Remote I-9 Collection
During COVID-19 Emergency

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Agenda

• Understand Harvard’s responsibilities regarding the completion of the Form I-9
• Understand new employee communication and employee responsibilities for Section 1
• Understand employer responsibilities and options for completing Section 2
• Process for submitting completed Form I-9 to Central Payroll
• GLACIER process for employees with an active, paid appointment
• FAQs
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. This includes those Harvard students who are or will be performing services for compensation.

Please contact your local human resources, faculty planning, or finance offices for guidance on current hiring policies.

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.
The Immigration Reform and Control Act of 1986, requires that employers “must verify the identify and employment eligibility of each person hired, complete and retain a Form I-9 for each employee and refrain from discriminating against individuals on the basis of national origin or citizenship.” Individuals cannot be put on a payroll until an I-9 has been completed.

- 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**.

- Section 2 of the I-9 must be completed by a Harvard I-9 Administrator **by the end of the 3rd day of work**. Employees must submit, in person, with original unexpired documents.

- Section 3 of the I-9: *Harvard does not currently use Section 3 when collecting the paper Form I-9, but instead requires a new Form I-9*. If an employee has completed the Electronic Form I-9, Section 3 must be completed when an employee’s employment authorization or documentation of employment authorization has expired "reverification“, or employee is rehired within 3 years of the date that [Form I-9](#) was originally completed, or employee has a legal name change.
When to Complete Form I-9

A new Form I-9 is completed for:

• New employees (never worked for Harvard)
• Rehires who have a break in service
• Reverification / Updates
  • Employees whose work authorization has expired, OR
  • The employee has a legal name change.

Section 3 is completed for by those Employees who previously completed Electronic I-9 Form and used:

• Employees already in the Electronic I-9 system whose work authorization has expired (an I-9 Administrator is only required to reverify work authorization document(s), OR
• Rehires who have a break in service, whose information is in the electronic I-9 system, and whose original Form I-9 was completed less than 3 years ago, OR
• The employee has a legal name change.
All employees on a Harvard PeopleSoft payroll are required to complete an I-9.

### Who Must Complete the Form I-9

<table>
<thead>
<tr>
<th>Pay Group Abbreviation</th>
<th>Pay Group Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>SPC</td>
<td>Pres + Fell Special Contracts</td>
</tr>
<tr>
<td>WPT</td>
<td>Pres + Fel Weekly Part Time Trade</td>
</tr>
<tr>
<td>WRT</td>
<td>Pres + Fell Weekly Regular Trade</td>
</tr>
<tr>
<td>WTM</td>
<td>Pres + Fell Weekly Temp/Students</td>
</tr>
<tr>
<td>PFX</td>
<td>Pres + Fell Exempt</td>
</tr>
<tr>
<td>PON</td>
<td>Pres + Fel OT Eligible Non Union</td>
</tr>
<tr>
<td>POU</td>
<td>Pres + Fell OT Eligible Union</td>
</tr>
<tr>
<td>MFC</td>
<td>Pres + Fell Faculty</td>
</tr>
<tr>
<td>MIP</td>
<td>Pres + Fell Internal Post Doc</td>
</tr>
<tr>
<td>MTF</td>
<td>Pres + Fell Teaching Fellows</td>
</tr>
</tbody>
</table>

### I-9 is Not Required

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>NPD</td>
<td>Non Paid Appointments</td>
</tr>
<tr>
<td>MST</td>
<td>Student Stipends</td>
</tr>
<tr>
<td>MEP</td>
<td>Nonemployee Post Docs</td>
</tr>
<tr>
<td>Outsourced</td>
<td>All outsourced payrolls (All Source, Etc.)</td>
</tr>
</tbody>
</table>
Be sure to use the version of the of the Form I-9 with a 10/21/2019 version date and a 10/31/2022 expiration date.

- All hiring departments should transition over to using the 10/21/2019 version by 4/30/20. After 4/30/20 I-9’s that are not the 10/21/19 version will be returned to hiring departments.
- Schools in the electronic I-9 pilot do not need to do anything unless they are accepting a paper I-9 form.
Options for Paper Form I-9 Collection Process During COVID-19 Emergency

In order to comply with Federal requirements regarding the Form I-9 which must be fully completed by the third day of work, there are three options available. Contact ufs_crt@harvard.edu with questions.

