

ICE

IMAGE

ICE Mutual Agreement between
Government and Employers



U.S. Immigration
and Customs
Enforcement

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ICE Mutual Agreement between Government and Employers

On July 26, 2006, the Department of Homeland Security introduced the IMAGE program as a comprehensive solution to the many challenges facing an employer in the area of employment eligibility verification.

ICE recognizes that the highest level of employment compliance can only be achieved through close coordination with industry partners. IMAGE was developed as an innovative concept for enhanced employer self compliance.



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ICE Mutual Agreement between Government and Employers

Through close coordination and partnership with the private sector, IMAGE seeks to promote principals of ethical business conduct, prevent the hire of unauthorized aliens, and empower employers with a pragmatic immigration compliance strategy.

As ethical and diligent employers begin to adopt the IMAGE best employment practices, ICE will more efficiently focus its attention on unscrupulous employers and egregious violators of our nation's immigration laws.



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1. Utilize E-Verify

E-Verify reduces unauthorized employment, minimizes verification related discrimination, and offers employers an efficient, non-burdensome internet based employment eligibility mechanism.

2. Internal Training Program

Promotes material expertise and continuity of knowledge by developing and implementing a comprehensive internal training program for employees involved in the hiring process.



3. Form I-9 Secondary Review

Reduces human error and safeguards against employee misconduct by requiring all Forms I-9 be reviewed for errors or deficiencies by a second party.

4. Internal Tip Line

Requires an accessible and confidential system for employees to report unauthorized aliens and other unlawful activity and establishes a protocol to timely monitor and address these reports.



5. Report Violations to ICE

Establishes a policy and procedure to timely report criminal violations to ICE or other law enforcement.

6. “No Match” Letter Resolution

Mandates a fair and consistent procedure to verify that the names and Social Security numbers on Form W-2 wage reports match to ensure proper wage reporting.



7. Annual Form I-9 Audits

Audits conducted by an external third party or by a trained employee outside of the hiring process allows for an unbiased, impartial review of a company's Form I-9 compliance.

8. Anti-Discrimination Protocols & Training

Protects employment authorized individuals from prohibited discrimination by establishing procedures and policies that treat all qualified, eligible employment applicants equally.



9. Promote IMAGE Partnership

Participate and contribute by communicating with and encouraging business partners to utilize the best employment practices to establish sound, legal hiring policies and procedures.


10. Annual Report

Submit an annual report to track results and assess the effect of program participation.



ICE

Simple
Quick
Non-Burdensome
Free



This Employer Participates in E-Verify

This employer will provide the Social Security Administration (SSA) and, if necessary, the Department of Homeland Security (DHS), with information from each new employee's Form I-9 to confirm work authorization.



IMPORTANT: If the Government cannot verify that you are authorized to work, this employer is required to provide you certain instructions and an opportunity to contact SSA and/or DHS before taking adverse action against you, including terminating your employment.

Employers may not use E-Verify to process job applicants or to reverify current employees and may not limit or influence the choice of documents presented for use on the Form I-9.



NOTICE
Federal law requires all employers to verify the identity and employment eligibility of all persons hired to work in the United States.

In order to determine whether Form I-9 documentation is valid, this employer uses E-Verify's photo screening tool to match the photograph appearing on new permanent resident and employment authorization cards with the official U.S. Citizenship and Immigration Services (DHS) photo/IDPA.

If you believe that your employer has violated its responsibilities under this program or has discriminated against you during the verification process based on your national origin or citizenship status, please call the Office of Special Counsel at 1-800-245-1601 (TDD) 1-800-233-2515.

