



**DOAA**  
Georgia Department  
of Audits & Accounts

# Immigration Compliance and Reporting Requirements for Counties and Municipalities

November 2025



# Agenda

- A little history
- Overview of compliance requirements
- The Immigration Collection System
- Penalties for noncompliance
- Obtaining credentials to access system
- Available resources
- Questions



## A Little History...

- General Assembly enacted laws in 2011 designed to ensure government funds were only going to people who were legally in the U.S. and that governments were only doing business with companies that hire people legally in the U.S.
- The 2011 law also imposed reporting requirements on government entities.
- The General Assembly mandated that the Department of Audits and Accounts would be the entity responsible for managing the reporting requirements.
- Today more than 2,400 state and local entities throughout Georgia are subject to the compliance and reporting requirements.



# Compliance and Reporting Requirements

The compliance requirements are located in various codes within Georgia Law.

O.C.G.A. §50-36-4 outlines all submission requirements.

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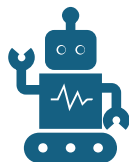
# Immigration Compliance Reporting

- O.C.G.A. §50-36-4 outlines six different reporting requirements as part of the annual reporting process.
  - Confirm E-Verify Number
  - Upload information for vendors who were hired for the “physical performance of services”
  - Upload business license issuances
  - Confirm your government does not have any sanctuary city policies
  - Report public benefits offered and your status with SAVE for these benefits
  - Verify compliance with laws related to law enforcement of illegal immigrants

# Completing the Report



Compliance reports are due to the Department of Audits and Accounts no later than December 31<sup>st</sup> of each year.




We use an automated collection system to collect your reports.



All persons submitting information for the report must create their own account.



Multiple people within an organization may have accounts.



Let's look at the Collection System and  
walk through the submission requirements.

# Immigration Collection System

The website for the DOAA Immigration Collection System is:

<https://www.audits.ga.gov/auth/login.aud>

If you have created  
your credentials, click  
here:

Department of Audits and Accounts Portal

Need Help?

Already Registered?

SIGN IN

[Forgot Password?](#)

Create an Account

First Name

Last Name

Phone Number

Email

Re-Enter Email

Manager Email

Password

Re-Enter Password

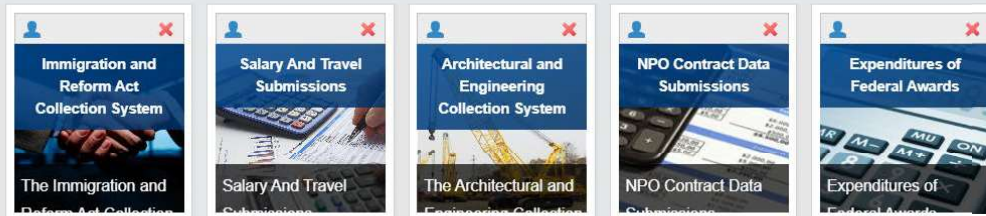
CREATE AN ACCOUNT

If you haven't created an account, click here:





Below are the applications you currently have access to. Click the tile to enter the system.



To request access to an application click the tile below. Once you have access it will appear in the area above.

You have access to all applications

Click the Immigration and Reform Act Collection System to access the site.

Hi Carol Schwinne (not you? click [here](#))



HELP

Need access to a different entity or app?

I Need More Access



Account info changed?

→ Click [here](#) to update

Email address changed?

→ Simply create a new account

Can't find the entity/app you need?

→ Try different entity name phrasing

# The Home Page

*Example Only*

Welcome to the Department of Audits Immigration & Reform Act Collection System. Please complete all sections to the right in order to be compliant. Please see the menu links at the top of this page if you need help.

