



		<b>Policy Section:</b>	Institutional Support
<b>Policy Number:</b>	5521-16	<b>Policy Title:</b>	I-9 Forms
<b>Original Effective Date:</b>	4/1/08	<b>Department:</b>	Human Resources
<b>Date Last Revised:</b>	1/14/2026		

**Policy Statement:**

It is the policy of Cairn University to comply with the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 which requires proper completion and retention of I-9 forms (also called Employment Eligibility Verification) issued by the Department of Homeland Security’s U.S. Citizenship and Immigration Services (USCIS).

**Purpose:**

To ensure that employees are authorized to work in the United States and provide documents which are deemed acceptable by the Department of Homeland Security. This policy sets forth procedures to ensure timely provision, verification, certification, reverification, retention and destruction of I-9 forms in compliance with USCIS regulations.

**1. Federal Requirements for Form I-9 Completion**

- 1.1 All new hires (including both U.S. citizens and non-citizens) must complete Form I-9 Section 1 no later than the first day of employment.
- 1.2 The employer is required to verify documents and complete Section 2 of Form I-9 within three business days of hire.
- 1.3 Acceptable documents are defined in Lists A, B, and C from USCIS. Employers must allow any combination listed on Form I-9 and cannot request specific documents.
- 1.4 Failure to comply with I-9 requirements (e.g., missing forms, incorrect retention) can result in civil fines and larger penalties for unauthorized employment or document fraud.

**2. Roles & Responsibilities**

**2.1 Employees**

- 2.1.1 Complete Section 1 of Form I-9 by the first day of employment.
- 2.1.2 Present original, unexpired acceptable documents (List A, or B + C) to proceed with Sect. 2.

**2.2 Authorized University Representatives (HR)**

- 2.2.1 Since Form I-9 is processed through the payroll system, only Human Resources (HR) representatives are authorized to review Section 1 to ensure it is complete and signed by the employee. HR is also responsible for completing Section 2, verifying documents, and certifying the form.
- 2.2.2 Verification must be completed within three business days of the employee’s start date.
- 2.2.3 Hiring supervisors are not permitted to perform I-9 certification or retain copies of I-9 forms or supporting documents.
- 2.2.4 In exceptional circumstances, HR may authorize a hiring supervisor to complete the certification process through the payroll system. If the employee resides outside the area, HR may designate an authorized representative to complete the certification.

2.2.5 HR electronically files the completed form.

### 3. Storage and Retention

**3.1 Storage:** I-9 forms are securely retained in a separate electronic file, apart from personnel records.

**3.2 Retention period:** Form I-9 must be retained for three years after the employee's hire date or one year after the employee's separation date, whichever is later. *For example, if an employee works for two years, the form must be kept for three years after the hire date. If an employee works for five years, the form must be kept for one year after separation.*

**3.3 Destruction:** Once the retention period expires, Form I-9 must be securely destroyed so that the information cannot be reconstructed or read. I-9s for terminated employees shall be removed from active employee files and stored in a separate tracking file until the scheduled destruction date.

### 4. Rehires

4.1 If a former employee is rehired after a break in service for longer than three years, a new Form I-9 must be completed.

4.2 If a former employee is rehired within three years of the date on their original Form I-9, HR will complete Section 3 of the original Form I-9 to confirm continued work authorization. If the original Form I-9 is not available, a new Form I-9 must be completed.

5. I-9 processes must be completed in a non-discriminatory manner. Employers may not request specific documents, refuse valid documents, or treat employees differently based on national origin or citizenship status.

### 6. Policy Review & Audits

6.1 The Department of Human Resources will conduct regular audits of I-9 forms for completeness, correctness, and timeliness.

6.2 The I-9 policy will be updated as federal or state regulations change.

6.3 The University will respond promptly and in "good faith" to any government inspection or DHS/I-9 audit.

### 7. Failure to Prove Employment Eligibility

Employees who do not provide acceptable I-9 documentation within the required timeframe (see 1.2) will be placed on unpaid suspension for up to 10 business days, beginning on their first day of employment. If the required documentation is not submitted within 10 business days of the start date, employment will be terminated. Rehire may be considered if the individual later provides the required documentation.

### 8. Reverification of Work Authorization

Non-U.S. citizens must provide updated work authorization before their current documents expire. HR will notify the employee and their supervisor in advance. If updated documents are not provided on time, the employee's work may be suspended (see Section 7). U.S. citizens do not need reverification, even if their documents expire.



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President's Cabinet Representative

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Date 1-14-26