# I-9 Compliance Workflow

New Hires, Rehires, Reinstatements and Federal Contractors

<table>
<thead>
<tr>
<th>I-9 Compliance Team</th>
<th>I-9 Anywhere/Equifax</th>
<th>Payroll</th>
<th>Tax Office</th>
<th>Department/School</th>
</tr>
</thead>
<tbody>
<tr>
<td>Processes new I-9s in person and reverifications in person for staff, faculty and students. Field questions from staff, faculty and students regarding the completion of I-9s and which documents are acceptable based on VISA status.</td>
<td>Processes new I-9s in person on behalf of JHU for staff, faculty and students who live or work in a location that is not within a reasonable driving distance of Eastern High School.</td>
<td>Processes weekly report from HRBS that compares SAP to Equifax to find individuals in SAP who are on hold that have completed I-9s in Equifax. Removes I-9 holds for citizens and legal permanent residents.</td>
<td>Processes daily report from Equifax to check for new I-9 submissions for foreign nationals and compares to new hires in SAP to remove I-9 hold status and update VISA status.</td>
<td>Send I-9 template to newly hired students, faculty and staff not hired through SuccessFactors. SuccessFactors hires receive automated email at hire with I9 Instructions.</td>
</tr>
<tr>
<td>Researches status of Pending I-9s, hire date and SSN mismatches in SAP and Equifax based on the I-9 non-compliant weekly reports comparing SAP and Equifax.</td>
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<td></td>
<td>Run the pending I-9 report weekly to determine which staff, students, and faculty have not completed a new I-9. Contact non-compliant employees to ensure the completion of their missing or incomplete I-9. Students, staff and faculty who continue to be non-compliant must be terminated.</td>
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<tr>
<td>Updates SSN applied for status in Equifax once social security numbers are received from foreign nationals without SSNs.</td>
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</tr>
<tr>
<td>Receives monthly report from the Controller’s office with Federal Contracts Internal Orders and compares to individuals at JHU who are on Federal Contracts but have not been through the E-verify process (hired before November 2009). Depts and employees are contacted to have employee complete a new I-9.</td>
<td></td>
<td></td>
<td></td>
<td>Follow-up with affected employees to ensure that they complete I9s if they are on Federal Contracts and were employed prior to the integration with Equifax (Nov 2009). I9 Compliance website: <a href="https://hr.jhu.edu/forms/i9-compliance.php">https://hr.jhu.edu/forms/i9-compliance.php</a></td>
</tr>
</tbody>
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## I-9 Compliance Workflow
### Work Authorization Extensions for Foreign Nationals

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<th>Department\School</th>
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<tbody>
<tr>
<td>Prepares report from Analysis with employees whose work authorization will expire within 120 days. Sends emails to the employee with instructions on how to process a reverification of employment if applicable. Receives monthly report from HRIS with expired work authorizations and distributes to schools/departments.</td>
<td>Receives weekly report from HRIS with employees who have expired work authorization and places them on Expired Work Authorization Hold (105)</td>
<td>Reviews daily report from Equifax to check for updates in VISA status and work authorization extensions for foreign nationals and then updates in SAP</td>
<td>Run pending I-9 report/work authorization expiration report monthly. Follow-up with employees who have not extended their work authorization within 30 days of expiration date. These staff members must process reverifications in the I9 management system. Students, staff and faculty with expired work authorization must be terminated or placed on leave of absence without pay using reason code 16 (work authorization pending). Here is the link to the I9 Compliance website to start the process: <a href="https://hr.jhu.edu/forms/i9-compliance.php">https://hr.jhu.edu/forms/i9-compliance.php</a>.</td>
</tr>
<tr>
<td>Updates SSN applied for status in Equifax once social security numbers are received from foreign nationals without SSNs.</td>
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<td></td>
</tr>
<tr>
<td>Receives monthly report from the Controller’s office with Federal Contracts Internal Orders and compares to individuals at JHU who are on Federal Contracts but have not been through E-verify process. Depts and employees are contacted to have employee complete a new I-9.</td>
<td></td>
<td>Process weekly report from HRBS that compares SAP and Equifax that indicates work authorization extensions and changes in VISA status for foreign nationals. Updates are made manually in SAP.</td>
<td>Follow-up with affected employees to ensure that they complete I9s if they are on Federal Contracts and were employed prior to the integration with Equifax (Nov 2009)</td>
</tr>
<tr>
<td>Field questions from staff, faculty and students who require guidance on which documents are acceptable to complete reverifications.</td>
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</tr>
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</table>
Pending I-9 and Work Authorization Report

- Based on the data stored in SAP, this report will help you identify faculty, staff and students with:
  - Expiring work authorization dates within 120 days
  - Work authorization that has already expired
  - Missing work authorization expiration dates
  - Pending I-9 status
- If any of your employees appear in this report they need your attention to be compliant with federal employment authorization regulations
• Select your criteria. There are several options.
• Personnel Area is required. If you choose to enter only Org Unit you will get an error.
• Key date is not an option; this report is always as of close of business yesterday.

