



Homeland Security

FEB 03 2014

MEMORANDUM FOR: Assistant Directors
Deputy Assistant Directors
Special Agents in Charge

FROM: *pd* James A. Dinkins (b)(6); (b)(7)(c)
Executive Associate Director

SUBJECT: Fiscal Year (FY) 2014 Worksite Enforcement Plan

Homeland Security Investigations' (HSI) worksite enforcement (WSE) strategy incorporates a multi-prong approach: enforcement (criminal arrests of employers), compliance (Form I-9 inspections, civil fines and suspension and debarment) and outreach (ICE Mutual Agreement between Government and Employers (IMAGE) program). The strategy is intended to increase our ability to criminally target the most egregious violators, while also placing emphasis in our Employment Eligibility Verification Form I-9 inspection efforts related to criminal and compliance investigations.

While our approach in implementing this strategy led to record years of Notices of Inspection (NOI) served in each of the last four FYs, over the past two years, HSI has been unable to fill auditor positions and has had to rely on special agents to achieve these numbers. Not only is the use of special agents for these administrative functions more costly and less efficient than the use of auditors, it also diverts their efforts away from conducting criminal investigations. Further, the increase of inspections in conjunction with the inability to fill vacant auditor positions has created an inspection backlog.

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Enforcement

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Compliance

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Outreach

The HSI field offices shall continue to promote the IMAGE program. In support of field office efforts, the WSE Unit will be seeking approval to conduct 16 IMAGE forums this FY.

Question concerning this memorandum should be directed to WSE Section Chief (b) (6), (b) (7)(C) (b)(6); (b)(7)(c) at 202-732- (b)(6); (b)(7)(c) or (b)(6); (b)(7)(c)@ice.dhs.gov.

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