



November 20, 2023

Samantha Deshommes
U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Office of Policy and Strategy
Regulatory Coordination Division
<http://www.regulations.gov>

Re: Agency Information Collection Activities; New Collection: E-Verify NextGen, I-9NG (OMB Control Number 1615-NEW) — e-Docket ID number USCIS-2023-0011

Dear Office of Policy and Strategy Chief Deshommes:

PayrollOrg (PAYO), formerly the American Payroll Association, supports the U.S. Citizenship and Immigration Services' proposed new E-Verify NextGen. PAYO agrees with the USCIS that this could be an exciting new program that greatly enhances the employment eligibility verification process.

If USCIS is interested, PAYO members would like to participate in the NextGen rollout process, such as to test the program or review employer and employee instructions.

About PAYO

Established in 1982, PAYO is a non-profit organization serving the interests of more than 20,000 payroll professionals nationwide. One of the PAYO's core missions is providing representation for payroll professionals at the federal, state, and local levels. This is done primarily through PAYO's Government Relations Task Force in which members educate government and community leaders about the payroll industry and the best practices associated with paying America's workers.

Payroll professionals are directly responsible for managing the employment eligibility verification onboarding process for their employers. PAYO's larger mission of educating payroll professionals



has always included USCIS's Verification Division in webinars and in person conferences. We look forward to including the E-Verify NextGen into PAYO's offerings.

Specific Comments

For many years, PAYO has asked USCIS about enhanced electronic capabilities for the Form I-9 verification process. E-Verify NextGen is the answer. By allowing employees to enter their own information, the amount of time and potential for employer errors can be greatly reduced.

Changing the onboarding process so USCIS directly communicates with employees about Further Action Notices through NextGen will speed up the onboarding process. This will eliminate the employer's role in dealing with Further Action Notices. This also provides employees with more control over their information to make corrections.

Key for the NextGen program to work effectively is ensuring that employees understand the requirements. PAYO members often share draft instructions with team members and employees to help agencies develop regulatory opportunities and capabilities. We would be pleased to assist the USCIS.

To discuss these comments further, please contact PAYO at Alice Jacobsohn 202-669-4001 or ajacobsohn@payroll.org.

Sincerely,



Alice P. Jacobsohn, Esq.
Director, Government Relations

For: Government Relations Task Force
Federal Issues Subcommittee
Chairs Rebecca Harshberger, CPP, and Jon Schausten, CPP