HARVARD FINANCIAL ADMINISTRATION



NEW FORM I-9 TIPS AND TRICKS AUGUST 23, 2023

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Agenda

- Overview of New Form I-9 released 8/1/2023
- Understand who is responsible for Section 1 and Section 2 of
- I-9 and Harvard's responsibilities around I-9 collection
- I-9 administrator options completing Section 2
- Process for submitting completed Form I-9 to Central Payroll
- Questions/FAQs

Hiring Practices

This guidance applies to:

- Harvard employees who complete Section 2 of the Form I-9
- Incoming new employees who must complete an I-9. This includes 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 and onboarding processes.

Individuals with an unpaid appointment (e.g., visiting scholars, unpaid interns, etc.) are not affected and not covered by this guidance. Follow your School's or Unit's unpaid or courtesy appointment processes.

When to Complete Form I-9

A new Form I-9 is completed for:

- New employees (never worked for Harvard)
- Rehires who've had a break in service
- Reverification / Updates
 - Employees whose work authorization has expired/will expire soon, OR
 - The employee has a legal name change, OR
 - The employee's citizenship type has changed

Section 1 of the I-9 can be completed by the employee

- as soon as an offer of employment has been accepted
- no later than the first day of work

Section 2 of the I-9 must be completed by the hiring department

• by the end of the 3rd day of work. Employees must present, in person, original unexpired documents.

Who Must Complete the Form I-9

I-9 Required							
Pay Group Abbreviation	Pay Group Name						
SPC	Pres + Fell Special Contracts						
WPT	Pres + Fel Weekly Part Time Trade						
WRT	Pres + Fell Weekly Regular Trade						
WTM	Pres + Fell Weekly Temp/Students						
PFX	Pres + Fell Exempt						
PON	Pres + Fel OT Eligible Non Union						
POU	Pres + Fell OT Eligible Union						
MFC	Pres + Fell Faculty						
MIP	Pres + Fell Internal Post Doc						
MTF	Pres + Fell Teaching Fellows						
	I-9 is Not Required						
NPD	Non Paid Appointments						
MST	Student Stipends						
MEP	Nonemployee Post Docs						
Outsourced	All outsourced payrolls (All Source, Etc.)						

All employees on a Harvard PeopleSoft payroll are required to complete an I-9.

Form I-9 is not required for individuals receiving a stipend or not receiving a paycheck from Harvard.

What Form I-9 to Use

The most up-to-date version of the Form I-9 with 8/1/2023 version date and 07/31/2026 expiration date

- Expired I-9 forms are automatically considered invalid in case of an audit
- Previous 10/21/2019 version of I-9 with 10/31/2022 exp. date is still valid until 10/31/2023





Options for Paper Form I-9 Collection Overview

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

2. Harvard Assigned Authorized Representative

• Only acceptable in cases where an employee will be working 100% remote and lives >50 miles from campus.

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.
- See <u>I-9 Collection Processes</u> for step-by-step process.



 The General Counsel's office has determined Harvard cannot use the new alternative procedure for remote examination of I-9 documents until all Harvard schools and departments are using Equifax and we are E-Verifying all employees.

Electronic I-9 and E-Verify Collection Process

Schools and units must have a Harvard I-9 Administrator or Authorized Representative complete and review original 2 documentation in person.

Option 1 - In Person Completion

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

If employees are 100% remote and live >50 miles from 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. See <u>Packet - Form I-9 with Instructions for Employee and Authorized Representative.</u>

- 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.
- 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 upload process <u>must include</u> uploading of copies of the Section 2 documentation.
- The Harvard I-9 Administrator would follow any E-Verify follow-up requirements as necessary.
- Do not send the Equifax electronic link the employee if using this option.

Option 3 - 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 <u>Overview of I-9 Anywhere</u> video.

- The remote agent will complete Section 2 and submit documents; however, the Harvard I-9 administrator will need to complete any E-Verify follow-up steps in the Equifax Electronic I-9 tool. To see if additional follow-up is needed, review the E-Verify issues dashboard.
- Schools will be charged \$115 (starting September 1, 2021) 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
- Contact Central Payroll at <u>I9help@harvard.edu</u> to request the I-9 Anywhere Remote URL to send the new employee.