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 the normal I-9 collection process.

Option 2 – Harvard Assigned Authorized Representative – PREFERRED 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 necessary by the Harvard I-9 Administrator or hiring department.

• An authorized representative may be an adult household member, personnel officer, foremen, agent, or notary public.
• A Harvard I-9 Administrator must walk the household member through process using teleconference to view and confirm the Section 2 documents being presented as well as confirm the accurate completion of Section 2.
• This option is always available, but best practice is for a Harvard I-9 Administrator to review and complete Section 2 with the employee in person.

Option 3 - Harvard I-9 Administrator Remote View – THIS OPTION REQUIRES FOLLOW-UP AND WILL NOT BE AVAILABLE AFTER JUNE 18, 2020
• This option is only available for employees starting on or before 6/18/20 and will not be available after 6/18/20. This process requires additional follow-up after 6/18/20.
• This option is not available for schools that are not operating remotely and are physically present at a work location.
• The new employee signs and attaches the completed and signed section 1 of the form I-9 as well as the appropriate preparer / translator box checked replying the original Kiteworks email. The new employee should include copies/photos of the Section 2 documents.
• A Harvard I-9 administrator reviews Section 1 of the Form I-9 and completes Section 2. The I-9 Administrator must review the documents remotely via Zoom or other teleconference system to confirm accuracy of the documents.
• I-9 Administrator signs as Section 2 completer and must note “COVID-19” in the additional information box.
• Upon resumption of normal duties (6/18/2020), the employee must bring in original, unexpired Section 2 documentation for review within three business days. Additional directions forthcoming.
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 the normal I-9 collection process.

• Harvard I-9 Administrator reviews Section 1 for completeness
• Harvard I-9 Administrator reviews original, unexpired documents and completes Section 2
• Submits completed Form I-9 with copies of documentation following their local school or unit’s processes to Central Payroll.
  • There are many different visa classifications used at the University to accommodate our international population. While the I-94 shows work authorization, I-9 Administrators must also collect additional documentation (I-797, I-20, DS-2019) to show eligibility to work at Harvard.
Option 2 – Harvard Assigns an Authorized Representative to Complete Section 2

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 necessary by the Harvard I-9 Administrator or hiring department. This option is the preferred option if the Form I-9 cannot be completed in person.

- An authorized representative may be an adult household member, personnel officer, foremen, agent, or notary public.
- A Harvard I-9 Administrator must walk a household member through process using teleconference to view the Section 2 documents being presented as well as confirm the accurate completion of Section 2.
- This option is always available, but best practice is for a Harvard I-9 Administrator to review and complete Section 2 with the employee in person.
- The Authorized Representative must fully review and complete Section 2 document information, including entering the first day of work, review all Section 2 document information and electronically or manually sign the Form I-9.
- 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
  Date: 2020.05.13 09:20:24.000

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

Harvard may assign an authorized representative to complete Section 2 of the Form I-9 by examining the individual’s documents and then completing and signing the USCIS Employment Eligibility Verification Form I-9. An authorized representative, with assistance of a Harvard I-9 Administrator, can complete Section 2 on behalf of Harvard and does not require any additional follow-up by the employee. See I-9 Collection Process During COVID-19 Emergency for detailed instructions.

### Option 2 - Harvard Assigned Authorized Representative

**Process for Paper Form I-9 Collection Process During COVID-19 Emergency**

Harvard I-9 Administrator or Hiring Department
- Confirms a household member or other can act as an authorized representative.
- Sends email to new employee via Accellion/Kiteworks with Packet – Form I-9 with Instructions for New Employee + Authorized Representative

New Employee
- Clicks on link in email and follows steps to create a guest Kiteworks account and downloads packet.
- Completes Section 1 of form and collects copies of appropriate Section 2 documentation.
- See Instructions - Form I-9 New Employee and Authorized Representative

Form I-9 Section 2 Completer
- Household Member Acting as a Harvard Authorized Representative
  - Harvard can authorize an adult member to act as an Authorized Representative on behalf of Harvard. This will remove the requirement of the employee having to bring their original Section 2 documentation to Harvard in person.
  - A Harvard I-9 Administrator must walk the authorized representative through the process as well as view the section 2 documentation using Zoom or other video conference tool.
  - See Instructions - Form I-9 New Employee and Authorized Representative

New Employee
- Replies to original email (may need to log back into Kiteworks) attaching fully completed I-9.
- Copies of Section 2 documentation must be submitted with the completed Form I-9.

