

²⁰²⁵ I-9 Palooza!

**I-9 Compliance:
What's Hot and
What's Next**

EQUIFAX®



Thanks For Joining Our I-9 Palooza!



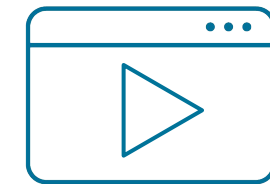
Welcome!

Thank you for joining our webinar. Stay tuned for more from Equifax Workforce Solutions!



Questions?

Please enter your questions in the chat box on your screen at any point during the presentation.



Recording

This webinar is being recorded. You will receive an email with a link to view the recording.

To Keep Our Lawyers Happy



The information provided herein is intended as general guidance and is not intended to convey specific tax or legal advice. For a legal opinion, please consult your lawyer.



This presentation is intended for the education and benefit of our customers and potential customers. This webinar cannot be shared with third parties.



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Your I-9 Subject Matter Experts Today



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Agenda: What's Hot and What's Next

- 1 Worksite Enforcement in 2025
- 2 Immigration Policy Changes (that impact I-9)
- 3 Examining Documentation in the Age of AI
- 4 Potential Changes on the Horizon
- 5 Questions and Answers



Poll Question

What aspect of I-9/E-Verify feels most uncertain or risky to your organization in 2025?

- ☐ Worksite enforcement actions (raids)
- ☐ Form I-9 Notices of Inspections
- ☐ Changes to immigration policy
- ☐ Document fraud and deepfakes
- ☐ Staying up-to-date with compliance changes
- ☐ None – we feel confident across the board

Worksite Enforcement

Worksite Enforcement in 2025

- Increasing worksite enforcement by ICE/HSI has been reported **across the US**
 - Form I-9 Notices of Inspection (NOIs)
 - “Knock and Talk” interactions
 - Coordinated ICE worksite enforcement actions
- Investigations of small, medium, and large businesses, in various industries (restaurants, hospitality, staffing, agriculture, etc.)
- Increasing criminal prosecutions of employers alleged to be knowingly hiring and/or continuing to employ unauthorized workers

Definitions

ICE = Immigration and Customs Enforcement

HSI = Homeland Security Investigations

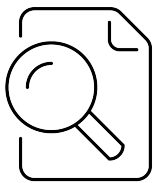
Source: <https://www.ice.gov/about-ice/hsi>

Anatomy of a Worksite Investigation in 2025

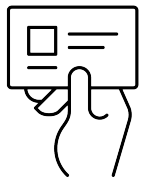
How ICE used the Form I-9 and other investigative methods to build a case against an employer



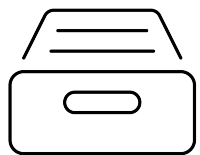
ICE receives **anonymous tip** about workers and/or working conditions



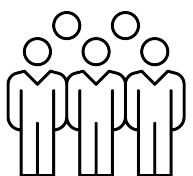
Employer receives **Form I-9 Notice of Inspection**



ICE discovers use of **fraudulent** documents and/or stolen identities



ICE obtains **search warrant** for broad search of documents



Enforcement Action initiated based on **prior surveillance** and other evidence

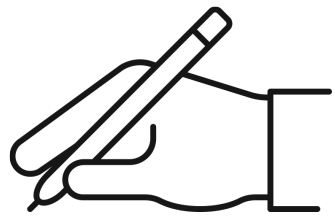
Tip: The ICE Form I-9 Inspection Fact Sheet contains an overview of the process, potential outcomes, and the determination of fines

<https://www.ice.gov/factsheets/i9-inspection>

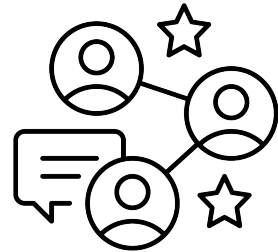
Immigration Policy Updates

Immigration and the Form I-9

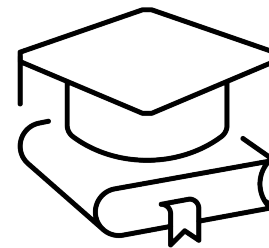
The many paths to work authorization in the US



Employer sponsored such as H-1B, L-1, TN, etc.



Humanitarian based such as TPS, Asylum, Humanitarian Parole, DACA



Work tied to educational, family, etc.

See the [USCIS website](#) for more information

Did you know?

