MASTER I-9 SELF-AUDIT TRACKER LOG

A Guide, Sample Spreadsheet Structure, Sample Entries, and Sample Memos

While federal law does not legally require employers to create or maintain a tracking log or audit log when conducting a voluntary I-9 self-audit, DHS/USCIS strongly recommends that you maintain an internal tracking or log sheet as a best practice to document what was reviewed, corrected, or resolved.

When federal investigators examine a company's immigration compliance, they look for systematic errors. Without a comprehensive tracker log, an internal I-9 self-audit can look less like a structured compliance initiative and more like ad-hoc tampering. A well-maintained tracker log acts as the narrative backbone of an employer's compliance program, providing a clear roadmap of how mistakes were found and fixed.

The Shield of "Good Faith Compliance" - If Immigration and Customs Enforcement (ICE) audits your business, they look at your historical intent. Under federal guidelines, an employer can avoid steep fines for technical or procedural violations if they can demonstrate a "good faith" effort to comply.

A chronological tracker log serves as **indisputable evidence** of this effort. It proves to auditors that your organization did not alter documents to deceive the government, but rather engaged in a transparent, organized effort to self-correct before any investigation was initiated.

A tracker log solves this by creating a parallel history. It explains why a correction was made, when it happened, and who authorized it. If an auditor asks why Section 2 has a line drawn through a date with a new signature next to it, the tracker log provides an immediate, verifiable explanation.

Operational Continuity and Accountability - Internal HR personnel change over time. If the person who conducted your self-audit leaves the company, their institutional knowledge leaves with them. A detailed log ensures business continuity. It allows a new HR manager or legal counsel to step in, immediately understand the compliance status of the workforce, and see what corrective actions are still pending without having to re-audit hundreds of physical files.

WHY USE AN I-9 SELF-AUDIT TRACKER LOG?

- **Proves Intent:** A log proves your company proactively intends to follow immigration laws.
- **Proof of Good Faith:** A clean log shows federal agencies (like ICE) that you actively and systematically manage compliance, and that you manage your records responsibly.
- **Organized Correction:** It helps you record which forms were reviewed, who conducted the review, and what corrections (if any) were made.
- **Organizes Workflow:** Keeps a clear history of active employee files versus retained terminated files.
- **Timeline Verification:** It establishes a clear timeline of when mistakes were discovered and corrected.
- **Tracking Deadlines:** Most systems use a tracking or "tickler" log to monitor work authorization expiration dates and upcoming reverifications.
- **Reduces Penalties:** ICE (Immigration and Customs Enforcement) often reduces fine amounts if you show an audit trail.

ENSURES OPERATIONAL CONTROL

- **Prevents Missed Fixes:** It ensures found errors are actually resolved and not forgotten.
- **Standardizes Process:** It creates a uniform correction method across different HR team members.
- **Tracks Accountability:** It notes exactly who reviewed each document and when.

PROTECTS AGAINST BACKDATING ACCUSATIONS

- **Legal Shield:** Documenting changes in real-time protects you from claims of fraudulent backdating.
- **Clear History:** It provides a historical narrative separate from the forms themselves.

***See sample annotated spreadsheet setup for I-9 Self-Audit Tracker Log on the next page*.**

Set up your spreadsheet rows using these column headers to cover mandatory compliance tracking fields, and other information you want to include. HRIS and Payroll systems usually download date to an Excel spreadsheet.