New Employee Section 1- Example



Employment Eligibility Verification Department of Homeland Security U.S. Citizenship and Immigration Services

USCIS Form I-9 OMB No.1615-0047 Expires 07/31/2026

START HERE: Employers must ensure the form instructions are available to employees when completing this form. Employers are liable for failing to comply with the requirements for completing this form. See below and the <u>Instructions</u>.

ANTI-DISCRIMINATION NOTICE: All employees can choose which acceptable documentation to present for Form I-9. Employers cannot ask employees for documentation to verify information in Section 1, or specify which acceptable documentation employees must present for Section 2 or Supplement B, Reverification and Rehire. Treating employees differently based on their citizenship, immigration status, or national origin may be illegal.

Section 1. Employee Information and Attestation: Employees must complete and sign Section 1 of Form I-9 no later than the first day of employment, but not before accepting a job offer.

Last Name (Esmily Name)	First Name (Ciuan Nama)						Mada	liddla Initial /if any) Other Last Names Llead /if any)					(amu)		
Last Name (Family Name)		First Name (Given Name)				MIDDIM	(ir any) Other Last Names Used (ir any)					arry)			
Harvard			Johr	n											
Address (Street Number and Nar	me)			Apt.	Num	nber (if any)	City or Tow	1 I				State	tate ZIP Code		
Harvard Yard							Cambri	dge				MA	•	02138	
Date of Birth (mm/dd/yyyy)	U.S. So	cial Sec	urity Nun	nber		Employee's	Email Addres	s				Employe	e's Tei	lephone Number	
11/26/1607	12	34	567	78	9	john_h	arvard@l	narva	rd.edu			(617)	555	-1212	
I am aware that federal law Check one of the following boxes to attest to your citizenship or immigration status (See page 2 and 3 of the instructions.):								the instructions.):							
provides for imprisonment	and/or	l 🗖 -	1. A citiz	ten of t	he U	nited States									
Ines for false statements, or the 2. A noncitizen national of the United States (See Instructions.)															
connection with the compl	etion of		3. A law	ful perr	mane	ent resident (Enter USCIS	or A-Nu	mber.)						
this form. I attest, under po of periury that this information	enalty ation	X	4. A non	citizen	(oth	er than Item	Numbers 2.	and 3. a	bove) author	rized	d to work un	til (exp. da	te, if a	my) 12/31/2023	
including my selection of t	he box		abook Bo	an Marine			a of the second								
attesting to my citizenship	or	IT you	SCIE A A	CIS A Number 4., enter one of these.				on Nun	n Number			ort Number and Country of Issuance			
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Signature of Employee															
John Harvard 8/3/2023															
A preparer and/or translator assisted you in completing Section 1, that are MUST complete the Preparer and/or Translator Certification on Page 3.															
				5		,									
ign by hand or digital signature (Signature of Employee															
	.0.001	D.		-		gnatare	or Employ						Di	nitally signed by John (
/ith date/time st	amp:				J	ohn Ha	arvard						D	te: 2023 08 18 10:45.	

Be sure that:

- Form is clear and legible
- New hire listed their legal name (not a nickname)
- DOB and SSN are correct
- New hire selected citizenship type and entered additional required information if 3 or 4 selected
- New hire signed and dated Section 1
- If Preparer/Translator used, complete Supplement A
- *Harvard international students who must apply for SSN should leave SSN field BLANK + include HUID on top of form.
 - For Non-Students request temp SSN following current process and include it on top right corner of I-9 Form

New Employee Supplement A - Example



Supplement A, Preparer and/or Translator Certification for Section 1

> Department of Homeland Security U.S. Citizenship and Immigration Services

Last Name (Family Name) from Section 1.	First Name (Given Name) from Section 1.	Middle initial (if any) from Section 1.
Harvard	John	

Instructions: This supplement must be completed by any preparer and/or translator who assists an employee in completing Section 1 of Form I-9. The preparer and/or translator must enter the employee's name in the spaces provided above. Each preparer or translator must complete, sign, and date a separate certification area. Employers must retain completed supplement sheets with the employee's completed Form I-9.

