

CATEGORY: PERSONNEL  
SECTION: Recruitment  
SUBJECT: Employment Eligibility Verification:  
Immigration Reform and Control Act  
EFFECTIVE DATE: June 8, 1989

I. PURPOSE

To define the process for verifying and documenting authorization to work in the United States.

II. SCOPE

This procedure applies to all employees of the University hired subsequent to May 30, 1987.

III. ADMINISTRATIVE RESPONSIBILITIES

The Employment Centers of the University (Exhibit C), are responsible for informing all candidates for employment of the requirements of the Immigration Reform and Control Act of 1986, posting University compliance procedures, distributing literature as part of the recruitment and employment process, and processing verification documents when an offer of employment is made.

IV. EXHIBITS

Exhibit A - Form I-9 Employment Eligibility Verification (U.S. Department of Justice, Immigration and Naturalization Service form), and Form Instruction Guide.

Exhibit B - University Employment Centers.

Exhibit C - Acceptable Documents for Verifying Employment Eligibility.

Exhibit D - Payroll/Personnel Verification Codes and Definitions.

V. PROCEDURE

A. University Compliance With the Immigration Reform Act During the Recruitment and Employment Process.

- Employment Center
1. Post notices throughout the applicable responsibility centers informing candidates of the requirements of the Act and the University compliance procedures.
  2. Advise candidates of the requirements of the Act, the University compliance procedures, and the various types of documents that may be used for attesting to identification. This may be accomplished during the interview by oral explanation or distribution of literature.

B. Employment Eligibility Verification - Completion of U.S. Department of Justice Form I-9

New Employee

3. Prior to, or within the first three days of work, present the appropriate documents attesting to identity and employment eligibility to the employment center processing the employee:
  - a. Staff employees covered by a Recruitment Request complete Form I-9 and present the required documentation for verification in the Office of Human Resources.
  - b. All employees other than Staff and College-Work Study Students (e.g. Faculty, Graduate Student Assistants, TA's, TF's, GMT's, Research Associates, non-work study student employee, etc.) complete Form I-9 and present the required documentation for verification in the appropriate administrative office of the college, school, department, or regional campus processing the employee.
  - c. College-Work Study employees complete Form I-9 in the Work Study Office at the Pittsburgh Campus or the regional campus.
  - d. Staff employees in WPIC, MHCD, and UHCP complete Form I-9 in the Personnel Office of the appropriate medical facility
  - e. Regional Campus staff employees complete Form I-9 in the appropriate Regional Campus Employment Center.

C. Processing Verification Documentation

Employment Center

4. Examine the documents presented to verify that the prospective employee is authorized to work in the United States.
5. If the prospective employee is authorized to work in the United States, certify Form I-9 and attach a copy of the documentation provided.

The departmental administrator who examines and verifies the documentation must sign and certify Form I-9.

Employment Center  
or Department

6. Complete an Appointment form,

inserting the appropriate payroll/personnel data, attach the original Form I-9 and photocopies of the documentation, and forward to the appropriate administrative office for processing. (Faculty Records section of the Provost Office or the Office of Human Resources.)

7. If the appropriate documentation is not provided within the first three working days, the employee is not permitted to continue work.

No appointment or payroll action may be executed until the requirements of the Act have been met. The effective date of the action and payment start date may not precede the date of the certification by more than three days.

#### D. Expiration of Employment Authorization

- Employment Center
9. Terminate alien employees (Code I9XD on Employee Record (See Exhibit D) when their authorization date for employment expires, except:
    - a. When the employee obtains an extension of their authorization date for employment
    - b. When the employee obtains a change in alien status, e.g.:
      - (1) From temporary status to naturalized citizen
      - (2) From temporary status to lawful permanent resident or conditional permanent resident
  10. Upon receipt of notification of a change in status in an alien employee's authorization date for employment (paragraph 9a. and 9b. above), reverify employee's employment eligibility as previously established in C. above.

#### E. Record Retention of Verification Documentation

- Employment Center
11. Upon completion of processing authorized employees through the Payroll/Personnel system, forward the original Form I-9 and eligibility verification documentation to the Payroll Office for filing.
- Payroll Office
12. Retain and file verification documentation for review by the U.S. Department of Justice, Immigration and Naturalization Service for three years from the date of hire or one

year from the date of termination,  
whichever is longer.

VI. REFERENCE

- [Policy ER 08 07-01-04, Employment Eligibility Verification:Immigration Reform and Control Act \(formerly 07-01-04\).](#)