[The Handbook for Employers \(M-274\)](#) contains almost 40 pages on how to complete the Form I-9 for non-citizen employees

Recent Changes to Humanitarian Parole and TPS

Potentially impacting employees working pursuant to these programs

Humanitarian Parole

DHS has ended the “Processes for Cubans, Haitians, Nicaraguans, and Venezuelans” (CHNV) program (subject to litigation)¹

Temporary Protected Status (TPS)

- **Venezuela:** The 2023 designation was terminated by DHS effective April 7, 2025 (subject to litigation)²
- **Haiti:** DHS has terminated TPS effective September 2, 2025 after previously reducing the designation period; however, a district court in NY ruled that DHS had exceeded their authority in shortening the designation period and restored the end date to February 3, 2026³
- Other TPS countries have also been scheduled for termination, including Afghanistan, Cameroon, Honduras, Nepal, and Nicaragua

Work Authorization Documentation

A12 or C19 for TPS
C11 for humanitarian parole



Review the
expiration date

- Employees working pursuant to humanitarian parole OR TPS will generally present an Employment Authorization Document (EAD) for Form I-9 purposes
- The category code designation on the front may help identify potentially impacted employees
- In some cases, EADs for TPS holders may be extended beyond the expiration date on the card

Source: [Handbook for Employers \(M-274\)](#)

E-Verify Status Change Report for Revoked EADs



- On June 20th, DHS notified enrolled E-Verify employers about a newly released “Status Change Report” for identifying employees with revoked EADs
- If an employer is using an E-Verify Employer Agent, such as an electronic I-9 provider, the agent can generate this report on the organization’s behalf
- DHS instructs E-Verify employers to reverify impacted employees within a reasonable amount of time

Proactive I-9 Management

1. Know your population

Review EAD category codes and expiration dates on document copies (if retained) or if separately recorded

Example Codes
(full list is available on [USCIS website](#))

EAD Category	Description
A12 or C19	TPS
C11	Humanitarian Parole
C33	DACA

2. Reverification Best Practices

- Monitor the USCIS website for policy changes that may impact work authorization
- Employees should always be provided the opportunity to present alternate acceptable documentation
- Work with immigration counsel when questions arise

Examining Documentation in the Age of AI

Fraudulent Documentation Concerns

- While employers are not expected to be document experts, they must contend with an increasing sophistication of fake IDs
- HSI has noted that complex digital documents and deepfakes are being used to evade detection
- In a December 2024 indictment, the Department of Justice noted that foreign actors used stolen identities to apply for jobs and paid US persons to receive, set up, and host laptops sent from employers



The Delicate Balancing Act

Examining I-9 Documentation

- Examine original, **acceptable**, and unexpired documentation, or an acceptable receipt
- Determine if **reasonably** appears to be genuine and relates to the person
- When reviewing documents virtually, USCIS recommends **fraud awareness** training

Avoiding Discrimination

Employers may not:

- Request more or different documents
- Reject reasonably genuine-looking documents
- Specify certain documents based on citizenship status or national origin

Reviewing Documentation Tips

Process Methodologies

- Reviewing and storing documentation
- Scheduling live video review (virtual)
- Internal auditing
- Escalations

Training Topics

- Avoiding discrimination
- Acceptable documents and receipts
- Fraud awareness
- Technology support

Quality Assurance

Documentation is:

- Clear and legible
- Sufficient for I-9 purposes
- Consistent with immigration attestation

Executive Considerations

- When to offer virtual
- E-Verify considerations
- Outsourcing potential

Visit [I-9 Central](#) for more information concerning remote document examination