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			Date (mm	n/dd/yyyy)		
Monica Chan	Digitally signed Date: 2023.08.1	by Monica Chan 17 13:49:04 -04'00'	2023			
Last Name (Family Name)	First	st Name (Given Name)			Middle Initial (if any)	
Chan	Mo	onica				
Address (Street Number and Name)		City or Town		State	ZIP Code	
1033 Mass Ave, 2nd Fl		Cambridge	02138			

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			Date (mm	/dd/yyyy)	
The said					
	_				
Last Name (Family Name)	First I	Name (Given Name)			Middle Initial (if any)
Address (Street Number and Name)	_	City or Town		State	ZIP Code
				•	

USCIS Form I-9

Supplement A

OMB No. 1615-0047

Expires 07/31/2026

- If new hire completed Section 1 without assistance, no need to complete Supplement A
 - Anyone assisting the new hire in completing Section 1 is considered a Preparer/Translator
 - Preparer/Translator completes Supplement A attestation
 - Multiple fields are available in case more than one Preparer/Translator involved

New Employee Section 2 - Example

Section 2. Employer Review and Verification: Employers or their authorized representative must complete and sign Section 2 within three business days after the employee's first day of employment, and must physically examine, or examine consistent with an alternative procedure authorized by the Secretary of DHS, documentation from List A OR a combination of documentation from List B and List C. Enter any additional documentation in the Additional Information box; see Instructions. List A List B List C AND Document Title 1 Passport Issuing Authority United Kingdom Document Number (if any) 1234567 Expiration Date (if any) 12/31/2031 Additional Information Document Title 2 (if any) 1-94 U.S. CBP Issuing Authority Document Number (if any) 51360137606 Expiration Date (if any) Harvard is not eligible to use DHS authorized alternative procedure. Document Title 3 (if any) DS-2019 Central Payroll will not accept I-9s U.S. Department of State Issuing Authority if this box is checked Document Number (if any) N00345678910 Expiration Date (if any) 12/31/2023 Check here if you used an alternative procedure authorized by DHS to examine documents. First Day of Employme Certification: Lattest, under penalty of perjury, that (1) Lave examined the documentation presented by the above-named (mm/dd/yyyy): employee, (2) the above-listed documentation appears to be genuine and to relate to the employee named, and (3) to the best of my knowledge, the employee is authorized to work in the United States. 09/01/2023 Last Name, First Name and Title of Employer or Authorized Representative Signature of Employer or Authorized Representative Today's Date (mm/dd/yyyy) Monica Chan Chan, Monica Authorized Representative 08/03/2023 Employer's Business or Organization Name Employer's Business or Organization Address, City or Tow State, ZIP Code Harvard University 1350 Mass Ave, Cambridge, MA 0213 For reverification or rehire, complete Supplement B, Reverification and Re re on Page 4. Form I-9 Edition 08/01/23 Page 1 of 4 Signed by hand **or** digital signature with date/time stamp: Signature of Employer or Authorized Representative Monica Chan Digitally signed by Monica Chan Date: 2023.08.16 12:48:44 -04'00'

- 1. Examine each original document the employee presents. They must appear to be genuine and to relate to the person presenting it.
- 2. In the appropriate fields, record document title, issuing authority, document number, and expiration date (if any).
 - additional document spaces in List A column for international students/scholars
 - I-94 document number is the Admission Record Number
 - Check I-20 and DS-2019 start/end dates. Exp. date is
 Program End Date or Form Covers Period From/To:
 MM/DD/YYYY.
- 3. Complete the "Certification" section of the I-9 Form:
 - Enter employee's first day of work for pay.
 - Enter your Last Name, First Name, and Title
 - Enter date completing Section 2
 - Enter "Harvard University" for Employer's Business Name
 - Enter Employer's Business Address
 - Apply your signature last because the rest of the form will lock after signing (typed name is not sufficient)
- 4. Copies of reviewed documents must be included with the Form I-9.

