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## Question of the Week

December 20, 2023

### Question

Can we store completed Forms I-9 electronically?

### ANSWER

Yes, you can store completed Forms I-9 electronically. However, per [U.S. Citizenship and Immigration Services](#), any electronic storage system must include the following:

- Reasonable controls to ensure the system's integrity, accuracy, and reliability. For instance, you would need to ensure that only authorized personnel have access to the records and have a backup plan to recover records in the event of information loss.
- Reasonable controls that prevent and detect any unauthorized or accidental changes. In practice, the system should create a secure and permanent record when an individual makes any changes, and this record should include the date of access, the identity of the person who accessed the electronic record, and the particular actions they took.
- An inspection and quality assurance program that regularly evaluates the system and includes periodic checks of electronically stored Forms I-9, including electronic signatures, if used. In other words, periodically verify that the storage system is working as intended.
- An indexing system that allows users to identify and retrieve records maintained in the system.
- The ability to reproduce legible and readable paper copies.

*This Q&A does not constitute legal advice and does not address state or local law.*