How to Update I-9’s Completed Using the Remote Review Collection Process
Revised July 22, 2020

Effective July 18, 2020, schools and units may no longer review Section 2 documentation remotely but must have the Form I-9 section 2 completed and documentation reviewed in person. Section 2 may be completed by a Harvard I-9 Administrator or Harvard assigned Authorized Representative (an adult household member, notary, etc.).

For Form I-9s that were completed before July 18 with section 2 documentation reviewed remotely, the Department of Homeland Security (DHS) requires that the employer review section 2 documentation in person by August 21, 2020.

We recognize that meeting the in-person requirement may be difficult while the majority of Harvard is working remotely. However, schools and units must apply their best efforts to comply with this federal legal requirement.

We note below three options for complying with the Form I-9 completion requirements, two of which do not require in-person contact between the Harvard I-9 administrator and the employee. These two options will require a person in the employee’s “social bubble” act as an Authorized Representative of Harvard, but provided that the employee can find a willing Authorized Representative, we strongly recommend these approaches.

Please note, the original documents to be reviewed in person must be the same documents that were used to complete Section 2 of the Form I-9. If different documents are presented, a new Form I-9 must be completed.

Please contact ufs_crt@harvard.edu for guidance with exigent circumstances.

Paper I-9 Forms Submitted to Central Payroll Requiring Additional Follow-Up

Central Payroll
On 7/17/20, Central Payroll sent lists of I-9’s requiring additional follow-up to the school or unit’s I-9 Section 2 administrator (i.e., completer) identifying the employee and notifying the completer that the section 2 documentation must be physically reviewed (i.e., reviewed in person). This information was based on the school or unit having entered “COVID-19” or other language in the Section 2 Additional Information box of the Form I-9, thereby signifying that the Form I-9 was completed during the period of time when DHS was allowing for exceptions. If an I-9 administrator is aware of other I-9s completed remotely that require additional follow-up, the I-9 administrator should follow the below guidance as well. For those I-9s that have not been updated, Central Payroll will send a follow-up reminder on August 7, 2020.

School or Unit’s I-9 Administrator
The hiring department’s I-9 administrator has three options for completing in-person review of the Section 2 documentation. In all cases, the section 2 completer must enter information in the Additional Information box in Section 2 to show that the section 2 documents have been reviewed in person.
Schools and units should focus on in-person review of the Section 2 documents for those employees continuing to work after August 18, 2020. Collection of documentation for employees who terminated prior to August 18 may be difficult; however, if they are rehired, the Section 2 documentation will require in-person review.

**Option 1 – Have an Authorized Representative Update A Previously Completed I-9**

An Authorized Representative may review in person, the Section 2 documents submitted on the originally completed I-9, and update in the Additional Information section.

A. The I-9 Administrator will reach out to the employee to see if employee has someone who may act as an Authorized Representative and review the Section 2 documents on behalf of Harvard.
   - The Authorized Representative will be responsible for reviewing the section 2 documentation in person and confirming the documents are the same as those that appear in Section 2, that the information is accurate, and make appropriate notations in the Additional Information section 2 of the Form I-9.

B. If the I-9 Administrator does not have a copy of the completed I-9, they may email ufs.crt@harvard.edu requesting a copy of the remotely reviewed Form I-9.
   - The email must contain the name and HUID of the employee(s) for which they need a copy of the completed I-9.

C. Central payroll will send to the I-9 Administrator via Accellion/Kiteworks a copy of the remotely reviewed Form I-9.

D. The I-9 Administrator will send the completed I-9 to the employee via Accellion/Kiteworks.

E. The employee will have the Authorized Representative review their original section 2 documents (which must be the same documents as listed on Section 2 of the Form I-9).
   1. A Harvard I-9 Administrator may set up a teleconference call to help guide the authorized representative on their responsibilities.
   2. The Authorized representative would acknowledge that they reviewed the Section 2 documentation in person in the Additional Information section of section 2.
      - Information which should appear in the Additional Information field must contain language that documents were reviewed in-person, the date the documents were reviewed, the full name of the reviewer, and relationship. See [Different I-9 Section 2 Completer and Section 2 In Person Document Reviewer](#).

F. The employee will return via Accellion/Kiteworks, the updated Form I-9 (and documents if not previously sent) to the I-9 Administrator.