Organization: Dekalb County Submission Period: 2024 0 of 6 sections complete

Section Title	Status	Description
Enter/Confirm E-Verify Number	Need Response	O.C.G.A. §13-10-91 requires every public employer to register and participate in the federal work authorization program and to post their federal work authorization number and date of authorization on their website. The program is operated by the Department of Homeland Security. If your entity has not yet enrolled, please click <a href="#">Enrolling in E-Verify</a> .
Title 13: E-Verify Contractor Reporting	Need Response	O.C.G.A. §13-10-91 prohibits any public employer from entering into a contract for the physical performance of services unless the contractor registers and participates in the federal work authorization program. Annually, all public employers are required to provide a report to the Department of Audits and Account's documenting compliance with this Code Section.
Title 36-60-6: Issuance of Business Licenses	Need Response	O.C.G.A. §36-60-6(e) requires any county or municipal corporation that issues a business license, occupational tax certificate, or other document required to operate a business to verify the person seeking such license is authorized to use the federal work authorization program when hiring staff, provided the person does not meet one of the exemptions noted. Annually, counties
Title 50: Public Benefits Reporting	Need Response	O.C.G.A. §50-36-1(e) requires all entities providing or administering a public benefit to verify the lawful presence of persons applying for such benefits. All applicants must complete an affidavit and provide either proof of citizenship or the systematic alien verification of entitlements number. Entities are required to confirm lawful presence of noncitizens through the federal SAVE
Title 36-80-23: Sanctuary Policy	Need Response	O.C.G.A. §36-80-23(b) prohibits any local governing authority from enacting, adopting, implementing, or enforcing any sanctuary policy. Sanctuary policy is defined as any regulation, rule, policy, or practice which prohibits or restricts officials or employees from communicating or cooperating with federal officials or law enforcement officers with regard to reporting
Title 35/42: Law Enforcement Reporting	Need Response	During the 2024 Session of the General Assembly, the Legislature enacted legislation designed to strengthen compliance of laws relating to law enforcement with respect to illegal aliens who are suspected of or have been convicted of criminal activity. Law enforcement agencies are required to certify their compliance with these laws through the annual immigration compliance

Counties and municipalities will be expected to respond to each of the six sections included in the report.

*\* Click on the title within each section to access the report.*

## Section 1 – Confirm E-Verify Number

Organization: Dekalb County Submission Period: 2024



Confirm E-Verify Number | Step 1 of 1  
Dekalb County: *Need Response*

Please provide / confirm an E-Verify number and authorization date for your organization:

E-Verify Number: 55412 *i* The entity's E-Verify is located on your entity's website, along with the date of authorization from the Department of Homeland Security. If you cannot locate the number on your website, please contact your HR department to verify the information.

Authorization Date: 09/26/2007 *i* This is the date your entity was assigned an E-Verify number from the Department of Homeland Security.

Do Not Qualify: ☐ *i* No E-Verify number has been assigned since the entity does not meet the criteria established by the Department of Homeland Security to obtain such number.

Go Home  Confirm 

Mark "Do Not Qualify" if your entity has no employees .

If you submitted a report the prior year, this information will be populated into your report.

If not correct, please make the necessary corrections.

If information is correct, click confirm.

If you do not know your entity's E-Verify number, please contact the HR Department. They should have that information.


## Section 2 – E-Verify Contractor Compliance Requirements

- OCGA 13-10-91 requires entities to obtain an affidavit from any vendor providing a service exceeding \$2,499.99.
- Through the affidavit, the vendor is attesting that they use the federal E-Verify program to confirm all persons hired are legally in the United States.
- Affidavit should be obtained from vendor before a contract is awarded.
- Any vendor hired who has one or more employees is required to utilize the E-Verify program if they wish to receive any government contract awards.
- A sole proprietor needs to provide other proof (driver's license or passport) that he/she is eligible to work in the United States.

## Section 2 – E-Verify Contractor Reporting

Organization: Dekalb County Submission Period: 2024

Title 13 E-Verify Contractor Reporting | Step 1 of 3: Opening Question  
Dekalb County: *Need Response* (by Carol Schwinne)



**OCGA 13-10-91** prohibits any contractor from entering into a contract with a public employer for the "physical performance of services" unless the contractor registers and participates in the federal work authorization program.

