

UNIVERSITY OF NEBRASKA AT OMAHA
Procedures for Compliance with Federal E-Verify Regulations
Revised February 9, 2010

On June 6, 2008, the President issued Executive Order 13465 "Economy and Efficiency in Government Procurement through Compliance with Certain Immigration and Nationality Act Provisions and the Use of an Electronic Employment Eligibility Verification System," providing that "Executive departments and agencies that enter into contracts shall require, as a condition of each contract, that the contractor agree to use an electronic employment eligibility verification system designated by the Secretary of Homeland Security to verify the employment of: (i) all persons hired during the contract term by the contractor to perform employment duties within the United States; and (ii) all persons assigned by the contractor to perform work within the United States on the federal contract." The Federal Acquisition Regulation (FAR) was therefore amended to require federal contractors to use E-Verify, which is the system designated to implement the Executive Order. The regulation is effective on September 8, 2009.

The University of Nebraska at Omaha has instituted the following procedures in compliance with this regulation.

The Office of Sponsored Programs & Research will review contracts for applicability to the E-Verify ruling. If the award appears to comply with the ruling and includes appropriate compliance language, Sponsored Programs will check the E-Verify box on the Internal Budget form that it completes for Grants Accounting. If the award appears to apply but does not include compliance language, Sponsored Programs will clarify the award's E-Verify status during its regular contract negotiations with the sponsor and will complete the Internal Budget form accordingly. Sponsored Programs & Research also will include an E-Verify compliance clause in subcontracts over \$3,000 it issues on E-Verify WBS Elements.

When **Grants Accounting** establishes the WBS Element(s) for an Internal Budget which is applicable to E-Verify, they will code the WBS Element in SAP with Priority Code "L" (Contracts E-Verify). Each time a new E-Verify WBS Element is established, Grants Accounting will send a listing of all the E-Verify WBS Elements to Human Resources, Payroll, Accounting Services, and the Office of Sponsored Programs & Research. Grants Accounting will notify the applicable Project Director and department each time an E-Verify WBS Element is established and send them a copy of this procedure.

Human Resources will verify all new hires assigned to an E-Verify WBS Element through the E-Verify system. Human Resources will also verify all current employees, hired after November 6, 1986, whose payroll is charged to an E-Verify WBS Element, through the E-Verify system. These payroll charges may

be assigned to WBS Elements via Personnel Action Forms, Recurring Payment Forms, and/or Payroll Expense Transfer Forms. New hires must be verified within 3 business days after the date of hire. Current employees must be verified within 30 calendar days of the employee's assignment to the contract.

UNO Departments will complete in an expedited fashion, any Personnel Action Forms, Recurring Payment Forms, and/or Payroll Expense Transfer Forms for new hires and current employees whose payroll will be charged to an E-Verify WBS Element. For E-verify WBS Elements, Departments will include the E-Verify clause in all applicable Purchase Orders and other payment documents over \$3,000 issued to goods/services providers.