Employment Verification  

For more information on E-Verify please contact DHS at 1-888-464-4218

FOUNDED BY A LEGISLATIVE ACT OF CONGRESS



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E-Verify

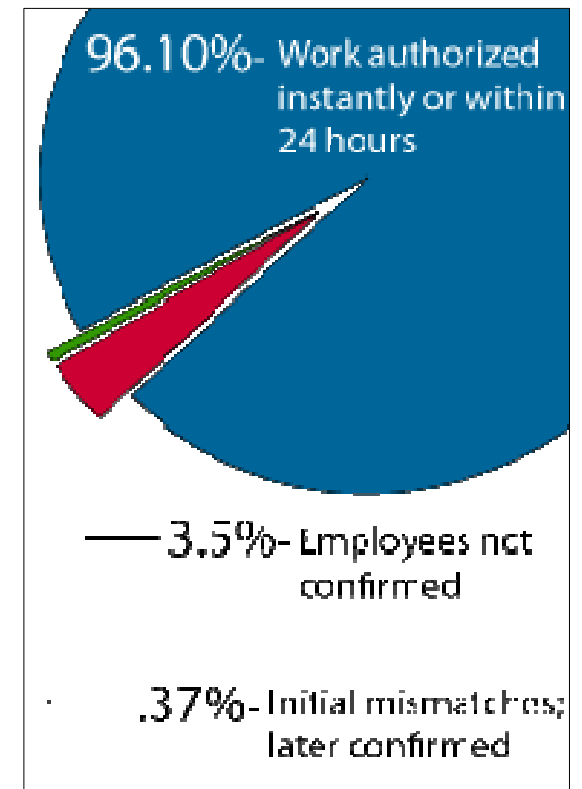
E-Verify is an internet based system operated by DHS in cooperation with the Social Security Administration (SSA) that allows the employer to electronically verify employment eligibility of new hires.

- Cornerstone element of the IMAGE program.
- Protects jobs for authorized workers, improves the accuracy of wage and tax reporting, and helps employers maintain a legal workforce.
- Offered to U.S. employers at no cost.
- Currently the best employment eligibility verification system available.
- www.dhs/E-Verify.gov

As of January 2009, over 100,000 participating employers

6.6 million verification queries in FY 2008

96.1 % of employees are confirmed as work authorized before any mismatch notice or need for action by the employee or employer.



Social Security Number Verification System (SSNVS)

- Historically, unauthorized aliens have obtained employment by providing fraudulent social security information during the hiring process.
- SSNVS assists employers with proper wage reporting by ensuring employees' names and social security numbers on Form W-2 wage reports match.
- IMAGE participation requires that employers utilize SSNVS and resolve any identified mismatch issues.
- www.ssa.gov



The anti-discrimination provisions of IRCA prohibit four types of unlawful conduct under Title 8 U.S.C. § 1324b:

- Citizenship or Immigration Status Discrimination
- National Origin Discrimination
- Document Abuse
- Intimidation or Retaliation

IRCA created the Office of Special Counsel (OSC) under the Department of Justice to enforce these anti-discrimination provisions.

IMAGE members receive training to prevent violations of anti-discrimination law.



Members

Participate in a Form I-9 inspection, utilize E-Verify, and adhere to all best hiring practices.

Associates

Adhere to the core best practices but are provided up to two years to improve hiring practices before submitting to a Form I-9 inspection and annual reporting requirements.

Endorsees

Associations agree to support and promote the IMAGE best employment practices among their members.



National Security

Contribute to national security by reducing opportunities for terrorists and criminals to gain access to our critical infrastructure worksites.

Workforce Integrity

Ensure workforce stability by hiring only persons authorized to work in the U.S.

Expert Training

Receive training on proper hiring procedures, fraudulent document detection, and use of the E-Verify employment verification system.

Brand Protection

Promote and protect a positive corporate image with a stable, authorized workforce.



Increased Marketability

Establish a competitive marketplace position by leveraging your ability to advertise and promote a stable, authorized workforce.

Workforce Stability

Increase efficiency and maximize the returns of costly training by ensuring employment authorization.

Risk Mitigation

Reduce the likelihood of ICE enforcement actions or administrative sanctions.

Customer Service

Receive the benefits associated with a dedicated ICE point of contact.



Policy Review

Review hiring practices, identify deficiencies, recommend improvements, provide minimal standards, and assist with the creation of an individualized immigration compliance program.

Cooperative Relationship

IMAGE is committed to working cooperatively and efficiently to correct hiring policy deficiencies and, if required, remove unauthorized aliens from the workforce with minimal business impact.



ICE Point of Contact

Provide access to training, updates, reference materials, and other benefits of IMAGE participation via a dedicated ICE special agent as a point of contact.

Form I-9 Inspection Deferral

Recognize each participant's commitment to a diligent, ethical immigration compliance program and provide you with a minimum two year deferral of Form I-9 inspections by ICE.



Fine Mitigation

ICE considers good faith, voluntary participation in the IMAGE program as a mitigating factor in assessing civil monetary penalties should they be levied.

Information Sharing

Commit to the periodic sharing of information regarding immigration regulations, trends, and new best practices while seeking to incorporate partners in the decision making process.

