

Global Migration, Lawful Employment, And U.S. Immigration Law

by Carol Hildebrand

This article provides an overview of issues related to the global movement of people. It includes a discussion of how U.S. immigration law deals with the movement of people into this country, as well as policy considerations in granting work authorization.

Whether people travel as tourists for pleasure or adventure, as refugees in flight from persecution or violence, or as workers in planned or desperate ways, all are participants in a global movement of people. The migration of people impacts every nation.¹

This article discusses U.S. immigration law in the context of a larger worldwide movement of people. It references sources of international law, addresses legal and illegal immigration in the United States, and connects immigration law, work permission for aliens, and the employment of people across borders.

The Global Migration Of People

Countries have presumed authority under international law to control the entry of noncitizens into their territories.² However, the custom of routinely authorizing entry of at least some noncitizens and the language of certain international agreements make an absolute statement of complete control subject to question.³ Countries also have presumed authority to designate which entrants may work.⁴ International human rights standards may challenge or limit full control.⁵

A country's laws governing immigration provide notice to the rest of the world as to what migration is officially acceptable. Immigration laws represent a country's widely accepted values and its lawmakers' assessment of what entrants serve its interests. These laws may reflect a welcoming attitude toward close relatives of its own citizens or a sense of duty toward people fleeing persecution or deprivation. Lawmakers analyze the coun-

try's interests to determine whether the admission of new people will have a positive or negative effect on economic productivity and prosperity, on cultural norms, on environmental and population management, or on the inventiveness and creativity of the society in question.

Migration Outside the Legal Structure

The ease with which people can move from one country to another has challenged many countries. Migration outside the legal structure is reported not just in the United States but also in Thailand, India, Canada, Mexico, Gambia, France, Spain, and Italy.⁶ Expecting imperfections in any immigration system may be necessary, according to an analyst with the Migration Policy Institute.⁷

According to the United Nation's Department of Economic and Social Affairs statistics, approximately 191 million people live outside their countries of citizenship.⁸ In 2001, the U.S. National Foreign Intelligence Board, under the authority of the Director of Central Intelligence, reported that 140 million people lived outside their countries of birth.⁹ A basic necessity for most people living outside their countries of birth is permission to work. The immigration laws of a particular country may officially sanction that work or enforce penalties for violating work prohibitions.¹⁰

Policy Considerations In Granting Work Authorization

Multiple considerations affect the work authorization of people from other coun-

tries. Trying to ensure a reasonable livelihood for a country's own citizenry has been a major immigration consideration, encompassing a nation's economic policies generally and its labor economic policies in particular.¹¹ Multinational companies and organizations have a significant interest in the availability of work authorization so they can transfer personnel from one country to another.¹²

Longer term concerns about a country's tax base, labor shortfalls, defense capabilities, and pension funding also influence policy choices.¹³ In addition, civil and human rights laws or aspirations may influence work authorization policies and procedures.¹⁴



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Legal or Documented Aliens in the United States

A person who enters and remains in the United States in accordance with the provisions of the Immigration and Nationality Act ("INA")¹⁵ is a legal or documented alien. The INA sets forth entry requirements for nonimmigrants, lawful permanent residents, and refugees.

Nonimmigrants

Nonimmigrants are foreign citizens who are diplomats; tourists; visitors for business; and foreign students,¹⁶ as well as professionals, managers, and executives typically authorized to work in the United States for a certain number of years.¹⁷ An unlimited number of seasonal farm workers and an annual quota of 66,000 other seasonal, peakload, or intermittent workers can be admitted, based on an employer's petition approved by U.S. Citizenship and Immigration Services ("USCIS"), where a shortage has been demonstrated.¹⁸ Absent from the list of legal nonimmigrants is a category for year-round semi-skilled, lesser-skilled, or unskilled workers not involved in agriculture.

Lawful status is granted to nonimmigrants for a specified period of time.¹⁹ Nonimmigrant workers may be called "guest workers," although that has not been common parlance in the United States. Usually they are referred to by the alphabetical subsection of the law under which they have entered the country. For example, a common nonimmigrant guest worker classification is the "H-1B" category for professionals.²⁰

Lawful Permanent Residents

Immigrants also are called "lawful permanent residents."²¹ Informally, they are referred to as "green card holders," despite the fact that the cards evidencing lawful permanent residency no longer are green. These entrants qualify for permanent residency based on a family relationship to a U.S. citizen or lawful permanent resident²² or an employment opportunity, usually following proof that U.S. workers are not qualified and not available.²³

Others qualify for permanent resident status based on making an investment that creates full-time work for at least ten U.S. workers²⁴ or based on success in the diversity visa lottery.²⁵ A few enter legally outside these categories in a classification known as parole.²⁶

Refugees and Asylees

Finally, refugees lawfully enter the United States with pre-approval by a U.S. consulate.²⁷ Asylees typically become legally recognized as such after arrival in the United States as nonimmigrants.²⁸ A well-founded fear of persecution in the person's home country must be demonstrated by individuals seeking either refugee or asylee status.