**OGGA 13-10-90** defines "physical performance of services" as the performance of labor or services for a public employer using a bidding process or by contract wherein the labor or services exceed \$2,499.99. Services include, but are not limited to, public works and construction, professional services, IT and maintenance services, support services, etc. The Code Section does allow for certain limited exceptions.

During the reporting period (December 1, 2023 - November 30, 2024), did your entity (Dekalb County) enter into any contracts for the "physical performance of services" as defined in O.C.G.A. §13-10-90? "Entity" includes all divisions and departments that are part of your entity's budget, including all law enforcement operations that are part of the entity's budget.

Yes ☐ No ☐

Next →

Step 1 question is the same as in prior years.

If you answer "Yes," the next screen will direct you to upload or enter your list of vendors.

**Note:**

When you see a lightbulb – That is an indication of resource information that may be helpful to you.

## Section 3 – Business License Compliance Requirements

- OCGA § 36-60-6(e) requires every county and municipal corporation that issues business licenses, occupation tax certificates, or other documents required to operate a business to obtain a notarized affidavit from the person applying for such license.
- Any applicant with more than ten employees must have a federal work authorization program (E-Verify) number before the license can be issued.
- The affidavit is only required for initial application unless the applicant's E-Verify number changes.

## Section 3 – Business License Reporting

Title 36 Issuance of Business Licenses | Step 1 of 3: *Opening Question*

Acworth, City of: *Need Response* (by Carol Schwinne) ⌚



OCGA 36-60-6 specifies that before any county or municipal corporation issues a business license, occupational tax certificate, or other document required to operate a business to any person, the person shall provide evidence that he or she is authorized to use the federal work authorization program or evidence that the provisions of this Code section do not apply. The provision would not apply if the person to businesses with 10 or fewer employees.

During the reporting period (December 1, 2023 - November 30, 2024), did your entity (Acworth, City of) issue any business licenses, occupational tax certificates, or other documents(s) required to operate a business to a private employer that is required to utilize the federal work authorization program under the provisions of Code Section 36-60-6?

Yes ☐

No ☐

Next →

Step 1 question is the same as in prior years.

If you answer “Yes,” the next screen will direct you to upload or enter information specific to all business licenses issued.

**Note:**

You only need to upload the business licenses for the new applicants. You do not need to enter renewal licenses.

## Section 4 – Public Benefits Compliance Requirements

- Per O.C.G.A. §50-36-1 (b) – every public employer is required to verify the lawful presence in the United States of any person who applies for public benefits.
- Applicants seeking public benefits are required to provide a secure and verifiable document and sign an affidavit affirming they are lawfully present in the United States.
- The public employer should seek authorization to use the federal SAVE program. For applicants who report they are legal aliens, the employer should run their alien number through the SAVE system to verify they are legally present in the United States.



## Section 4 – Public Benefits Reporting

Title 50 Public Benefits | Step 1 of 4: Opening Question  
Dekalb County: *Need Response* (by Carol Schwinne) ⌚

During the reporting period (December 1, 2023 - November 30, 2024), did your entity (Dekalb County) provide any public benefits as defined in Title 50? \*See list below

Yes ☐

No ☐

- Adult education

- Authorization to conduct a commercial enterprise or business

- Business loan

- Disability assistance or insurance

- Energy assistance

- Gaming license

- Health benefits

- Loan guarantee

- Occupational license

- Public and assisted housing

- Rent assistance or subsidy

- State grant or loan

- Tax certificate required to conduct a commercial business

- Unemployment insurance

- Apprenticeships

- Business certificate, license, or registration

- Cash allowance

- Down payment assistance

- Food stamps

- Grants

- Housing allowance, grant, guarantee, or loan

- Medicaid

- Professional license

- Registration of a regulated business

- Retirement benefits

- State issued driver's license and identification card

- Temporary Assistance for Needy Families (TANF)

- Welfare to work

Save & Next Step →

Step 1 question is the same as in prior years.

The public benefits that are subject to this compliance requirement are listed on Step 1.

If your entity provides any of these public benefits, you will report those in Step 2 and will report if you have SAVE authorization for each benefit noted.