Harvard I-9 Administrator or Hiring Department
- Receives Kiteworks file with I-9, downloads and reviews I-9 for completeness.
- Faxes (617-496-3196) or Emails ufs_crt@Harvard.edu for individual email address to forward completed I-9 via Kiteworks.
- Reviews I-9 and updates I-9 Table in PeopleSoft.

Central Payroll
- Sends I-9 Administrator an individual email address to forward completed I-9 via Kiteworks.
- Reviews I-9 and updates I-9 Table in PeopleSoft.

Harvard I-9 Administrator or Hiring Department
- Hires employee in PeopleSoft when “eligible to work” box is checked.
- Documents must not be stored on desktop. Remove materials using Identity Finder or other system to remove from laptop
Option 3 - Harvard I-9 Administrator Remote View – Not Recommended

On March 20, the Department of Homeland Security (DHS) announced flexibility regarding the in-person review of Section 2 documents during the COVID-19 Emergency. This was set to expire on May 19, but was extended an additional 30 days. This option requires follow-up and is set to expire on June 18, 2020.

After this flexibility expires, within 3 days the new employee must bring in their original documentation for review by the Harvard I-9 Administrator.

- This option is only available for employees starting on or before 6/18/20 and will not be available after 6/18/20. This process requires additional follow-up after 6/18/20.
- This option is not available for schools that are not operating remotely and are physically present at a work location.
- The new employee signs and attaches the completed and signed section 1 of the form I-9 as well as the appropriate preparer / translator box checked replying the original Kiteworks email. The new employee should include copies/photos of the Section 2 documents.
- A Harvard I-9 administrator reviews Section 1 of the Form I-9 and completes Section 2. The I-9 Administrator must review the documents remotely via Zoom or other teleconference system to confirm accuracy of the documents.
- I-9 Administrator signs as Section 2 completer and must note “COVID-19” in the additional information box.
- Upon resumption of normal duties (6/18/2020), the employee must bring in original, unexpired Section 2 documentation for review within three business days. Additional directions forthcoming.

This option can only be used for employees starting work on or before 6/18/20 and will not be available after 6/18/20. Before using this option, Harvard I-9 administrator or hiring department should determine if the new employee has an adult member of the household or other individual who can act as a Harvard Authorized Representative. See I-9 Collection Process During COVID-19 Emergency for detailed instructions.

Harvard I-9 Administrator or Hiring Department

- Sends email to new employee via Accellion/Kiteworks with Packet - Form I-9 with Instructions for Remote Completion Expires 2020JUN18

New Employee

If an authorized representative cannot be assigned. The employee will:
- Clicks on link in email and follows steps to create a guest Kiteworks account and downloads packet.
- Downloads and completes and signs Section 1, checks the appropriate box for the preparer/translator section and collects copies of appropriate Section 2 documentation.
- Replies to original email (may need to log back into Kiteworks) attaching completed Section 1 and preparer/translator section of Form I-9 with photos of Section 2 documentation.

Harvard I-9 Administrator or Hiring Department

The remote view option will not be available after 6/18/20 and requires follow-up by the employee and administrator after that date.
- Receives Kiteworks file with I-9, downloads to desktop and contacts new employee to complete Section 2 via Zoom.
- A Harvard I-9 administrator reviews the documents remotely and completes and signs Section 2.
- Harvard I-9 Administrator must enter “COVID-19” in the additional information box of Section 2.
- Emails ufs_crt@Harvard.edu for individual email address to forward I-9 via Kiteworks or faxes I-9 and documents to 617-496-3196. DO NOT forward the I-9 to the UFS_CRT@Harvard.edu.

Central Payroll

- Sends I-9 Administrator an individual email address to forward completed I-9 via Kiteworks.
- Reviews I-9 and updates I-9 Table in PeopleSoft.

