



Maintaining worker document compliance is critical for any employer, and a key part of this process is verifying documentation during hiring and onboarding.

Document fraud has become an increasingly sophisticated challenge for employers. Fraudulent compliance documents can bypass traditional screening processes, potentially exposing organizations to significant legal, financial and reputational risks.

As an employer, you must develop strong strategies to detect and prevent document manipulation.

This quick guide provides tips to identify red flags, implement verification protocols and protect your organization from potential compliance document fraud.

Disclaimer. This guide does not constitute legal advice. Consult legal counsel with specific compliance questions.

What is a Form I-9?

Before diving in, let's define Form I-9 and its importance. The U.S. Citizenship and Immigration Services (USCIS), an agency of the Department of Homeland Security, requires completion of the Form I-9, Employment Eligibility Verification, to establish that an employee is eligible to work in the U.S.

In addition to proving employment eligibility, the Form I-9 verifies an individual's identity by requiring the individual to provide the employer with acceptable documentation as evidence of identity and employment authorization.



What is the Form I-9 used for?

As noted, the Form I-9 verifies the identity and employment authorization of individuals hired to work in the U.S. Federal law requires employers to hire only individuals legally permitted to work in the U.S., including:

U.S. Citizens

Non-Citizen Nationals

Lawful Permanent Residents Non-citizens authorized to work the United States



What documents are needed to complete the form?

A single document may establish both employee identity and employment eligibility, such as a U.S. passport or Permanent Resident Card. Alternatively, an employee may present two documents, such as an original unrestricted Social Security card (not a copy) and a valid driver's license.

Employees choose which documents to provide from the Form I-9 Instructions, but employers must examine these documents to determine whether they reasonably appear to be genuine and relate to the employee.



General rules for Form I-9 documentation

DOCUMENTATION PROVIDED FOR SECTION 2 OF THE FORM I-9 MUST:

1.

Reasonably appear to be genuine AND

2.

Relate to the person providing the documentation

What does this mean in simple terms?

A genuine document is real or authentic, as opposed to fake or fraudulent. Employers must use a 'reasonableness' standard to determine document authenticity.



IMPORTANT REMINDERS



Employers are not expected to be document experts but should focus on identifying documents that do not reasonably appear to be genuine.



Various documents can fulfill the Form I-9 requirements — detailed resources should be provided to those verifying documents. <u>Acceptable forms and examples</u> can be found here.



Employers cannot request specific forms of identification or make statements that a document is "fake" or "fraudulent." Instead, state that you cannot accept the document and ask if the employee has another acceptable document.

Let's get into potential red flags that could indicate a fraudulent document.

Things to watch out for on Form I-9 documentation

There are a few red flags on documents that could indicate they're not genuine. While not exhaustive, these common indicators should raise concern.

1. Misspellings

Example: City, State or Issuing Authority is misspelled.

2. Incorrect issuing authority

Example: "Department of Social Security" instead of "Social Security Administration."

3. Font or formatting issues

- Different font sizes within the same word or phrase.
- Inconsistent fonts throughout the document.
- Document orientation does not match standard format (e.g., a horizontal driver's license when it should be vertical for minors).

4. Mismatched issue date and document version

Example: A Permanent Resident Card with an issue date that does not match the version used at that time.

5. Unusual coloring

Example: Colors appear too bright, fluorescent or inconsistent with known versions of the document.

6. Extraneous text or markings

Example: Additional words, dashes (-) or commas (,) not found on authentic documents.

7. Incorrect form number

- Permanent Resident Card (Form I-551)
- Employment Authorization Document (Form I-766)

Example: Documents labeled as "1-551," "I-531" or "I-736" are incorrect.



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8. Missing authenticity markers

Many official documents contain security features, including:

- Ghost images (faint duplicate images of the holder's photo)
- Holograms (3D images that change when viewed from different angles)
- Magnetic strips (often on the back of IDs, allowing for data scanning)
- Seals (official insignias from government agencies)
- Unique identifiers (e.g., Golden Gate Bridge on California driver's licenses)

9. Raised edges or borders

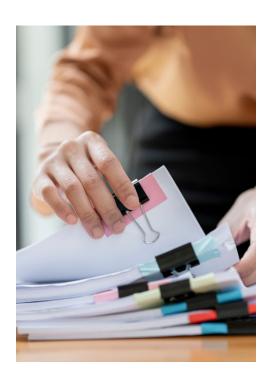
Legitimate identification cards have smooth surfaces. Raised photographs or uneven lamination may indicate tampering.

Example: A raised photograph could suggest the original photo was covered and the card has been re-laminated.

Common errors when examining documents

There are also a few common errors made when examining documents. Be sure to properly train anyone responsible for document review to avoid these practices.

- Not spending enough time examining the entire document (both front and back if applicable)
- Inspecting a copy of a document instead of the original
- Not looking for red flags indicating a document may not be genuine
- Reviewing documents online instead of in person (in-person verification is required by law).





Verifying the person submitting the documents



After careful examination and verification of the submitted Form I-9 documents, the next step is to verify the person submitting them. Not only must documents presented for the Form I-9 be genuine, they must also reasonably relate to the person who is presenting them as his or her identification. Here are a few things to keep in mind.