## Section 5 – Sanctuary Policy Compliance Requirements

- Per O.C.G.A. §36-80-23, governments **cannot** have any policies in effect within any unit or department of its government that prohibits employees from notifying federal officials of the immigration status of a person when the employees are acting in their official capacity. Additionally, governments **cannot** enact policies that prohibit employees from cooperating or communicating with federal officials or law enforcement officers regarding the immigration status of a person when the employees are acting in their official capacity.
- Each government must annually certify that no such policies exist. This is done through the annual reporting with the Department of Audits and Accounts.

## Section 5 – Sanctuary Policy Reporting Requirements *Example Only*

Organization: Dekalb County Submission Period: 2024

Title 36-80-23 Sanctuary Policy | Step 1 of 2: Opening Question  
Dekalb County: *Need Response* (by Carol Schwinne)

Attention: This section addresses policies of the governmental entity and should only be answered by persons who have authority to make policy decisions.

**OCGA 36-80-23** prohibits any local governing body from enacting, adopting, implementing or enforcing any sanctuary policy.

**Local governing body** includes any political subdivision of this state, including any county, consolidated government, municipality, authority, school district, commission, board, or any other local public body corporate, governmental unit, sheriff's office, law enforcement agency, or political subdivision.

**Sanctuary Policy** means any regulation, rule, policy, or practice adopted by a local governing body which prohibits or restricts local officials or employees from complying with an immigration detainer notice or communicating or cooperating with federal officials or law enforcement officers with regard to reporting immigration status information when such local official or employee is acting within the scope of his or her official duties.

Please provide your job title to be saved with your response

Certified by: Carol Schwinne

\* Title: begin typing...

I certify that this entity (Dekalb County):

☐ has not enacted or adopted a sanctuary policy for any purpose or for any unit within the entity.

☐ has enacted or adopted a sanctuary policy for any purpose or for any unit within the entity.

Save Save & Next Step →

The responder must include his/her title.

Click "Save and Next Step"

Certification is required of each public employer.

Compliance means you certify that your government does not have a sanctuary policy. That means there are no policies that prohibit employees from cooperating with the federal government with respect to illegal immigration.

The responder must sign their name and record their title. This was added to ensure someone in authority at the entity is responding to this section of the report.

## Section 5 - Compliance with O.C.G.A. §36-80-23 *Example Only*

Organization: Dekalb County Submission Period: 2024

Title 36-80-23 Sanctuary Policy | Step 2 of 2: Confirmation Needed

Dekalb County: **Started** (by Carol Schwinne) ⌚

Dekalb County has not enacted or adopted a sanctuary policy for any purpose or for any unit within the entity.

Certified by: [Carol Schwinne](#) Title: [Executive Director](#)

**i** Please confirm your answers and click "Confirm" below to complete the process for this sector.

← Back Confirm ✓

Your response will appear on this screen.

If you are satisfied with response is correct, click "Confirm."

## Section 5 - Compliance with O.C.G.A. §36-80-23 *Example Only*

Organization: Dekalb County Submission Period: 2024

Title 36-80-23 Sanctuary Policy | Step 2 of 2: *Confirmed*

Dekalb County: *Confirmed* (by Carol Schwinne)

Dekalb County has not enacted or adopted a sanctuary policy for any purpose or for any unit within the entity.

Certified by: *Carol Schwinne* Title: *Executive Director*

The Sanctuary Policy section has been completed by **Carol Schwinne** on 11-12-2024 9:33 AM

← Back Reset Status ↻ Go Home 🏠

Use the “Back” button to return to the previous screen. This will not remove your responses.

Click “Reset Status” if you need to correct a response.



This is a final confirmation page for this section.

Click “Go Home” to return to original home page.

## O.C.G.A. §36-80-23 Sanctuary Policy




The 2024 reporting  
requirement for OCGA 36-  
80-23 is now complete.