Harvard I-9 Administrator or Hiring Department

- Hires employee in PeopleSoft when “eligible to work” box is checked.
- Documents must not be stored on desktop. Remove materials using Identity Finder or other system to remove from laptop

New Employee and Harvard I-9 Administrator or Hiring Department

- Employee must submit in person, original Section 2 documentation after expiration of the Form I-9 remote view flexibility (currently scheduled to expire 6/18/20).
- Additional instructions are forthcoming.
How do I send this information to the new employee?
Sample Email to New Employee

Most schools and units have a standard template and process used for new employees. Please contact your local HR or Faculty Planning/Affairs Office for a school-specific template as well as processes around communication Massachusetts Paid Family and Medical Leave.

Sample Email to New Employee:
Congratulations on your new position with SCHOOL/UNIT/DEPT!

In accordance with federal law, Harvard requires all employees to complete a Form I-9 as part of the employment eligibility verification process. All information collected is protected by industry standard SSL encryption.

- Section 1 of the Form I-9 must be completed any time after an offer of employment is accepted but no later than your first day of work.
- Section 2 of the Form I-9 must be completed by your third day of work and requires you provide appropriate original, unexpired documentation in person to a Harvard I-9 Administrator or Harvard-assigned Authorized Representative

Form I-9 COVID-19 Remote Document Review Process:
Due to the restrictions in travel due to the COVID-19 public health emergency, the Department of Homeland Security has temporarily relaxed the in person review of the Section 2 documentation and will allow Section 2 documentation be reviewed through remote video by a Harvard I-9 Administrator. This process requires additional follow-up by the employee within three days from the expiration of the Department of Homeland Securities currently scheduled for June 18, 2020.

Another option is to have an adult member of your household act as an Authorized Representative and complete Section 2 on behalf of Harvard.

- A Harvard I-9 Administrator will assist this person in completing Section 2 and reviewing the original, unexpired documents via remote teleconference.

Please see the attached instructions for both the employee and the household member.
New Employee Process (No Harvard Key)

- To receive a secure file that has been sent to you from the Accellion/Kiteworks web application tool, go to your email inbox.
- You will have received an email message from a Harvard I-9 Administrator.
- Sent file links have an expiration date of 14 days.
  - **Note:** Non-Harvard recipients should check their spam/junk email folders if they don’t see the expected email.
  - **Note:** Microsoft Edge, Chrome or Firefox are recommended browsers for best experience. It is recommended to clear your browser cache or run the session in a “new incognito window” to avoid being sent to an old login screen.
- Click on the file hyperlink displayed at the bottom of the message.
- Sign in using the email address that the message was sent.
- Click “Next”
- You will be prompted to create a password if you have not signed in before.
Upon successful log-in you will see the following screen:

- Select the attachment and download the Form I-9 and any instructions to your desktop.
- Complete and sign Section 1 of the I-9
  - Be sure to check appropriate box under Prepare and/or Translator Certification Section and complete, section if a preparer and/or translator is used.
- Coordinate with the Harvard I-9 Administrator to set up a video call to walk through the Section 2 completion process (either by a household member or for the I-9 Administrator and allow the Harvard I-9 Administrator to review the Section 2 documents).
New Employee Section 1- Example

<table>
<thead>
<tr>
<th>Last Name (Family Name)</th>
<th>First Name (Given Name)</th>
<th>Middle Initial</th>
<th>Other Last Names Used (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harvard</td>
<td>John</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address (Street Number and Name)</th>
<th>Apt. Number</th>
<th>City or Town</th>
<th>State</th>
<th>ZIP Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harvard Yard</td>
<td>N/A</td>
<td>Cambridge</td>
<td>MA</td>
<td>02138</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date of Birth (mm/dd/yyyy)</th>
<th>U.S. Social Security Number</th>
<th>Employee's E-Mail Address</th>
<th>Employee's Telephone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>11/26/1987</td>
<td>1234567890</td>
<td><a href="mailto:john_harvard@harvard.edu">john_harvard@harvard.edu</a></td>
<td>8175551212</td>
</tr>
</tbody>
</table>

I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form.

I attest, under penalty of perjury, that I am (check one of the following boxes):

- 1. A citizen of the United States.
- 2. A noncitizen national of the United States (See instructions).
- 3. A lawful permanent resident (Alien Registration Number/USCIS Number):

   - 4. An alien authorized to work (expiration date, if applicable, mm/dd/yyyy):

     Some aliens may use "N/A" in the expiration date field. (See instructions.)