COLUMN	HEADER NAME	FORMAT TYPE	DESCRIPTION / DROPDOWN OPTIONS
A	Employee ID	Text / General	Unique internal workforce identifier *(e.g. HRIS identifier, or last 4 of employee's SSN)*
B	Employee Last Name	Text	Must match Section 1
C	Employee First Name	Text	Must match Section 1
D	Employee Middle Initial	Text	Must match Section 1 – Don't use middle name
E	Employment Status	Dropdown List	Active / Terminated
F	Date of Hire	Date (MM/DD/YYYY)	Employee's first day of work for pay
G	Termination Date	Date (MM/DD/YYYY)	Employee's last day of work for pay
H	Form I-9 Retention Date	Date (MM/DD/YYYY)	Use Excel formula to calculate the retention date for terminated employees *(see formula at bottom)*
I	Form Version Valid?	Dropdown List	Yes / No (Verifies current edition used at hire date)
J	Section 1 Status	Dropdown List	Complete / Missing Info / Missing Signature / Missing Date / Late Completion
K	Supplement A Status *(Previously Section 1)*	Dropdown List	Complete / Missing Info / Missing Signature / Missing Date
L	Section 2 Status	Dropdown List	Complete / Missing Info / Expired Docs / Late (>3 Days)
M	Supplement B Status *(Previously Section 3)*	Dropdown List	Complete / Missing Info / Missing Signature / Missing Date
N	Errors Identified	Text	Detailed narrative of any omissions or mistakes
O	Error Classification	Dropdown List	None / Technical (Minor) / Substantive (Major) / Uncorrectable
P	Corrective Action Taken	Text	Specific remediation steps completed
Q	Date Corrected	Date (MM/DD/YYYY)	Date the remediation was completed
R	Notes / Memo Attached	Dropdown List	*Yes / No* –track if you appended an explanatory page
S	Corrector Name / Initials	Text	Person making the corrections noted
T	Auditor Name / Initials	Text	Person conducting this specific entry final review
U	Comments/Notes	Text	Write other comments or notes you want to capture for the record.

*** ROW H FORMULA - To calculate the federal I-9 retention date in Excel, use the formula:**

- =IF(G2="", DATE(YEAR(F2)+3, MONTH(F2), DAY(F2)), MAX(DATE(YEAR(F2)+3, MONTH(F2), DAY(F2)), DATE(YEAR(G2)+1, MONTH(G2), DAY(G2))))
- This formula assumes cell **F2** is the hire date and cell **G2** is the termination date. Change the cell names in the formula This logic checks if the employee is still active, automatically adds 3 years to the hire date, or picks the later date between 3 years post-hire and 1 year post-termination.

SAMPLE ENTRIES FOR “ERRORS IDENTIFIED” IN COLUMN “N”

Section 1 – Employee Information & Attestation (Employee Errors)

- **Missing Employee Signature**: Section 1 employee signature line left blank.
- **Missing Attestation**: Citizen/Noncitizen status box not selected in Section 1.
- **Incorrect Date Format**: Employee wrote birthdate as MM/DD/24 instead of MM/DD/YYYY.
- **Late Completion**: Section 1 signed on 08/15/2026, but the employee hire date was 08/10/2026.
- **Missing Foreign Passport Details**: Employee selected "A noncitizen authorized to work" but left the Foreign Passport Number and Country of Issuance fields blank.
- **Missing USCIS/A-Number**: Employee checked the Lawful Permanent Resident box but did not provide their 7-to-9-digit USCIS Number.
- **Missing Social Security Number**: SSN field left blank (Note: Only an error if the employer is enrolled in E-Verify; otherwise, it is optional).
- **Future Expiration Date Omission**: Employee selected "noncitizen authorized to work" but failed to enter the expiration date for their employment authorization.

Supplement A - Preparer/Translator Certification *(Section 1 prior to 8-1-2023)* (Preparer/Translator Errors)

- **Missing Signature**: Supplement A completed by a Spanish translator, but the signature line was left blank.
- **Missing Address**: Preparer provided their name and signature but left the physical address fields blank.
- **Missing Date**: Translator signed Supplement A but did not input the date of execution
- **Incomplete Multiple Preparers**: Two preparers assisted the employee, but only one completed and signed Supplement A.
- **Missing Checkbox Link**: Section 1 checkbox for "A preparer(s) and/or translator(s) assisted..." was checked, but Supplement A was left completely blank.
- **Incorrect Date Format:** Preparer wrote their signature date using a two-digit year (MM/DD/26) instead of the required four-digit year (MM/DD/YYYY).
- **Illegible Name**: Preparer's printed last name is unreadable, making identity verification impossible.

