

CHAPTER VI. EMPLOYER PARTICIPATION AND PERCEPTIONS OF THE BASIC PILOT

An integral component of any pilot program is identifying the satisfaction and difficulties that pilot participants experience during program implementation. This chapter discusses the factors that employers considered when deciding to participate in the pilot program and discusses the difficulties employers encountered in using the program in day-to-day operations. It also addresses the successes and challenges that pilot – and comparable non-pilot – participants experience. Finally, this chapter reviews employer perceptions of the program’s overall benefits and disadvantages and ends with a series of employer recommendations for improvements to the Basic Pilot program.

A. SOURCES OF INTRODUCTION TO THE BASIC PILOT PROGRAM

Among pilot establishments, the most frequently reported sources of introduction to the Basic Pilot were information from company headquarters and INS materials, audits/visits, and presentations. Sources less frequently reported included information from other employers, an SSA newsletter, a request from a client to participate, and a variety of other sources (see Exhibit VI-1).

Exhibit VI-1: How Employers Were Introduced to the Basic Pilot Program

Source	Percent of Employers
General company headquarters decision	25
Materials from company headquarters	18
INS materials or publications	16
INS audit or visit	11
INS presentation	10
Other employers	9
SSA newsletter	6
Request from client to participate	4
Other sources combined	18

NOTE: Percentages will not add to 100 because employers could provide more than one response.

SOURCE: Employer Mail Survey

B. RECRUITMENT OF ESTABLISHMENTS INTO THE BASIC PILOT PROGRAM

In the five original States targeted by the Basic Pilot Program, only 876 (0.04 percent) of the 2.1 million establishments enrolled in the pilot program as of July 31, 1999. Such a low participation rate may be due to a variety of factors, including that most employers were unaware of the pilot program or did not perceive it as being sufficiently beneficial to warrant implementation.

An examination of employers' reasons for deciding to participate in the Basic Pilot program is important for understanding the perceived advantages and disadvantages of participation.

1. REASONS FOR DECIDING TO PARTICIPATE IN THE BASIC PILOT PROGRAM

Approximately one-quarter of Basic Pilot program establishments reported that their company headquarters made the decision to participate in the program. Among establishments that made the decision themselves, the overwhelming majority (81 percent) reported that they had agreed to participate in order to improve work-authorization verification. Ten percent of establishments decided to participate to avoid an INS enforcement action, audit, or fine (Exhibit VI-2).

Exhibit VI-2: Reasons for Participation in the Basic Pilot Program

Reason	Percent of Employers
Improve work-authorization verification	81
Avoid INS audit, enforcement action, or fine	10
Satisfy a client's request	2
Other	7

SOURCE: Employer Mail Survey

Further analysis showed that all 64 employers who agreed to participate to avoid an INS audit, enforcement action, or fine also reported an INS visit in the past 2 years. On the other hand, establishments reporting no INS visits within the past 2 years did not indicate potential INS visits as a reason to participate. These findings support the hypothesis that employers who had had problems with INS may have felt pressured into signing up for the program and may have believed that participation would grant at least partial immunity from INS enforcement operations. These perceptions exist even though the Basic Pilot program literature clearly states that participation will not increase or decrease the chances of being audited by INS.

2. FEDERAL OBSERVATIONS ABOUT RECRUITMENT

Although it is reasonable to assume that employers are most knowledgeable about their decision to participate, Federal officials and contractors involved with the pilot programs were also asked to provide their views on employer motivations for participation.

Federal officials unanimously agreed that it was difficult to recruit employers into the pilot program. "If you look at the original recruitment targets and goals for the pilot programs, you will see that we haven't always met them. The pilot programs have not been easy to sell."

Word of mouth proved to be the most effective recruitment technique, officials said, adding that employers often signed up because they perceived that cooperating with INS would serve as insurance against INS enforcement visits. SSA and INS program officials

cited several reasons why employers might resist signing up. These included the paperwork involved, the burden of additional procedures for newly hired employees, the possibility that pilot participation might put them at a competitive disadvantage compared to nonparticipating employers, limitations on their freedom to hire whomever they please, and driving away job applicants. According to officials, some employers fear that participation may result in additional scrutiny by INS, even though such concerns are unrealistic in the opinion of the Federal officials interviewed.

According to INS program officials, employers who have had difficulty with INS or had undergone INS audits perceive participation as insurance against future investigations, even though participation has no effect on an employer's chance of being audited. "We have been the most successful recruiting among INS-troubled employers," one official said. In the words of another official, "Recruitment success probably requires that employers have the concern that they may be inspected." Said another: "Employers must feel a threat of enforcement; they need the stick to do this."

INS and SSA program officials offered additional reasons to explain recruitment difficulties:

- Employers think that INS can look at all their records if they participate in the pilot, and they are afraid of close scrutiny.
- Workers sometimes disappear when INS officials arrive, even if the visit has no connection with law enforcement. "Fear of the government in the employee population makes the employer skittish."
- Employers often do not want to know that they have ineligible workers. In today's economy, employers need workers and oppose legal requirements for employment verification. The following are representative quotes:

"(In) this overheated economy, all the concerns about immigration are out the window."

"With this system, employers can't get sufficient employees. If the economy does a downturn, this may not be a problem. But right now, it is."

"They tell us that they need employees. If they use the system, they know [that employees are not] authorized. Given this economy, they don't really want a system that's going to tell them that the employee is not authorized. And they're complying with the law. We get a lot of calls from employers asking about why they should use the pilot program. And we'll talk with them about the security of it, and knowing for sure. But they respond that they don't want to have to go beyond what they're doing because they need workers."

"In this economy, in which many employers will take anyone, many employers will take their chances of being caught, especially given the recent de-emphasis on interior enforcement."

