



Harvard University

Paper Form I-9 Collection Process

To comply with federal law, employees must complete a Form I-9 to show eligibility to work in the United States. A 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. For schools or units with an on-campus presence, a Harvard I-9 administrator **must** complete section 2 of the Form I-9 in person. Assigning an Authorized Representative to complete Section 2 increases the risk for inaccurate form completion and documentation and therefore should be reserved only for exceptional cases.

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 note: Harvard is **not** currently eligible to complete remote examination of I-9 documents. Until further notice, and to comply with federal regulations, the Harvard I-9 Administrator or Authorized Representative must review, in person and in the physical presence of the employee, the original unexpired Section 2 documentation when completing Section 2 of the Form I-9. Certain non-U.S. citizens will have restrictions that prohibit non-Harvard work locations. Hiring departments and employees must confirm their work location eligibility with the Harvard International Office (HIO) prior to being hired. See [Considerations for Foreign Nationals](#). Please contact ufs_crt@harvard.edu for guidance with exigent circumstances.

Options for Paper I-9 Collection

Option 1 – In-Person Completion (Required if Department or Employee has an on-campus presence or if Employee lives within 50 miles of campus)

Schools and units with an on-campus presence (hybrid or other) must have a Harvard I-9 Administrator complete section 2 and meet with the new hire to review original documents **in person** following their usual I-9 collection process. This reduces the possibility of incomplete or inaccurate I-9s.

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 are 100% remote and live >50 miles from 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 Section 2 documents, no further action is required by the Harvard I-9 Administrator.

This option cannot be used for convenience or if the local hiring unit has an on-campus presence.

1. An authorized representative may be an adult household member, personnel officer, foreman, notary public, etc. Best practice is to have a notary (if allowed by that state) or personnel office complete Section 2 of the Form I-9 rather than household member.
2. In the physical presence of the new employee, 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.
3. Harvard remains liable for any incomplete forms, so a Harvard I-9 Administrator must set up a video conference call to walk the authorized representative through the process and review the documentation via video conference, making sure that the documents are appropriate, original, and not expired.
4. Authorized Representatives must 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").
5. 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.
6. See [Instructions - Form I-9 New Employee and Authorized Representative](#) for step-by-step processes.
7. If submitting completed documents electronically to Central Payroll, please request a secure email by logging a ticket at ufs_crt@harvard.edu and name the documents submitted to Central Payroll with the employee's legal name and document being submitted (*e.g.*, "John Harvard I-9" or "John Harvard I-94" or "John Harvard I-9 Full Packet").



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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 [Accellion/Kiteworks](#) secure file transfer or [Outlook Message Encryption](#) and attach:
 - a. A blank copy of the Form I-9 packet with a link to the online Form I-9 instructions, OR
 - b. A Form I-9 that allows electronic signatures - see [Packet - Form I-9 with Instructions for Employee and Authorized Representative](#)
2. Please note: Harvard is not currently eligible to complete remote examination of I-9 documents. To comply with federal regulations, the Harvard I-9 Administrator or Authorized Representative must review, in person and in the physical presence of the employee, the original unexpired Section 2 documentation when completing Section 2 of the Form I-9.
3. Employee will complete and sign Section 1. If they received assistance from a preparer or translator in completing Section 1, the Preparer or Translator must complete Supplement A of the Form I-9.
 - 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.
4. The assigned Authorized Representative will complete Section 2 in the physical presence of the employee. 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 must 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.](#))
5. 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 in the physical presence of the employee, 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
Valid signature

Digitally signed by Karen Kittredge
Date: 2020.05.13 09:20:24 -04'00'
 - b. Copies of 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.
6. 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 fully completed I-9 and Section 2 documentation.
 - a. If using Kiteworks/Accellion or Microsoft Encryption to submit to Central Payroll:
 - The Harvard I-9 Administrator emails ufs_crt@harvard.edu (subject line: “Completed I-9 Submission”) requesting an email address supplied by Central Payroll to send the Form I-9 and documentation via secure email. Central Payroll will contact the I-9 Administrator to specify an email address to forward/send the documents via [Kiteworks/Accellion](#) or [MS Encryption](#).
 - When submitting the documents, please name the documents with the employee’s legal name and document being submitted (e.g., John_Harvard_I9 or John_Harvard_I94 or John_Harvard_I9FullPacket).



