GRINNELL COLLEGE



Title **Verification of Work Authorization Policy**

Summary All employees must provide documentation that they are legally authorized to work in the United States. This policy explains the

procedures for verification of legal status.

Legal Acts The Immigration and Nationality Act of 1952 (as amended)

The Immigration Reform and Control Act of 1986

Summary of federal laws relating to employee verification/I-9:

http://counsel.cua.edu/fedlaw/i9.cfm

USCIS Handbook for Employers (Form M-274):

http://www.uscis.gov/files/form/m-274.pdf

Policy Statement Grinnell College requires that all employees be legally authorized to work in the United States, and it abides by all laws that prohibit the employment of undocumented foreign nationals. Any person employed by the College must complete the federal Employment Eligibility Verification Form (I-9) within three days of hire and will be entered into the federal E-Verify system.

Implementation Every newly hired employee must complete Section 1 of the federal Employment Eligibility Verification Form (I-9), attesting to their eligibility for employment in the United States, no later than the first day of employment, but not before a job offer is made. Only authorized staff in the Office of Human Resources may complete Section 2 of Form I-9 on behalf of Grinnell College. The director of human resources is the only person who may assign such authority. Section 2 of Form I-9 is normally completed at the new employee's orientation session, which is to be held within the first three days of employment.

> In order for authorized staff to complete Form I-9, new employees need to present legally valid (unexpired) documentation that they are authorized to work in the United States. The last page of Form I-9 provides the federally approved Lists of Acceptable Documents, and these lists will be provided to new employees before their orientation session. If for any reason an orientation session cannot be scheduled within an employee's first three days of employment, Human Resources must schedule a time for the employee to present the required documentation to authorized staff within his or her first three days of employment. Grinnell College cannot specify which document(s) employees must present from the Lists of Acceptable Documents, except as required by the E-Verify system.

The new employee's documentation is photocopied and filed with the completed Form I-9 in the Human Resources office. Employees are also entered into the federal E-Verify system.

Enforcement

New or prospective employees who believe that a Grinnell College staff member has violated this policy are encouraged to contact the director of human resources, explaining how the procedure was violated and providing supporting details. The director of human resources will investigate the case and provide a report to the complainant within ten business days. If an employee or prospective employee believes this policy has been applied in a discriminatory fashion, he or she is encouraged to discuss the situation with the College's Title IX Coordinator. Employees may also seek counsel from the College's ombudsperson.

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