G. The I-9 Administrator must email ufs.crt@harvard.edu (subject line: “Remote I-9 Review Complete”) and notify them they have a completed Form I-9 for submission and indicate whether they will:
   1. Fax the materials to 617-496-3196; or
   2. Require and email address supplied by Payroll Customer Service to send the Form I-9 and documentation via secure email.

H. Payroll Customer Service (via ufs.crt@harvard.edu) will contact the I-9 Administrator (i) to specify a Payroll Customer Service contact to receive the documents via Kiteworks/Accellion or (ii) to confirm receipt of faxed documents.
I. When submitting the documents to Central Payroll, please name the documents with the employee’s name and document being submitted (e.g., John_Harvard_I9 or John_Harvard_I94 or John_Harvard_I9FullPacket).

**Option 2 – Employee Completes New I-9 with an Assigned Authorized Representative**

In some cases, it may be easiest to have the employee complete a new I-9 and Harvard assign the role of authorized representative to an outside individual which allows them to complete all of Section 2 of the Form I-9 on behalf of Harvard. If completed correctly and, with the submission of the Section 2 documents, no further action is required by the Harvard I-9 Administrator.

- An authorized representative may be an adult household member, personnel officer, foremen, notary public, etc.
- The authorized representative would complete section 2, review original documents, collect copies of the documentation and sign section 2 on behalf of Harvard.
- Harvard remains liable for any incomplete forms, so a Harvard I-9 administrator should set up a video conference call and walk the authorized requestor through the process and review the documentation via video conference to make sure that the documents are appropriate, original and not expired.
- Have the authorized representative enter in the “Additional Information” box the language “reviewed with” and the name of the Harvard I-9 Administrator who reviewed the documents with them remotely (e.g., Reviewed with John Harvard).
- See [Instructions - Form I-9 New Employee and Authorized Representative](#) for step-by-step processes.

**Option 3 - In Person Review of Section 2 Documents**

If a hiring department is able to review section 2 documents in person, they must follow the following process. This option requires in-person contact between the I-9 completer and the employee and we recommend Option 1 or 2 if at all possible, to limit in-person contact.

A. If the I-9 Administrator does not have a copy of the completed I-9, they may email ufs_crt@harvard.edu requesting a copy of the remotely reviewed Form I-9.
   1. The email must contain the name and HUID of the employee(s) for which they need a copy of the completed I-9.

B. Central payroll will send via Accellion/Kiteworks a copy of the remotely reviewed Form I-9.

C. The I-9 Administrator will set up an appointment with the employee to have them come in and physically review in person the Section 2 documentation and update Section 2 on behalf of Harvard. I-9 Administrators should follow all Harvard and CDC health and safety requirements if on campus or meeting in a neutral spot to review the documents.
   1. The I-9 administrator reviews in person the section 2 documents and confirms they are the same documents as those listed in Section 2.
   2. The I-9 administrator must make required notations for the physical inspection of section 2 documents in the Additional Information field of Section 2.
      - Information which must appear in the Additional Information field must contain language that documents were reviewed in-person, the date the documents were reviewed, and the initials or full name of the reviewer. See [Same I-9 Section 2 Completer and Section 2 In Person Document Reviewer](#)

D. The I-9 Administrator must email ufs_crt@harvard.edu (subject line: “Remote I-9 Review Complete”) and notify them they have an updated Form I-9 for submission and indicate whether they will:
1. Fax the materials to 617-496-3196; or
2. Require an email address supplied by Payroll Customer Service to send the Form I-9 and documentation via secure email.
3. When submitting the documents, please follow the naming convention listed below.

E. Payroll Customer Service (via ufs_crt@harvard.edu) will contact the I-9 Administrator (i) to specify a Payroll Customer Service contact to receive the documents via Kiteworks/Accellion or (ii) to confirm receipt of faxed documents.

1. Naming Convention: When submitting the documents to Central Payroll, please name the documents with the employee’s name and document being submitted (e.g., John_Harvard_I9 or John_Harvard_I94 or John_Harvard_I9FullPacket).

**Updating Signed Pdfs.**
Some of the documents may allow an update to the Additional Information box. If they do not, there are several options.