INS and SSA officials suggested various strategies to improve recruitment, including tying participation in the pilot with facilitating wage reporting and increasing in-person marketing to employers to alleviate some of their apprehensions. An SSA program official suggested that promotional materials be included in mailings that employers receive every year from the Internal Revenue Service. Another official said: “If there were shorter [Memoranda of Understanding] and better hardware and software, more people would be interested.”

C. TIMELY USE OF THE BASIC PILOT SYSTEM BY EMPLOYERS

1. DELAY IN SYSTEM USE

An indicator of the value of the pilot system to employers is the percentage of pilot establishments that have actually used it. Of the 626 pilot employers who responded to the mail survey, 461 (75 percent) reported that they were actually using the system at the time they completed the survey (March 2000 or after), while 165 (26 percent) said that they were not.

Seventy-five percent is a higher rate of use than is indicated by an analysis of the transaction database, which showed that 34 percent of pilot participants had not used the system from the time they signed up for the pilot through December 31, 1999. The evaluation team believes that four factors contributed to this apparent difference. First, the timeframes for the two analyses were different; some establishments that had not used the system by December 1999 may have started using it by March 2000 and therefore would not be included in the transaction database. Second, establishments that had gone out of business after signing the Memorandum of Understanding (MOU) were included in the transaction database statistics but were not included in the survey. It is likely that a large percentage of these establishments were non-users.⁶⁶ Third, non-users were less likely to respond to the mail survey than were users.⁶⁷ Fourth, employers might have overstated their use of the system on the questionnaire because they were trying to appear compliant.

Most establishments reported installing the Basic Pilot software soon after receiving it (55 percent in less than 1 month and 78 percent within 3 months) (Exhibit VI-3). Again, this is a more positive picture than is indicated by the transaction database analysis. According to that analysis, only 38 percent of establishments had used the system by the third month after signing the MOU. In addition, it is likely that some of the difference between employer responses and the database analysis can be attributed to differences in

⁶⁶ These establishments presumably had less time in which to implement the system. Further, it is likely that many of these establishments were small businesses that were having financial or other difficulties that led to their hiring few, if any, employees.

⁶⁷ A short version of the questionnaire was used with employers who had no transactions recorded on the database as of July 1999 and who also confirmed that they were not using the pilot system when subsequently contacted by telephone. The response rate for this group of known non-users was 40 percent, compared to 74 percent for the remainder of the pilot establishments.

what is measured in the two information sources. The database analyzes the time period starting with the signing of the MOU and ending with system use, while the employer survey question starts with the receipt of the software and ends with system installation. There may have been significant time lags between the signing of the MOU and receipt of the software and/or between system installation and actual use. It is also possible, of course, that establishments reported faster installation than actually occurred because they did not accurately recall the installation date.

Exhibit VI-3: Reported Time Lapse Between Receipt of Basic Pilot Software and Its Installation

Elapsed Time	Percent of Employers
Less than 1 month	55
1-3 months	23
4-6 months	8
More than 6 months	6
Never installed	8

SOURCE: Employer Mail Survey

The overwhelming majority (89 percent) of the Basic Pilot establishments that reported using the system said they did so routinely. However, comparison of the transaction database with the sampled I-9 forms raises serious concerns about whether employers are, in fact, following the pilot requirement to verify every new employee. In this analysis, I-9 forms that were in scope, based on the date of hire, were compared to the Basic Pilot transaction database. Overall, almost one-fourth (24 percent) of the sampled I-9 forms were not in the Basic Pilot database. Some of the discrepancy may be explained by establishments simply using the system intermittently for benign reasons. In some cases, employers did not start up the Basic Pilot Integrated system immediately after stopping use of the original pilot system. Nonetheless, an analysis of information in the transaction database suggests that delayed or intermittent use cannot explain all of the instances where the system was not used to verify new employees.

2. REASONS FOR DELAY IN SYSTEM USE

Thirty-seven percent of employers received the Basic Pilot software but delayed installing it for a month or more. Their reasons for delay provide some additional insights into possible problems with the system. The most common reasons for installation delay were technical difficulties and a lack of the necessary equipment. Among other reasons cited were a lack of staff available to install the program and the staff training required (Exhibit VI-4). Several establishments also reported that they received blank diskettes and had to wait for a new copy. In some of these cases, the establishments claimed that they had never received a new copy of the software and, therefore, did not participate in the program.

Exhibit VI-4: Reasons for Delay in Installing Basic Pilot System

Reason	Percent of Employers
Experienced technical difficulties	33
Lacked necessary equipment	32
Required staff training	26
No staff available to install	25
Couldn't gain access	14
Hired no new employees	7
Couldn't reach INS support	4
Other	14

NOTE: Percentages will not add to 100 because employers could provide more than one response.

SOURCE: Employer Mail Survey

D. CHARACTERISTICS OF PILOT USERS AND NON-USERS

Large pilot establishments were more likely to use the Basic Pilot system than were small establishments. The average pilot establishment that was not routinely using the system at the time of the mail survey in early 2000 reported having fewer than 150 employees, compared to the average of approximately 185 employees among pilot establishments routinely using the system. Additionally, the number of employees hired during the past 6 months was more than six times higher among pilot users than among non-users (an average of 100 versus 15, respectively).⁶⁸

Two major hypotheses were put forward to explain the higher use of the Basic Pilot program among larger establishments:

- Since many of the costs of the Basic Pilot system are fixed (i.e., they are systemic), the cost per case verified declines as the number of verifications per establishment increases. The system is, therefore, more cost effective for large establishments than for small ones.⁶⁹
- Larger employers are more visible to government agencies and are, therefore, more likely to acquiesce to government requests to adopt administrative structures and systems such as the Basic Pilot.