Title 36-80-23: Sanctuary Policy

Confirmed  

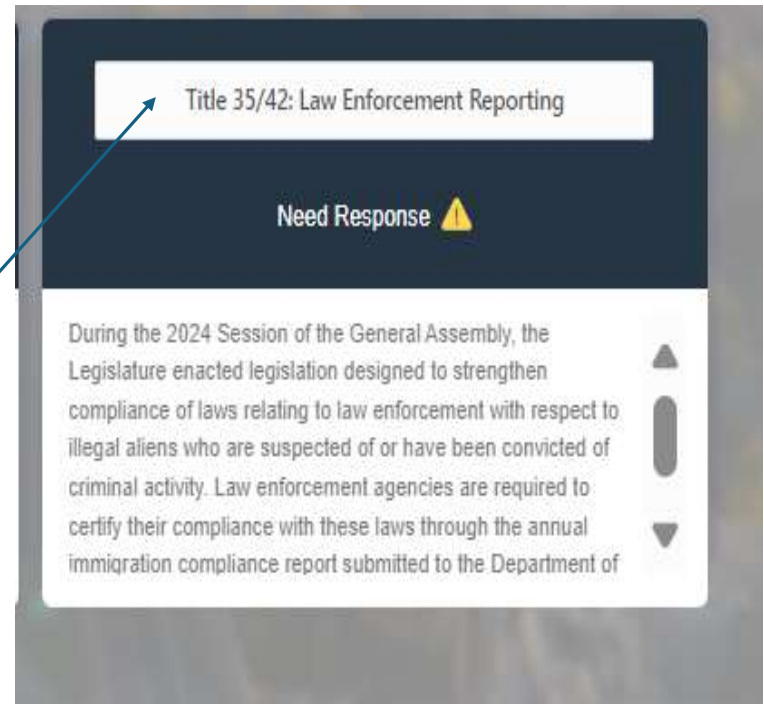
by: Carol Schwinne (11-04-2024 12:55 PM)

O.C.G.A. §36-80-23(b) prohibits any local governing authority from enacting, adopting, implementing, or enforcing any sanctuary policy. Sanctuary policy is defined as any regulation, rule, policy, or practice which prohibits or restricts officials or employees from communicating or cooperating with federal officials or law enforcement officers with regard to reporting immigration status information while acting within the scope of



# Title 35/42 – Law Enforcement Reporting

Click inside the title box to open the report.



*This section was new in 2024 and was added as a result of HB 1105.*

# Compliance Requirements for Law Enforcement

House Bill 1105 includes several compliance requirements:

- It is the Legislature's intent that all law enforcement seek to comply with state immigration laws, subject to their level of authority.
- Government entities that operate jails and/or detention centers should seek an MOU with the Department of Homeland Security.
- Law enforcement departments with custodial authority must make a reasonable effort (within 48 hours) to determine the nationality of any person confined and to confirm they are not illegal aliens.
- This section will require law enforcement departments that operate a county jail or municipal detention facility to maintain certain statistics and post such information on the public website of the local jurisdiction quarterly.



# Compliance with Law Enforcement Provisions in Title 35/42

- Certain provisions of HB 1105 only apply to law enforcement departments that operate jails or detention centers.
- How you answer the two initial questions will dictate what questions you are required to answer to complete this section.
- The system will automatically populate the additional questions based on your responses to the questions in Step 1 of 3.
- It is important that someone who is in leadership answer the remaining questions within this reporting section.

# Compliance with Law Enforcement Provisions

## Initial Section 6 Questions:

All cities, counties, and authorities will be required to answer the following question:

- Is your entity either (1) a sheriff's office or (2) an entity that has law enforcement operations and personnel?

If you answer "No," you will be directed to the Confirm page.

If you answer "Yes," you will be asked the following question:

- Does your entity operate a jail or detention center?

***Note: If you work for a county government and the county only operates a sheriff's office, you need to answer "NO" to the first question because the sheriff's office will issue its own report to DOAA.***

## Section 6 - Compliance with Title 35/42

*Example Only*

Organization: Abbeville, City of Submission Period: 2024

Title 35/42 Law Enforcement | Step 1 of 3: Opening Questions

Abbeville, City of: *Need Response* (by Carol Schwinne)

1) Is your entity (Abbeville, City of) either (1) a sheriff's office or (2) an entity that has law enforcement operations and personnel (such as a police department, public safety, marshal's office, etc.)?

