IMAGE BEST EMPLOYMENT PRACTICES

1. Use E-Verify, the DHS employment eligibility verification program, to verify the employment eligibility of all new hires.
2. Use the Social Security Number Verification Service (SSNVS) for wage reporting purposes. Make a good faith effort to correct and verify the names and Social Security numbers of the current workforce and work with employees to resolve any discrepancies.
3. Establish a written hiring and employment eligibility verification policy.
4. Establish an internal compliance and training program related to the hiring and employment verification process, including completion of Form I-9, how to detect fraudulent use of documents in the verification process, and how to use E-Verify and SSNVS.
5. Require the Form I-9 and E-Verify process to be conducted only by individuals who have received appropriate training and include a secondary review as part of each employee's verification to minimize the potential for a single individual to subvert the process.
6. Arrange for annual Form I-9 audits by an external auditing firm or a trained employee not otherwise involved in the Form I-9 process.
7. Establish a procedure to report to ICE credible information of suspected criminal misconduct in the employment eligibility verification process.
8. Ensure that contractors and/or subcontractors establish procedures to comply with employment eligibility verification requirements. Encourage contractors and/or subcontractors to incorporate IMAGE Best Practices and when practicable incorporate the use of E-Verify in subcontractor agreements.
9. Establish a protocol for responding to letters or other information received from federal and state government agencies indicating that there is a discrepancy between the agency's information and the information provided by the employer or employee (for example, "no match" letters received from the Social Security Administration) and provide employees with an opportunity to make a good faith effort to resolve the discrepancy when it is not due to employer error.
10. Establish a tip line mechanism (inbox, email, etc.) for employees to report activity relating to the employment of unauthorized workers, and a protocol for responding to credible employee tips.
11. Establish and maintain appropriate policies, practices and safeguards to ensure that authorized workers are not treated differently with respect to hiring, firing, or recruitment or referral for a fee or during the Form I-9, E-Verify or SSNVS processes because of citizenship status or national origin.
12. Maintain copies of any documents accepted as proof of identity and/or employment authorization for all new hires.

Report Suspicious Activity
1-866-DHS-2-ICE
1-866-347-2423
www.ice.gov

03/2011

ICE Mutual Agreement between Government and Employers

IMAGE

Fostering Compliance Through Education and Partnership

U.S. Immigration and Customs Enforcement

IMAGE PROGRAM

With the passage of the Immigration Reform and Control Act (IRCA) in 1986, employers in the U.S. and its territories are required to hire only authorized workers. Employers are required to document their employees' identity and work eligibility on the Form I-9, Employment Eligibility Verification, within three days of hire. Violations of immigration law can expose employers to possible civil and criminal penalties.

Employers should recognize that unauthorized workers may attempt to secure a job by fraudulent means through the use of false documents and identity theft. Verifying your workforce will help you conduct business efficiently, legally and with integrity by mitigating the risks associated with employing unauthorized workers.

IMAGE PROGRAM

U.S. Immigration and Customs Enforcement (ICE) is responsible for enforcing the nation's immigration and customs laws. To minimize vulnerabilities that help unauthorized workers gain unlawful employment, the Department of Homeland Security (DHS) introduced the ICE Mutual Agreement between Government and Employers (IMAGE) program in 2006. The goal of the IMAGE program is to reduce the employment of unauthorized workers through outreach, education and training. ICE advocates IMAGE's Twelve Best Employment Practices.

OUTREACH AND TRAINING

As part of the IMAGE program, ICE will meet with and provide interested employers education and training in proper hiring procedures, fraudulent document detection, use of the E-Verify employment eligibility verification program and the Social Security Number Verification Service. This training is free of charge, is available to any employer, can be tailored to meet specific needs, and will equip the employer with the knowledge and the tools needed to ensure a legal and authorized workforce.

IMAGE CERTIFICATION

IMAGE offers a formal membership program that focuses on exceptional employers that have the ability to effect change within their industry or region. These employers also serve as an example and role model in the business community while highlighting the importance and viability of immigration compliance. Program participants will be deemed IMAGE certified upon enrollment and completion of IMAGE membership requirements. Employer feedback on the IMAGE program and industry participation in IMAGE will serve to guide DHS in shaping future worksite enforcement policy.

Participating in the IMAGE program reduces unauthorized employment and minimizes the use of fraudulent identity documents. It also protects workforce integrity by helping to ensure employees are who they represent themselves to be. Through IMAGE, participants may also be contributing to national security by reducing opportunities for terrorists and criminals by limiting their access to critical infrastructure worksites. Improving company hiring practices will help avoid negative exposure due to unauthorized workers in the workplace and as a result will create an enhanced corporate image.

For more information on the IMAGE program or to request training, please visit **www.ice.gov/image** or email **image@dhs.gov.**

DHS E-VERIFY

E-Verify is an Internet-based system that compares information from an employee's Form I-9, Employment Eligibility Verification, to data from DHS and Social Security Administration records to confirm employment eligibility.

While participation in E-Verify is voluntary for most businesses, some companies may be required by state law or federal regulation to use E-Verify. For example, most employers in Arizona and Mississippi are required to use E-Verify. E-Verify is also mandatory for employers with federal contracts or subcontracts that contain the Federal Acquisition Regulation E-Verify clause. E-Verify is fast, free and easy to use – and it's the best way employers can ensure a legal workforce. Visit E-Verify at **www.dhs.gov/E-Verify** for more information.

Information for Employers