Illegal or Undocumented Aliens in the United States

Illegal or undocumented status results when a person fails to enter the United States in a category designated by the INA. This occurs when an individual physically enters the country at a border or sea coast without undergoing inspection by a U.S. Customs and Border Protection official. A person entering in this manner is considered inadmissible and is removable.²⁹

Losing Legal Status

Entering in a nonimmigrant category and then violating the limited purpose of that nonimmigrant entry also results in illegal or undocumented status. For example, tourists are not authorized to work.³⁰ Therefore, a tourist who works for money or in exchange for goods or services immediately is considered illegal and undocumented, and is deportable.³¹

Staying in the United States longer than authorized makes a previously lawful nonimmigrant undocumented and illegally present; he or she becomes deportable.³² An authorized foreign student who stays longer than his or her status allows also becomes deportable.

Terms used in common parlance like "illegal" or "undocumented" and the terminology used in the INA are not precisely the same. Moreover, due process safeguards, including a general right to notice and a hearing, make conclusions about illegal or undocumented status legally uncertain until the immigration court proceeding is complete.³³ During the hearing, potential remedies are considered, unless the alien who allegedly has entered or stayed in violation of the INA admits the allegations and seeks no remedy.³⁴

Employment Authorization and Sanctions

All lawful permanent residents are authorized to work in the United States.³⁵ Persons granted status as refugees or

asylees also are granted authorization to work.³⁶ In contrast, only certain nonimmigrant classes are authorized to work, and most are limited to those whose employers preliminarily petitioned the U.S. government to request the foreign citizen's nonimmigrant work-authorized status.³⁷

Work authorization evidenced by an Employment Authorization Card³⁸ is granted to certain aliens applying for permanent residency. Spouses of certain nonimmigrants may obtain an Employment Authorization Card on application after entry.³⁹

Pre-1986 Law

Before the INA was amended in 1986, employers of foreign citizens who might be illegally present or undocumented were not subject to civil or criminal penalties.⁴⁰ Employees could have been deported if immigration authorities discovered their illegal or undocumented status. However, there was, and still is, the possibility of criminal sanctions for unlawfully harboring aliens.⁴¹ "Harboring" occurs when an employer makes a concerted effort to hide or protect from detection an illegal worker.⁴²

The potential to lose a valued worker through deportation therefore often motivated employers to petition for work authorization for foreign workers. Foreign recruits with professional, managerial, or executive status generally expected that an employer would obtain lawful work authorization on their behalf; employers had multiple nonimmigrant and immigrant categories to consider. Employers of lesser skilled workers, on the other hand, had few nonimmigrant and immigrant categories available.⁴³

Current Law

Under current law, employers must assess each new hire's authorization to work.⁴⁴ Each new hire and his or her employer must complete Form I-9, "Employment Eligibility Verification."⁴⁵ Employers who knowingly hire or continue to employ a foreign citizen not authorized to work in the United States face fines ranging from \$275 to \$11,000, as well as the possibility of a prison term.⁴⁶ The definition of "knowing" encompasses both actual knowledge and "constructive knowledge," but with strict prohibitions on assessments based on foreign appearance or accented speech.⁴⁷

Employers also are statutorily prohibited from requesting more or different documents than the employee selects for

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proving identity or authorization to work when those documents appear genuine on their face.⁴⁸ Civil fines also may be imposed for discriminatory practices toward job applicants and employees related to the process of establishing identity and authorization to work.⁴⁹

Legalization Opportunities

When Congress enacted the legislation penalizing employers who knowingly hire undocumented workers, it also enacted legislation to permit undocumented aliens able to prove arrival before 1982 to become documented.⁵⁰ These aliens first became temporary residents and then full permanent residents after a waiting period. The same legislation offered illegal or undocumented people with proof of presence in the United States since 1972 the opportunity to apply to register as permanent residents.⁵¹