It is also likely that at least some of the difference in use statistics between small and large establishments is explained by the fact that some small employers hired no employees over a period of time. Indeed, the primary reason pilot employers reported for

⁶⁸ The measure of average used in these comparisons is the median.

⁶⁹ See Chapter X for additional information on the relationship between employer costs and establishment size.

non-use of the system was that they had not hired any new employees. This reason was reported by more than 70 percent of non-users (Exhibit VI-5).

Exhibit VI-5: Reported Reasons for Not Using Basic Pilot System

Reason	Percent of Employers
No new employees hired	73
Experienced technical difficulties	20
No trained staff available	6
Use employees of temporary/contract agencies	5
System is burdensome and time consuming	3
Developed other ways to ensure work eligibility	2
Have a contractor verify employees	1
Other	10

NOTE: Percentages will not add to 100 because employers could provide more than one response.

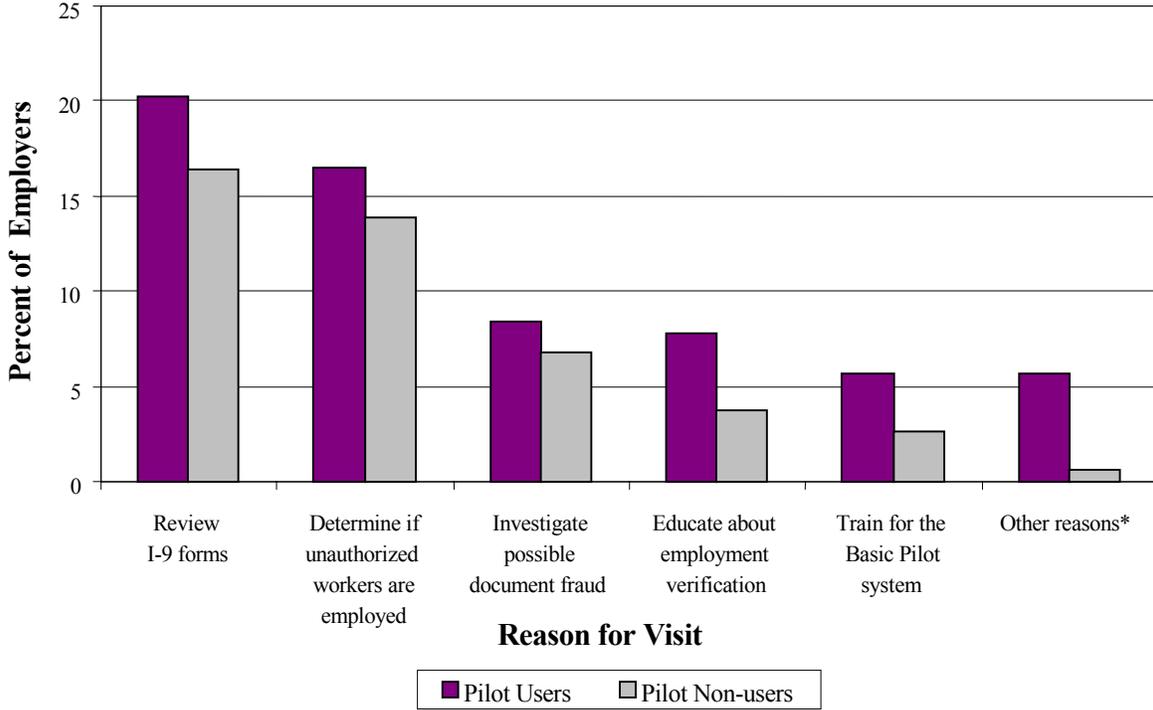
SOURCE: Employer Mail Survey

The following are some other characteristics that distinguish pilot users from non-users:

- Pilot users tend to employ less educated workers. Non-users reported markedly higher education levels for their hourly employees than did pilot users. Twenty-nine percent of non-user establishments reported having a workforce consisting of 80 percent or more employees with at least a high school diploma, compared to 19 percent of user establishments.
- Thirty-two percent of employers that used the system have some union representation, as opposed to only 23 percent of establishments that never used the system.
- Employers using the pilot system are more likely to have had contact, either positive or negative, with INS than are those who signed up but did not use the system. Both pilot and non-pilot users most often cited the review of I-9 forms and the investigation of possible document fraud as the reasons for INS visits. INS also reportedly made visits to provide education about employment verification, to provide training on the Basic Pilot system,⁷⁰ and to determine whether unauthorized workers were employed (see Exhibit VI-6).
- Many stakeholders have expressed the fear that the pilot program may make it harder for employers to recruit workers, especially workers in the less skilled labor categories. However, as Exhibit VI-7 shows, employers do not appear to have difficulty recruiting such workers.
- There is little difference between system users and non-users in terms of the ease of recruiting salaried workers (Exhibit VI-7).

