



SOLUTIONS LAW PRESS

HR & BENEFITS UPDATE

ICE Invites Comments On Information Required For IMAGE Program Employers

August 31, 2010

September 30, 2010 now is the deadline for employers and others wishing to comment on the information that the Department of Homeland Security, U.S. Immigration and Customs Enforcement (ICE) plans to require employers to supply when completing the “Form 73–028, IMAGE Information Request and Membership Application/ICE Mutual Agreement between Government and Employers” (IMAGE Form) required to participate in the IMAGE program originally announced by ICE in the June 11, 2010 Federal Register [here](#). In a notice published in the August 31, 2010 Federal Register, ICE announced that it is extending the period for commenting on its proposed information collection requirements for an additional 30 days after having received no response to its June 11, 2011 request for comments.

IMAGE refers to the “Immigration and Customs Enforcement Mutual Agreement between Government and Employers (IMAGE) program is the outreach and education component of the Office of Investigations (OI) Worksite Enforcement (WSE) program. ICE promotes IMAGE participation as part of its efforts to build cooperative relationships with the private sector to enhance compliance with immigration laws and reduce the number of unauthorized aliens within the American workforce. Under this program ICE will partner with businesses representing a cross-section of industries. A business will initially complete and prepare an IMAGE membership application so that ICE can properly evaluate the company for inclusion in the IMAGE program. The information provided by the company plays a vital role in determining its suitability for the program.

As employers participating in the IMAGE program will be required to complete the IMAGE Form, employers interested in this participation may wish to review the proposed information collection requirements and share any concerns with ICE in response to the request for comments by the September 30, 2010 deadline.

For Assistance or More Information

If your organization needs assistance reviewing or responding to the request for comments or otherwise dealing with I-9 or other human resources compliance concerns, please contact the author of this update, Board Certified Labor & Employment attorney Cynthia Marcotte Stamer at (469) 767-8872 or via e-mail [here](#).

Board Certified in Labor and Employment Law by the Texas Board of Legal Specialization, Ms. Stamer has more than 23 years experience advising employers and others about I-9 and other labor and employment, employee benefits, compensation and other workforce compliance, risk management and defense matters. She continuously advises employers about these and other related regulatory compliance, workforce management, operational, public policy, enforcement, litigation and risk management and other concerns. Ms. Stamer also publishes, conducts client and other training, speaks and consults extensively on these and other health and managed care

program concerns and practices. She regularly speaks and conducts training for the ABA, American Health Lawyers Association, Institute of Internal Auditors, and many other organizations. Her insights on these and related topics have appeared in Atlantic Information Service, Bureau of National Affairs, World At Work, The Wall Street Journal, Business Insurance, Managed Healthcare, Health Leaders, various ABA publications and a many other national and local publications. To contact Ms. Stamer or for additional information about Ms. Stamer, her experience, involvements, programs or Publishers of her many highly regarded writings on health industry and human resources matters include the Bureau of National Affairs, Aspen Publishers, ABA, AHLA, Aspen Publishers, Schneider Publications, Spencer Publications, World At Work, SHRM, HCCA, State Bar of Texas, Business Insurance, James Publishing and many others. You can review other highlights of Ms. Stamer's experience [here](#).

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- ✓ [**HHS, DOL & IRS Rules Define "Grandfathered" Group Health Plans & Health Insurance Coverage under the Patient Protection and Affordable Care Act**](#)

- ✓ [New Rule Requires Federal Government Contractors To Post New “Employee Rights Under The National Labor” Poster](#)
- ✓ [Defined Contribution Plans Investing In Publically Traded Employer Securities Face New Requirements](#)
- ✓ [CBO Raises Estimated Cost of Health Care Reforms As Employers, Health Plans Brace Costs Of Newly Effective & Impending Mandates](#)
- ✓ [Certain Workforce Reductions Trigger Plant Closing Notice & Other Obligations](#)
- ✓ [Mishandling Employee Benefit Obligations Creates Big Liabilities For Distressed Businesses & Their Business Leaders](#)
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