

E-Verify: Purchasing Guidelines

Function: Purchasing
Procedure: E-verify: Employee Verification Procedure
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Guideline Recommendations

The E-Verify policy states that any subcontractors/contractors who are paid on a covered contract and meet the requirements (see [Guidance on FAR 52.222-54: E-Verify Optional Clause](#)), must register with E-Verify. This document provides E-Verify guidance within the Purchasing Module in Oracle. The Research Foundation (RF) operating locations should follow these guidelines to ensure compliance with the [Employment Eligibility Policy](#).

It is the responsibility of the RF to assure that all subcontractors, independent contractors or other entities that provide services or construction are registered. When a subcontractor/contractor has registered with E-Verify, it is the campus responsibility to ensure that the **E-Verify Company ID Number** is on the supplier file and a copy of the *Maintain Company* page is attached to the header of the supplier record (see [Attachments in Supplier File Module](#)). The E-Verify rule applies only to requisitions/purchase orders for services or construction. Purchase orders *must* be used when paying subcontractors/contractors on an award that is subject to the E-Verify Policy.

The following warning message will occur in the **Requisition form** - "*This requisition may be subject to E-Verify requirements. Please ensure the supplier is registered and the Company ID Number is recorded in the supplier file if appropriate.*" This warning will occur if all the following conditions are met:

- Total requisition amount is equal to or greater than \$3,000
- The award number on any of the distributions has a value of "YES" in the **Subject to E-Verify Rule** field
- The **Expenditure Type** starts with: **GNS, LSB, SUB** or **LSE**

The following warning message will occur in the **Purchase Order form** - "*This supplier's E-Verify information is not on file. Please ensure the supplier is registered and the Company ID Number is recorded in the supplier file if appropriate.*" This warning will occur if all the following conditions are met:

- Total purchase order is over \$3,000
- The award number on any of the distributions has a value of "YES" in the **Subject to E-Verify Rule** field
- The **Expenditure Type** starts with: **GNS, LSB, SUB** or **LSE**
- The **E-Verify Company ID Number** field is null on the supplier record.

If the conditions above occur, a review of the documentation must be performed for further clarity.

You will need to verify 1) length of the services; 2) total amount being paid; and 3) expenditure type being used.

If it is determined that the **Company ID Number** is required, contact your grants administrator to obtain a copy of the *Maintain Company* page and the **Company ID Number**. Input the number into the **E-Verify Company ID Number** field on the supplier file and scan the maintain company page into the header.

E-Verify requirements include procurement for services or construction that:

- Have a term period of more than 30 days; and
- Are not commercially available off the shelf (COTS) items and related services.

Examples when E-verification will not be required:

Example 1 - A contractor is hired under a covered contract and is performing construction services for a total fee of \$4,000. The work being performed is for only two weeks. In this case, E-Verify would not be required because it is less than 30 days.

Example 2 - Computers are purchased for \$10,000 from Company A. The same company is installing the computers for an additional \$4,000. In this case, E-Verify would not be required because the contract is for commercially available off the shelf items and related services.

Responsibilities

The following table outlines the responsibilities for compliance with this guideline:

Responsible Party	Responsibility
Purchasing Staff	Comply with these guidelines

Definitions

E-Verify - E-Verify is a web-based system that allows an employer, using information reported on an employee's Form I-9, to verify employment eligibility. The E-Verify system is operated by the U.S. Department of Homeland Security (DHS) in partnership with the Social Security Administration (SSA).

Company ID Number - A numeric only id number that verifies a company has enrolled in the Employment Eligibility Verification (E-Verify) system. This number is found on the Maintain Company page in E-Verify which is provided to the RF by covered subcontractors.

Commercially available off the shelf (COTS) - Items commonly sold in a commercial marketplace, unmodified, and typically offered for sale to and used by the general public. Such commercially available items are based on established catalogue or market prices. The services provided to support the COTS are narrowly defined to those services directly offered by the supplier to install, service or repair the item. Services or items that are considered "custom" are not COTS exempt.

Related Information

- [Employment Eligibility Policy](#)
- [E-Verify: Employee Verification Procedure](#)
- [E-Verify \(Homeland Security\)](#)

Change History

Date	Summary of Change
October 31, 2016	Updated links and revised document to comply with guideline template
April 22, 2010	New Document

Feedback

Was this document clear and easy to follow? Please send your feedback to webfeedback@rfsuny.org.