Title: I-9 Form Completion During University Remote Operation

Overview

This University Operating Procedure (UOP) is designed to allow the University to manage its I-9 process during University Remote Operation due to the COVID-19 pandemic, and to provide a plan for compliance once the University returns to normal operation. This UOP will be updated as requirements change in response to the evolving crisis.

This UOP is effective as of the date listed below and will be in effect during any period of University Remote Operation during which the Department of Homeland Security (DHS) permits remote document approval. It supplements the UVM’s I-9 UOP.

Applicability of the Procedure

The following procedures apply to all employees required to complete Section 1 of the I-9 form, as well as to the Authorized University Representatives (AURs) who are responsible for completing Section 2 and hiring managers and supervisors during University Remote Operation.

Definitions

**University Remote Operation:** any period of time that the University is operating remotely in compliance with federal or state guidance, such as a national state of emergency, and during which the Department of Homeland Security permits remote review and approval of I-9 documents.

The other definitions under this UOP are the same as under UVM’s I-9 UOP.

Procedures

I. Hiring

The University’s decisions regarding hiring and recruiting are evolving and will be communicated as circumstances change. Contact your Dean or Vice President for guidance before hiring or beginning a recruitment effort.

II. Onboarding Program Requirements

It is important to note that these procedures are temporary and apply only during University Remote Operation. If you are unsure whether these procedures apply to a current hiring situation, you are required to contact your HR representative or your VP/Dean to obtain further guidance.
I-9 Verification

Even during University Remote Operation, the University is still required to verify employment eligibility. With the exception of the changes listed herein, the University must still maintain compliance with the requirements outlined in its I-9 UOP.

Authorized University Representatives (AURs) who are taking physical proximity precautions during University Remote Operation will not be required to review the employee’s identity and employment authorization documents in the employee’s physical presence. However, an AUR must inspect the Section 2 documents remotely and obtain, inspect, and retain copies of the documents, within three (3) business days of the employee’s start date for purposes of completing Section 2.

Once Section 1 of the I-9 form has been filled out by the employee, the University will take the following steps to maintain form I-9 compliance:

- **Inspect**: A trained Authorized University Representative (AUR) will remotely review the employee’s acceptable documents using an approved University videoconferencing technology. Given the sensitivity of the information contained in the required documents, AUR’s are prohibited from using a non-approved technology for this review. Currently, UVM approves Microsoft Teams using either an @uvm.edu or @med.uvm.edu account or Zoom using an @med.uvm.edu account. The list of approved technology may be updated as circumstances change.

- **Retain Copies**: There are two options available for employees to provide copies of their required documents to the University.
  - **Preferred option**: Employees should send copies or images of their required documents to hrsinfo@uvm.edu through UVM’s file transfer service. HRS will follow-up with the AUR if they do not receive the documents on the same day as the I-9.
  - **Secondary option**: In the event that the employee is unable to provide copies of their required documents, while the employee is showing the documents to the AUR over videoconferencing technology, the AUR may take a screenshot using the print screen feature of the documents and immediately file transfer them to hrsinfo@uvm.edu. If this option is utilized, once the documents have been file transferred, the AUR is required to immediately delete the screenshot from their device and then immediately delete the screenshot from their recycle bin. Under no circumstances should these images be saved on a local device.

Special note regarding expired state ID or driver’s license:

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 state has extended the document expiration date 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. Confirm that the state has auto-extended the expiration date of state IDs and driver’s licenses by checking the appropriate state’s Department of Motor Vehicles’ website. Attach a copy of the state motor vehicle department’s webpage or other notice indicating that their documents have been extended.

Once Human Resource Services receives both the completed Section 1 of the I-9 and copies of the acceptable document(s), HRS will enter “COVID” into the applicable field in PeopleSoft at the same
time as when they document that there is a valid I-9 on file. This will allow HRS staff to run reports showing which employees have participated in the remote verification of Section 2.

Once the University has resumed normal operations, the University will be required to physically inspect the documents. Physical in-person inspection must occur no later than 3 business days after the termination of University Remote Operation. The University will accomplish this by taking the following steps:

- HRS will run a PeopleSoft report that will list out those employees whose required documents were reviewed remotely.
- The report will be provided to responsible department AURs. AUR or HRS will then perform a physical, in-person inspection of the documents and complete section 2 of the I-9 form.
- AUR’s will enter “COVID-19” as the reason for the physical inspection delay in the Section 2 Additional Information field.
- AUR's will add “documents physically examined” with the date of inspection to the Section 2 Additional Information field.

Additional Onboarding Information:

Hiring managers or supervisors should continue to register all new benefit eligible faculty and staff for both a New Hire Enrollment session and a Culture and Community session. Eligible employees will be able to participate in both sessions remotely during University Remote Operation.

Contacts

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<thead>
<tr>
<th>Questions concerning the daily operational interpretation of this UOP should be directed to the following:</th>
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<tbody>
<tr>
<td><strong>Title(s)/Department(s):</strong></td>
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<td>Human Resources Services</td>
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Forms/Flowcharts/Diagrams

- None

Related Documents/Policies

- [I-9 University Operating Procedure](#)

Training/Education

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<tr>
<th>Training Topic:</th>
<th>Authorized University Representative I-9 University Remote Operation Training</th>
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<tbody>
<tr>
<td><strong>Training Audience:</strong></td>
<td>Authorized University Representatives (AURs)</td>
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<tr>
<td><strong>Delivered By:</strong></td>
<td>Human Resource Services (HRS) with assistance, as needed, from the Office of Compliance Services</td>
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<tr>
<td><strong>Method of Delivery:</strong></td>
<td>Remote Videoconferencing</td>
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<td><strong>Frequency:</strong></td>
<td>As needed</td>
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## About This Procedure

<table>
<thead>
<tr>
<th>Responsible Official:</th>
<th>Vice President for Human Resources, Diversity and Multicultural Affairs</th>
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</thead>
<tbody>
<tr>
<td>Approval Authority:</td>
<td>Vice President for Human Resources, Diversity and Multicultural Affairs</td>
</tr>
<tr>
<td>Affiliated Policy Number(s):</td>
<td>7.13.1, UOP35</td>
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<tr>
<td>Effective Date:</td>
<td>April 17, 2020</td>
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<tr>
<td>Revision History:</td>
<td>None</td>
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