   Aliens authorized to work must provide only one of the following document numbers to complete Form I-9:

   - Alien Registration Number/USCIS Number:
   - Form I-94 Admission Number:
   - Foreign Passport Number:

   OR: Date of birth in this space

**Preparer and/or Translator Certification (check one):**

- I did not use a preparer or translator.
- A preparer(s) and/or translator(s) assisted the employee in completing Section 1.

I attest, under penalty of perjury, that I have assisted in the completion of Section 1 of this form and that to the best of my knowledge the information is true and correct.

Signature of Preparer or Translator | Today's Date (mm/dd/yyyy)
-----------------------------------|--------------------------

John Harvard

Be sure to check appropriate box under Prepare and/or Translator Certification Section and complete, section if a preparer and/or translator is used.
Household Member - Section 2 Completer Instructions

See instructions at [Guidance Regarding I-9 Collection During COVID-19](#).

**NOTE:** A Harvard I-9 Administrator will assist the Authorized Representative in completing Section 2 and review the documents via Zoom, Skype, etc.

An adult household member can act as Harvard University’s representative to examine the identity and employment authorization document(s) for a new employee.

The household member would serve as Harvard’s representative and:

- Examine the new employee’s documents:
  - Examine each original document the employee presents to determine if it reasonably appears to be genuine and relates to the person presenting it.
  - In the Section 2 spaces provided, record the document title, issuing authority, document number, and expiration date (if any). **Note:** Generally, only unexpired, original documents are acceptable, except that an employee may present a certified copy of a birth certificate. Faxes, photocopies, and laminated social security cards are unacceptable. See the list of “[Acceptable Documents](#)” for additional guidance.

- Complete and sign the Form I-9.
  - Enter “Reviewed with [and the name of the Harvard I-9 administrator who assisted]” in the Section 2 Additional Information box.
  - Enter the employee’s first day of employment.
  - Sign the Authorized Representative section.
  - Date the form.
  - Enter your Title as “Authorized Representative,” your Last Name, and First Name.
  - Enter “Harvard University” for the Employer’s Business Name.
  - Enter the Employer’s Business Address or (Central Payroll, 1033 Massachusetts Ave., Cambridge, MA 02138) if not provided.

- Photos of the documents must be included with the Form I-9.
### Household Member Section 2 - Example

1. Examine each original document the employee presents to determine if it reasonably appears to be genuine and to relate to the person presenting it.

2. In the spaces provided, record the document title, issuing authority, document number, and expiration date (if any). Note: There are many different visa classifications used at the University to accommodate our international population. While the I-94 shows work authorization, I-9 Administrators must also collect additional documentation (I-797, I-20, DS-2019) to show eligibility to work at Harvard.

3. Complete the “Certification” section of the I-9 Form, as follows:
   - Enter “Reviewed with” and the name of the Harvard administrator who assisted in the Section 2 Additional Information box.
   - Enter the employee’s first day of employment.
   - Sign the Authorized Representative section (electronic signature or manually signed, typed name is not sufficient).
   - Date the form.
   - Enter your Title as “Authorized Representative,” your Last Name, and First Name.
   - Enter “Harvard University” for the Employer’s Business Name.
   - Enter the Employer’s Business Address (COVID-19, Central Payroll, 1033 Massachusetts Ave., Cambridge, MA 02138)

4. Photos of the documents must be included with the Form I-9.

NOTE: A Harvard I-9 Administrator will assist with every step of this process and review the documents via Zoom or other teleconference system.
REQUIRED DOCUMENTS

A Harvard I-9 Administrator will view Section 2 documentations via Zoom. If possible, copies of the documents should be included with the Form I-9 submission.

**List A:** Establish both identity and employment authorization, OR

**List B:** Establishes identity only - To meet E-Verify requirements list B documents must have a photograph, AND

**List C:** Establishes work authorization only

There are many different visa classifications used at the University to accommodate our international population. While the I-94 shows work authorization, I-9 Administrators must also collect additional documentation (I-797, I-20, DS-2019) to show eligibility to work at Harvard.