REQUIRED DOCUMENTS

- 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

Harvard I-9 Administrator **cannot tell** employee what documents to provide to complete Section 2. There are many different visa classifications used at the University to accommodate our international population. While many documents (e.g., 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.**

	Visa Type			A	dditiona					
	F-1			F	orm I-20					
	H-1B			F	orm I-79)7				
	J-1			F	orm DS-					
Department of Homeland Security U.S. Immigration and Customs Enforcement SEVIS ID: N0004705512	I-20, Certific OMB N	ate of Eligibility	NUMBER ST	AV N DC		<u> </u>	CERTIFICATE OF E	U.S. 1	Department of	State
SURNAME/PRIMARY NAME Doe Smith PREFERRED NAME John Doe-Smith COUNTRY OF PUPTH	GIVEN I John PASSPO	1-797A NO	TICE OF ACTION	I QENTRENIA	HOMELAND SECURITY	Exchange Visit Bxchange Visit Date of Birth (see -dd-yyy): 03-25-1995 Logal Permanent Residence	Your City of Birth: Your City	Country of Birth: SWEE Residence Country:	EN Position Code:	Citizenship Country SW Position:
DATE OF BIRTH 01 JANUARY 1980	UNITED	Reading Number 10E3346116888 Readined Date	Priority Date	Case Type 1129 - PETIT Petition	ION FOR A NONIMME	SW Primary Site of Activity: R 9	SWEDEN obertson Research 002 NANCY LN	Institute	213	UNIVERSITY
FORM ISSUE REASON INITIAL ATTENDANCE SCHOOL INFORMATION	LEGAC John D	2/16/2023 Native Date 2/19/2023	Page 1 of 2	HARVARD U Beneficiary LAST NAM	UNIVERSITY	P	ORT WASEINGTON, MD	20744-2430		
SCHOOL NAME HARVARD UNIVERSITY	SCHOC 9002 1	HARVARD UNIVERSI 6/0 HARVARD INTERN 1350 MASSACHUSETT CAMBRIDGE MA 021	TY JATIONAL OFFICE S AVE STE 864 38	-12	Notice Type: A H1B Valid from 04/	01/2023 to 10/31/2025	Certson Research In	2023	4 Aug 17 I-9 (Collection Proc

esses

REQUIRED DOCUMENT COPIES OF FRONT AND BACK

Some documents may have the required information on the back and will need to have **both the front and back copied.** For a complete list of allowable documents, please see Form I-9 on the USCIS website at <u>https://www.uscis.gov/i-9</u>

Example of the I-551 – the document number should be 13 characters/digits long





Note: There is different information on the front and back of this version of the card. Make sure that you copy both sides of the card on one page to upload.

Example of Employment Authorization (EAD) Card





Example of U.S. Passport bio page (front) and barcode page (back)



2023 Aug 17 I-9 Collection Processes

New Employee Supplement B - Example

		Supplement B,	USCIS					
	Reverific	Reverification and Rehire (formerly Section 3)						
	U	OMB No. 1615-0047 Expires 07/31/2026						
Last Name (Family Name) fi	om Section 1.	First Name (Given Name) from Section 1.	Middle initial (if any) from Section 1.					

Date of Rehire (if applicable)	New Name (if applicable)							
Date (mm/dd/yyyy)	Last Name (Family Name)		First Name (Given Name)			Middle Initial		
Reverification: If the employee requires reverification, your employee can choose to present any acceptable List A or List C documentation to show continued employment authorization. Enter the document information in the spaces below.								
Document Title		Document Number (if any)		Expin	ation Date (if any	y) (mm/dd/yyyy)		
I attest, under penalty of employee presented doc	I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented documentation, the documentation I examined appears to be genuine and to relate to the individual who presented it.							
Name of Employer or Authoriz	ed Representative	Signature of Employer or Aut	horized Representative		Today's Date	(mm/dd/yyyy)		
Additional Information (Initi	al and date each notation.)				Check here if y	ou used an		
					alternative proc by DHS to exam	edure authorized nine documents.		

- We are not using Supplement B for Rehires
- If you must complete an I-9 update or Reverification and your normal process is to submit I-9s to Central Payroll for processing:
 - DO NOT complete Supplement B
 - Complete a new I-9 form (Section 1 and Section 2)

Tips and Tricks

Don't forget!

- The form must be legible double check the name and SSN.
 - $\,\circ\,$ Students who must apply for SSN can leave SSN field BLANK.
- Confirm the employee has signed Section 1 of the Form I-9.
- Check the first day of employment is entered in Section 2.
- Check that employee's start date falls within their work authorization date(s) (most commonly listed on an employee's DS-2019, I-797, I-20, or I-766 EAD).
- Minors' work permits, as applicable, must be verified and retained at the local level.