Section 2 - Employer Review & Verification (Employer Errors)

- **Missing Hire Date**: Section 2 Certification box for "The employee's first day of employment" left blank.
- **Over-Documentation**: Employer recorded both List B (Driver's License) and List C (Social Security Card) alongside a List A passport.
- **Missing Document Issuer**: List B issuing authority field left blank for State Driver's License.
- **Illegible Representative Name**: Employer representative printed name is unreadable, and no signature is present.
- **Expired List B Document**: Employer accepted a state driver's license that expired on 03/12/2026 for an employee hired on 05/01/2026.
- **Late Physical Review**: Section 2 certified and signed on 08/10/2026 for an employee whose first day of employment was 08/03/2026 (exceeded the 3-business-day rule).
- **Missing Document Title**: Employer recorded the document number and expiration date for List C but left the "Document Title" field blank.
- **Photocopy Rule Violation**: Employer failed to retain a photocopy of the employee's US Passport (*Note: Only an error if the employer uses E-Verify and a List A passport/green card was presented*).

Supplement B - Reverification and Rehires *(Section 3 prior to 8-1-2023)* (Employer Errors)

- **Expired Work Authorization**: Section 3 reverification not completed before the original List A document expired on 07/01/2026.
- **Wrong Form Version**: Reverification completed using an outdated, expired version of Form I-9.
- **Missing Rehire Date**: Employer completed Supplement B for a rehired employee but left the "Date of Rehire" field blank.
- **Reverification of Permanent Resident Card**: Employer unnecessarily completed Supplement B to reverify an expired Form I-551 (Green Card), which does not require reverification.
- **Missing Employer Signature**: New document details were recorded in Supplement B, but the employer representative forgot to sign and date the certification block.
- **Wrong Document Category Accepted**: Employer accepted a List B Driver's License in Supplement B to reverify expiring work authorization (only List A or List C documents are valid for reverification).

SAMPLE ENTRIES FOR "CORRECTIVE ACTION TAKEN" IN COLUMN "P"

A "Corrective Action Taken" entry must state exactly how the error was fixed, who made the correction, and the date it occurred. It should also note if a mistake was uncorrectable, such as a missed federal timeline deadline.

Section 1 – Employee Information & Attestation (Employee Corrections)

- **Employee Filled Missing Field:** Employee entered missing USCIS number in Section 1, then initialed and dated "08/18/2026" next to the change.
- **Corrected Date Format:** Employee crossed out "26" with a single line, wrote "2026", and initialed/dated the correction.
- **Uncorrectable Late Completion:** Noted Section 1 was completed two days late. Backdating is prohibited; self-audit log entry serves as the official compliance note.
- **Missing Date of Birth**: Employee wrote missing birthdate in Section 1 field, initialed, and dated next to entry.
- **Incorrect Citizenship Box**: Employee realized they checked "Noncitizen National" instead of "Citizen." Employee drew a single line through the wrong box, checked the correct box, and initialed/dated the change.
- **Missing Email/Phone**: Employee filled in the blank email and telephone fields. (*Note: If the employee prefers not to provide them, they must write "N/A." Leaving them completely blank is a minor error*).
- **Missing Form I-94 Number**: Employee entered their missing 11-digit Form I-94 number to support their noncitizen authorized to work status, then initialed and dated.

Section 2 – Employer Review & Verification (Employer Corrections)

- **Recorded Missing Title:** HR representative entered "Social Security Card" in the missing List C Title field, then initialed and dated the entry.
- **Missing Document Expiration Date**: HR added the missing expiration date for the employee's state ID card under List B, then initialed and dated the entry.
- **Wrong Document Category Column**: HR accidentally recorded a List C Social Security card under the List B column. HR drew a line through the incorrect column entry, rewrote the details in the List C column, and initialed/dated the correction.
- **Missing Business Address**: HR representative filled in the missing company name and physical workplace address in the Section 2 signature block, then initialed and dated.
- **Missing Issuing Authority**: HR added "Social Security Administration" to the missing issuing authority field for the List C card, then initialed and dated the form.
- **Fixed Over-Documentation:** Drew a single line through the extra List B and C entries (since a List A passport was already verified), initialed, and dated the deletion.
- **Resolved Unsigned Section 2:** HR Representative signed and dated the Section 2 certification block on "08/18/2026" using the current date.
- **Receipt Rule Verification:** Employee's temporary receipt expired. Employee presented the actual replacement List A EAD card. HR recorded the permanent document details in Section 2, initialed, and dated "08/18/2026."
- **Remote Verification Update:** Original Section 2 was completed via video review during standard operations. HR conducted an in-person physical document inspection on "08/18/2026," added "Alternative Procedure Physical Inspection Completed" to the Section 2 Additional Information field, and initialed the note.