The * is a wildcard. By using it you are telling the report to return results for all JHU Personnel Areas. Personnel Area is a required selection.

The prompt screen says that Org Unit is an optional selection. However, if you normally have to enter org units to get results from Analysis reports because your roles are limited to specific org units that is true in this report also.
You may see up to four I-9 categories in the report:

If a person should have a Work Permit Expiration in SAP, but the field is blank the category is Non Resident Alien without Work Permit Expiration Date. (Appendix – page 13)

If a person has a Work Permit Expiration in SAP that will expire within 120 days the category is Non Resident Alien with Upcoming Work Permit Expiration Date. (Appendix – page 12)

If the Pers. Admin code in SAP is 105 the category in this report is Reverification Pending. Code 105 is assigned when the SAP work permit expiry date has passed and there is no other type of hold on the record. (Appendix – page 11)

If a person’s SAP record has a hold on the field Mail Code/Pers. Admin or if the Residence Status is set to Pending I-9 the category in this report will be Pending I-9. (Appendix – page 14)
This sample report was run on 5/19/2022. 8/15/2022 is 88 days from now.

When Work Permit Expires = # and I-9 Category = Pending I-9 the I-9 is not yet completed or was completed so recently that it has not yet been recorded in SAP.

When Work Permit Expires = # and I-9 Category = Non Resident Alien without Work Permit Expiration Date a work authorization expiration date needs to be added to Residence Status in SAP.

Negative numbers indicate that the work authorization date has passed.
Continuous Service Date corresponds with the most recent JHU hire.

Continuous Service Date is calculated based on the person, even if they have concurrent assignments. A person who is new to your area may not be new to JHU.

All new hires and those rehired with more than a three-day break in service need a new I-9.

The “Hire Date” on a person’s I-9 should match their Continuous Service Date in this report. Date mismatches generally either indicate that a new I-9 is required or a clerical error has occurred.
You can do some customization, like many other Analysis reports

Save as: keep a copy of your customized report in your favorites folders.

Add free characteristics into the report by dragging them to the rows area at the right.

Export to Excel

Remove characteristics you don’t need from the default layout by dragging them off to the left.
Who do I contact with questions?

Questions about I-9s and Work Authorization:
• I9ComplianceSvcs@jhu.edu

Questions related to user access and authorizations:
• https://ssc.jhmi.edu/hr_payroll/DataFiles_HR_Payroll/analysis_auth.pdf

Technical problems with Analysis/BW Reports:
• JHU IT Help & Support
• https://it.johnshopkins.edu/help/index.html
Appendix

• The following slides contain images of the areas in ECC where you may view the infotypes that cause an employee to appear in the Pending I-9 and Work Authorization Expiration report.

• If you need to review an individual’s work authorization status you can:
  • Run the report wide open and filter or scroll to see that person in the results
  • Run the report and enter the person’s pernr(s) in the selection criteria to limit the results
  • Use ECC to review all of the SAP infotypes that can cause an individual to appear in the report
Reverification Pending

Navigate to Residence Status or infotype 1 (Org Assignment) in the Direct selection box. Click the glasses (Display). You will see 105 in the PersAdmin field.

It’s important to understand that the category “Reverification Pending” is telling you that reverification is urgently needed, not necessarily that reverification is already in progress.

PersAdmin is changed to code 105 when the infotype 94 (Residence Status) expiration date has passed and the record has no other type of hold. Individuals with the status Non-resident Alien must have a valid Expiry of WP date.
Non Resident Alien with Work Permit Expiration Date

Navigate to Residence Status or infotype 94 in the Direct selection box. Click the glasses (Display).

Expiry of WP dates that have passed or will expire within 120 days will cause a person to appear in the Pending I-9 report.
Non Resident Alien without Work Permit Expiration Date

Navigate to Residence Status or infotype 94 in the Direct selection box. Click the glasses (Display).

You can see that the expiration date is blank. Individuals with the status Non-resident Alien must have an active Expiry of WP date.
Pending I-9

Navigate to Organizational Assignment or infotype 1 in the Direct selection box. Click the glasses (Display). Holds on PersAdmin indicate incomplete work authorization. There are multiple types of holds that may be used on PersAdmin.

Pending I-9 on Residence status also indicates incomplete work authorization.