exists for each active employee
- ☐ Identify terminated employees whose I-9s must still be retained
- ☐ Confirm I-9 forms are stored separately from personnel files

Section 1 Review (Employee Completes)

- ☐ Employee's full legal name completed
- ☐ Current address completed
- ☐ Date of birth completed
- ☐ Citizenship/immigration status selected
- ☐ Additional information completed when required (A-Number, USCIS Number, I-94 Number, etc.)
- ☐ Employee signed and dated Section 1
- ☐ Employee completed Section 1 no later than first day of employment
- ☐ Preparer/Translator section completed if applicable
- ☐ No missing fields or unexplained blanks

Section 2 Review (Employer Completes)

- ☐ Section 2 completed within 3 business days of hire
- ☐ Employee's first day of employment entered correctly
- ☐ Document title(s) listed
- ☐ Issuing authority completed
- ☐ Document number(s) completed
- ☐ Expiration date(s) entered, if applicable
- ☐ Documents appear reasonable and genuine
- ☐ Employer representative signed and dated Section 2
- ☐ Employer business name and address completed
- ☐ No expired documents were accepted when prohibited
- ☐ All document information is legible

Section 3 Review (Reverification/Rehire)

- ☐ Reverification completed for employees with temporary work authorization
- ☐ Rehires reviewed for Section 3 requirements
- ☐ Section 3 completed before work authorization expiration
- ☐ Employer representative signed and dated Section 3

- ☐ No reverification performed for U.S. citizens or permanent resident cards that do not require reverification

Supporting Documentation

- ☐ Consistent document retention practice followed
- ☐ If copies of documents are retained, copies exist for all employees or follow a consistent practice
- ☐ E-Verify records maintained (if applicable)
- ☐ Tentative Non-Confirmation documentation retained (if applicable)
- ☐ Employment authorization and reverification records maintained

Retention Requirements

For terminated employees, confirm I-9 retention requirements:

- ☐ Retain I-9 for **3 years from date of hire** OR
- ☐ **1 year after termination**
- ☐ Keep the form for whichever date is later
- ☐ Destroy I-9s that have exceeded retention requirements

Common Audit Findings

- ☐ Missing Form I-9
- ☐ Section 1 completed late
- ☐ Section 2 completed late
- ☐ Missing employee signature
- ☐ Missing employer signature
- ☐ Missing hire date
- ☐ Missing document information
- ☐ Incorrect citizenship status selection
- ☐ Incomplete reverification
- ☐ Improper corrections made with white-out or document alteration
- ☐ I-9 retained in personnel file without separate storage

Correction Procedures

- ☐ Draw a single line through incorrect information
- ☐ Enter correct information
- ☐ Initial and date all corrections
- ☐ Never backdate forms
- ☐ Prepare written explanation for significant corrections
- ☐ Complete missing I-9s immediately upon discovery
- ☐ Maintain audit findings and corrective action log

HR Synergy Recommended Action Plan

Priority 1 (Within 7 Days)

- Create list of missing I-9s
- Complete missing forms
- Separate I-9 files from personnel files

Priority 2 (Within 14 Days)

- Correct technical errors
- Verify retention requirements
- Review reverification dates

Priority 3 (Within 30 Days)

- Implement annual I-9 audit process
- Train hiring managers on I-9 completion requirements
- Establish standardized onboarding procedures

Audit Summary Tracking

Category	Number Reviewed	Number with Errors	Corrected
Active Employee I-9s			
Terminated Employee I-9s			
Missing Forms			
Late Section 1			
Late Section 2			
Reverification Issues			
Retention Issues			

Overall Compliance Score: _____%

Date of Audit: _____

Conducted By: _____

Follow-Up Review Date: _____