Insights: Alerts

Trump Administration Launches E-Verify Enforcement Initiative Targeting Over $50 Billion in Federal Contracts

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On November 19, 2026, the U.S. General Services Administration (GSA) and U.S. Department of Homeland Security (DHS), in coordination with the White House Task Force to Eliminate Fraud, announced a new enforcement initiative targeting potential E-Verify noncompliance among federal contractors. The agencies identified 1,579 contractors holding more than $50 billion in federal contracts that may not be complying with federal employment eligibility verification requirements.

The agencies have issued notices requiring identified contractors to demonstrate compliance or take corrective action within 30 calendar days.

Scope of the Enforcement Initiative

E-Verify is an electronic employment eligibility verification system administered by DHS in partnership with the Social Security Administration. Under Federal Acquisition Regulation (FAR) 52.222-54, certain federal contractors are required to participate in E-Verify.

By comparing E-Verify records with federal contracting information maintained in SAM.gov, the agencies identified three categories of potential noncompliance:

- Contractors not enrolled in E-Verify or whose profiles do not identify them as federal contractors subject to the FAR E-Verify clause;
- Contractors whose E-Verify profiles contain missing or inconsistent Employer Identification Numbers (EINs), Unique Entity Identifiers (UEIs), or other registration information; and
- Contractors that do not appear to have created required E-Verify cases for covered employees performing work under federal contracts.

These discrepancies do not necessarily establish violations, and contractors may provide documentation demonstrating compliance.

Contractor Notices and Increased Oversight

In a November 16, 2026 letter, GSA and DHS directed potentially noncompliant contractors to respond by December 16, 2026, either by explaining corrective actions taken or providing supporting documentation disputing the

identified discrepancies.

Contractors that fail to respond or demonstrate compliance may be referred for additional government review, including review by their contracting officers.

In a separate letter to Senior Procurement Executives, the agencies also requested increased oversight of E-Verify compliance across federal agencies. Following the 30-day response period, contracting officers may be directed to issue letters of concern to contractors with unresolved discrepancies, warning of potential referrals to the E-Verify program for further action.

Implications for Federal Contractors

The initiative reflects increased federal scrutiny of employment eligibility verification practices among government contractors, including the accuracy of contractor registration information and documentation of E-Verify compliance.

Although the agencies have not announced findings of wrongdoing against the identified contractors, the initiative raises several considerations for businesses holding federal contracts:

- **Contractual requirements:** Contractors should review their federal contracts to determine whether FAR 52.222-54 applies and whether their E-Verify enrollment and verification practices satisfy applicable requirements.
- **Registration and recordkeeping:** Contractors should verify that their E-Verify profiles, EINs, UEIs, and SAM.gov registrations are accurate and consistent, and that required E-Verify cases have been created for covered employees.
- **Government inquiries:** Contractors receiving compliance notices should promptly review the identified discrepancies, preserve relevant documentation, and coordinate timely responses with appropriate personnel and legal counsel.

If your organization has received a notice regarding potential E-Verify noncompliance, please contact your Kilpatrick team member for assistance in evaluating the notice and preparing a response.

Looking Ahead

Although the agencies have not announced findings of wrongdoing against the identified contractors, the initiative reflects a broader effort to strengthen employment eligibility enforcement through federal contracting oversight.

We will continue to monitor developments and provide updates as additional information becomes available.

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