

# Client Alert

## ICE Launches National I-9 Audit Initiative

Beginning today, Immigration and Customs Enforcement (ICE) has launched a national Form I-9 Audit Initiative (Employment Eligibility Verification). Form I-9 is required to be maintained and filed for all employees working in the U.S. for a U.S. employer. It is expected that each Special Agent in Charge (SAC) will initiate multiple I-9 audits in each ICE jurisdiction today. The overall number of audits initiated in today's first wave could exceed several hundred nationwide.

**Comment:** The large-scale Form I-9 Audit Initiative launched today represents the first step by Homeland Security Secretary Napolitano to focus worksite enforcement efforts on employer compliance. It is anticipated that the number of I-9 audits will increase in the coming months. It is recommended that all employers who receive a notice of audit consult with immigration counsel as quickly as possible. It is also advisable that all employers take steps to review their compliance practices to date and to ensure that they maintain the strongest compliance profiles.