- Select Print and Printer Adobe PDF and save document.
- You may be able to add a comment.
- Select form – fill and sign
- If you were the original signer, you may be able to remote the original signature, edit and resign. Right-click on the signature and choose “clear signature.”
- For those documents are locked:
  - See if the employee can print out page 2 and have the authorized representative hand-write in the information in the Additional Information box, take a picture or scan for resubmission.
  - Use copy/snag it tool to make a copy of page 2 as an image, copying it to MS Word and adding a text box over the Additional Information box to make the update and saving that.
  - Have the employee and authorized representative completed a whole new I-9
Same I-9 Section 2 Completer and Section 2 In Person Document Reviewer

If the individual who performed the remote review of section 2 is the same one reviewing the section 2 documents in person, they must indicate: **COVID-19 physically reviewed documents, the date they physically reviewed the documents and their initials.**

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### Section 2. Employer or Authorized Representative Review and Verification

(Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee’s first day of employment. You must physically examine one document from List A or a combination of one document from List B and one document from List C as listed on the “Lists of Acceptable Documents.”)

<table>
<thead>
<tr>
<th>Employee Info from Section 1</th>
<th>List A Identity and Employment Authorization</th>
<th>List B Identity</th>
<th>List C Employment Authorization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document Title</td>
<td>N/A</td>
<td>Document Title</td>
<td>N/A</td>
</tr>
<tr>
<td>Issuing Authority</td>
<td>N/A</td>
<td>Issuing Authority</td>
<td>Social Security Administration</td>
</tr>
<tr>
<td>Document Number</td>
<td>N/A</td>
<td>Document Number</td>
<td>N/A</td>
</tr>
<tr>
<td>Expiration Date (if any)</td>
<td>N/A</td>
<td>Expiration Date (if any)</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**COVID-19**

Documents physically reviewed on mm/dd/yyyy by AA (or Abigail Adams)

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Certification: I attest, under penalty of perjury, that (1) I have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) appear to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

The employee’s first day of employment (mm/dd/yyyy): **03/30/2020**

<table>
<thead>
<tr>
<th>Signature of Employer or Authorized Representative</th>
<th>Today’s Date (mm/dd/yyyy)</th>
<th>Title of Employer or Authorized Representative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abigail Adams</td>
<td>03/30/2020</td>
<td>HR Manager</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Last Name of Employer or Authorized Representative</th>
<th>First Name of Employer or Authorized Representative</th>
<th>Employer’s Business or Organization Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adams</td>
<td>Abigail</td>
<td>Department of Defense</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Employer’s Business or Organization Address (Street Number and Name)</th>
<th>City or Town</th>
<th>State</th>
<th>ZIP Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>123 Independence Avenue NW</td>
<td>Washington</td>
<td>DC</td>
<td>20210</td>
</tr>
</tbody>
</table>

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Section 3. Reverification and Rehires (To be completed and signed by employer or authorized representative.)

A. New Name (if applicable)

<table>
<thead>
<tr>
<th>Last Name (Family Name)</th>
<th>First Name (Given Name)</th>
<th>Middle Initial</th>
<th>Date (mm/dd/yyyy)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

B. Date of Rehire (if applicable)

C. If the employee’s previous grant of employment authorization has expired, provide the information for the document or receipt that establishes continuing employment authorization in the space provided below.

<table>
<thead>
<tr>
<th>Document Title</th>
<th>Document Number</th>
<th>Expiration Date (if any)</th>
</tr>
</thead>
</table>

I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.

<table>
<thead>
<tr>
<th>Signature of Employer or Authorized Representative</th>
<th>Today’s Date (mm/dd/yyyy)</th>
<th>Name of Employer or Authorized Representative</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Different I-9 Section 2 Completer and Section 2 In Person Document Reviewer

If the person who performed the remote inspection cannot also perform the physical inspection, the person who performs the physical inspection should indicate the date they physically examined the documents as well as their full name and title in the Additional Information field.

### Additional Information

COVID-19

Documents physically reviewed on mm/dd/yyyy by Martha Washington, spouse
How to Update Extended List B Documents

Due to the state of emergency and stay-at-home orders, some renewal services were restricted and individuals may not have been able to renew a state driver’s license, state ID card, or other Form I-9 employment Eligibility list B identity documentation. In those cases, the Section 2 administrator was able to use the expired document with a notation of COVID-19 EXT in Section 2. Updated List B documentation must be submitted within 90 days of July 18, 2020.

It is best if the employee can present the replacement of the actually expired document, but if necessary, a different List A or B document(s) can be used with appropriate Section 2 information updated and notes in the Additional Information section.
FOR SCHOOLS AND UNITS PILOTING THE ELECTRONIC I-9 AND E-VERIFY PROCESS:

Effective July 18, 2020, schools and units may no longer review Section 2 documentation remotely, but must have the Form I-9 section 2 completed and documentation reviewed in person by either a Harvard I-9 Administrator or Assigned Authorized Representative. Section 2 may be completed by a Harvard I-9 Administrator or Harvard assigned Authorized Representative (an adult household member, notary, etc.).

