Employment Compliance Tips – Focus on Recruitment and On-Boarding Processes

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Steps for Onboarding

Depending on the employee’s position at Saint Louis University, they are expected to complete several tasks prior to beginning work:

- A Criminal Background Check (CBC),
- Employment Eligibility Verification (Form I-9), and
- Direct deposit and tax forms.
- Some positions will require a pre-employment health screening.
- HR will provide the new hire with a list of required pre-employment tasks.
Common Types of Employees

• New full-time and part-time employees
• Internal Transfers
• Faculty
• Graduate Assistants
• Student Workers
Non-Employees at SLU

- Voluntary faculty
- Volunteers
  - University scholars
  - Research observation and visiting scientists
New FT and PT Employees

On-boarding process

– CBC for ALL
– Employee health for anyone having patient and/or high student volume contact and according to labor contracts
– Direct deposit and tax forms for ALL
– I-9 forms for ALL
Internal Transfers

- Two ways to transfer jobs:
  - Position Justification and Classification Form
  - Requisition required for PT to FT transition and new positions
- Employee has to be in position for at least six (6) months prior to transfer request
- Transferring from academic to medical and/or high student volume – health screening is required
- Existing employees do not need to complete a new I-9 with transfer
- PT to FT transitions qualify the employee for healthcare insurance, new benefit forms required
Student Workers

Student positions should be posted through SLU Career Services (not HR)

- No CBC required
- Employee health check required for:
  - Students working on the medical campus and at DRC
  - Resident hall coordinators
- Required to fill out tax and I-9 forms (if no prior student worker job at SLU)
I-9 Enforcement

- INS was dissolved 3/1/2003 with creation of the Dept. of Homeland Security on US Citizenship and Immigration Services (USCIS)
  - USCIS handles documentation of aliens/immigrants and I-9 verification

- US Immigration and Customs Enforcement (CIS) investigates and enforces immigration laws
Civil Enforcement

- Previous focus was on the individual – leading to deportation
- Current focus is on the employer and management
- There may be criminal charges
- Random audits and inspections of I-9s
Civil Penalties

Incorrect I-9s:
- $110-$1,100 per error

Unauthorized workers:
- $375-$3,200 first offense
- Up to $16,000 per unauthorized worker hired for subsequent offenses

Criminal Enforcement:
- Up to 6 months for hiring unauthorized workers
- Up to 5 years for hiring >10 unauthorized workers
- Up to 5 years for falsifying an I-9
Office of International Services (OIS)

- OIS helps international employees and scholars with assuring they have proper visa status.
- The department should consult the OIS to begin the paperwork for processing a visa document or a visa petition.

Four months is not too early to begin any type of visa application
Department Responsibility: Tax and I-9 Violations

- Fines imposed to the university will come out of department budgets
- Possible corrective action for manager or individuals responsible for violation
- Managers/individuals may not be protected by the University if they fail to follow HR guidelines by allowing an individual to begin work prior to completion of the necessary paperwork
Volunteers/Observers

- Volunteer forms found on HR website tab for “Forms and Resources” under “Volunteers”
- Volunteer Onboarding Checklist
- CBCs for individuals with unsupervised contact with patients/students and/or access to confidential materials
- Employee health for those on the medical campus
- Paperwork is required for new volunteers/observers except voluntary faculty
  - Certain visa status may/may not allow an individual to be a volunteer
  - Voluntary faculty handled by offices of VP for Academic Affairs and VP Medical Affairs
Questions?

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