Yes ☐ No ☐

2) Does your entity (Abbeville, City of) operate a jail or detention center?

Yes ☐ No ☐

Each Sheriff's Office should respond "Yes" to Question #1. Additionally, any city, county, authority, school board, university, or state agency that has law enforcement operations and personnel should answer "Yes." Note: County governments that only operate with a sheriff's office should answer "No." Your county sheriff's office is required to submit a separate report and will report on its behalf.

Answer yes if the entity operates its own jail or detention center.

Save & Next Step →

Answer "Yes" or "No" to the two questions in Step 1.

If you are satisfied that your response is correct, click "Save and Next Step."

# Compliance with Title 35/42


*Example Only*

Organization: Abbeville, City of Submission Period: 2024

Title 35/42 Law Enforcement | Step 2 of 3: Submission

Abbeville, City of: Started (by Carol Schwinne)

Please read before you complete this section

 This reporting requirement specifically addresses compliance with immigration laws by law enforcement personnel. This section of the report should be completed by a ranking member in law enforcement, or by leadership within the governmental entity (i.e., mayor, CEO, agency head, etc.)

Back ← Next →

If you answer “Yes” to Question #1, you will be directed to this screen before you are directed to answer any additional questions.

Do not proceed with answering any additional questions if someone in law enforcement or someone in a leadership position is not logged on and ready to complete the report.

Clicking “Next” will take you to any remaining questions your entity is required to answer.

# Additional Certification Questions



Question	Respond If...
I certify that our entity seeks to comply with state law related to deterring the presence of criminal illegal aliens, to the extent of our authorized powers. (OCGA 35-1-17)	You are an entity that operates law enforcement operations.
I certify that the entity has cooperated with federal authorities by sending, receiving, and maintaining information relating to the immigration status of any individual, as reasonably needed for public safety. (OCGA 35-1-17 (b) (1))	You have law enforcement operations that operate a jail or detention facility.
Has the entity entered into a memorandum of agreement with the U.S. Department of Justice, Department of Homeland Security, or any other federal agency for the purpose of enforcing federal immigration laws? (OCGA 35-1-17 (b)(2)) <ul style="list-style-type: none"> <li>• If entity responds yes, they will be asked for the date of the Memorandum of Agreement.</li> <li>• If the entity responds no, they will be asked if they have sought an agreement.</li> </ul>	You have law enforcement operations that operate a jail or detention facility.
I certify that a reasonable effort was made within 48 hours of such person's arrival at the jail or detention facility to determine (a) the nationality of the person confined and (b) that the confined person is not an illegal alien. (OCGA 42-4-14 (b))	You have law enforcement operations that operate a jail or detention facility.
I certify that our entity has posted the quarterly inmate reports as required by O.C.G.A. 42-4-16.	You have law enforcement operations that operate a jail or detention facility.

# Compliance with Law Enforcement Provisions in Title 35/42

- The system will automatically populate the name of the person responding to these questions.
- The responder will be required to record his/her title.
- If you have law enforcement in your city/county, someone in law enforcement or the city manager/county administrator should be answering any questions beyond those noted in Step 1.

# Confirmation

Title 35/42: Law Enforcement Reporting

Confirmed  

by: Carol Schwinne (11-05-2024 12:16 PM)

During the 2024 Session of the General Assembly, the Legislature enacted legislation designed to strengthen compliance of laws relating to law enforcement with respect to illegal aliens who are suspected of or have been convicted of criminal activity. Law enforcement agencies are required to certify their compliance with these laws through the annual immigration compliance report submitted to the Department of Audits and Accounts.

The Home Page will show that you have completed this section.

# Confirmation Email

Once your entity has completed all required sections, all persons who have access to the collection system will receive an email confirming their report is complete. We encourage you to maintain this documentation for your auditor or for any state agencies that may require confirmation of compliance.