In 1994, Congress enacted legislation that enabled certain unlawfully present persons an additional opportunity to become permanent residents.⁵² Subsequent extensions, plus an amendment in 2000, provided employers a brief opportunity to initiate permanent residency efforts on behalf of undocumented workers. Though complex, this legislation also served to legalize a portion of the undocumented population.⁵³

Free Trade Agreements

Agreements negotiated by the U.S. executive branch and ratified by the legislative branch may change U.S. immigration laws. Just as the agreements seek to ease the movement of goods and investment between countries, some are negotiated with chapters that ease the movement of people.⁵⁴

North American Free Trade Agreement

The North American Free Trade Agreement, in effect among Canada, the U.S. and Mexico since 1994, creates an open market for a multitude of professionals.⁵⁵ With significant ease, a professional from one country can work in one of the other countries, even if there might be persons in that country available for the job.

The positions must be "professional." Most professions require education at the bachelor's degree level; however, some, such as computer systems analyst, hotel manager, management consultant, scientific technician, and technical writer, permit less education with certain experience.⁵⁶

Other Free Trade Agreements

Free trade agreements with Singapore⁵⁷ and Chile⁵⁸ have set aside a specific number of visas for professionals through the existing quota-limited H-1B "professional" visa classification. A separate visa category for Australian professionals was added to the nonimmigrant visa categories as part of the U.S./Australian Free Trade Agreement.⁵⁹ An Australian professional may have this nonimmigrant status renewed indefinitely.

Deemed Exports

Work by a foreign person inside or outside the United States for a U.S. employer with technology, software, data, or products that are of military use or both civilian and military use may require an export license and can be prohibited. Immigration laws and export control laws must be reviewed for possible applicability when hiring a foreign recruit.⁶⁰

Taxation and Social Security

Foreign workers in the United States and their employers should determine the applicability of U.S. tax and Social Security laws. Becoming a U.S. tax resident is the norm under provisions of the Internal Revenue Code.⁶¹ This means foreign workers of nonimmigrant, permanent resident and even undocumented status generally are obligated to file U.S. income tax returns on their worldwide income. The applicability of tax treaties must be ascertained to determine whether U.S. income tax may be reduced because of taxes owed abroad, thereby avoiding double taxation. Individuals with substantial wealth always should assess the estate and income tax consequences before moving to the United States.⁶² This is true regardless of whether the employee will be a nonimmigrant or lawful permanent resident under U.S. immigration laws.

Social Security and Medicare tax liability also is the norm for foreign workers working in the United States.⁶³ Some nonimmigrants and their employers may avoid these U.S. Federal Insurance Contributions Act⁶⁴ contributions if they are citizens of a country with a totalization agreement with the United States.⁶⁵ Totalization agreements have been negotiated with twenty-one countries.⁶⁶ Advance planning to marshal evidence to establish continuing contributions into the Social Security system of the home country may be advantageous.⁶⁷

Labor and Employment Law Standards

Lawful employment of foreign personnel in terms of immigration, export control, and tax laws are first considerations in initiating an employment relationship. Laws governing the employment relationship, including working conditions, hours, benefits, terminations, leaves, and safety also must be considered.⁶⁸ Foreign workers may be unfamiliar with U.S. laws on these topics; anticipating a foreign recruit's expectations will be beneficial to the employer's negotiations.⁶⁹

Labor and employment discrimination laws may pose considerations for employers when an employee or significant percentage of the work force is undocumented to work in the United States. Due to the lack of authorization to work, available employee remedies have been limited to those that direct neither reinstatement nor back pay for periods after termination when the work would have been unauthorized under the INA.⁷⁰

Human Resources Management for Global Operations

Advice on global issues of immigration and employment is available to human resources personnel and their advisors, usually as a subsection of a text or treatise on human resources management.⁷¹ Lawyers can assist with the selection of foreign personnel from one jurisdiction for placement in another by considering from a global perspective topics such as employee compensation and benefits, employee data privacy, union and work council prerogatives, and termination under local law or contract.⁷²

Maintaining compliance with immigration laws will be a principal consideration for successful foreign placements. Harmonization of employment practices by companies and organizations, while maintaining compliance with the laws of multiple countries of operation, is a gradual process.

Conclusion

Because people, like goods and money, move across borders, the U.S. immigration laws described in the "primer" articles in this October issue of *The Colorado Lawyer* will need frequent reconsideration by lawmakers. Deciding which short- and long-term entries with employment authorization are advantageous will require regu-

lar study. The nation, the hemisphere, and the whole world are faced with making the movement of people and their employment manageable under the law.

NOTES

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