



**STATE OF NORTH CAROLINA
OFFICE OF STATE HUMAN RESOURCES**

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November 20, 2025

TO: Agency Human Resources Directors

FROM: Kristin Siemek, State Talent Acquisition Manager

A handwritten signature in black ink, appearing to read "KS/Siemek", written over the printed name.

RE: Important Form I-9 and E-Verify Information

With the launch of Workday on October 8, 2025, Workday agencies began conducting employment authorization with E-Verify through the Workday platform. As a result, Workday agencies are all operating under a single E-Verify Memorandum of Understanding (MOU). Consequently, employees and agencies no longer have to complete a new Form I-9 and E-Verify case when an employee transfers between two Workday agencies. Instead, the sending agency transfers the employee's existing Form I-9 and associated documents, including E-Verify case number on the top of Form I-9 or printed verification from E-Verify, to the receiving agency.¹

Because of these changes, agencies must take 3 important actions with their existing E-Verify accounts:

- (1) Form I-9 and E-Verify Case Audits,
- (2) E-Verify's Scheduled Records Disposal, and
- (3) Employment Authorization Documentation Revocations.

Please pay close attention to the deadlines and the need to produce regular reports listed below in this letter.

(1) Form I-9 and E-Verify Case Audit

Due to the change in the Form I-9 and E-Verify process for employees transferring between Workday agencies, OSHR is requesting that agencies conduct audits of their agency specific E-Verify accounts and Form I-9 documentation. It is important that agencies ensure their Form I-9

¹ Refer to the [Form I-9 and Employment Verification policy](#) for further details on this process.

and E-Verify records are complete so that when an employee transfers from one Workday agency to another, their Form I-9 and associated documents may be transferred to their new Workday agency.

The best practice for a Form I-9 and E-Verify audit is to include current employees and separated employees who are still required to have a Form I-9 on file. The primary purpose of this audit is to ensure current employees' paperwork is complete and accurate, in the event it needs to be transferred to another Workday agency.

The federal government recommends communicating to employees that you are conducting an audit. This includes advising employees that they will be contacted if they are required to correct Section 1 of their Form I-9 or provide documentation. Advising your employees in advance that you are conducting an audit will help ease confusion if any employees are contacted to correct their Form I-9 or provide documentation. They will understand this is part of an agency wide internal audit, not something for which specific employees were selected.

Your agency audit should consist of the following:

- 1) Verification that all current employees hired by your agency on or after November 6, 1986, have a Form I-9 on file.
- 2) Verification that all current employees hired by your agency on or after January 1, 2007, have a closed E-Verify case with a case result of "Employment Authorized".
 - a. To get this verification, agencies should utilize the Quick Audit Report and Historic Records Report (for resolved cases 10 years or older). Information on how to access these reports can be found here: <https://www.e-verify.gov/e-verify-user-manual/50-case-reports>.
 - b. If your agency has utilized multiple E-Verify accounts and you no longer have access to some of those accounts, it will suffice as documentation that an E-Verify case was completed if the completed case is part of your Form I-9 record through either a printout or a recorded case number.
- 3) Verification that all separated employees who are required to have a Form I-9 on file do.
- 4) Verification that Forms I-9 are properly completed.
- 5) Correction of all incorrect Form I-9s that can be corrected. (See USCIS instructions for correcting Forms I-9 here: <https://www.uscis.gov/i-9-central/form-i-9-resources/handbook-for-employers-m-274/90-correcting-errors-or-missing-information-on-form-i-9>)
 - a. Important Reminder: Only the employee may correct errors in Section 1 of Form I-9.
- 6) Completion of a new Form I-9, only if the Form I-9 does not exist.

- 7) Completion of a new E-Verify case in your existing agency-specific E-Verify account, only if the agency inadvertently failed to create a case in E-Verify for an employee when one should have been created.

The federal government has provided guidance to help employers perform internal audits. This [Guidance for Employers Conducting Internal Employment Eligibility Verification Form I-9 Audits](#) answers questions that may come up during an audit. You can find this guidance by visiting <https://www.justice.gov/crt/file/798276/dl?inline=> in an Internet browser.

We recognize an audit of this scale will take some time to be completed. OSHR asks that agencies complete the audit as soon as possible. The OSHR E-Verify team will check in with agencies periodically for audit status. We appreciate agency cooperation to ensure full compliance with federal law.

(2) E-Verify's Scheduled Records Disposal

USCIS has announced a records disposal scheduled for January 5, 2026. Records for E-Verify cases last updated on or before December 31, 2015, are scheduled for disposal by USCIS. Agencies have until **January 4, 2026**, to download records for E-Verify cases related to this disposal time period. It is critical to download the Historical Records Report prior to the disposal date to have complete records for your agency audit.

Program administrators can download the Historical Records Report to retain information about these E-Verify cases. The case data includes basic company information as well as case identifiers and case resolution information.

Employers who have not already done so must record the E-Verify case verification number on each corresponding Form I-9, Employment Eligibility Verification, or attach a copy of the case details page to the Form I-9. Employers should retain the Historical Records Report with the Forms I-9.

To learn more, please see the [E-Verify Records Retention and Disposal Fact Sheet](#) and the [instructions for downloading](#) the Historical Records report. You can find these documents by visiting <https://www.e-verify.gov/e-verify-records-retention-and-disposal-fact-sheet> and <https://www.e-verify.gov/e-verify-records-retention-download-instructions> in an Internet browser.

(3) Employment Authorization Document Revocations

Beginning in April 2025, the Department of Homeland Security began revoking previously granted employment authorization documents (EADs). Per E-Verify, revoked EADs will no longer appear in Case Alerts within E-Verify. Therefore, it is important that your agency

regularly generates the Status Change Report in your existing, agency specific E-Verify account to identify E-Verify cases that may have been created with an EAD that is now revoked. OSHR will generate this report for E-Verify cases created through Workday. **Do not assume you do not need to continue to run the report if you do not see any employees with revoked EADs.** EADs continue to be revoked by DHS without advance notice.

Employers who find revoked EADs on a Status Change Report must reverify their employees whose revoked EAD was used to create their E-Verify case.

You must follow up on all case alerts and cases in the Status Change Report in E-Verify and reverify each current employee on Form I-9 whose EAD was revoked. **Do not create a new E-Verify case.** Use Form I-9, Supplement B, to begin reverifying each current employee whose EAD was revoked and complete all reverifications within a reasonable amount of time. See [I-9 Central](#) for more information on completing [Form I-9 Supplement B](#).

The Status Change Report will include former employees. If an employee who transferred to another Workday agency on October 8, 2025, or later, appears on your agency's Status Change Report, please notify OSHR at nceverify@nc.gov. OSHR must notify the new agency so they can conduct the reverification. Because a new Form I-9 and E-Verify case will not be completed when an employee transfers between two Workday agencies, this employee's revoked EAD will not appear in the Status Change Report generated by OSHR.

Please refer to this E-Verify page for additional EAD Revocation Guidance and Frequently Asked Questions: <https://www.e-verify.gov/ead-revocation-guidance-for-e-verify-employers>.

Additionally, OSHR is conducting an audit of new hires, reinstatements and transfers during the October transition period into Workday to ensure the Form I-9 and E-Verify process was completed appropriately. The OSHR E-Verify team will provide additional information related to that review.

OSHR and the OSHR E-Verify team thank you for your time and attention to these important issues.

If you have any questions, please contact us directly at kristin.siemek@nc.gov | (984) 236-0853 or Anna Perkinson at anna.perkinson@nc.gov | (984) 236-0824. Thank you for your commitment to a better North Carolina for all.