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INSTRUCTIONS TO THE *NEW EMPLOYEE* TO COMPLETE PAPER FORM I-9

EMPLOYEE INFORMATION:

Employee 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 solutions for protecting data in transit. It uses industry-standard encryption to secure files sent or received by users.
2. You will download and save the Form I-9 Packet 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. If anyone assists you in completing Section 1, they are considered a Preparer and/or Translator and they must complete the attached Supplement A, Preparer and/or Translator Certification.
4. You will assemble original, unexpired documents that fulfill the requirements of "[Acceptable Documents](#)."
5. You will photograph Section 2 documents and include them in your I-9 packet.
 - 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. If working off-campus, confirm that your work authorization permits you to work remotely. Contact the Harvard International Office for additional guidance.
6. If an adult household member is completing Section 2, the hiring department must set up a video conference with you and the Authorized Representative to assist them with every step of the process to confirm the appropriate documents have been presented and the form has been completed accurately.
7. 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](#).
8. 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.
9. Signature requirements: If you have a printer, you can print the Form I-9. The new employee must sign Section 1 and the Authorized Representative signs 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.
10. 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 Karen Kittredge <small>Valid signature</small>	Digitally signed by Karen Kittredge Date: 2020.05.13 09:20:24 -04'00'
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INSTRUCTIONS TO THE *AUTHORIZED REPRESENTATIVE* COMPLETING SECTION 2 OF THE PAPER FORM I-9

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, in the physical presence of the new employee, their original documents and then completing and signing Section 2 of the USCIS Employment Eligibility Verification Form I-9. A Harvard I-9 Administrator will up a video conference with the Authorized Representative and employee to assist with the process, view and confirm the appropriate documents have been presented and the form has been completed accurately. 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 the employee has fully completed, signed, and dated Section 1 of the I-9.
2. If the authorized representative or another individual assists the employee in completing Section 1 for the Form I-9, complete Supplement A.”
3. 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.
4. In the appropriate spaces provided under List A or List B and List C, please record the document title, issuing authority, document number (if any), 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.
5. DO NOT check the box indicating alternative procedure authorized by DHS to examine documents.
6. Enter the first day of employment (the date the employee began or will begin work for pay).
7. Enter your Last Name, First Name, and your Title as “Authorized Representative”.
8. Enter the date you completed Section 2.
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):



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

For schools or units with an on-campus presence, a Harvard I-9 administrator must complete section 2 of the Form I-9 in person. Assigning an Authorized Representative option increases the risk for inaccurate form completion and documentation and therefore should be reserved only for exceptional cases.

Please note: Harvard is **not** currently eligible to complete remote examination of I-9 documents. Until further notice, and to comply with federal regulations, the Harvard I-9 Administrator or Authorized Representative must review, in person and in the physical presence of the employee, the original unexpired Section 2 documentation when completing Section 2 of the Form I-9. Certain non-U.S. citizens will have restrictions that prohibit non-Harvard work locations. Hiring departments and employees must confirm their work location eligibility with the Harvard International Office (HIO) prior to being hired. See [Considerations for Foreign Nationals](#). Please contact ufs_crt@harvard.edu for guidance with exigent circumstances.

Please contact i9help@harvard.edu for guidance with exigent circumstances.

Options for Equifax Electronic I-9 Completion:

Option 1 - In Person Completion (Required if Department or Employee has an on-campus presence)

Schools and units with an on-campus presence (hybrid or other) will follow their usual I-9 Equifax collection process; sending the URL to the employee to complete Section 1 and the Harvard I-9 Administrator completes Section 2 with in-person document review.

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 [I-9 Anywhere Support Guide](#).

1. Harvard will send the specific I-9 Anywhere link to the new employee who will complete Section 1 and set up an appointment with a I-9 Anywhere remote agent.
2. The employee will go their appointment and the remote agent will complete Section 2 and submit documents to E-Verify.
3. Harvard I-9 Administrators must review the E-Verify response and complete any follow-up needed (e.g., Photo Matching).
4. 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.
5. Contact Central Payroll at i9help@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

This option cannot be offered if the hiring department or employee has an on-campus presence. 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., for employees who are 100% remote and live >50 miles from campus), Harvard may assign the role of Authorized Representative to an outside individual, who may complete Section 2 of the Form I-9 on behalf of Harvard. If completed correctly and, with the submission of 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. This option cannot be used for convenience or if the local hiring unit or employee has an on-campus presence.



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Be sure the completed paper Form I-9 has an expiration date of 07/31/2026. Any Form I-9s that do not have that date cannot be used and hiring departments will be required to complete a new paper Form I-9..

1. See [Packet - Form I-9 with Instructions for Employee and Authorized Representative](#)
2. A Harvard I-9 Administrator must 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.
3. The completed paper Form I-9 is the document of record, and the Harvard I-9 Administrator must review the completed Form I-9 to make sure it is completed correctly. Any corrections must be made to the document prior to entering and uploading it in Equifax.
4. 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](#).
5. The employee **would not** complete section 1 via the URL but complete the paper Form I-9 only.
6. The upload process **must include** uploading copies of the Section 2 documentation.
7. The Harvard I-9 Administrator must take action on any follow-up E-Verify responses as necessary.