SECTION TWO. FINDINGS

A. ABOUT THIS SECTION

Section Two presents the findings of the Basic Pilot evaluation in six chapters:

- Employment Verification Outcomes from the Basic Pilot Program (Chapter V)
- Employer Participation and Perceptions of the Basic Pilot (Chapter VI)
- Compliance with Basic Pilot Procedures (Chapter VII)
- Impact of the Basic Pilot on Discrimination (Chapter VIII)
- Privacy and Fair Information Practices (Chapter IX)
- Pilot Financial and Non-financial Costs and Benefits (Chapter X)

Chapter III presented an overview of the methodology used in this study, including its strengths and limitations. Additional detail is provided in the Technical Appendices. The following are the most important limitations that readers should keep in mind as they read the findings:

- The surveys were designed to include a sufficient number of cases to provide fairly precise estimates for all pilot and similar non-pilot employers and for all pilot employees. However, the evaluation team has sometimes examined information about subgroups of the larger sample (Exhibit TWO-1). Findings based on all survey respondents are, generally, more accurate than those based on subgroups, especially when the respondent subgroup is small. For example, addressing some of the key research issues requires an understanding of the experiences of employees who went to INS or SSA to resolve their work-authorization problems. Even though the evaluation team oversampled employees in this category and tried hard to locate them, this subgroup includes only 67 respondents. Conclusions based on such a small sample are considerably less precise than conclusions based on all 970 employees interviewed. Exhibit TWO-1 presents additional information on the sample sizes for the most important groups surveyed in this evaluation.
- The evaluation team gave considerable effort to locating and eliciting cooperation from sample members; however, not everyone asked to respond to the surveys did. Although the results were weighted to compensate for some of the known differences between respondents and nonrespondents, there is undoubtedly some residual nonresponse bias. In particular, it is likely that response bias in the employee interviews led to an underestimate of the number of employees who are not work-authorized.
- Respondents do not always provide accurate information. Sometimes the respondent does not answer truthfully because the answer may be self-

incriminating (e.g., asking employers if they limit the work assignments of employees while they are resolving tentative nonconfirmations). Sometimes respondents provide inaccurate information because they do not have access to accurate information or do not bother to locate the needed information (e.g., a respondent to the employer mail survey may not have had accurate information about the costs of implementing the Basic Pilot program). Survey items may be misunderstood because of language differences, inattention, or other reasons.

Exhibit TWO-1: Sample Sizes for Key Subgroups Analyzed in Chapters V to X

Subgroup	Number of Cases
Employer mail survey	
All pilot establishments	1,189
Pilot establishments with at least one transaction on database	714
Pilot respondents	637
Pilot establishments reporting use of Basic Pilot system (pilot users)	469
Non-pilot respondents	235
Employer on-site interviews and observations	
Pilot respondents	317
Non-pilot respondents	93
In-person employee interviews	
Pilot respondents	970
Pilot respondents saying they were offered a job by pilot employer	857
Pilot respondents saying they completed the I-9 form before receiving job offer	523
Pilot respondents saying they were told about work-authorization problems	101
Pilot respondents saying they decided to clear up problems	72
Pilot respondents saying they visited SSA or INS to resolve problems	67
Basic Pilot transaction database	
All transactions sent to SSA	364,987
All transactions with authorized outcomes	317,336
All transactions with final nonconfirmation and unresolved outcomes	47,492
All transactions with unauthorized outcomes	159
Sample of I-9 forms within designated sampling period	
Forms sampled during site visits at pilot establishments	3,864
Forms sampled during site visits at non-pilot establishments	283
Forms for pilot employees attesting to being U.S. citizen or national	2,422
Forms for non-pilot employees attesting to being U.S. citizen or national	177
Forms for pilot employees that could be matched to transaction database	2,933

A number of limitations emerged in developing the Basic Pilot transaction database from the INS and SSA administrative databases and in analyzing the verification outcomes captured in these databases. Employers sometimes enter information into the computer incorrectly, enter the information for the same employee several times, or do not follow the Basic Pilot procedures in using the system. Further, the INS and SSA administrative databases were designed to capture the information necessary for processing the

verification rather than for analysis. Often, the database does not capture all the information the evaluation team would like to have about the cases entered in the system. Although the evaluation team has made every effort to work around these limitations in preparing the report, it has often been necessary to make educated guesses when summarizing the data.

Findings based on I-9 forms sampled from pilot and non-pilot employers also have some limitations. Of the 380 employers visited on site, 283 (74 percent) allowed the interviewer access to I-9 forms – 253 pilot and 30 non-pilot employers.

The estimates based on the sample I-9 forms are not weighted.⁶² Further, although interviewers were given sampling instructions for several types of Form I-9 record keeping, the evaluation team has some concern that interviewers may not have had access to all I-9 forms eligible for the study (current as well as terminated employees) because of differences in establishments' record-keeping procedures.

The quotes from Federal officials included in this report are based on qualitative interviews with Federal officials at INS, SSA, and the Office of Special Counsel who were involved with and knowledgeable about the pilots. As such, they represent the personal opinions of the individuals interviewed and cannot be extrapolated to other officials in the various agencies they represent.

B. GENERAL APPROACH

The evaluation of the Basic Pilot was based on multiple sources of information that examined the program from three different perspectives: employers, employees, and Federal agencies. To mitigate the effect of the data limitations discussed above, and to increase confidence in the conclusions presented in this report, the evaluation team used these multiple data sources in a "triangulation" approach. Triangulation involves reaching conclusions by comparing the results of the analysis of multiple data sources and reconciling or explaining inconsistencies among the findings from the different sources. The main benefit of triangulation is that it provides a stronger basis for deriving conclusions from multiple, independent data sources. The evaluation team first set forth hypotheses about the research issues and then analyzed the data sources. The team then compared the results from all of the data sets on a given issue to determine whether the findings supported the hypothesis. If all of the findings supported the hypothesis, the evaluation team was confident in stating a conclusion based on the findings. When results were contradictory, the team explored possible reasons and performed additional analyses to better understand the discrepancy. When the evaluation team could not resolve observed contradictions related to important research issues, the contradictory results are presented.

⁶² The evaluation team identified problems in the way several interviewers had recorded the information necessary to compute the weights.