The Immigration Reform and Control Act of 1986, as amended by the Immigration Act of 1990 requires employers to hire only persons who may legally work in the United States citizens and nationals of the United States and aliens authorized to work.

Human Resources and Talent Development (HRTD) is responsible for the development of all pre-employment procedures and determines the appropriate documentation required prior to hire. HRTD shall ensure that the documentation required is in accordance with the immigration reform act of 1986 and other applicable federal and state laws and regulations. To comply with the law, The University of Toledo must verify the identity and employment eligibility of anyone hired.

The following procedures must be followed by representatives of the University who are responsible for the hiring process and authorized to extend an offer of employment.

Non-Faculty Staff
Human Resources and Talent Development is responsible for extending offers of employment for all non-faculty positions, except for residents and graduate students working on Health Science Campus.

To the extent practical, candidates will complete the Form I-9 (Employment Eligibility Verification) before their first day of employment. The I-9 form is completed at the time an employee presents himself in Human Resources and Talent Development to complete the pre-employment requirements. Persons tested at a facility other than the University will complete the Form I-9 on their first day of employment.

The Form I-9 identifies various documents that will satisfy the requirements. The Form I-9 must be completed within three (3) business days of the date employment begins. Persons are ineligible for employment if they are unable to present the required documents. Persons unable to present the required documents are employment eligible if they present a receipt for the
Once completed, I-9s will be maintained in Human Resources and Talent Development separate from the employee personnel file.

**Faculty**
Academic Affairs is responsible for ensuring the completion of all pre-employment documents.

**Residents**
New residents will complete the Form I-9 during resident orientation on their first day of employment. Human Resources and Talent Development is responsible for ensuring the required documents are presented.

**Graduate Students**
The International Services Coordinator in the Graduate School is responsible for verifying the eligibility of graduate students for University employment.

**Completing the Form I-9**
A person must present a document or documents that establish identity and employment eligibility. A person can consult with Human Resources and Talent Development to obtain a list of acceptable documents.

If a person is unable to present the required document(s) within 3 business days of the date employment begins, he or she must present (within 3 business days) a receipt showing that he or she has applied for the document. The person then must present the actual document within 90 days of the date employment begins. The person must have indicated on or before the time employment began, by having checked an appropriate box in Section 1, which he or she is already eligible to be employed in the United States. Failure to produce the required documents will result in an immediate inability to work until compliant with this regulation.

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Approved by:  

Lloyd A. Jacobs, M.D.  
President  

February 12, 2013  
Date  

Review/Revision Completed by: Vice President of Administration, Human Resources

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