

From: Manuel P. Monteiro
To: Vice Presidents, Deans, Directors and Department Heads
Re: Changes to the Process for Completing a Form I-9
Date: October 2, 2009

I am writing to inform you about changes being undertaken by Boston University to improve the process for completing the Form I-9 for all newly hired employees. In addition, we are taking steps to safeguard the personal information contained on the Form I-9.

Effective Monday, October 5, 2009, the responsibility for completing the Form I-9 for all newly hired **staff** on the Charles River Campus will be transferred from units/departments to Human Resources. Beginning in November, Human Resources will assume the responsibility for completing the Form I-9 for all newly hired **faculty** as well as **casual** employees. On the Medical Campus, all newly hired faculty, research associates, post-docs and casual employees will complete Form I-9 in Human Resources at the Crosstown Center commencing on October 5, 2009. Once these groups are successfully integrated into the new hire process, Human Resources on both campuses will assume responsibility for all newly hired employee groups who currently complete the Form I-9 at the International Students and Scholars Office.

To facilitate this process, Human Resources has selected a vendor, *Form I-9 Compliance*, to provide an electronic Form I-9 that will eventually eliminate the use of the current paper forms, except in a few isolated instances. Utilizing this error-detecting software to complete the Form I-9 will allow Boston University to achieve two statutory requirements: 100% compliance with the Immigration Reform and Control Act of 1986 (IRCA) and compliance with the Massachusetts law regarding personal information protection (PIPA) that will take effect in March 2010. Use of this system will also allow us to meet the requirements of E-Verify for certain current and new employees working on specified federal contracts.

The current procedure for the completion of Form I-9 on student employees will remain unchanged. However, the Student Employment Office will begin to assume the responsibility for housing all completed student Form I-9s starting October 13, 2009. Units/departments will be contacted directly by the Student Employment Office regarding the collection process.

As I am sure you know, IRCA requires that an employer complete Form I-9 on every newly hired employee ***within the first three days of employment***. U.S. Immigration and Customs Enforcement has stepped up its compliance enforcement efforts, issuing over 600 audit notices over the last quarter. Fines for non-compliance are substantial, potentially reaching six figures. This means that any newly hired employee who does not have a completed Form I-9 by the end of his or her third day of employment at BU

will not be allowed to return to work until the form has been completed. There are no exceptions.

Massachusetts law requires all employers to take specific measures to protect personal information. As part of this Form I-9 project, Human Resources will retrieve all paper I-9 forms currently stored in units/departments across campus. These forms will be audited, imaged, indexed, and securely archived. By taking these steps, we will prevent unauthorized access to personal information that is contained on the Form I-9 records.

The entire Human Resources staff has been trained on this new Form I-9 process and is available to members of the university community should they have any questions about the process.

I thank you in advance for your cooperation.