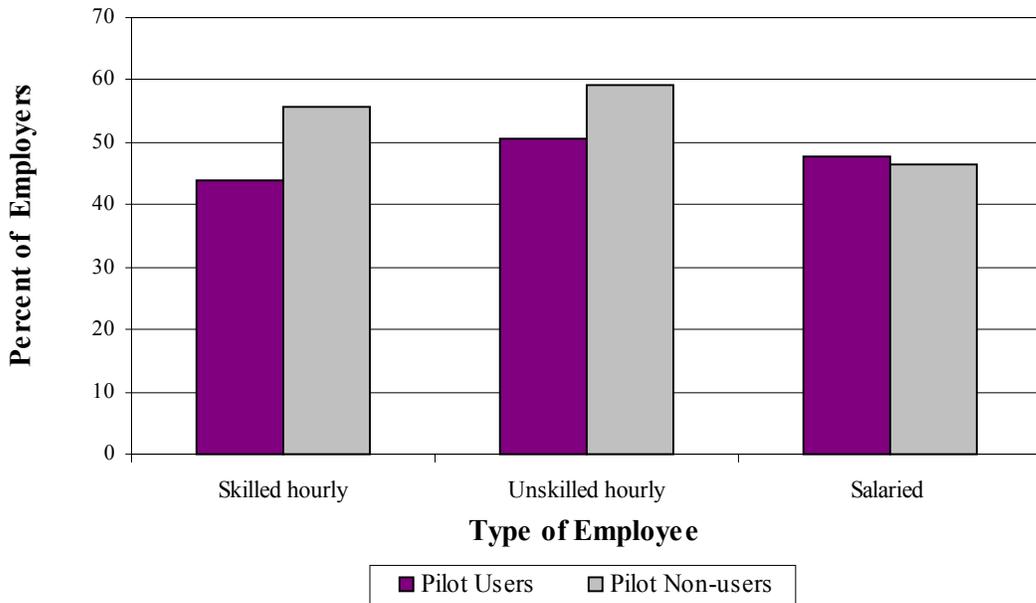
⁷⁰ Formal training by INS refers to the training delivered when employers began in either the Employment Verification Pilot or the Joint Employment Verification Pilot, since the Basic Pilot program did not include any formal on-site training for participating employers.

Exhibit VI-6: Reasons for INS Visits in the Past 2 Years



* Differences are significant at the 0.05 level.
 SOURCE: Employer Mail Survey

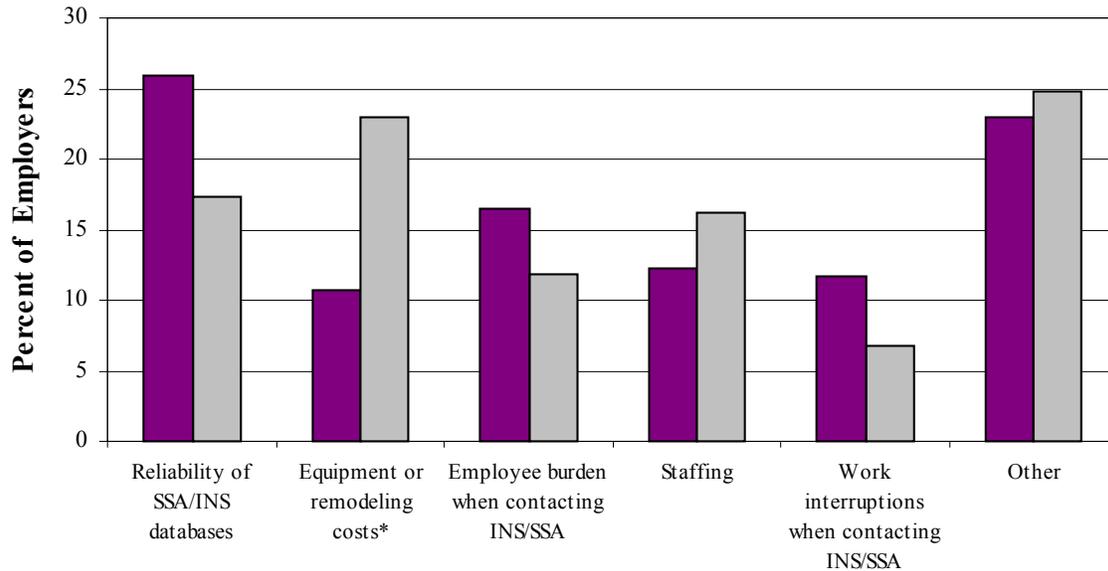
Exhibit VI-7: Percentage of Employers Reporting It Was Easy to Hire Workers, by Worker Skill Level



NOTE: The exhibit shows the percentage of employers who reported that filling these positions was “Very Easy” or “Fairly Easy.” Differences are not statistically significant at the 0.05 level.
 SOURCE: Employer Mail Survey

Pilot system users were less likely than non-users to express concern about the cost of equipment or remodeling (Exhibit VI-8). This points to a possible cause for the inactivity of non-users and may help to explain the dramatic size difference between establishments that do and do not use the system, since larger establishments may be more likely to have computer equipment and dedicated telephone lines.

Exhibit VI-8: Employers' Main Reservations or Concerns About Pilot Participation



Main Concerns About Pilot Participation



* Differences are significant at the 0.05 level.

SOURCE: Employer Mail Survey

The evaluation also identified certain factors on which pilot users and non-users were similar:

- Whether they rely primarily on full-time permanent, part-time permanent, or temporary workers
- The percentage of their workforce who are noncitizens
- The racial/ethnic composition of their workforce
- Compensation rates (as reported by employers)
- Sponsorship of H-1 nonimmigrant workers
- Recruiting practices
- Reliance on seasonal hiring

1. ADVANTAGES OF THE SYSTEM AS PERCEIVED BY PILOT EMPLOYERS

Basic Pilot employers reported positive experiences with the system. In an overall rating, 96 percent of employers using the pilot believed that the Basic Pilot is an effective tool for employment verification. These highly positive results may reflect in part that these employers self-selected to participate in the Basic Pilot program. Other employer perceptions are summarized below:

- Ninety-two percent of employers believed that the tasks of the verification system do not overburden their staff.
- Ninety-four percent reported that it is feasible to fulfill employer obligations required by the verification process.
- Ninety-three percent indicated that the Basic Pilot verification process is easier than the Form I-9 process. (More than three-quarters of the pilot establishments indicated that the Form I-9 process is either a slight burden or no burden at all. The response patterns did not differ significantly between establishments that had used the system and those that had not.)
- Ninety-four percent felt that the Basic Pilot verification process is more reliable than the process they used previously.

