
The Department of Homeland Security’s flexibility in requirements related to Form I-9 compliance during the COVID-19 public health emergency has been extended through July 18, 2020. This flexibility allows the remote view of section 2 documentation but requires the employee show their original section 2 documentation in person within three business days of the July 18 expiration date. In order to reduce the administrative burden of the Section 2 documentation review follow-up requirements, Schools and units should assign an authorized representative to complete section 2 on behalf of Harvard whenever possible.

Form I-9 Section 2 completers should only collect I-9s for individuals who have started or will be starting work on or before the July 18, 2020. Schools and units should defer all other appointments if possible. Please contact ufs.crt@harvard.edu for guidance with exigent circumstances.

This guidance applies to current employees and prospective new employees who have been approved for hire prior to the hiring freeze or in accordance with the hiring freeze exception process. Individuals with an unpaid appointment (e.g., visiting scholars, unpaid interns, etc.) are not affected by the hiring freeze and are not covered by this guidance. Follow your School’s or unit’s unpaid or courtesy appointment processes.

Options for I-9 Collection - Below are three options that are available to hiring departments regarding completion of the Form I-9. The first two options are always available, option 3 is not available for employees with a start date later than 7/18/20 and will not be available after July 18, 2020.

Option 1 - In Person Completion
For schools that are not operating remotely and are physically present at a work location (i.e., essential personnel), I-9 Completers should follow their normal I-9 collection process.

Option 2 - Authorized Representative – PREFERRED OPTION IF WORKING REMOTELY
Harvard may assign the role of authorized representative to an outside individual which allows them to complete 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 - Harvard I-9 Administrator Remote View – THIS OPTION CANNOT BE USED AFTER JULY 18, 2020
- This option is only available for employees starting work on or before 7/18/20 and requires additional follow-up after 7/18/20.
- This option is not available for schools that are not operating remotely and are physically present at a work location.
- The new employee attaches the completed and signed section 1 of the form I-9 as well as the appropriate preparer / translator box checked via secure email. The new employee should include copies/photos of the Section 2 documents.
- A Harvard I-9 administrator reviews the documents remotely and completes Section 2 noting “COVID-19” in the additional information box.
- Upon resumption of normal duties (7/18/2020), the employee must bring in original, unexpired Section 2 documentation for review within three business days. Additional directions are forthcoming.
INSTRUCTIONS FOR HIRING DEPARTMENT
WHO HAS ASSIGNED AN HARVARD AUTHORIZED REPRESENTATIVE

1. After the job offer has been accepted, the hiring department (“I-9 Administrator”) will email I-9 information to the new employee using Accellion/Kiteworks secure file transfer and attach:
   - A blank copy of the Form I-9 with a link to the online Form I-9 instructions, OR
   - A Form I-9 which allows electronic signatures - see Packet - Form I-9 with Instructions for Employee and Authorized Representative

2. Employee will complete and sign Section 1 and check appropriate box for the Preparer/Translator section (see Instructions - Form I-9 New Employee and Authorized Representative).
   a. Section 1 of the I-9 must be completed by the employee once they have accepted an offer of employment, but no later than the first day of work.

3. The Assigned Authorized Representative will complete Section 2. An authorized representative may be an adult household member, personnel officer, foremen, agent, notary public, etc.
   a. Section 2 of the I-9 must be completed by the end of the 3rd day of work.
   b. The Harvard I-9 Administrator should set up a videoconference to walk the household member through the process and view and confirm the appropriate documentation is being collected and verified. (See Instructions - Form I-9 New Employee and Authorized Representative.)