2024 Immigration Compliance Report Completion - Confirmation (Abbeville, City of)



DOAA-NoReply

To  Carol Schwinne



Tue 12/10/2024 12:35 PM

This email is confirmation that your entity (Abbeville, City of) completed all required sections of the 2024 Immigration Compliance Report. Please forward this confirmation to your entity's leadership and/or records manager as documentation of completion. Grantor agencies and other entities may require documentation of completion prior to awarding of funds.

This is an auto generated e-mail, please do not reply directly to this e-mail.



# Annual Review



DOAA IS NOW REQUIRED TO  
REVIEW SUBMISSIONS AND  
REPORT ON COMPLIANCE TO  
THE GENERAL ASSEMBLY.



THIS REPORT WILL INCLUDE A  
LISTING OF ENTITIES THAT DO  
NOT SUBMIT THEIR REPORTS.



PLEASE COMPLETE YOUR  
REPORTS NO LATER THAN  
DECEMBER 31<sup>ST</sup>.

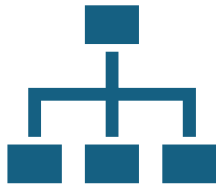


# Penalties or Consequences of Non-Compliance

Sections with penalties or consequences of non-compliance

- Title 13 – Contractor Reporting
- Title 50 – Public Benefits
- Sanctuary Policies – OCGA 36-80-23

# Penalties and consequences related to non-compliance of Title 13 reporting



Provisions of O.C.G.A. §13-10-91 (b)(7) require the Commissioner of the Department of Community Affairs (DCA) be notified of noncompliance municipalities and counties.



DCA should exclude municipalities and counties not in compliance from the list of qualified local governments (QLG).



This exclusion may jeopardize funding of any grants or loans made through DCA (including the State Community Development Program).

# Penalties and consequences related to non-compliance of Title 50 reporting

- Title 50 section – listing of public benefits provided by entity and whether or not the entity has received SAVE authorization for purposes of managing eligibility of these benefits
- SAVE – Systematic Alien Verification for Entitlements
- Confirmation of compliance with provisions of O.C.G.A. 50-36-1
- Two reporting issues – provide a listing of each public benefit administered and whether SAVE program authorization received
- Commissioner of DCA notified of noncompliant political subdivisions
- Entities that fail to report are not entitled to any financial assistance, funds, or grants from the DCA.

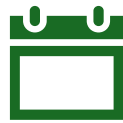
# Penalties and consequences related to non-compliance of Sanctuary Policy Reporting

- Provisions of O.C.G.A. §36-80-23 require confirmation that governments did not enact any sanctuary policy
- Two compliance issues – not reporting or not completing the section or reporting enactment of sanctuary policies
- DOAA is required to notify all state agencies that provide funding of non-compliance entities
- Commissioners of Department of Community Affairs (DCA) and Georgia Department of Transportation (GDOT) notified specifically and separately as required

# Immigration Compliance Reporting Reminders



Reporting  
deadline:  
December 31



Reporting period:  
December 1 -  
November 30



Immigration & Reform  
Act Collection System  
opens on November 1



O.C.G.A. 50-36-4  
requires all Georgia  
governmental entities  
to submit an  
annual immigration  
compliance report

# Setting up your credentials...

- Access: <https://www.audits.ga.gov/auth/login.aud>
- Go to “Create an Account” and enter the requested information.
- You will receive an email with an activation link. The email will come from DOAA-NoReply
- When you access the email, click the activation link.
- You will be redirected to the login page. Enter your email address and password to sign in.
- Once you are logged in, you will still need credentials to access the immigration collection system. Click on the tile labeled “Immigration and Reform Act Collection System” and then click “Yes” to request access.
- Your screen will now show you have access to the collection system.
- You may now enter the system and submit your reports.

## For Questions...

Please visit our resource page on our website:

<https://www.audits2.ga.gov/resources/other/immigration/>

You may also contact DOAA at [immhelp@audits.ga.gov](mailto:immhelp@audits.ga.gov) with your questions about immigration compliance and reporting.







*Thank you*