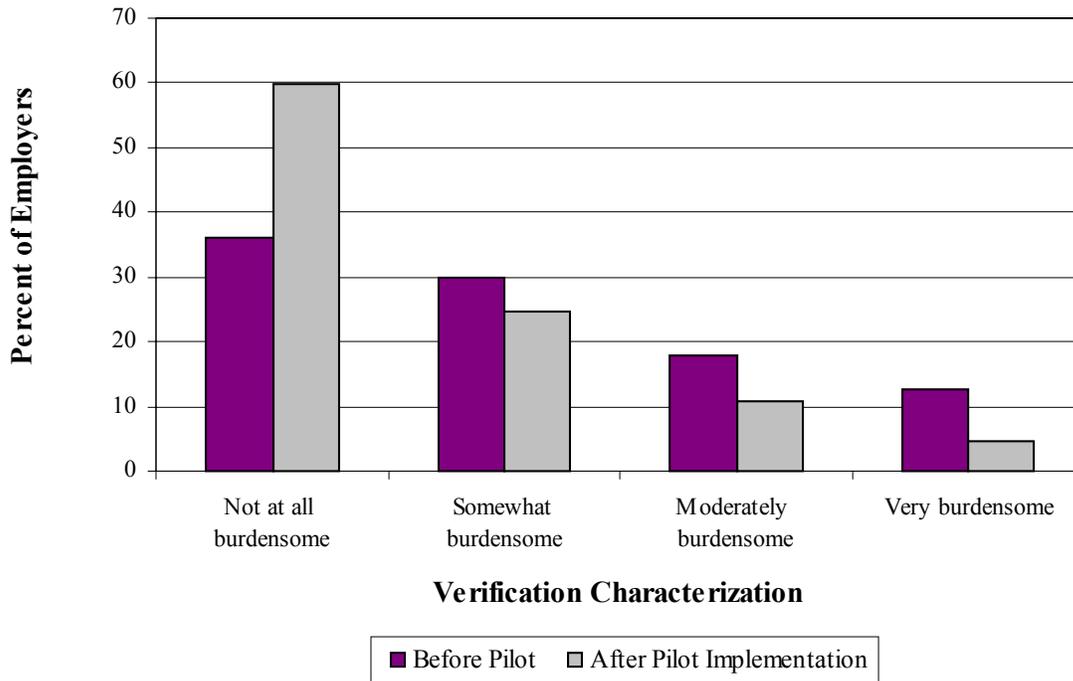
a. EMPLOYER BURDEN

One of the objectives of the designers⁷¹ of the Basic Pilot program was to avoid unnecessary burden on employers. To determine whether the Basic Pilot program has met that challenge, the evaluation team asked employers to rate the Form I-9 and to compare the employment authorization procedures they had used before and after the Basic Pilot program. A four-point scale was used, with 1 being “very burdensome” and 4 being “not at all burdensome.” The reported burden under the Basic Pilot program was significantly less than it had been prior to implementing the pilot. The percentage of employers who rated the Form I-9 process and the employment verification procedures as “not at all burdensome” increased from 36 percent before they implemented the Pilot program to 60 percent after they had implemented the program (Exhibit VI-9).

Eighty-three percent of employers reported that the Basic Pilot reduced uncertainty regarding work authorization. By maintaining a workforce made up of authorized employees, employers are less burdened by loss of unauthorized employees if they are faced with an INS worksite enforcement action.

⁷¹ The objectives of the program designers are discussed in more detail in Chapter II.

Exhibit VI-9: Employers’ Characterization of Employment Verification Procedures Before and After Implementing the Basic Pilot



SOURCE: On-Site Employer Survey

b. EMPLOYEE RECRUITMENT

One of the concerns expressed by stakeholders representing employers was that the Basic Pilot program would make employee recruitment very difficult for pilot employers. Some stakeholders hypothesized that employers might also experience a decrease in the supply of work-authorized applicants when using the Basic Pilot system. These applicants might, for example, hear about problems other work-authorized employees had had during the authorization process and fear that they would have similar problems. Therefore, the evaluation asked employers using the pilot about the program’s impact on recruitment and the availability of workers.