4. The Authorized Representative must fully review and complete Section 2 document information, including entering the first day of work, all Section 2 document information and electronically or manually sign the Form I-9.
   a. An electronic signature must be a digital signature that shows the date and time the individual signed the form. Example of an electronic signature:

   
   [Signature of Employee]

   Karen Kittredge

   Digitally signed by Karen Kittredge
   Date: 2020.05.13 09:20:24 -04'00

   b. Copies of the Section 2 documentation must be included and submitted with the completed Form I-9.
   c. If possible, the authorized representative to should enter in the “Additional Information” box, “reviewed with and the name of the Harvard I-9 Administrator who reviewed the documents with them”.

5. The new employee will log into Accellion/Kiteworks and reply to the original email and attach scans or photos of the full completed and signed I-9 and Section 2 documentation.

6. Upon receipt of a completed Form I-9, the I-9 Administrator must email ufs_crt@harvard.edu (subject line: “Completed I-9 Submission”) and notify them they have a completed Form I-9 for submission and indicate whether they:
   a. Have faxed the materials to 617-496-3196; or
   b. Request an email address supplied by Payroll Customer Service to send the Form I-9 and documentation via secure email.

7. 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.
INSTRUCTIONS TO THE NEW EMPLOYEE TO COMPLETE FORM I-9

Hiring Department:
This document must be completed by the hiring department and provided to the employee along with the “Instructions to the Authorized Representative Completing Section 2 of the Form I-9.”

If a household member is completing Section 2, the hiring department should set up a video conference with the Authorized Representative to assist them with every step of the process in order to confirm the appropriate documents have been presented and the form has been completed accurately.

EMPLOYEE INFORMATION

<table>
<thead>
<tr>
<th>Last Name:</th>
<th>First Name:</th>
<th>Middle Initial:</th>
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Employee’s First Day of Employment (for I-9):

INSTRUCTIONS TO THE EMPLOYEE:
Secure File Transfer and Household Member Acting as a Section 2 Completer
1. You, the employee, will receive a Harvard email requesting you complete the enclosed Form I-9. You will be prompted to set up a Kiteworks/Accellion account using your email address as the log-in. Kiteworks/Accellion is a secure file transfer solution for protecting data in transit. It uses industry-standard encryption to secure files sent or received by Kiteworks users.
2. You will download Form I-9 and complete Section 1 of the Form I-9 as soon as possible but no later than the close of business on your first day of employment with Harvard University. You may also find the Form I-9 in both English and Spanish at: https://www.uscis.gov/i-9
3. You are required to indicate on the form whether you did or did not use a preparer and/or translator to assist you with completing Section 1.
4. You will assemble original, unexpired documents that fulfill the requirements of “Acceptable Documents.”
   • You will photograph Section 2 documents and include them in your I-9 packet.
   • Attn: Nonresident Aliens: While the I-94 shows work authorization, Harvard requires additional documentation (I-797, I-20, DS-2019) to show eligibility to work at Harvard. Please consult the “Acceptable Documents” section of the Form I-9 Instructions.
5. You will have an adult (member of your household, notary, personnel office, etc.,) act as Harvard’s authorized representative and complete Section 2 of the Form I-9. See the attached instructions for the authorized representative.
6. Contact your hiring department listed on the Authorized Representative with questions. The Authorized Representative must fully complete Section 2 document information including entering the first day of work.
7. Signature requirements: If you have a printer, print out the Form I-9. The new employee must sign Section 1 and the Authorized Representative sign Section 2. Attach a scan or photo of the signed form with copies of the Section 2 documents, to the Kiteworks/Accellion email and reply back to Harvard. If a printer is not available, both you and the Authorized Representative can electronically sign the Form I-9 and attach it with scans or photos of the Section 2 documents to the Kiteworks/Accellion email and reply back to Harvard.
8. NOTE: an electronic signature must be a digital signature that shows the date and time the individual signed the form. Example of an electronic signature:

Signature of Employee

Digitally signed by Karen Kittredge
Date: 2020.05.13 09:20:24 -04'00'
INSTRUCTIONS TO THE AUTHORIZED REPRESENTATIVE COMPLETING SECTION 2 OF THE FORM I-9

Hiring Department:
This form must be completed by the hiring department and provided to the employee. The employee is to provide this form to the Authorize Representative at the time the Form I-9 is completed.