For Form I-9s that were completed before July 18 with section 2 documentation reviewed remotely, the Department of Homeland Security (DHS) requires that the employer review section 2 documentation in person by August 21, 2020.

Options to Physically Review I-9 Section 2 Documents:

Four options for complying with the Form I-9 completion requirements are listed below. Three of these options do not require in-person contact between the Harvard I-9 completer and the employee.

Option 1 - Use the I-9 Anywhere Option

If a hiring department is not able to physical review section 2 documentation, the hiring department can request that the employee complete a new I-9 using the I-9 Anywhere option which allows new employees take their Section 2 documents to an approved remote agent based on their zip code. There are over 1,300 authorized remote agents across the U.S. and employees can select and schedule a time to bring in their Section 2 documents at their convenience. See Overview of I-9 Anywhere video.

1. The employee should know their original hire date when working with the remote agent.
2. The remote agent will complete Section 2 and submit documents and complete E-Verify in the Equifax Electronic I-9 tool. In most cases, the new I-9 will be “attached” to the existing I-9 in Equifax. There may be some cases where there are two records; especially if a different hire date was used. LIMs and Central will monitor this and correct any hire dates as needed.
3. Schools may be charged a small fee ($35) for each remote hire request. If an appointment is cancelled or rescheduled or a “no show” within 24 hours of the agreed upon appointment, the school will also be charged $35.
4. Contact Central Payroll at ufs_crt@harvard.edu to request the I-9 Anywhere Remote URL to send the new employee.

Option 2 – Authorized Representative Reviews Documents and Updates Section 2

An Authorized Representative may review in person, the Section 2 documents submitted on the originally completed I-9, and update in the Additional Information section.

A. The I-9 Administrator will reach out to the employee to see if employee has someone who may act as an Authorized Representative and review the Section 2 documents on behalf of Harvard.
   • The Authorized Representative will be responsible for reviewing the section 2 documentation in person and confirming the documents are the same as those that appear in Section 2, that the information is accurate, and make appropriate notations in the Additional Information section 2 of the Form I-9.

B. The I-9 Administrator will download the I-9 from Equifax (use the print to adobe option) and send the completed I-9 to the employee via Accellion/Kiteworks.

C. The employee will have the Authorized Representative review their original section 2 documents (which must be the same documents as listed on Section 2 of the Form I-9).
   • A Harvard I-9 Administrator may set up a teleconference call to help guide the authorized representative on their responsibilities.
• The Authorized representative would acknowledge that they reviewed the Section 2 documentation in person in the Additional Information section of section 2.
  o Information which should appear in the Additional Information field must contain language that documents were reviewed in-person, the date the documents were reviewed, the full name of the reviewer, and relationship. See Different I-9 Section 2 Completer and Section 2 In Person Document Reviewer.

D. The employee would return via Accellion/Kiteworks, the updated Form I-9 (and documents if not previously sent) to the I-9 Administrator.
  • Copies of the Section 2 documentation must be collected and uploaded into Equifax (if not already collected).

E. The Harvard I-9 Administrator would select the employee and select COVID-19 Update.

F. Confirm the physical documents that the Authorized Representative attested to.

• NOTE: If the Section 2 documents are different, a new I-9 must be submitted.
When uploading a new I-9, the I-9 Administrator will receive a notification that a duplicate SSN is on file. Review the information and if Person A and Person B are the same select “same” and continue in the upload process.

Because E-Verify was already submitted, you may receive an E-Verify error message “The case is invalid because another case with the same data already exists.” This is noting that there is already an E-Verify case on file and no further action is needed.

G. A response update will be received regarding the attestation.

H. Attach the updated I-9 to the file under the Attached File Section.
   • When selecting “attach file” select appropriate document being uploaded or “other” when uploading the updated I-9.
   • When selecting “other” name it the appropriate document type (e.g., Updated I-9).

I. Make a note in the comments section
   • Short description: AR RR Update
   • Longer description: Authorized Requestor Remote Review Update

Short Description: AR RR Update
Longer: Authorized Requestor Remote Review Update
Option 3 - New Paper Form I-9 Completed by Employee and Authorized Representative

In some cases, it may be easiest to have the employee complete a new I-9 and Harvard assign the role of authorized representative to an outside individual which allows them to complete all of Section 2 of the Form I-9 on behalf of Harvard. If completed correctly and, with the submission of the Section 2 documents, no further action is required by the Harvard I-9 Administrator.

