



**Policy Title:** I-9 Employment Eligibility Verification

**Policy #:** 06-001-0175

**Effective Date:** 07/24/2025

**Approved by:** Telly Delor, Chief Operating Officer

**Functional Area:** Human Resources

**Responsible Leader:** Stephanie Shank, Human Resources Director

**Policy Owner:** Kristy Dennis, Human Resources Manager

**Applies to:** SCCCMH Staff

**Purpose:** The purpose of this policy is to establish and communicate St. Clair County Community Mental Health's (SCCCMH) consistent process for completing, maintaining, and storing Form I-9, Employment Eligibility Verification, in compliance with immigration regulations. This policy applies to all employees hired by SCCCMH regardless of business unit, location, or type of employment (full time, part time, or temporary).

### I. Policy Statement

SCCCMH is committed to complying with the Immigration Reform and Control Act of 1986. All employees hired after November 6, 1986, must complete a Form I-9 to verify their identity and eligibility to work in the U.S.

SCCCMH uses E-Verify, U.S. Citizenship and Immigration Services' online system, for verifying employment eligibility, to verify all employees' employment eligibility.

### II. Standards

#### A. Completion of Form I-9:

1. All new employees of SCCCMH must complete Section 1 of Form I-9 electronically after accepting their offer of employment and no later than their first day of employment.
2. Employees must present acceptable documentation in person to verify identity and employment eligibility on their first day of employment.

3. HR or designated personnel will complete Section 2 of Form I-9 by reviewing and verifying the employee's documentation within three business days of the employee's start date.

**B. Documentation:**

1. Only original and unexpired documents from the lists of acceptable documents may be used for I-9 verification.
2. Photocopies, faxes, or digital scans of identity or employment eligibility documents are not permissible for verification purposes.

**C. Retention and Storage:**

1. SCCCMH will retain completed I-9 forms for three years after the date of hire or one year after employment ends, whichever is later.
2. SCCCMH will make and retain copies of I-9 documents (front and back sides) along with each employee's I-9 form.
3. SCCCMH stores I-9 forms and copies of documents separately from employee personnel files to ensure privacy and ease of access for audit purposes. I-9 forms and copies of documents are stored within the Human Resource Information System (HRIS) under EI-9 Management and/or Employee Documents within the I-9 Category as applicable.

**D. Reverification:**

1. Reverification of employment authorization is required when an employee's List A or List C document has an expiration date. The only exceptions are if the document provided was: 1) a valid I-551 Permanent Resident Card, 2) an expired I-551 Permanent Resident Card with Form I-797 receipt notice for a Form I-90, or 3) an expired I-551 Permanent Resident Card with Form I-797C receipt notice for a Form N-400 with language on the I-797C automatically extending the I-551 Permanent Resident Card.
2. Employees must present valid documentation for reverification before their current authorization expires.
3. HR will notify employees 30 days or more in advance of an authorization expiration date so that their documentation will need to be reverified.
4. Employees are encouraged to report legal name changes to HR. While a legal name change alone does not require reverification of employment authorization, HR will update Form I-9 accordingly to maintain accurate records.
5. Employees may provide documentation (e.g., marriage certificate, court order) to support a legal name change, although it is not mandatory.
6. Since SCCCMH uses E-Verify, employees should update their name with the Social Security Administration to prevent mismatches.

7. HR will complete Supplement B (formerly Section 3) of Form I-9 for reverification purposes and to record legal name changes, ensuring the form reflects current employee information.

**E. Training:**

1. All HR personnel and designated staff involved in the I-9 process will receive training on I-9 compliance and verification procedures.
2. All HR personnel and designated staff are required to complete periodic training to remain up to date when there are changes to Form I-9 or E-Verify procedures.

**F. Audits and Compliance:**

1. SCCCMH's HR personnel will conduct routine internal audits of I-9 documentation to ensure compliance.
2. Noncompliance or violations may result in disciplinary action, up to and including termination of employment.

### III. Procedures, Definitions, and Other Resources

#### A. Procedures

##### Actions

Action Number	Responsible Stakeholder	Details
1.0	Employee	<ol style="list-style-type: none"><li>1. Complete Section 1 of Form I-9 electronically after accepting the offer and no later than the first day of employment.</li><li>2. Present original, unexpired documents in person on first day of employment to verify identity and work eligibility.</li></ol>
2.0	Human Resources or Designated Personnel	<ol style="list-style-type: none"><li>1. Review employee's documents and complete Section 2 within three business days of start date.</li><li>2. Only accept original, unexpired documents.</li><li>3. Do not accept photocopies, faxes, or digital scans.</li><li>4. Retain I-9 forms for three (3) years after hire or one (1) year after employment ends, whichever is later.</li><li>5. Make and retain copies (front and back) of documents with the I-9.</li><li>6. Store all I-9 forms and documents separately from personnel files in HRIS (EI-9 Management/I-9 Category).</li></ol>
3.0	Human Resources or Designated Personnel	<ol style="list-style-type: none"><li>1. Notify employees 30+ days in advance of document expiration.</li><li>2. Complete Supplement B for reverification or name change.</li></ol>

Action Number	Responsible Stakeholder	Details
4.0	Employee	<ol style="list-style-type: none"><li>1. Provide valid documents before current authorization expires.</li><li>2. May provide documentation for legal name changes (optional).</li><li>3. Encouraged to update name with SSA to avoid E-Verify mismatches.</li></ol>
5.0	Human Resources or Designated Personnel	<ol style="list-style-type: none"><li>1. Complete initial training on I-9/E-Verify.</li><li>2. Complete periodic training when form or procedure changes occur.</li><li>3. Conduct internal audits of I-9s regularly.</li><li>4. Implement, monitor, and ensure compliance.</li><li>5. Review policy annually and update as needed.</li></ol>
6.0	Manager / Supervisor	<ol style="list-style-type: none"><li>1. Ensure employees cooperate with HR on I-9 requirements.</li></ol>
7.0	Employee	<ol style="list-style-type: none"><li>1. Submit accurate documentation.</li><li>2. Complete required sections.</li><li>3. Respond to HR requests.</li></ol>

**B. Related Policies**

NA

**C. Definitions**

1. *Form I-9, Employment Eligibility Verification*: a form used by employers in the United States to verify the identity and employment authorization of individuals hired for employment.

**D. Forms**

[Form I-9, Employment Eligibility Verification](#)

**E. Other Resources** (i.e., training, secondary contact information, exhibits, etc.)

[Acceptable Documents](#)

[Instructions for Form I-9, Employment Eligibility Verification](#)

**F. References**

1. [United States Citizenship and Immigration Services I-9 Central](#)

**IV. History**

- Initial Approval Date: 7/24/2025
- Last Revision Date: BY:
- Last Reviewed Date: BY:
- Non-Substantive Revisions: N/A
- Key Words: I-9, employment, eligibility