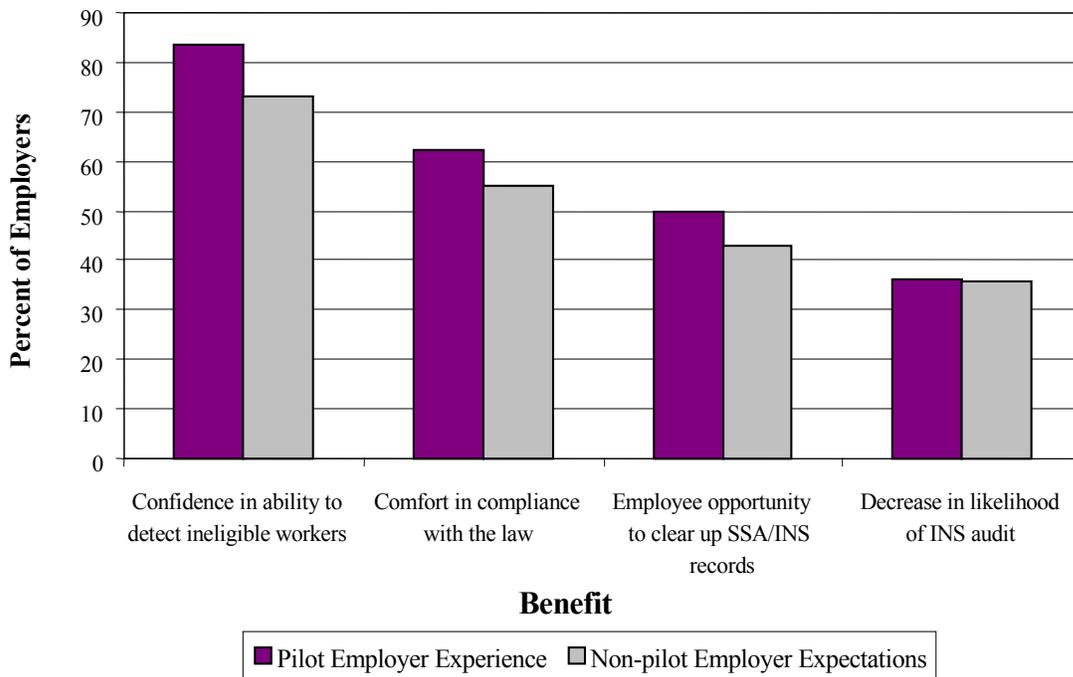
Twenty-one percent of pilot employers responding to the mail survey stated that their participation in the Basic Pilot had reduced their pool of work-authorized applicants, whereas 64 percent reported a decrease in unauthorized workers only. The impact of such decreases is, of course, dependent upon the available labor pool. Although this evaluation was conducted during a tight labor market, most (80 percent) of pilot employers reported that qualified hourly workers were not difficult to recruit using the Basic Pilot system and almost all (96 percent) reported no difficulties in recruiting qualified salaried workers when using this system.

Pilot employer responses to on-site interviews confirmed these findings. When asked to weigh the benefits and disadvantages of the Pilot program, only 4 of 315 pilot employers mentioned that the Basic Pilot program limited the pool of applicants.

c. COMPLIANCE WITH THE LAW

A majority of respondents to the on-site interview cited the comfort that came from knowing they are in compliance with the law as a major benefit of the program. These thoughts were expressed both as direct responses and as part of open-ended responses. Sixty-two percent of pilot employers in the on-site survey said that the Basic pilot puts an establishment at ease in knowing that it is in compliance with the law. In open-ended comments, 47 percent of respondents discussing the program’s advantages expressed confidence that they were in compliance with the law as a result of their voluntary participation in the Pilot program (Exhibits VI-10 and VI-11).

Exhibit VI-10: Main Benefits of Basic Pilot Based on Pilot Employers’ Experience and Non-pilot Employers’ Expectations



SOURCE: On-Site Employer Survey

Exhibit VI-11: Comments on Main Benefits of Basic Pilot Based on Pilot Employers' Experience and Non-pilot Employers' Expectations

Comment	Percent of Employers
User friendly/easy to use	47
More secure in hiring process	33
Selling feature	8
Non-discriminatory system/uniformity of treatment	6
Serves as a deterrent to undocumented immigrants	5
Direct link to INS and SSA	3
Less turnover	3
Other	3

NOTE: The total number of respondents was 107, and the total number of responses was 114. Percentages will not add to 100 because employers could provide more than one response.

SOURCE: On-Site Employer Survey

d. EFFICIENT VERIFICATION PROCESS

One goal of the pilot program is to provide employers with an efficient process for determining whether an employee is work-authorized. The need for such a system was a common theme in employers' responses during the on-site interviews.

Among respondents to the on-site interviews, 22 percent mentioned that the pilot program is an efficient verification process (Exhibit VI-12). In response to another question, 64 percent of respondents agreed that this program reduced some of the problems associated with the collection and review of documents required for employment verification.

e. COMPETITIVE ADVANTAGE

One question raised was whether the pilot programs would place participants at a competitive disadvantage. It was, therefore, surprising that 46 percent of the Basic Pilot establishments responding to the mail survey indicated that participation provided a competitive advantage. Interpreted in conjunction with the reported effects of the program on employee recruitment and retention, this finding indicates that any recruitment problems resulting from system use are, for most employers, balanced by benefits obtained from the system.

Exhibit VI-12: Employer Views on Balance of Benefits and Disadvantages of Basic Pilot

Employer View	Number of Responses			Total
	Benefits Outweigh Disadvantages	Benefits and Disadvantages Are Equal	Disadvantages Outweigh Benefits	
Confident that establishment is compliant with the law	79	1	-	80
Efficient verification process	38	-	-	38
No disadvantages	22	2	-	24
Cuts down on ineligible workers in the workforce	12	-	-	12
Disadvantages (cost, forgery, time, non-competitive)	4	-	7	11
Other	2	1	3	6
Limits applicants	-	2	2	4
Prevents wasting money on training	2	1	-	3
Protects employer and employee	3	-	-	3
Reduces the chance of losing skilled workers	3	-	-	3
Promotes a professional image	2	1	-	3
Shifts burden from company to government	1	-	-	1
Total	168	8	12	188

NOTE: The total number of respondents was 172, and the total number of responses was 188.

SOURCE: On-Site Employer Survey

2. DISADVANTAGES OF THE SYSTEM AS PERCEIVED BY PILOT AND NON-PILOT EMPLOYERS

An integral component of a pilot program is identifying difficulties that can be addressed if the program is continued. In the case of the Basic Pilot, employers were interviewed on-site on many facets of the program, including any technical or organizational difficulties they may have experienced. Thirty-three percent of the employers interviewed said that they had encountered some technical or organizational difficulties when setting up the Basic Pilot program. Most of these problems were technical in nature, relating to the modem connection or the telephone line (77 percent), software or hardware problems (39 percent), or computer problems. Organizational problems were mentioned less frequently (11 percent) (Exhibit VI-13). Open-ended responses related to this item reiterated the employers' frustration with the software and hardware. Of the 78 comments related to this topic, 55 employers detailed problems with printing, connecting to the system, passwords, corrupt software, slow connections, and types of computers required. The other 23 comments addressed issues such as insufficient training, orientation, and technical support (Exhibit VI-14).