See Form I-9 on the USCIS website at [https://www.uscis.gov/i-9](https://www.uscis.gov/i-9) for a complete list of allowable documents.

<table>
<thead>
<tr>
<th>Most common additional documentation to collect based on visa type:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>H-1B VISA Type</strong></td>
</tr>
<tr>
<td>Foreign passport I-94 or I-94A I-707</td>
</tr>
<tr>
<td><strong>F-1 OPT VIA Type</strong></td>
</tr>
<tr>
<td>EAD (I-766)</td>
</tr>
</tbody>
</table>
New Employee Process (No Harvard Key) (continued)

• To return documents, go back to the original email and select “reply all” and upload your completed Form I-9. If possible, take pictures of your section 2 documents and upload the completed Form I-9 and document pictures to the original email and send.
Schools participating in the Equifax Electronic I-9 Pilot have three options regarding the completion of the Form I-9.

**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](mailto: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 Assigned 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 them 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 June 18, 2020**
This process can only be used for employees starting on or before 6/18/20 and will not be available after June 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.

05/27/2020 Remote I-9 Collection COVID-19
**Option 2 – Harvard Assigns an Authorized Representative to Complete Section 2**

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 necessary by the Harvard I-9 Administrator or hiring department. **This option is the preferred option if the Form I-9 cannot be completed in person.**

- An authorized representative may be an adult household member, personnel officer, foremen, agent, or notary public.
- A Harvard I-9 Administrator must walk a household member through process using teleconference to view the Section 2 documents being presented as well as confirm the accurate completion of Section 2.
- This option is always available, but best practice is for a Harvard I-9 Administrator to review and complete Section 2 with the employee in person.
- The Authorized Representative must fully review and complete Section 2 document information, including entering the first day of work, review all Section 2 document information and electronically or manually sign the Form I-9.
- 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 Example](image)

  - Copies of the Section 2 documentation **must** be included and submitted with the completed Form I-9.
  - 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](#).
  - The Harvard I-9 Administrator would follow any E-Verify follow-up requirements as necessary.

Option 3 - Electronic I-9 Harvard I-9 Administrator - Process


1. Harvard I-9 Administrators may be notified of Section 1 being completed:
   • Through the school or unit's standard I-9 email, or
   • Through new employee emailing them once they have completed Section 1, or
   • Through a search of the I-9 Pending Completion page

2. Harvard I-9 Administrator will set up a Zoom meeting with the new employee to complete Section 2. This includes reviewing remotely the Section 2 documents.

3. When completing the Section 2 document information, select the checkbox labeled “I want to use COVID-19 exception for this employee.”

4. Follow the steps to validate information and electronically sign the form.

5. Rather than uploading the documents, the I-9 Administrator will check the box indicating that they will upload the materials within 2 business days which appears in the blue box noting record retention policy.

6. When Section 2 is completed “COVID-19” will be automatically interested into the Additional Information field of the Form- I-9.

7. Upon expiration of the remote review option (scheduled to expire on June 18, 2020) employee must bring in original Section 2 documentation within three business days for review.

See Equifax Electronic I-9 COVID-19 Remote Review Process
GLACIER and PeopleSoft Paid Appointments

1. As soon as a paid appointment is processed and active in PeopleSoft, an email is sent to the employee.
   • Email is from Harvard psoft@harvard.edu notifying new employee that an email from support@online-tax.net is forthcoming (which is sent ~24-48 hours later).

2. Employees receive email from support@online-tax.net, creates an account and complete GLACIER.

3. When selecting the button to print the GLACIER forms, open a PDF file with your GLACIER Tax Summary and all required forms (e.g., Forms W-8, W-4, W-7, M-4, 8233, etc.)

4. Employee must SIGN each form.
   • Please do NOT submit forms double-sided, as these forms may need to be processed separately.
   • Basic or digital signatures are allowable.
     • Basic Electronic Signature includes signature stamp .gif, facsimiles of signature, photocopy of signature. An example of this is when a signature is made into a .gif, uploaded to Adobe Acrobat Professional to create a “signature stamp” that is then applied a .pdf document, and resaved as a new .pdf document.
     • Digital Signature (aka Advanced/Qualified Signature): The creation of a digital signature generally requires the use of a software program and offers the most assurance of true identity because the software uses distinct signing keys for each person. The keys link the identity of the signer directly to the signed document so that it can be verified independently with the aid of an industry standard PDF reader. It is important to note that both advanced/qualified signatures are technically referred to as digital signatures and not electronic signatures, though the Internal Revenue Manual seems to use the terms interchangeably.