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

Authorized Representative:
The U.S. Citizenship and Immigration Services (USCIS) requires employers to verify the eligibility of employees to work in the U.S. We are asking you to serve as Harvard’s authorized representative in this regard by examining the individual’s documents for us and then completing and signing the USCIS Employment Eligibility Verification Form I-9. Please contact the hiring department contact listed below with any questions or to set up a time to go through the process via video conference. Please see: Form I-9 Instructions and List of Acceptable Documents for additional information.

INSTRUCTIONS:
1. Confirm that the employee has fully completed, signed, and dated Section 1 of the I-9.
2. Confirm that the employee has indicated if they did or did not use a preparer and/or translator to assist with completing Section 1.
3. If not already completed, enter the employee’s last name, first name, and middle initial, then select the correct citizenship/immigration status in the “Employee Info from Section 1” area at the top of Section 2.
4. Review the documents presented; see list of “Acceptable Documents.” Examine each original, unexpired document the employee presents to determine if it reasonably appears to be genuine and to relate to the person presenting it. Faxes, photocopies, and laminated social security cards are unacceptable.
5. In the spaces provided under List A or List B and List C, please record the document title, issuing authority, document number, and expiration date (if any). Note: There are many different visa classifications used at Harvard to accommodate our international population. The authorized representative must collect additional documentation (I-797, I-20, or DS-2019) to show eligibility to work at Harvard.
6. Enter the date the employee began or will begin work for pay.
7. Enter the date you completed Section 2.
8. Enter your Title as “Authorized Representative,” your Last Name, and First Name.
9. Enter “Harvard University” for the Employer’s Business Name.
10. Enter the Employer’s Business Address listed below or Central Payroll, 1033 Massachusetts Ave., Cambridge, MA 02138 if blank.
11. Sign the form. By signing the form, you are attesting, under penalty of perjury, that to the best of your knowledge, the employee is authorized to work in the United States, and the document(s) you examined appeared to be genuine and to relate to the individual. NOTE: An electronic signature must be a digital signature that shows the date and time the individual signed the form.
12. Make copies of the section 2 documents reviewed to submit with the form.
13. Return the completed Form I-9 as well as the original and copies of the documentation back to the employee who will submit the packet to Harvard.

EMPLOYEE’S HIRING DEPARTMENT CONTACT INFORMATION

<table>
<thead>
<tr>
<th>Contact Name:</th>
<th>Contact Title:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Phone Number:</td>
<td>Contact Email Address:</td>
</tr>
<tr>
<td>Business Address (for I-9):</td>
<td>Business City, State, Zip (for I-9):</td>
</tr>
</tbody>
</table>
INSTRUCTIONS FOR HIRING DEPARTMENT COMPLETING SECTION 2
AND VIEWING DOCUMENTS REMOTELY

This option is only available for employees starting on or before 7/18/20 and is not available after that date. This option also requires follow-up of in-person review of the Section 2 documentation after 7/18/20.

1. After the job offer has been accepted, the hiring department (“I-9 Administrator”) will email I-9 information to the new employee using Accellion/Kiteworks secure file transfer and attach:
   - A blank copy of the Form I-9 with a link to the online Form I-9 instructions, OR
   - A Form I-9 which allows electronic signatures (see Packet – Form I-9 with Instructions for Remote Completion Expires 2020JUN18)

2. Employee will complete and sign Section 1 and check appropriate box for the Preparer/Translator section (see Instructions to the New Employee).
   - Section 1 of the I-9 must be completed by the employee once they have accepted an offer of employment, but **no later than the first day of work**.
   - Employee will submit the partially completed Form I-9 and documentation to the Harvard I-9 administrator (see Instructions to the New Employee).