Exhibit VI-13: Technical and Organizational Difficulties Encountered During the Process of Setting Up the Basic Pilot Program

Difficulty	Percent of Employers
Problem with modem	53
Other technical problems with software/hardware	39
Problem with the telephone line	24
Problem with the type of computer used	19
Organizational problems related to determining who will do verifications, training staff, etc.	11
Other	37

NOTE: Percentages will not add to 100 because employers could provide more than one response.

SOURCE: On-Site Employer Survey

Exhibit VI-14: Comments on Technical and Organizational Difficulties Encountered in Setting Up the Basic Pilot Program

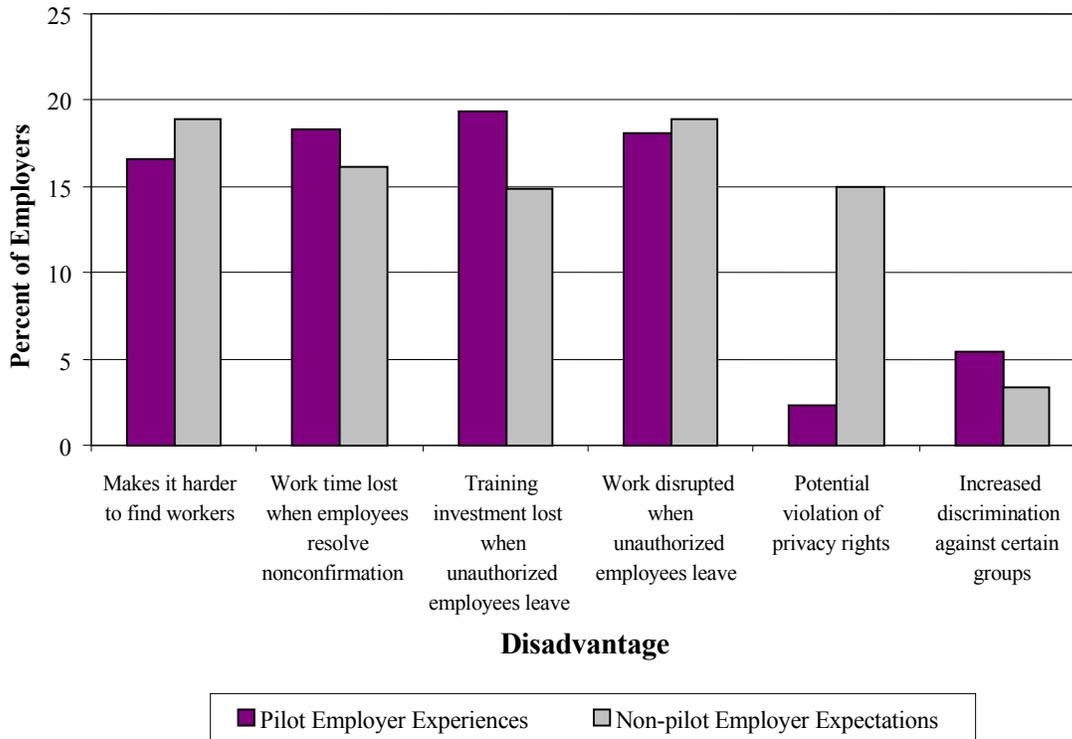
Comment	Percent of Employers
Software problems (printing, connecting to system, password, data, etc.)	67
Hardware problems (modem, type of computer, etc.)	23
Problems with training, orientation, and tutorial	8
Other (staffing, technical support, other)	29

NOTE: The number of employers providing open-ended responses was 62, and the number of responses was 78. Percentages will not add to 100 because employers could provide more than one response.

SOURCE: On-Site Employer Survey

In comparing pilot employers' experiences with and non-pilot employers' expectations for a verification program, the evaluation team found that pilot employers were more confident than non-pilot employers that such a program could detect unauthorized workers (83 percent versus 73 percent, respectively). This finding implies that the Basic Pilot may exceed the expectations of those who have not used it. Therefore, those who have used it successfully may be the most effective spokespersons for the program (see Exhibit VI-10). There were no significant differences between pilot employers' experiences and non-pilot employers' expectations in relation to the shortcomings of a verification program such as the Basic Pilot (Exhibit VI-15).

Exhibit VI-15: Disadvantages of Basic Pilot from Perspective of Pilot Employers' Experience and Non-pilot Employers' Expectations



SOURCE: On-Site Employer Survey

In spite of general approval of the system, employers also saw disadvantages. Almost 20 percent of pilot employers interviewed on-site agreed that the establishment loses work time when employees need to leave work to resolve tentative nonconfirmations. A similar percentage of employers agreed that work is disrupted and that training investment is lost when employees turn out to be unauthorized and leave. Seventeen percent of employers said that the Basic Pilot program makes it harder for them to find workers. In the on-site interview, 2 percent of pilot employers expressed concern about the potential violation of employee privacy rights, and 5 percent were concerned about increased discrimination against certain groups (Exhibit VI-15). Other disadvantages, cited by 139 pilot employers, included software issues and the system being time consuming. Open-ended comments on disadvantages focused on the process taking too long and problems with the pilot software (Exhibit VI-16).

Exhibit VI-16: Comments on Main Disadvantages of Basic Pilot from Employer's Perspective

Disadvantage	Percent of Employers
Overall process takes too long	33
No comment	17
Problems with software	16
Issues with nonconfirmation complaints	9
Need to update SSA and INS systems	7
Burden on employer	6
System not foolproof	6
Other	7

NOTE: The total number of respondents was 138, and the total number of responses was 139. Percentages will not add to 100 because employers could provide more than one response.