People's physical appearances do change over time. Differences due to a change in a person's physical appearance — like a new haircut — where the photo identification still appears to match the person who is providing the photo identification are to be expected. Also, some states issue driver's licenses that are valid for as long as 12 years, so it is possible that the person could look different in their picture.

A note on glasses

Some people wear both glasses and contact lenses. While some states make people take their glasses off for photo identification pictures, other states allow people to wear their glasses for photo identification pictures. Generally, these differences are not a problem.

However, a photo identification where a person is wearing sunglasses should be a warning sign — as photo identifications where the person is wearing sunglasses are not common.

If the photo identification on the document does not "look" like the person who is providing it, though, you can reject the document and ask the person to provide another acceptable document.



List of acceptable documents

EMPLOYEES MUST PRESENT:

One document from List A OR

One document from List B AND one document from List C

At least one document must include a photo, and all documents must be unexpired.

<u>A detailed list of Acceptable Documents</u> can be found in the Form I-9 Instructions or on the U.S. Immigration website for a visual example.

| LIST A | | LIST B | LIST C |
|--|----|--|--|
| Documents that Establish Both Identity and Employment Authorization | OR | Documents that Establish Identity ANI | Documents that Establish Employment Authorization |
| U.S. Passport or U.S. Passport Card Permanent Resident Card or Alien Registration Receipt Card (Form I-551) | 1 | Driver's license or ID card issued by a State or outlying possession of the United States provided it contains a photograph or information such as name, date of birth. | A Social Security Account Number card, unless the card includes one of the following restrictions: (1) NOT VALID FOR EMPLOYMENT |
| Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine- readable immigrant visa | | sex, height, eye color, and address 2. ID card issued by federal, state or local government agencies or entities, provided it contains a photograph or information such as | (2) VALID FOR WORK ONLY WITH INS AUTHORIZATION (3) VALID FOR WORK ONLY WITH DHS AUTHORIZATION |
| Employment Authorization Document that contains a photograph (Form I-766) | | name, date of birth, sex, height, eye color, and address | Certification of report of birth issued by the Department of State (Forms DS-1350, |
| For an individual temporarily authorized to work for a specific employer because | | School ID card with a photograph | FS-545, FS-240) 3. Original or certified copy of birth certificate issued by a State, county, municipal authority, or territory of the United States bearing an official seal |
| of his or her status or parole: | | Voter's registration card | |
| a. Foreign passport; and | | 5. U.S. Military card or draft record | |
| b. Form I-94 or Form I-94A that has the following: | | 6. Military dependent's ID card | |
| (1) The same name as the passport; and (2) An endorsement of the individual's status or parole as long as that period of endorsement has not yet expired and the proposed employment is not in conflict with any restrictions or limitations identified on the form. | | 7. U.S. Coast Guard Merchant Mariner Card | Native American tribal document |
| | | 8. Native American tribal document | 5. U.S. Citizen ID Card (Form I-197) |
| | | Driver's license issued by a Canadian government authority | Identification Card for Use of Resident Citizen in the United States (Form I-179) |
| | | For persons under age 18 who are unable to present a document listed above: | 7. Employment authorization document issued by the Department of Homeland Security For examples, see Section 7 and Section 13 of the M-274 on uscis.gov/i-9-central. The Form I-766, Employment Authorization Document, is a List A, Item Number 4. document, not a List C document. |
| | | 10. School record or report card | |
| Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI | | 11. Clinic, doctor, or hospital record | |
| | | 12. Day-care or nursery school record | |
| Acceptable Receipts | | | |
| May be presented in lieu of a document listed above for a temporary period. | | | |
| For receipt validity dates, see the M-274. | | | |
| Receipt for a replacement of a lost, stolen, or damaged List A document. | OR | Receipt for a replacement of a lost, stolen, or damaged List B document. | Receipt for a replacement of a lost, stolen, or damaged List C document. |
| Form I-94 issued to a lawful permanent resident that contains an I-551 stamp and a photograph of the individual. | | | |
| Form I-94 with "RE" notation or refugee stamp issued to a refugee. | | | |

Form I-9 Edition 1/20/2025



The PeopleReady difference

Meeting employment eligibility requirements isn't just a best practice — it's a necessity. PeopleReady has you covered. Our robust I-9 and E-Verify compliance program ensures we comply with all regulations and protect your business from unnecessary risk.

Every year, thousands of businesses trust PeopleReady to help them navigate complex immigration and worker documentation requirements. Don't leave your staffing practices at risk – partner with PeopleReady today and get access to a compliant and documented W-2 workforce.

About PeopleReady

PeopleReady, a TrueBlue company (NYSE: TBI), specializes in quick and reliable on-demand labor and highly skilled workers. PeopleReady supports a wide range of industries, including construction, manufacturing and logistics, retail and hospitality.

Leveraging its top-rated JobStack staffing app and hundreds of local teams, PeopleReady connects thousands of businesses with job seekers each year across all 50 states.

Interested in learning more about our staffing and compliance solutions? Get in touch with our team at peopleready.com.