Supplements A *(Section 1 prior to 8-1-2023)* & B *(Section 3 prior to 8-1-2023)* (Preparer/Translator, & Employer Corrections)

- **Completed Missing Supplement A:** Located the original translator. Translator filled out their missing address, signed, and dated the form.
- **Corrected Reverification Document:** HR representative crossed out the invalid List B document entry in Supplement B. HR then recorded the new, valid List C card details, initialed, and dated the change.
- **Missing Employee Checkbox Link**: Employee didn't check the box indicating they used a preparer. Employee checked the "A preparer assisted..." box in Section 1, then initialed and dated the mark on "08/18/2026."
- **Supplement B Late Reverification**: Work authorization expired on 08/01/2026. Valid replacement List C document was not presented or recorded until 08/05/2026. HR recorded the new document in Supplement B using the current date. Attestation note added to log to acknowledge the 4-day lapse in verification.
- **Name Change Update:** Employee legally changed their name. HR recorded the new legal name, reviewed the supporting marriage certificate, and signed/dated Supplement B on "08/18/2026."

SAMPLE MEMO NOFITYING EMPLOYEES OF AN I-9 SELF-AUDIT

Use this to notify employees that you will be conducting a voluntary Form I-9 Self-Audit. While not a legal requirement, it is best practice to notify employees that you will be conducting a voluntary I-9 self-audit. You can also edit this for use to notify employees of an external I-9 audit to be conducted by a federal agency.

Note that California law also has a 72-hour employee notification rule under California Labor Code Section 90.2 requiring that employees receive advance notice when an employer receives an official Notice of Inspection (NOI) or external audit request from a federal immigration agency like ICE.

MEMORANDUM

DATE: [Insert Current Date - MM/DD/YYYY]

TO: All Employees

FROM: [Insert Your Name and Title/HR Department]

SUBJECT: **Internal Audit of Form I-9 (Employment Eligibility Verification)**

Purpose of the Audit

[Company Name] is conducting a routine internal audit of all Form I-9 documents. This audit ensures our records are accurate, complete, and compliant with federal regulations.

What This Means for You

- **No Action Needed Now:** Most employees will not need to do anything.
- **Potential Document Request:** HR may contact you if your file has missing information, spelling errors, or expired work authorization documents.
- **Correction Process:** If contacted, you will be asked to review your form or present valid documents to correct the error.

Important Timeline and Support

- **Audit Window:** The audit will take place between [Start Date] and [End Date].
- **No Re-verification for Citizens:** Standard audits do not require U.S. citizens to re-verify their status unless original paperwork is missing.
- **Anti-Discrimination:** This is a company-wide review. Employees are not being singled out based on citizenship, national origin, or immigration status.

Please contact the HR department at [Extension/Email] if you have any questions or concerns about this process. Thank you for your cooperation in keeping our company records compliant.

SAMPLE MEMO NOFITYING EMPLOYEES OF CORRECTION NEEDED ON I-9

MEMORANDUM

DATE: [Insert Current Date - MM/DD/YYYY]

TO: [Employee Name]

FROM: [Insert Your Name and Title/HR Department]

SUBJECT: **Immediate Action Required: Correction of Form I-9 Documentation**

Purpose of This Notice

[Company Name] recently conducted a routine, comprehensive internal audit of all Form I-9 records. This proactive compliance review ensures our organization adheres strictly to U.S. Citizenship and Immigration Services (USCIS) regulations.

