Form I-9 Employment Verification Procedure

SOP · US · Updated 2026-07-13 · Square brackets are placeholders to replace with your own details.

A Form I-9 employment verification procedure is the written routine an employer follows to verify the identity and employment authorization of every person it hires to work in the United States: who completes what, by when, how documents are examined, how mistakes are corrected, and how the forms are stored and eventually purged.

The I-9 applies to every employee of every US employer, runs on federal deadlines measured in days, and is enforced through audits where paperwork errors carry penalties even when every worker was authorized. Most findings are not about unauthorized workers — they are late forms, blank fields, and corrections done wrong. A written procedure is how a small HR team gets it right every time.

This procedure covers the two federal timing rules, Section 1, the employer's document review with the document categories as concepts, corrections and reverification, retention and storage, and where E-Verify fits.

Purpose and scope

This procedure sets out how [Your company] completes, corrects, stores, and retires Form I-9 for every employee hired to work in the United States — full-time, part-time, and temporary alike. It applies to [HR/name/role] as owner and to every manager involved in onboarding.

The goal is a perfect routine, not heroics: the right form, the two federal deadlines met on every hire, documents reviewed the same way for everyone, and files an auditor could walk through without a single question.

Roles and responsibilities

- [HR/name/role]: owns this procedure, tracks the deadline for every new hire, performs [or assigns] the document review, and runs the retention log.
- Hiring managers: confirm start dates to [HR] as soon as offers are accepted, and never let anyone start work before the I-9 process is underway.
- Onboarding coordinator [if separate]: sends the new hire the Section 1 link/form and the USCIS list of acceptable documents before day one.
- [Name/role]: runs the [annual] internal I-9 audit and the purge of forms past their retention date.

The two federal clocks

Per USCIS, the employee completes Section 1 of Form I-9 by their first day of work for pay, and [Your company] completes the employer section — examining the employee's original documents — within 3 business days of the employee's start date. Both deadlines are tracked in [system] from the moment a start date is confirmed.

If an employee cannot present acceptable documents in time [beyond any receipt rules in the current USCIS instructions], escalate to [HR/role] before the deadline passes, not after — and never backdate: a late form honestly dated is a correctable problem, a falsified one is not.

Section 1 — the employee

1. Send the new hire Form I-9 [or the Section 1 link in [system]] with their offer packet, along with the current USCIS list of acceptable documents — so they can choose what to bring without anyone suggesting a document.
2. Confirm the employee has completed and signed Section 1 by their first day of work for pay: legal name, address, date of birth, and their attestation of status. The attestation is theirs alone — staff answer process questions but never advise which status box to check.
3. Check Section 1 for completeness the day it arrives — blank fields and missing signatures found on day one are fixed in minutes; found in an audit, they are findings.

Employer document review

1. Ask the employee to present original documents from the USCIS lists of acceptable documents. The choice is theirs, between two routes: one document proving both identity and authorization to work, or one proving identity plus one proving authorization. Never specify, suggest, or reject a valid choice.
2. Examine the originals with the employee physically present [or under any alternative procedure currently authorized by USCIS, where [Your company] is eligible — check the current rules].
3. Apply the reasonable standard: does the document appear genuine and relate to the person presenting it? You are not a forensic examiner — accept documents that reasonably appear genuine; if one does not, let the employee choose others from the lists.
4. Record the document details in the employer section exactly as the current instructions require, enter the first day of employment, and sign and date within 3 business days of the start date.
5. [If [Your company] retains document copies: retain them for everyone verified the same way, attached to the I-9, never selectively — and note that E-Verify has its own copy rules.]

Corrections and reverification

1. Correct errors properly: draw a single line through the wrong entry, write the correction, and initial and date it. Never use correction fluid, never obscure the original entry, and never backdate — employees correct Section 1, the employer corrects its own sections.
2. Track work-authorization expiration dates in [system] and reverify before expiry where current USCIS instructions require it — and not where they say not to; unnecessary reverification is a discrimination risk.
3. Run an internal audit [annually]: sample [or review all] I-9s for completeness, correct what can be corrected with dated annotations, and record the audit and fixes at [location] — a documented self-audit is the best posture before a government one.

Retention and storage

- Retain each I-9 for as long as current USCIS retention guidance requires — the rule combines hire and separation dates, so [name/role] logs a destruction date at offboarding rather than guessing later.
- Store I-9s separately from personnel files, in a dedicated [binder/electronic] system at [location], so an audit response exposes I-9s and nothing else.
- Electronic storage [if used] follows the current federal standards for electronic I-9 systems — confirm your vendor attests to them.
- Access is limited to [named roles], and forms past their retention date are destroyed on schedule and logged — keeping I-9s forever just enlarges the audit surface.

E-Verify, records, and review

E-Verify remains optional for most employers — required by some states and certain federal contracts — so requirements vary by state and locality. [Your company] [does / does not] use E-Verify: [if enrolled — create cases within the timeframe current E-Verify rules require, follow the case result procedures exactly, and take no adverse action on an interim case status]. E-Verify supplements the I-9; it never replaces it.

This procedure is reviewed [frequency, e.g. annually], whenever USCIS publishes a new form or instructions, and after any audit finding. Owner: [name/role]. Next review due: [date].

How to use this template

1. Download the current Form I-9, instructions, and acceptable-documents list from USCIS today — never work from a saved copy, because old editions become invalid.
2. Put the two deadlines into your onboarding system as tracked tasks with owners: Section 1 by the first day of work for pay, employer section within 3 business days of the start date.
3. Decide your document-copy and storage approach once, write it in, and apply it to every hire identically — selective practice is the discrimination-risk pattern auditors look for.
4. Train every person who will examine documents on the two rules that generate violations: the employee chooses the documents, and corrections are lined-through, initialed, and dated — never erased.
5. Calendar the internal audit now — the first self-audit almost always finds fixable problems, which is exactly the point.

Official guidance

› USCIS — Form I-9, Employment Eligibility Verification
› USCIS — I-9 Central
› USCIS — Form I-9 acceptable documents