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August 28, 2023

Samantha L. Deshommes
Chief
Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security

Subject: Comment to "Agency Information Collection Activities; New Collection: E-Verify NextGEN, I-9NG" [OMB Control Number 1615-NEW, Docket ID USCIS-2023-0011]

Worldwide Employee Relocation Council (Worldwide ERC®) represents over 2,500 workforce mobility enterprises which include corporations and government agencies moving employees across the United States and around the world. Our membership is also comprised of the many service providers who support the move, such as relocation management companies, movers, real estate agents, tax and legal experts, and many destination service providers. We are bringing our industry together, helping global mobility and relocation professionals navigate current and emerging sustainability issues and forging the future for our industry and our world. In our role as an industry leader on immigration policy, Worldwide ERC® greatly appreciates the opportunity to provide our comments to U.S. Citizenship and Immigration Services on "Agency Information Collection Activities; New Collection: E-Verify NextGEN, I-9NG."

Worldwide ERC® supports USCIS' efforts on the E-Verify NextGEN demonstration project. Enabling employees to have direct access and responsibility for providing their personal information and managing their E-Verify process in connection with their Form I-9 will benefit both employees and employers. Worldwide ERC® has been a longstanding champion of the E-Verify program and its ability to enable employers to ensure their talent is legally eligible to work in the United States. The NextGEN project is a critical step in evolving the E-Verify program to best support the current and future needs of employers and employees. We look forward to when NextGEN is fully operational putting in place a more efficient verification system.

In regard to the collection activities in which USCIS is seeking comment, Worldwide ERC® agrees overall with the approaches and the specifc areas of data collection outlined in the notice. We also do not have reason to disagree with the total number of estimated respondents or the total public burden in hours or cost. We believe the information is consistent with meeting the requirements of the Paperwork Reduction Act of 1995.

When engaging in collection activities related to this demonstration project, we encourage USCIS to pursue input and feedback reflective of the broadest range of potential employer organizations. This includes, but is not limited to, current E-Verify users vs. non-current E-Verify users, industry types (reflective of current NAICS trends), employer size, and involvement in multinational business vs. domestic only. Actively focusing on soliciting input representative of the broadest range of organization types will help ensure that the agency is aware of potential impacts of E-Verify NextGEN and can incorporate this feedback into the project accordingly.

Again, Worldwide ERC® greatly appreciates the opportunity to provide comments on the notice. Worldwide ERC® and our members stand ready to support USCIS with this project moving forward.

Should you have any questions regarding our comments, please do not hesitate to reach out to me by email at mjackson@worldwideerc.org or phone at 703-842-3400.

Requestfully submitted,

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Michael T. Jackson

Vice President of Member Engagement and Public Policy

Worldwide ERC®

Worldwide ERC® is the professional association for workforce mobility professionals. Since 1964, Worldwide ERC® has been committed to connecting and educating workforce mobility professionals across the globe. A global not-for-profit organization, we are headquartered in Washington, D.C. and represent over 4,000 members around the world. Learn more at WorldwideERC.org.