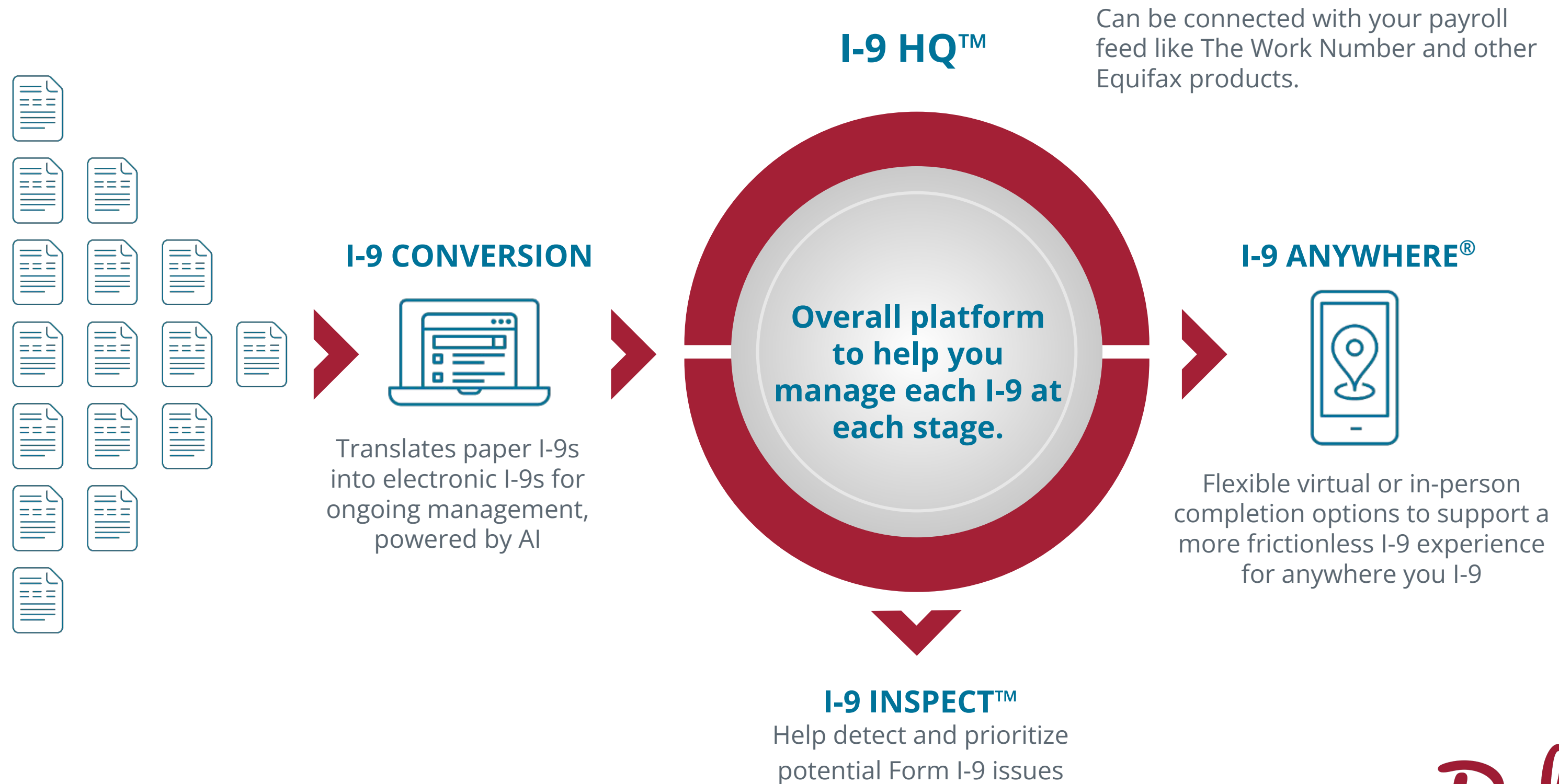
What's Next

What's (Potentially) Next for Form I-9

- Large-scale disruptive enforcement operations in light of recently passed budget reconciliation bill¹
- Terminations of additional TPS country designations and other forms of discretionary work authorization
- Additional E-Verify audits (desk reviews² and state-based investigations)
- Increasing obligations for employers to investigate data discrepancies relating to their employees (e.g., potential return of no-match letters)³

Q&A

I-9 HQ Suite of Solutions



Next Steps



1 SURVEY

Complete the survey through the webinar console



Activity ID:
25-X4VNR



2 CONTACT

Want to talk to someone about your Form I-9 processes? Click on the “Want to Get In Touch” button on your webinar console or contact us at:

workforce.equifax.com/contact



3 CONNECT

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Week 1: July 15 to July 17

TODAY, July 15, 2025

✓ **11:00-12:00 pm Central**
I-9 Compliance: What's Hot and What's Next

2:00-3:00 pm Central
Form I-9 101: Back to Basics

Thursday, July 17, 2025

11:00-12:00 pm Central
Inside E-Verify: Compliance Updates & E-Verify+

2:00-3:00 pm Central
Help Optimize HR Forms: Enhanced
Experiences, Reduced Risk

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Week 2: July 22 to July 24

Tuesday, July 22, 2025

11:00-12:00 pm Central

All About Audits Part 1: ICE Encounters

2:00-3:00 pm Central

All About Audits Part 2: Conducting an Internal I-9 Assessment

Thursday, July 24, 2025

11:00-12:00 pm Central

The Crossroads of Immigration and the Form I-9

2:00-3:00 pm Central

I-9 Q&A Live: Your Questions, Expert Answers!