

Paper Form I-9 Collection Process – Revised 09/01/2021

In order to comply with federal law, employees must complete a Form I-9 to show eligibility to work in the United States. An Harvard I-9 Administrator or Authorized Representative must review, in person, original unexpired Section 2 documentation within three days of the employee's start date.

To allow Central Payroll to prioritize Form I-9 data entry, please submit completed I-9s as close to the hire date as possible. Schools and units should defer all other appointments if possible. If submitting documents electronically, please name the documents submitted to Central Payroll with the employee's name and document being submitted (e.g., John_Harvard_I9 or John_Harvard_I94 or John_Harvard_I9FullPacket).

This guidance applies to current employees and prospective new employees who have accepted a paid position at Harvard. Individuals with an unpaid appointment (e.g., visiting scholars, unpaid interns, etc.) are not covered by this guidance. Follow your School's or unit's unpaid or courtesy appointment processes.

Please contact ufs crt@harvard.edu for guidance with exigent circumstances.

Options for Paper I-9 Collection - Below are two options that are available to hiring departments regarding completion of the paper Form I-9.

Option 1 - In Person Completion (Best Practice)

As schools and units return to campus, they should have a Harvard I-9 Administrator complete section 2 and review the original documents in person following their usual I-9 collection process. This reduces the possibility of incomplete or inaccurate I-9s and is considered a *strongly preferred* best practice.

Fallback Option - Authorized Representative

In the rare case where a Harvard I-9 Administrator is not able to complete Section 2 and review the documentation in person (*e.g.*, employees who will not be working on campus), Harvard may assign the role of Authorized Representative to an outside individual, who may complete Section 2 of the Form I-9 on Harvard's behalf. 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. Best practice is to have a notary (if allowed by that state) or personnel office complete the Section 2 of the Form I-9 rather than household member.
- The authorized representative would complete section 2, review original documents, collect copies of the documentation and sign section 2 on behalf of Harvard. The signature must be an original or electronic / digital signature with a date and time stamp.
- 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, in order to make sure that the documents are appropriate, original, and not expired.
- The Harvard I-9 Administrator must review the completed Form I-9 and documentation before submitting it to their local office or Central Payroll following local procedures. Incomplete I-9s will be returned.
- 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.



FALLBACK OPTION: INSTRUCTIONS FOR HIRING DEPARTMENT WHO HAS ASSIGNED A HARVARD AUTHORIZED REPRESENTATIVE

- 1. After the job offer has been accepted, the hiring department ("I-9 Administrator") will email Form I-9 information to the new employee using <u>Accellion/Kiteworks</u> secure file transfer or <u>Outlook Message Encryption</u> and attach:
 - a. A blank copy of the Form I-9 with a link to the online Form I-9 instructions, OR
 - b. A Form I-9 that allows electronic signatures see <u>Packet Form I-9 with Instructions for Employee and</u>
 Authorized Representative
- 2. Employee will complete and sign Section 1 and check appropriate box for the Preparer/Translator section.
 - a. Section 1 of the Form I-9 must be completed by the employee promptly upon acceptance of 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 Form 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 Authorized Representative 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, reviewing the original documents in person, 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:

 Example of an electronic signature:

 Example of Example
 - b. Copies of the Section 2 documentation must be included and submitted with the completed Form I-9.
 - c. 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 with them.
- 5. The new employee will log into Accellion/Kiteworks and reply to the original email or reply using the original Outlook encrypted email and attach scans or photos of the full completed and signed I-9 and Section 2 documentation.
- 6. If using Kiteworks/Accellion or Microsoft Encryption
 - a. The Harvard I-9 Administrator emails <u>ufs_crt@harvard.edu</u> (subject line: "Completed I-9 Submission") requesting an email address supplied by Payroll Customer Service to send the Form I-9 and documentation via secure email. Payroll Customer Service (via <u>ufs_crt@harvard.edu</u>) will contact the I-9 Administrator to specify a Payroll Customer Service contact to forward/send the documents via <u>Kiteworks/Accellion_or_MS_Encryption</u>.
 - b. When submitting the documents, 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). OR
- 7. Fax the completed Form I-9 materials to 617-496-3196 and email ufs_crt@harvard.edu with the subject line "Complete I-9 Submission Faxed). Payroll Customer Service (via ufs_crt@harvard.edu) will confirm receipt of faxed documents



INSTRUCTIONS TO THE NEW EMPLOYEE TO COMPLETE PAPER 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 an adult 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

Last Name:	First Name:	Middle Initial:
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. The email may be sent via Microsoft Outlook Encryption or Kiteworks/Accellion. In either case, follow the steps to log-in, request a PIN, or set up a one-time account using your email address as the log-in. Both Microsoft Outlook Encryption and Kiteworks/Accellion are 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 and save the Form I-9 to your desktop 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.
- Contact your hiring department listed on the instructions for 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 Microsoft Outlook Encrypted or 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: Karen Kittredge Digitally signed by Karen Kittredge

Date: 2020.05.13 09:20:24 -04'00'



INSTRUCTIONS TO THE *AUTHORIZED REPRESENTATIVE* COMPLETING SECTION 2 OF THE PAPER 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 original documents and then completing and signing Section 2 of 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 "<u>Acceptable Documents</u>." 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. While the I-94 shows work authorization, the Authorized Representative must collect additional documentation (I-797, I-20, or DS-2019) to show eligibility to work at Harvard. Consult the "Acceptable Documents" section of the Form I-9 Instructions.
- 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

Contact Name:	Contact Title:
Contact Phone Number:	Contact Email Address:
Business Address (for I-9):	Business City, State, Zip (for I-9):



FOR SCHOOLS AND UNITS PILOTING THE ELECTRONIC I-9 AND E-VERIFY PROCESS:

Options for Equifax Electronic I-9 Completion:

Option 1 - In Person Completion (Best Practice)

For schools with staff on campus, the Harvard I-9 Administrator should follow their usual I-9 Equifax collection process; sending the url to the employee to complete Section 1 and the Harvard I-9 Administrator completing Section 2 and review the documentation in person. *This is the *strongly preferred* best practice.*

Option 2 - 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 to 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. The remote agent will complete Section 2 and submit documents to E-Verify.
- b. Harvard I-9 Administrators must review the E-Verify response and complete any follow-up needed (e.g., Photo Matching).
- c. Schools will be charged (\$115) 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 \$115.
- d. Contact Central Payroll at ufs_crt@harvard.edu to request the I-9 Anywhere Remote URL to send the new employee.

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

In the rare case where a Harvard I-9 Administrator is not able to complete Section 2 and review the documentation in person (*e.g.*, employees who will not be working on campus), 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. Best practice is to have a notary (if allowed by that state) or personnel office complete the Section 2 of the Form I-9 rather than a household member.

- 1. See Packet Form I-9 with Instructions for Employee and Authorized Representative
- 2. 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.
- 3. The Harvard I-9 Administrator would complete the "Equifax Upload 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.
 - a. The employee would not complete section 1 via the URL but complete the paper Form I-9 only.
 - b. The upload process must include uploading of copies of the Section 2 documentation.
 - c. The Harvard I-9 Administrator would follow any E-Verify follow-up requirements as necessary.