For Schools and Units Piloting the EQUIFAX Electronic I-9 and E-Verify Process During COVID-19 Public Health Emergency – Revised July 22, 2020

On March 20, 2020 the Department of Homeland Security (DHS) announced flexibility in requirements related to Form I-9 compliance during the COVID-19 public health emergency. This process has been extended through August 18, 2020 for schools and units that are operating remotely during the public health emergency. I-9 Section 2 completers that are physically present at a work location (i.e., essential personnel), should follow the normal I-9 collection process. This process may not be used once the public health emergency has been lifted.

Equifax has modified the Electronic I-9 and E-Verify form to allow Harvard I-9 Administrators to show they have reviewed the documents remotely during this period. Upon resumption of normal duties, the DHS requires that the employee bring, in person, their original documentation for in-person verification of identify and employment eligibility documentation by August 21, 2020. I-9 Administrators must make copies of this documentation and upload it into the employees I-9 record at this time.

Effective July 18, 2020, schools and units should no longer use the remote view process listed below except under unusual circumstances. Please contact karen_kittredge@harvard.edu for guidance with exigent circumstances.

For schools and units that do not have staff on-site to review Section 2 documentation, schools and units should assign an authorized representative to complete section 2 on behalf of Harvard whenever possible. See I-9 Collection Process During COVID-19 Emergency

Harvard Electronic I-9 Administrator Reviews Documentation Remotely during Public Health Emergency

1. Harvard sends electronic I-9 URL to new employee following local school or unit processes.
2. Once the new employee has completed Section 1, the Harvard I-9 Administrator will contact new employee to set up a video conference (Zoom, Skype, etc.).
3. Harvard I-9 Administrator will visually review the documents via video conference and may have the employee read the details of the Section 2 being presented for entry into Section 2 by the I-9 Administrator.
4. While completing the selection of documents being presented by an employee for Section 2, the I-9 Administrator will see an option to indicate an employee is impacted by COVID-19 and the administrator will be reviewing their documents virtually. Select the checkbox labeled “I want to use COVID-19 exception for this employee.”
5. Click “continue” and follow steps to validate information and electronically sign form.
   a. I-9 Administrator must review all Section 1 and 2 information with the new employee and correct as needed.
   b. I-9 Administrator electronically signs Section 2 which will automatically submit to E-Verify.
6. At the documentation attachment screen, rather than uploading the documents, the I-9 Administrator must check the box indicating that they will upload the materials within 2 business days which appears in the blue box noting record retention policy.

7. Follow next steps regarding submission and E-Verify responses. I-9 Administrator must follow E-Verify requirements and follow-up as needed.
8. Those with an HR Manager Role may also note in the comments field “COVID-19.” The comments field appears below the I-9 History section and is part of the individual’s permanent I-9 record. Directions on when to use this field for other situations are forthcoming.

When Section 2 is complete “COVID-19” will be automatically inserted into the Additional Information field of the Form I-9 PDF.

Follow-Up Required by August 21, 2020
Per the DHS requirements, Section 2 documentation must be physically reviewed in person by August 21, 2020. See Equifax Updating I-9s Completed by Remote Review