

## Human Resources Management - I-9 Verification & E-Verify Policy and Procedure

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### ***Policy and Procedure***

<b>Subject Area:</b>	Employment
<b>Policy Title:</b>	<b>I-9 Verification &amp; E-Verify Policy and Procedure</b>
<b>Policy / Procedure No:</b>	HRM061
<b>Responsible Office:</b>	Hiring department, HRM, ISSI, Office of University Counsel, Student Employment
<b>Documents Needed:</b>	Employment Eligibility Verification I-9 Form
<b>Special Instructions:</b>	Employment and continuation of employment is contingent upon satisfactory completion of the verification.

**POLICY:** To comply with federal regulations of the Immigration Reform and Control Act (IRCA), all employees are required to complete an [Employment Eligibility Verification form \(I-9 form\)](#). This law applies to all individuals hired, including part-time/temporary employees and students. Additionally, Northeastern University is an E-Verify employer. E-Verify is a web-based program administered by the U.S. Department of Homeland Security, USCIS Verification Division, and the Social Security Administration that supplements the current I-9 employment eligibility verification process. The program determines whether the information provided by the new hire matches government records and whether the new hire is authorized to work in the United States.

All employees must complete Section 1 of the I-9 form on day one of their employment. All employees must complete the I-9 form within three (3) business days of the date employment begins by providing appropriate documentation. Any employee who fails to complete the I-9 within the three (3) day time period cannot continue to work at Northeastern.

To maintain compliance, the appropriate Northeastern University designee must also certify Section 2 of Form I-9 AND prepare the E-Verify report within three (3) business days of the date of employment. The below procedure outlines the appropriate employer designee based on employee type.

### **Form I-9 and E-Verify Procedure**

**Administrative/Professional staff and Full-Time Faculty** - The Hiring department staff completes the I-9 form, obtains supporting documents, and prepares the E-Verify report. The I-9 form, photocopies of the supporting documents, and E-Verify report should be submitted to HRM no later than three days after the new employee's date of hire. All of the documents are retained in HRM.

**Office, Support, Technical, Crafts, Trades & Service staff** - All Office, Support, Technical, Crafts, Trades and Service Staff are required to report to HRM in 250 Columbus Place on their first day of employment. The I-9 form & E-Verify report are completed by HRM staff. The I-9 form, photocopies of the supporting documents, and E-verify report are retained in HRM.

**Employment Based Visa Hires** - The Office of University Counsel completes the I-9 form and E-Verify report for all new hires authorized to work in the U.S. with an H1B, O, TN, E-3 and other employment based visa statuses sponsored by the University. The original I-9 form, supporting documents and E-verify report are forwarded to HRM. A copy of the I-9 form, supporting documents and E-Verify report is retained by University Counsel.

**International Students and Scholars** - All new hires authorized to work in the U.S. with F or J visas are required to schedule an appointment with the International Student Scholar Institute (ISSI). The I-9 & E-Verify report are completed and retained at ISSI. A copy of the I-9 form, supporting documents and the E-Verify report is forwarded to HRM (staff, faculty, temporary non-students) or the Student Employment Office (students, co-op)

**Part time Instructors/ Adjunct Faculty** - The Hiring department staff completes and retains the I-9 form, supporting documents, and E-Verify report.

**Temporary employees** - The Hiring department staff completes the I-9 form, obtains supporting documents, and prepares the E-Verify report. The I-9 form, photocopies of the supporting documents, and E-Verify report should be submitted to HRM no later than three days after the new employee's date of hire. All of the documents are retained in HRM.

## **Students**

- *Work Study Students* - the Student Employment Office completes and retains the I-9 form, supporting documents, and E-Verify report.
- *Part-time/Temporary Students* - the Student Employment Office completes and retains the I-9 form, supporting documents, and E-Verify report.
- *Co-op Students* - the Student Employment office completes and retains the I-9 form, supporting documents, and E-Verify report.
- *International Students* - the I-9 is completed and retained in ISSI department and a copy is sent to the Student Employment Office, along with supporting documents, and E-Verify report.
- *Stipend Graduate Assistants* - are not employees of the University and are not required to have and an I-9 or E-Verify report completed.

## **Re-verifications & Re-hires**

Re-verification of the I-9 form: Federal regulations require Northeastern University to update and/or re-verify the I-9 form when one of the following occurs:

- An employee is terminated and then re-hired to the University - The original I-9 is valid only when the employee is re-hired within three years of the original hire date. Otherwise, a new I-9 form and E-Verify report must be completed. A new E-Verify report must be completed for all re-hires.

- An employee's work authorization is about to expire and a new or extended status has been approved, or, the employee's status has changed to another non-immigrant or to immigrant status. No new E-Verify report is required for work authorization re-verifications.

Re-verifications for terminated employees who are rehired within 3 years of the original start date should be completed at the location that the original I-9 is stored. For example, Office, Support, Technical, Crafts, Trades & Service Staff, Administrative & Professional Staff and Full-Time Faculty would report to HRM to re-verify their I-9, whereas Part-Time Instructors / Adjunct Faculty should report to their Hiring Department.

Re-verifications related to updated work authorization and visa updates should be completed at either ISSI (F & J visa status) or University Counsel (all employment-based visas).

### **I-9 Retention**

Northeastern University must retain a valid I-9 for all its active employees. Once an employee has terminated, I-9s are retained for three years from the original start date or 1 year beyond the employee's termination date, whichever date is later.

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