The General Counsel's office has determined Harvard **cannot** use the new alternative procedure for remote examination of I-9 documents until all Harvard schools and departments are using Equifax and we are E-Verifying all employees.

Submitting I-9s to Central Payroll

To submit I-9s electronically to Central Payroll:

- send an email to <u>ufs_crt@harvard.edu</u> notifying us you need to send a completed I-9 packet via Harvard approved secure file transfer.
- Central Payroll will respond with a specific email address where you can send the documents securely.
- Using MS Outlook encryption or Kiteworks Secure File Transfer, send the I-9 packet using the following naming conventions: John_Harvard_I9 or John_Harvard_I94 or John_Harvard_I9Full Packet.

DO NOT directly forward or attach the I-9 packet to <u>ufs</u> crt@harvard.edu

If necessary, paper forms can be dropped off at 1033 Mass Ave using the dropbox outside or on the 2nd floor of the building.

Additional Materials

The below may be found on the <u>Central Payroll</u> Website:

- Payroll Policy
- I-9 Collection Process
 - Form I-9 Packet with Instructions for Employee and Harvard Authorized Representative
- <u>I-9 Verification Tool</u> A tool in the Harvard Training Portal that display different types of visas along with I-9 documentation examples.

IT Links

Accellion / Kiteworks - <u>https://filetransfer.harvard.edu/</u> Zoom - <u>https://harvard.zoom.us/</u>

I-9 Administrators should make a thorough review of Form I-9 instructions and the Handbook For Employers (M-274) provided by the Department of Homeland Security at : <u>http://www.uscis.gov/sites/default/files/files/form/m-274.pdf</u>

Questions: contact ufs_crt@harvard.edu

Appendix

FAQs What is the Form I-9 **Overview of In-Person I-9 Completion Process** Overview of I-9 Completion with Authorized Rep. Process **Digital Signatures on I-9 Forms Temporary Placeholder Numbers** GLACIER and PeopleSoft Paid Appointments What is Accellion/Kiteworks Sending and Scanning of High-Risk Confidential Information (HRCI) What is Identity Finder by Spirion Equifax Electronic Harvard I-9 Administrator – I-9 Collection Options

Frequently Asked Questions (FAQ)

Q: E-Verify employers can now verify I-9 documentation remotely, why isn't Harvard taking advantage of this?

A: The federal regulations specify an "E-Verify employer in good standing" can use the alternative remote examination option. OGC has determined since not all schools/depts at Harvard are currently E-Verifying all employees, we are not an E-Verify employer in good standing. We will continue to reevaluate our policies as we continue to move toward transitioning to an electronic I-9 process.

Q: What do I do if the employee does not have a permanent Social Security Number?

A: If the employee is a current Harvard student, they may leave the SSN field blank on the I-9 and include their HUID on the top of the form.

Otherwise, 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 the upper right-hand corner of page 1 of the I-9 if submitting the form to Central Payroll.

Q: Is there a new process regarding temporary placeholder numbers for students?

- A: Effective July 2023, Student Financial Services will assign a Temporary Placeholder Number (Temp SSN) to any incoming foreign student without an SSN on file in the student information system (SIS) after these students are activated in mid-June. This eliminates the need to request a temp SSN for students prior to I-9 submission.
 - It's no longer necessary to request a temp SSN in advance when hiring a Harvard student.
 - Remember to always use a student's HUID when completing a student hire.

Frequently Asked Questions (FAQ) continued

Q: What does the employee do about getting a permanent Social Security Number?

A: Employees may work temporarily without a social security number (SSN). Employees must apply for and provide Harvard with their SSN within **90** days from their hire date. Local Social Security Administration offices have recently reopened and resumed in-person service. See <u>HIO's SSN Instructions</u>.

What is the Form I-9

Immigration Reform and Control Act of 1986 requires employers to verify the identity and employment eligibility for all U.S. employees through completion and retention of the Form I-9. Individuals cannot be put on a payroll until an I-9 has been completed.