5. Submit the signed forms and copies of required immigration documents (as listed on the GLACIER Tax Summary Report) to Nonresident Alien Tax Compliance in order for payment to be issued at the proper withholding rate. Your completed GLACIER submission can be submitted via:
   • Fax to 617-496-3196, OR
   • Secure upload directly to the Nonresident Alien Team, “Secure upload of GLACIER Documentation”, if you are a Harvard affiliate and have a Harvard key

   • For your security, PLEASE DO NOT SEND THE DOCUMENTS VIA EMAIL.
Frequently Asked Questions (FAQ)

Q: Does this mean I don’t need to see original documentations anymore?
A: If a hiring department or unit assigns an authorized representative who completes section 2 on behalf of Harvard (with the assistance of a Harvard I-9 Administrator) and submits the fully completed I-9 with documentation no additional follow-up is required.

If a hiring department or unit completes section 2 and reviews the section 2 documents remotely, Harvard must still review the section 2 documents in person upon resumption of normal operations.

Q: What do I do if the employee does not have a permanent Social Security Number?
A: There is no change in how hiring departments would request a temporary social security number. Harvard I-9 Administrators should type the temporary placeholder number on page 1 on the upper right hand corner.

Q: Do I have to use Zoom?
A: No. I-9 Administrators can whatever video link works with them (skype, etc.)

Q: What does the employee do about getting a permanent Social Security Number?
A: Employees may work temporarily without a social security number (SSN). However, in order to comply with E-Verify, employees must apply for and provide Harvard with their SSN within 90 days from their hire date.

Currently all Social Security Administration Offices are closed so nonresident aliens are unable to apply for a SSN. We expect guidance from the SSA extending the SSN requirement in the next week. For now employees will continue to work under their temporarily placeholder number that was assigned to them when they were hired.
Frequently Asked Questions (FAQ)

Q: If the new employee, e.g., a student, doesn’t return to campus within three days, what do we do?
A: We are reviewing these scenarios and will provide an updated FAQ as soon as possible.

Q: For Section 2, if an employee presents list A documentation, is it necessary to put N/A under Lists B and C?
A: No, based on the sample provided in Handbook for Employer’s M-274, this is not necessary.

Q: If I have an employee starting work in CA, what do I do about reviewing the I-9 documentation in person when normal operations resume?
A: If the I-9 is completed by an Harvard-assigned authorized representative (under the supervision of a Harvard I-9 Administrator) and provide copies of documentation reviewed, you will not need to review in person.

Q: I cannot sign the Form I-9 electronically, what do I do?
A: The Form I-9 on the USCIS website can be completed as a smart form, but is not set up for electronic signature for both sections 1 or 2. If the Form I-9 is going to be signed electronically, use the I-9 Packets.

Q: I am still having problems signing the Form I-9 with Electronic Signature, what do I do?
A: Sometimes there may be problems with the electronic signature based on an individual’s personal computer set-up. Guidance on common issues is forthcoming.
Q: My Section 2 documentation has or is about to expire, what do I do?
A: Many states are extending the expiration date of state IDs and/or driver's licenses. If the employee's state ID or driver's license expired on or after March 1, 2020, and the document expiration date has been extended by their state due to COVID-19, then it is acceptable as a List B document for Form I-9. Enter the document's expiration date in Section 2 and enter "COVID-19 EXT" in the Additional Information field. Employers may also attach a copy of the state motor vehicle department's webpage or other notice indicating that their documents have been extended. Please reach out to ufs_crt@Harvard.edu if you have any questions.

Government issued IDs
Passports - If you applied and requested expedited service on or before March 19, 2020, the State Department will honor the commitment of 2-3 weeks door-to-door for expedited service. If you applied in-person at a passport agency or center on or before March 19, 2020, the passport agency or center will contact you and ask if you want to pick-up your passport in person or have it mailed to you. Individuals applying for or renewing a U.S. passport on or after March 20, 2020, will not offer expedited service and routine service may be delayed.