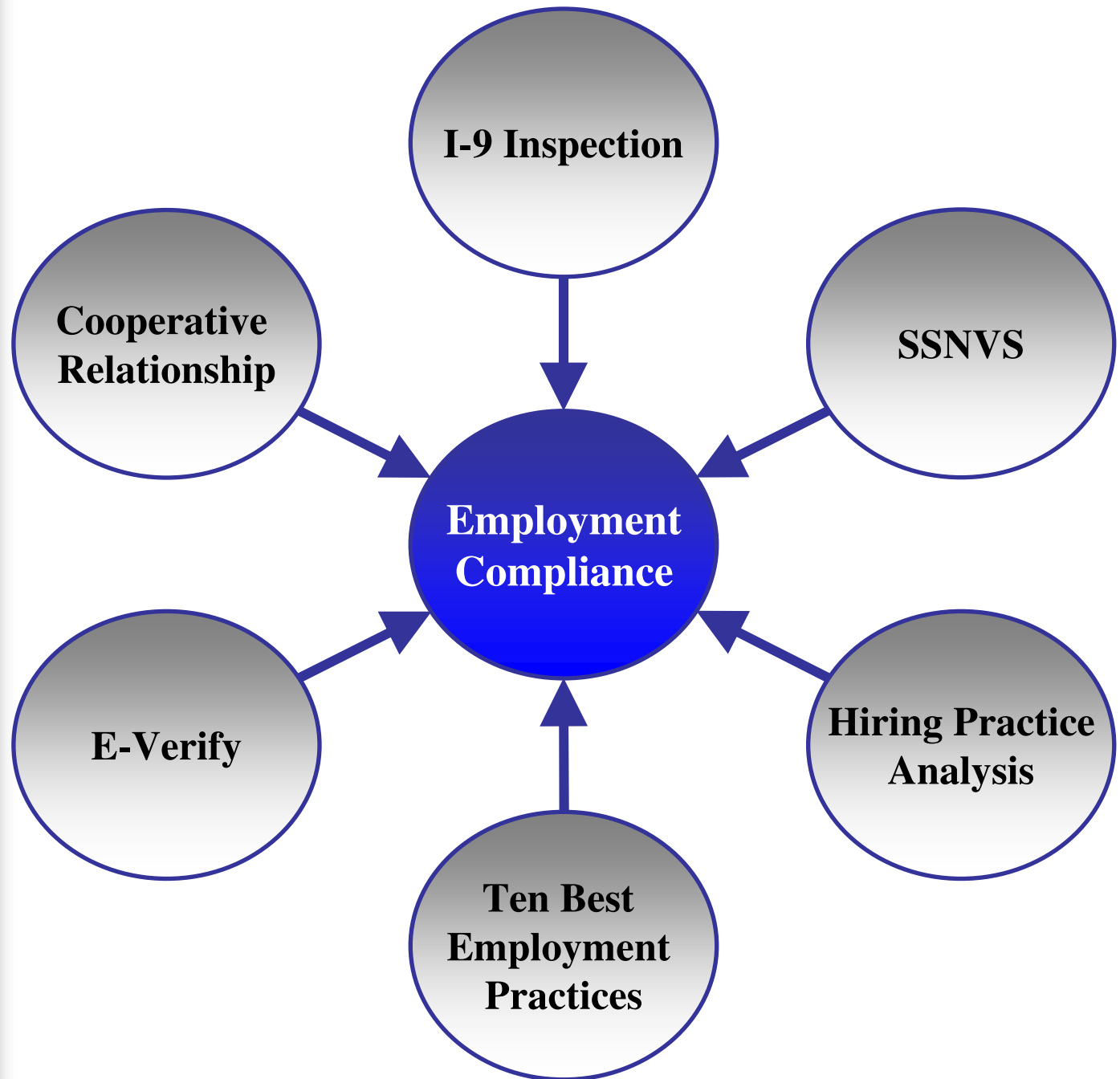


ICE

IMAGE Employment Compliance Model



U.S. Immigration
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- Complete a self assessment questionnaire.**
- Enroll in E-Verify and SSNVS.**
- Utilize IMAGE best employment practices.**
- Participate in an ICE Form I-9 inspection.**
- Sign an official IMAGE agreement.**



ICE

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IMAGE COORDINATOR

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Report Suspicious Activity

1-866-DHS-2-ICE

www.ice.gov/image



**U.S. Immigration
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Your Workforce Compliance Partner