

Navigating E-Verify's Status Change Report

Labor & Employment Law Update

By Sara Zorich on August 12, 2025

On July 15, 2025, the U.S. Department of Homeland Security ("DHS") released updated E-Verify compliance information related to revoked Employment Authorization Documents ("EADs") for certain noncitizens whose parole status under the CHNV (Cuba, Haiti, Nicaragua, and Venezuela) parole program has been terminated.

This stems from a decision on May 30, 2025, in which the U.S. Supreme Court allowed DHS to terminate CHNV parole and revoke the work authorization status for individuals in the program.

As a result, DHS indicated that it is revoking the EADs to individuals on a case-by-case basis. DHS indicated it has issued direct notifications informing affected individuals of the termination of their parole and revocation of their parole-based EADs. E-Verify employers must be aware of and understand these new compliance obligations related to revoked EADs.

New Status Change Report for E-Verify Employers

In response, E-Verify introduced a new "Status Change Report" to assist E-Verify employers in identifying impacted employees and meeting Form I-9 reverification obligations. U.S. Citizenship and Immigration Services (USCIS) issued updated guidance on how E-Verify employers are to access the Status Change Report and address revoked EADs. E-Verify employers should:

- 1. Obtain the Status Change Report:** The Status Change Report allows E-Verify employers to review consolidated case data for employees who initially presented an EAD that has since been revoked by DHS. For each impacted case, the Status Change Report includes key details such as the employee name, revocation date, case number, and A-Number. Employers can access the report by logging into their pre-existing E-Verify account and clicking on the "Reports" tab to select the new Status Change Report. Employers who use an employer agent or vendor should contact that third party to obtain a copy of the report.
- 1. Reverify on Form I-9, Supplement B:** Once the employer has obtained the Status Change Report, they should contact each employee individually and reverify each current employee whose EAD was revoked within a "reasonable

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amount of time." The reverification is done using the Form I-9 and Supplement B. Employees with revoked EADs must provide unexpired documentation from List A or List C of the Lists of Acceptable Documents in order to recertify. Employers SHOULD NOT create a new E-Verify case when reverifying. USCIS has indicated that employers cannot continue employing a person who does not provide proof of current employment authorization.

Compliance Obligations for Employers

While the process above may sound straight forward, it is far from it. The USCIS guidance leaves many questions for E-Verify employers. First, there is no definition for "reasonable amount of time" to address the Status Change Report. Second, with the rollout of the Status Change Report, employers can no longer rely on passive E-Verify alerts to flag revoked EADs. Instead, employers must take an active role in generating and reviewing the Status Change Report regularly to stay compliant.

This shift places greater responsibility on employers to implement internal procedures for tracking employment authorization and reverifying affected employees promptly. Failure to act promptly may result in the continued employment of individuals without valid work authorization, exposing employers to potential civil penalties. E-Verify employers should carefully consider the report, timeframe for reverification, and impact on their business with legal counsel.

Employers who do not use E-Verify have no ability to pull or access the "Status Change Report" and therefore have no ability to verify if the EAD of any employee has been revoked. If an employee self identifies their work authorization has been revoked, the employer must act on such knowledge. However, without that, employers need to be very careful making any assumptions related to an employee's status. Rejecting an EAD that appears valid on its face can lead to discrimination.

In addition, employers should review their E-Verify and Form I-9 policies and procedures. E-Verify employers should take steps to establish compliance and a non-discriminatory process to address employees identified on the Status Change Report.