Section 1 of the I-9 can be completed by the employee

- as soon as an offer of employment has been accepted
- no later than the first day of work

Section 2 of the I-9 must be completed by the hiring department

by the end of the 3rd day of work. Employees must present, in person, 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 you are using Equifax we have a Section 3 process that applies in certain cases.

In Person Paper Form I-9 Completion

Harvard I-9 Section 2 Completers should follow the normal I-9 collection process:

- Review Section 1 for completeness
- Meet with the employee in-person to review original, unexpired documents they present and make sure they are <u>Form I-9 acceptable documents</u>*
- Complete Section 2
- Submit completed Form I-9 with document copies following their local school or unit's processes to Central Payroll. If submitting electronically, email <u>ufs_crt@harvard.edu</u> for individual email address to forward I-9 and documents securely.

*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 sometimes must also collect additional documentation (I-797, I-20, DS-2019) to show eligibility to work at Harvard. I-9 Verification Tool is a helpful resource in these cases.

Harvard Authorized Representative Overview

May only be used when an employee will be working 100% remote and lives >50 miles from campus

Harvard may assign the role of authorized representative to an outside individual , allowing them to complete Section 2 of the Form I-9 on behalf of Harvard. The authorized representative must continue review, in person, the original Section 2 documents.

- 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.
- 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:
- Copies of the Section 2 documentation <u>must</u> be included and submitted with the completed Form I-9.
- The authorized representative must enter in the "Additional Information" box "reviewed with [name of the Harvard I-9 Administrator]."
- See <u>I-9 Collection Processes</u> for step-by-step process.

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Harvard Assigned Authorized Representative - Process for Paper Form I-9 Collection Process

May only be used when an employee will be working 100% remote and lives >50 miles from campus

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. **This option cannot be used for convenience or if the local hiring unit has an on-campus presence.** See <u>I-9 Collection Processes</u> for step-by-step processes.

Harvard I-9 Administrator or Hiring	New Employee	F	Form I-9 Section 2 Completer
 Department Confirms a household member or other can act as an authorized representative. Sends email to new employee via Harvard approved secure file transfer 	 Opens attachment or 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 		 Household Member Acting as a Harvard Authorized Representative Employee designates another adult to act as an Authorized Representative on behalf of Harvard. A Harvard I-9 Administrator must walk the authorized representative through the process using Zoom or other video conference tool. See Instructions - Form I-9 New Employee and Authorized Representative

New Employee

- Replies to original email (if using Kiteworks may need to log back in) attaching fully completed I-9.
- Copies of Section 2 documentation <u>must</u> be submitted with the completed Form I-9.

Harvard I-9 Administrator or Hiring Department

- •Receives secure file with I-9, downloads and reviews I-9 for completeness.
- •Emails <u>ufs_crt@harvard.edu</u> for individual email address to forward I-9 and documents via Kiteworks. **DO NOT forward or attach the I-9 to the ufs_crt email.**

Central Payroll

 Sends I-9 Administrator an individual email address to forward complete I-9 securely.
 Proviews L 9 and undates

• 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 <u>Identity Finder</u> or other system to remove from laptop

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Digital Signatures

Digital signatures on the I-9 are acceptable for both in-person document verification and the authorized representative option. If a digital signature is not possible, the individual should print the document out, sign and date it, take a photograph of the document and submit securely to the Harvard I-9 Administrator.

A digital signature is an electronic signature but is distinct in that a digital signature is more secure and tamper-evident, using a certificate-based digital ID to authenticate a signer's identity and encrypts the document, permanently embedding the information in it. If a user tries to commit any changes in the document, then the digital signature will be invalidated.

Adobe Digital Signature

Most Harvard staff and students have access to adobe through the Software Center and can use the certificate option which allows you to set up a digital certificate. To get the certificates option, in the tools tab in Adobe find the "forms and Signatures" option and add "Certificates" select the "Digitally Sign" option and follow the steps to create a digital ID. If you are not the last signatory for the document, DO NOT "Lock" the document after signing.