VISAs
In response to significant worldwide challenges related to the COVID-19 pandemic, the Department of State is temporarily suspending routine visa services at all U.S. Embassies and Consulates. Embassies and consulates will cancel all routine immigrant and nonimmigrant visa appointments as of March 20, 2020. As of March 18, U.S. Citizenship and Immigration Services has temporarily suspended routine in-person services through at least May 3 to help slow the spread of coronavirus (COVID-19). USCIS staff will continue to perform mission critical duties that do not involve contact with the public. However, USCIS will provide emergency services for limited situations. To schedule an emergency appointment contact the USCIS Contact Center.
Q: I use the Electronic I-9 system and received a TNC in E-Verify, what do I do?

A: Follow-up as normal to make sure that no typos or other information is inaccurate on the Form I-9. If the I-9 administrator receives a true TNC, contact karen_kittredge@harvard.edu for additional guidance. DHS has released new guidance to extend the timeframe for employees to resolve certain Tentative Non-Confirmations (TNCs). This provides employees more time to resolve TNCs because of the closure of Social Security and other public offices. Harvard will not take any adverse action against the employee because the E-Verify case is in an interim case status, including while the employee’s case is in an extended interim case status.
Additional Materials

The below may be found on the Central Payroll Website:

- Payroll and NRA Emergency Operations Changes
- Interim Payrolling Guidance (updates forthcoming)
- I-9 Collection Process during COVID-19
- Form I-9 with Electronic Signature COVID-19 for Remote Use
  - Electronic Signature Suggestions (Forthcoming)
- Submitting GLACIER information Packet during COVID-19

**I-9 Verification Tool** – A tool in the Harvard Training Portal that display different types of visas along with I-9 documentation examples.

**IT Links**
Accellion / Kiteworks - [https://filetransfer.harvard.edu/](https://filetransfer.harvard.edu/)
Zoom - [https://harvard.zoom.us/](https://harvard.zoom.us/)


Questions: contact ufs_crt@harvard.edu
Appendix

What is Accellion/Kiteworks
What is Identity Finder by Spirion
**What is Accellion/Kiteworks**

Harvard Secure File Transfer is enabled through the use of a tool called Kiteworks, the successor to Accellion. Harvard Secure File Transfer is supported by HUIT and provides secure file transfer for use by faculty, researchers, and administrative staff who have the need to share files that contain up to and including level 4 data, are very large in size or have unique file types.

Kiteworks is available to most Harvard Schools and Units including DIV, CADM, GSE, GSD, FAS, HKS, HSPH, HMS, Radcliffe, SEAS. For school or units not listed above, please contact your local school helpdesk for information on tools and services available for secure file transfer.

**Kiteworks:**
- Require a valid HarvardKey primary email address in a Harvard email domain
- **Note:** shared accounts are not supported by HarvardKey, it must be an individual HarvardKey email.
- Message content (body) is not encrypted - only the file(s) being transferred are encrypted.
- To ensure compliance with level 4 data policies visit [https://policy.security.harvard.edu/level-4](https://policy.security.harvard.edu/level-4)
- Users must adhere to the [Harvard Enterprise Information Security Policies](https://policy.security.harvard.edu/level-4)
- See key features and benefits and requirements plus plug ins at [HUIT](https://policy.security.harvard.edu/level-4).

To access Kiteworks go to: filetransfer.harvard.edu
What is Identity Finder by Spirion

Per Harvard University security policy, http://policy.security.harvard.edu/, High Risk Confidential Information (HRCI) such as Social Security and credit card numbers should not be stored on Harvard desktop or laptop computers. Identity Finder is a tool that can provide you peace of mind knowing that your computer is not storing any of this highly confidential information. Identity Finder will help you search your computer for data that may contain this type of information and then you can take the appropriate action against what it finds. In order to aid you in keeping your computer free of high-risk confidential information, it is recommended that you run periodic scans of your computer.

If Identity Finder discovers any HRCI data on your computer, please make sure to move it to an approved location for HRCI data. Once data is moved, you may use the Shred option to remove it completely from your machine.

See the below or contact your local IT Department for additional guidance.
https://policy.security.harvard.edu/faq/using-identity-finder