SOURCE: On-Site Employer Survey

E. EMPLOYER RECOMMENDATIONS

Employer recommendations are reflections of pilot participants' experiences with and perceptions of the pilot program. Most of the recommendations discussed here were compiled from employers' open-ended comments during on-site interviews.

When asked to recommend improvements to make employment verifications easier to process, half of the 259 pilot employers interviewed on-site either said that no improvements were needed or responded with general praise (Exhibit VI-17). However, 25 percent gave specific feedback on enhancements to the computer product and the customer service procedures to make the system more user friendly and efficient. The most frequently cited request was to provide a faster connection to the SSA and INS databases.

Some respondents (14 percent) also made recommendations on other issues, including the need to provide better training, improve the training manual, and provide a contact person to support companies. Expanding the system's hours of operation to nights and weekends was a frequently cited recommendation when pilot employers interviewed on-site were asked about possible changes to the Basic Pilot in general (Exhibit VI-18).

Exhibit VI-17: Recommended Improvements to Make Work Authorizations Easier to Process, by Type of Improvement

Improvements	Number of Respondents	Percent of Respondents
No improvements needed	130	50
Computer program	43	17
Improve field for names	9	
Fewer steps would be easier	7	
More specific explanation of forms	5	
Longer expiration time for passwords	3	
Responses should come in the order submitted	2	
Easier way to change the password code	2	
Need a way to modify information	2	
Show sample of documents on the screen	2	
Not having password expire	2	
Other	9	
Computer connection/access	22	9
Provide faster connection with more lines	13	
Provide Internet instead of modem access	4	
Make the operating systems compatible	4	
Other	1	
Customer service	35	14
Faster verification	24	
System available longer hours and on weekends	5	
Provide training	2	
Provide preprinted forms system generates	2	
Other	2	
Policy	5	2
Compatibility between INS and SSA data	5	
Other	42	16
Total	277	106.9

NOTE: The total number of respondents was 259, and the total number of responses was 277. Percentages will not add to 100 because employers could provide more than one response.

SOURCE: On-Site Employer Survey

In a similar question asking about recommendations for changes in the Basic Pilot in general, almost half the respondents' comments addressed computer issues (Exhibit VI-18). One-quarter of the respondents mentioned customer service issues, and 19 percent made general policy-type recommendations, one of which was that verification should precede hiring.⁷² Another such recommendation provided by a few respondents was to make sure the Basic Pilot program is used by all establishments so that it can no longer present an advantage to establishments that do not use it, since they would theoretically be the recipients of the unauthorized workers who will not approach establishments using the pilot (see Exhibits VI-17 and VI-18).

⁷² See Chapter IX for a discussion of the laws against prescreening and the reasoning behind such laws.

Exhibit VI-18: Recommended Changes in Basic Pilot, by Type of Change

Changes	Number of Respondents	Percent of Respondents
Computer program	66	40
Software problem with last names	13	
General software issues/recommendations	11	
Software problem, identifying correct documents	11	
Software request, forms in Spanish	6	
Tentative nonconfirmation, general complaints	5	
Software request, password change less often	4	
General computer issues	4	
Number of requests	3	
Tentative nonconfirmation, provide guidelines	3	
Tentative nonconfirmation, provide reason for rejection	3	
Software problem, having to re-enter information	3	
Computer connection/access	15	9
Make it faster	11	
Software compatibility problems	4	
Computer Total	81	49
Customer service	47	29
Expand the hours (weekends and nights)	10	
INS too slow	10	
Better manual/training	9	
SSA complaints	7	
Better customer care	6	
Provide a contact	5	
Policy	31	19
Initial 3 days insufficient	7	
Verification should occur prior to hiring	8	
Allow more time for problems	5	
Expand program capabilities	5	
Program should be used by all	6	
General praise	22	13
Nothing to add	6	
General praise	16	
Other	8	5
Total	189	115.2

NOTE: The total number of respondents was 164, and the total number of responses was 189. Percentages will not add to 100 because employers could provide more than one response.

SOURCE: On-Site Employer Survey

F. SUMMARY

The major factor that influenced employers' decisions to volunteer to participate in the Basic Pilot program was to improve verification of work authorization. After using the system, almost all pilot employers (96 percent) perceived the Basic Pilot as an effective tool for employment verification. This attests to the success of the Basic Pilot program in meeting one of the prime objectives for which it was designed. The program was also successful in meeting other objectives. Most importantly, participating employers felt confident that they were in compliance with employment verification procedures. At the same time, they agreed that verifying employees through the pilot program was less of a burden than processing them through the Form I-9 process alone.

On the other hand, the pilot program was not as successful when it came to the technical aspect of program implementation. The major shortcomings perceived by employers focused on two major themes: computer issues and technical support. Most prevalent was the slow modem connection, with employers sometimes finding it hard to connect to the system at all. Some employers also detailed software shortcomings, while others just suggested general computer improvements. On a related topic, many employers complained of technical problems and some suggested that the manuals be updated. Others stated that their employees did not have the proper training to operate the system. The employers' inability to use the system properly may have caused some of the usage errors and, therefore, some of the data entry mistakes on the transaction database.

In summary, pilot participants are encouraged by the advantages of the Basic Pilot system but seem to be asking for some technical improvements and better technical support in using the program.⁷³ Most importantly, they perceive that the benefits of the Basic Pilot program outweigh its disadvantages, although some of this effect may reflect the high expectations of this self-selected group.

⁷³ See Chapter XIII for specific recommendations that address these technical and training difficulties.