Temporary Placeholder Numbers

Employees may work temporarily without a social security number (SSN). However, employees must apply for and provide Harvard with their SSN within **90** days from their hire date. Employees may apply for an SSN at the Social Security Administration Office and bring receipt of application to their I-9 Administrator. Employees who fail to provide an SSN within 90 days may result in **serious employment consequences.**

After the employee has received a permanent SSN the hiring department or employee needs to:

- Submit a copy of the card to Central Payroll (list HUID and last temporary number on copy) contact <u>ufs_crt@harvard.edu</u> notifying them you need to send the SS card via Harvard approved secure file transfer. They will respond with a specific email address to send the document. Do not send attachments to <u>ufs_crt@harvard.edu</u>.
 - Nonresident aliens should also update their <u>GLACIER</u> record and upload <u>updated documents containing their SSN</u> in order to have a tax review of adjustments to their tax withholding.
- 2. Central Payroll will update the personal information in PeopleSoft with the permanent SSN.
- 3. If individual is a student*, Central Payroll will send the number to the Student Accounts Office (SAO). It can take up to two business days for the permanent SSN to appear in PeopleSoft.

*Best Practice for Students: Students may update their SSN in my.Harvard; however, this does not automatically update their record in PeopleSoft or Equifax. If you are aware of a SSN being updated in my.Harvard, please email <u>I9help@harvard.edu</u> with the employee's name and HUID so Central Payroll can update appropriate I-9 tables.

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@onlinetax.net is forthcoming (which is sent ~24-48 hours later).
- 2. Employees receives email from support@online-tax.net and creates an account and complete GLACIER.
- 3. When selecting the button to print the GLACIER forms, open the 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.
- 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 a secure upload directly to the Nonresident Alien Team, "Secure upload of GLACIER Documentation", if you are a Harvard affiliate and have a Harvard key.
- 6. For questions or assistance including scheduling a 1:1 virtual appointment see <u>Nonresident Alien Tax</u> <u>Compliance website</u>.

PLEASE DO NOT SEND THE DOCUMENTS VIA EMAIL, MAIL, FAX, or IN-PERSON DROP OFF.

What is Accellion/Kiteworks

Harvard Secure File Transfer is enabled through 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
- Users must adhere to the Harvard Enterprise Information Security Policies
- See key features and benefits and requirements plus plug ins at <u>HUIT</u>.

To access Kiteworks go to: filetransfer.harvard.edu

Sending, Scanning and Storage of High-Risk Confidential Information (HRCI)

Scanning HRCI

Any HRCI that is scanned should be deleted from an individual's desktop immediately after it is no longer needed. <u>Identity Finder by Spirion</u> should be run on a regular basis to securely delete all HRCI. Following submission to Central Payroll, I-9s should not be stored locally. Please review <u>RMS policy on I-9 retention</u> at the local level.

Sending HRCI

I-9 information is considered high-risk confidential information (HRCI) and must follow For <u>high-risk</u> data, you can send encrypted messages and files directly from the <u>Outlook</u> web or desktop apps. This adds an extra layer of security to the message and its attachments (up to 150MB) and means only the intended recipient can view it. <u>Learn how to send an encrypted email and files using Outlook</u>.

For Harvard Google Users

For <u>high-risk</u> data, you can send a file securely using <u>Accellion Kiteworks</u>. It's important to note that Kiteworks doesn't encrypt the body of the message you send, so make sure any sensitive data is in the file itself.

²⁹ See: <u>Collaboration Tools Matrix | Harvard University Information Security</u>

What is Identity Finder by Spirion

Per Harvard University security policy, <u>http://policy.security.harvard.edu/</u>, 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. <u>https://policy.security.harvard.edu/faq/using-identity-finder</u> <u>https://huit.harvard.edu/identity-finder-security-tool-update-release</u> Data Classification - Administrative Examples | Harvard University Information Security

Equifax Electronic Harvard I-9 Administrator - Process

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 <u>I-9 Anywhere Support Guide</u>.

- a. 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.
- b. The employee will go their appointment and the remote agent will complete Section 2 and submit documents to E-Verify.
- c. Harvard I-9 Administrators must review the E-Verify response and complete any follow-up needed (e.g., Photo Matching).
- d. 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.
- e. 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 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. This option cannot be used for convenience or if the local hiring unit or employee has an on-campus presence.

- 1. See <u>Packet Form I-9 with Instructions for Employee and Authorized Representative</u>
- 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.
 - rately. 2023 Aug 17 I-9 Collection Processes

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