During this self-audit, we identified a specific clerical error, missing item, or technical omission on your Form I-9. Federal law mandates that both employers and employees maintain 100% accurate verification records. Therefore, we must work together to correct this record immediately.

What Error Was Found - We found the following issue(s) with your Form I-9:

- ☐ **Section 1: Employee Information and Attestation**
  - ☐ Missing or incomplete personal information (e.g., address, date of birth, Social Security number).
  - ☐ Citizen/immigration status box was left unchecked.
  - ☐ Employee signature or date of signature is missing.
- ☐ **Section 2: Employer Review and Verification**
  - ☐ The original documents presented during onboarding were recorded incorrectly.
  - ☐ Document details (e.g., document number, issuing authority, expiration date) are illegible or missing.
- ☐ **Section 3: Reverification and Rehires**
  - ☐ Your temporary employment authorization has expired or is nearing expiration, and we must verify your updated, unexpired work authorization document.
- ☐ **Other:** [HR to insert clear, specific explanation of the issue].

Required Action Steps for You

1. **Bring Original Documents:** Please bring valid, unexpired original documents from the attached List of Acceptable Documents (e.g., a U.S. Passport, or a combination of a Driver's License and Social Security Card) to the HR office. By law, we cannot accept photocopies, scanned images, or digital pictures.
2. **Review and Amend:** You will meet with an HR representative to correct your original Form I-9.
3. **Do Not Backdate:** If you need to sign or date a correction, use the current calendar date. Do not use your original hire date.

Firm Deadline for Completion - Please bring your documents to the Human Resources office no later than ***[Date - typically 3 business days from receipt] at [Time]***.

Please understand that [Company Name] is legally required to maintain these records to avoid severe federal penalties. Promptly correcting these technical errors ensures your employment eligibility file remains in good standing. Failure to update these mandatory federal records may impact your employment eligibility status.

Non-Discrimination Policy - This audit is a standard internal operational procedure applied uniformly to all employees. [Company Name] strictly prohibits discrimination based on citizenship, immigration status, or national origin. This notice does not imply any wrongdoing or legal issues regarding your citizenship status.

If you have any questions regarding which documents are acceptable or need to schedule a specific time to meet, please contact [HR Contact Name] at [Phone Extension] or [Email Address].

Thank you for your immediate cooperation and professionalism in helping us maintain compliance.

***Attachment**: USCIS List of Acceptable Documents*

SAMPLE MEMO FOR CREATING A COMPLETELY NEW I-9

Use this if the original form was missing entirely, completely unusable, or if an outdated version of the Form I-9 was originally filled out and a total re-do is required.

MEMORANDUM

DATE: [Insert Current Date - MM/DD/YYYY]

TO: Form I-9 File for [Insert Employee Full Name]

FROM: [Insert Your Name and Title/HR Department]

SUBJECT: Internal I-9 Self-Audit – Creation of New Form I-9

This memorandum serves to explain the presence of a newly executed Form I-9 for [Insert Employee Full Name] (Hire Date: [Insert Hire Date]).

On [Insert Date Audit Was Conducted], this organization conducted a voluntary internal self-audit of all Form I-9 records. During the review, the following systemic issue was identified regarding this employee's paperwork:

[Insert Reason, e.g., The original Form I-9 was missing from the file / The original form was completed on an expired version of the Form I-9 and required recreation.]

Corrective Action Taken:

To achieve full compliance, the employee was asked to complete Section 1 of the current, valid version of the Form I-9 on [Insert Date Section 1 Was Completed]. The employer physically examined original, unexpired documentation and completed Section 2 on [Insert Date Section 2 Was Completed].

The original documents (if available) have been retained, and this new form has been baseline-dated with current dates to ensure no backdating occurred. This memo is permanently attached to document our good-faith compliance efforts.

Protocol for Attaching Memo

- **Do not discard old forms:** Staple the new Form I-9, the memo, and the old Form I-9 together.
- **Ink color:** Sign these memos using blue or black ink to prove they are original signatures.
- **Keep with the I-9:** Staple this memo to the corrected and original I-9 forms, or store these memos directly inside the employee's I-9 file (paper or electronic), not their general personnel file.