

Client Training HQ

Identifying Employees Impacted by TPS and Humanitarian Parole Terminations

Quick Reference for Guardian Administrators and Users

Temporary Protected Status (TPS) and Humanitarian Parole Terminations

The U.S. Department of Homeland Security (DHS) has announced the termination of several humanitarian immigration programs in 2025, which may impact an employer's Form I-9 obligations and responsibilities. These announcements include [the termination of the categorical humanitarian parole program for certain nationals of Cuba, Haiti, Nicaragua, and Venezuela \(CHNV\)](#) as well as [the termination of the 2023 Temporary Protected Status \(TPS\) designation for Venezuela](#). Other TPS terminations have also recently been announced.

While some of these terminations are currently subject to litigation, employers may, in consultation with counsel, desire to review their I-9 records to determine the potential impact. For example, employers may choose to review I-9s and stored documentation for employees who presented an Employment Authorization Document (EAD) with a specific category code on the front of the card that correlates with TPS or humanitarian parole. [According to the USCIS](#), the categories A12 and C19 are used for TPS, while a category of C11 is used for humanitarian parole.

Important: Employers may not be able to rely on EAD categories alone to determine applicability. For example, the C11 category is used for many types of humanitarian parole and not just CHNV.

Guardian Reporting: Identifying All EAD Holders

If your organization retains copies of I-9 documentation (either for all I-9s or just for E-Verify® photo matching), you can build and generate an Interactive Report to help identify employees who presented an EAD during a prior Section 2 completion. Once these individuals have been identified, review their stored documents in OnDocs to confirm if they have an applicable EAD category code.

Note: If your organization is using the Foreign National Tracking Feature in Guardian (described below), you can skip to that section for a more streamlined option.

Building an Interactive Report to Identify EAD Holders

- **Base Table:** Dashboard
- **Dashboard:** Top Pending Re-Verifications
- **Columns:** Configure the report as desired. The following are suggested:
 - **Employee information such as name, SSN, employee ID, or other identifier**
 - **I-9 Section 1 info:** S1 Citizenship Attestation, S1 Work Until Date, S1 Country of Issuance
 - **I-9 Section 2 info:** S2 Document A Name, S2 List A Expiration Date #1, S2 Additional Information
 - **I-9 Expiration Date** (used by the system for reverifications)
- **Download Excel Report:** Filter the records by the S2 Document A Name to show only those where "Employment Authorization Document (Form I-766)" was selected.
- **OnDocs Review:** Examine the stored EAD (if available) to look for the category code.
- Also, refer to the **Advanced Reports Guide** on [Connections](#) to build a report.

Guardian Foreign National Tracking

To assist with I-9 record reviews, admins may activate the Foreign National Tracking feature to enable the capturing and tracking of EAD category codes and visa types on new I-9s and Reverifications moving forward. Once enabled, employer representatives will be prompted to record the category and country of birth if an EAD is presented, or the class of admission (visa status) if an I-94 is presented *after* the Section 2 or Section 3 (Supplement B) has been completed.

Enabling the Foreign National Tracking Feature

- **Guardian G1 Admin Access:** Guardian Administration > I-9 Policy Module > I-9 Management Tab > Scroll to the bottom of the page: Toggle **Yes** on the *Track Visa Type and Work Eligibility* feature
- **Guardian G2 Admin Access:** Guardian Administration > Preferences > General > I-9 Preferences > select the checkbox for *Track Visa Type and Work Eligibility* activation
- Refer to [Connections](#) for the video titled: **Foreign National Tracking**

Building an Interactive Report with Work Eligibility Information

Create an interactive report with the desired columns (refer to the **Advanced Reports Guide** on [Connections](#) and the Foreign National Tracking Report)

- Once the report has been downloaded to Excel, filter the records by the Work Authorization Description column to identify the category codes of interest. For example:
 - **A12** – Temporary Protected Status
 - **C19** – Temporary Protected Status
 - **C11** – Public interest parolee (this category is used broadly for humanitarian parole and may not necessarily pertain to a categorial (such as CHNV) parole program)
- Review the Work Authorization Country fields and add additional filters as desired.

Note: Reports generated from Guardian are for informational purposes only and not intended as a directive for any particular I-9 action. Due to rapid changes in immigration policy, it is critical to regularly check the USCIS website for the latest official guidance. Employers are also strongly advised to consult with their legal counsel before making any employment decisions.

More Training Available!

Check out additional training resources available on our site, [Connections](#).

The information provided is intended as general guidance and is not intended to convey any tax, benefits, or legal advice. For information pertaining to your company and its specific facts and needs, please consult your own tax advisor or legal counsel. Links to sources may be to third party sites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third party sites or services.