3. A Harvard I-9 Administrator must set up a video conference call with the employee to complete Section 2 and view documents remotely.
   - Section 2 of the I-9 must be completed by the end of the 3rd day of work.
   - Harvard I-9 Administrator must view Section 2 documents remotely and complete documentation details in Section 2.
   - Harvard I-9 Administrator must enter “COVID-19” in the additional information box on Section 2.
   - Additional follow-up is required within three business days after July 18, 2020.

4. The Section 2 Completer must fully review and complete Section 2 document information, enter the first day of work, and electronically or manually sign the I-9 form.
   - An electronic signature must be a digital signature that shows the date and time the individual signed the form. Example of an electronic signature:

   Signature of Employee

   Digitally signed by Karen Kittredge
   Date: 2020.05.13 09:20:24 -04'00'

5. Upon completing the Form I-9, the I-9 Administrator must email ufs_crt@harvard.edu (subject line: “Completed I-9 Submission”) and notify them they have a completed Form I-9 for submission and indicate whether they:
   a. Have faxed the materials to 617-496-3196; or
   b. Request an email address supplied by Payroll Customer Service to send the Form I-9 and documentation via secure email.

6. 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

7. Employee must submit in person, original Section 2 documentation after expiration of the Form I-9 remote view flexibility (currently scheduled to expire 7/18/20). Additional instructions forthcoming.
FOR SCHOOLS AND UNITS PILOTING THE ELECTRONIC I-9 AND E-VERIFY PROCESS:
The Department of Homeland Security’s flexibility in requirements related to Form I-9 compliance during the COVID-19 public health emergency issued March 20, 2020 has been extended through July 18, 2020. This flexibility allows the remote view of section 2 documentation but requires the employee show their original section 2 documentation in person within three business days of the July 18 expiration date. In order to reduce the administrative burden of the Section 2 documentation review follow-up requirements, Schools and units should assign an authorized representative to complete section 2 on behalf of Harvard whenever possible.

The options listed below are for schools and units that are operating remotely. I-9 Section 2 completers that are physically present at a work location (i.e., essential personnel), should follow the normal I-9 collection and review process.

**Options for Complete the I-9 Remotely:**

**Option 1 - Use the I-9 Anywhere Option**
Equifax offers a remote I-9 option called I-9 Anywhere which allows new employees who are not local take their Section 2 documents to an approved remote agent based on their zip code prior to arriving on campus. There are over 1,300 authorized remote agents across the U.S. and new employees can select and schedule a time to bring in their Section 2 documents at their convenience. See [Overview of I-9 Anywhere](#) video.

a. No additional follow-up is needed by Harvard I-9 Administrators if this process is used. The remote agent will complete Section 2 and submit documents and complete E-Verify in the Equifax Electronic I-9 tool.
b. 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
c. Contact Central Payroll at ufs_crt@harvard.edu to request the I-9 Anywhere Remote URL to send the new employee.

NOTE: While remote agent sites be limited since they are considered nonessential business; we expect many of the offices to be reopening in the next 2-4 weeks.

**Option 2 - Upload Paper Form I-9 Completed by an Authorized Representative**

a. See [Packet - Form I-9 with Instructions for Employee and Authorized Representative](#)
b. 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.
c. The Harvard I-9 Administrator would complete the “Paper Form I-9” upload process in Equifax which requires entering the Form I-9 information, uploading the Form I-9 as well as the documentation. See [Equifax Electronic Paper Form I-9 Upload Process](#).
d. The Harvard I-9 Administrator would follow any E-Verify follow-up requirements as necessary.

**Option 3 - Harvard I-9 Administrator Reviews and Completes Section 2 Remotely – Expires July 18, 2020**
This process can only be used for employees starting on or before 7/18/20 and will not be available after July 18, 2020 and requires in-person review of section 2 documentation within three days from the expiration date. See the [Equifax Electronic I-9 COVID-19 Remote Review Process](#) for instructions.