5. A new I-9 may be completed with an Authorized Representative completing section 2 and physically reviewing the section 2 documents.

6. See Packet - Form I-9 with Instructions for Employee and Authorized Representative

7. A Harvard I-9 Administrator should set up a video conference with the Authorized Representative to assist then with the process in order to view and confirm the appropriate documents have been presented and the paper form I-9 has been completed accurately.

8. Copies of the Section 2 documentation must be collected and uploaded into Equifax.

9. The Harvard I-9 Administrator would follow the Option 2 steps E-I.
   • Select the employee and select COVID-19 Update.
   • Confirm the physical documents that the Authorized Representative attested to are the same or different than the ones on the new Section 2 of the Form I-9.

   NOTE: If the Section 2 documents are different, a new I-9 must be submitted.

   • The I-9 Administrator will receive a notification that a duplicate SSN is on file. Review the information and if Person A and Person B are the same select “same” and continue in the upload process.
   • Because E-Verify was already submitted, you may receive an E-Verify error message “The case is invalid because another case with the same data already exists.” This is noting that there is already an E-Verify case on file and no further action is needed.

• A response update will be received regarding the attestation.
• Attach the updated I-9 to the file under the Attached File Section.
  • When selecting “attach file” select appropriate document being uploaded or “other” when uploading the updated I-9.
  • When selecting “other” name it the appropriate document type (e.g., Updated I-9).
• Make a note in the comments section
  o Short description: AR RR Update
  o Longer description: Authorized Requestor Remote Review Update
Option 4 – I-9 Administrator Physically Reviews Documents

I-9 Administrators who can physical inspect the documents for employees that were previously reviewed virtually should follow the below steps. The I-9 Administrator can set up an appointment with the employee to have them come in and physically review in person the Section 2 documentation and update Section 2 on behalf of Harvard. I-9 Administrators should follow all Harvard and CDC health and safety requirements if on campus or meeting in a neutral spot to review the documents.

J. Search for I-9’s that were completed via remote review for your location.

K. Employees that have “COVID-19” marked in the Additional Information field of Section 2 will appear with a new search option. Select the dropdown option labeled “COVID-19 Virtual Update” under “Type of I-9” in the search for employee page.
L. Select the appropriate employee and the “COVID-19 Update” section at the bottom of the record.

M. After selecting “COVID-19 Update” you will be directed to a new COVID-19 update screen which will allow you to confirm that you have physically reviewed documents in person.

**REMINDE**r: Harvard required copies of all the I-9 Section 2 Documentation. This information must be copied and uploaded into the employees I-9 Record.
N. After selecting “Continue” the I-9 Section 2 Additional Information section will be updated with the language “COVID-19 Documents Physically Examined” and you are done.
Updating Expired List B Documents
Due to the state of emergency and stay-at-home orders, some renewal services were restricted and individuals may not have been able to renew a state driver’s license, state ID card, or other Form I-9 employment Eligibility list B identity documentation. In those cases, the Section 2 administrator was able to use the expired document with a notation of COVID-19 EXT in Section 2. Updated List B documentation must be submitted within 90 days of July 18, 2020.

It is best if the employee can present the replacement of the actually expired document, but if necessary, a different List A or B document(s) can be used with appropriate Section 2 information updated and notes in the Additional Information section.

Two workflows exist for COVID-19/Expired List B Documentation:
1. The document is expired and the Issuing Authority has extended the document expiration date, OR
2. The document is expired and the Issuing Authority has not extended the document expiration date (to now be treated as a receipt).

A. Search for I-9’s that were completed via remote review for your location
B. Employees that have “COVID-19 EXT” marked in the Additional Information field of Section 2 will appear with a new search option. Select the dropdown option labeled “COVID-19 EXT Update” under “Type of I-9” in the search for employee page.
C. Select the appropriate employee and the “COVID-19 Update” section at the bottom of the record.

D. I-9 Administrators select if the receipt update is being processed using the same document(s) originally presented or with new documents.

E. Selecting “Same document(s) presented by employee” will default to the original documentations submitted
F. If “other documents were presented” is selected, the workflow will give I-9 Administrators the ability to select new documents to complete the updated process.

G. Upload any new documents as needed. Once the update is completed, all relevant information will be added to the “Additional Information field on the Form I-9.”