

# Guidelines for I-9 Managers Completing I-9s During COVID-19 Outbreak

## 1. DETERMINE IF THE EMPLOYEE'S START DATE CAN BE DELAYED

**First, determine if an employee's start date can be delayed until normal on-campus work resumes.** If possible, delay the start date until after on-campus work resumes. Complete the I-9 with the employee in person as normal. Do not create a Remote I-9.

**If the start date cannot be delayed,** use Tracker's Remote I-9 functionality.

## 2. INITIATE A REMOTE I-9

See the System HR website for a job aid: <https://www.hr.uillinois.edu/policy/formi9/jobaid-remotehire>

**Create the Remote I-9 in Tracker.** You will be prompted to enter the start date, employee's email address, and information for an Authorized Representative. The Authorized Representative is the person who will examine, in-person, the employee's documents for Section 2. If an Authorized Representative has already been identified, you may enter their information immediately. Otherwise, initiate the Remote I-9 without a representative's information so that the employee can complete Section 1 and contact the employee to identify an Authorized Representative.

## 3. DETERMINE AN AUTHORIZED REPRESENTATIVE

An Authorized Representative can be any person, designated by the university, to complete and sign Section 2. This person must understand the obligation and take the responsibility seriously. Due to liability in connection with the Form I-9 and verification process, the university **may refuse** any person from acting as an Authorized Representative.

**In order of most preferred to least preferred,** the individuals listed below may be designated as Authorized Agents for Section 2. **For numbers 2 and 3,** you should be sure to be available to answer any questions from the Authorized Representative. **For numbers 4 through 7,** it is *strongly* recommended that you be on the phone with the Authorized Representative as they inspect documents and complete Section 2.

1. An I-9 Manager of the new employee's hiring unit.
2. Another I-9 Manager, or a person with I-9 knowledge and training, at the university. (Central HR staff, other unit I-9 managers)
3. A person with I-9 knowledge and training at another organization or agency. (Former employer, another college or university, local office of a State agency)
4. A professional whose typical job duties include confidentiality, compliance, or otherwise suggest that they would understand the obligation of completing an I-9. (Notary, lawyer, accountant, agent, banker)
5. A colleague or coworker at U of I. This option may be used if the new hire's role is considered essential or requires on-site work, and other employees are present, but the I-9 Manager is not. (Hospital, certain student services, certain research)
6. An adult person over age 18 who is not a family member or household member of the new hire. (Neighbor, friend, clergy)
7. An adult person over age 18 who is a family member or lives in the new hire's household (Spouse/partner, parent, adult child, roommate)

Whoever is selected, you should contact the identified person directly to verify that they are willing to act as an Authorized Representative. Ensure that they understand the importance of the role and its responsibilities. Inform them that they will be receiving an email soon with a link to complete Section 2, and if they are not familiar with Form I-9, explain the process for reviewing documents and completing Section 2.

**If you feel that an Authorized Representative is not able to competently and correctly complete Section 2**, you may refuse that person as the Authorized Representative and ask the employee to find another. If there is no other appropriate person available to act as an Authorized Representative, contact your central HR office.

#### 4. AUTHORIZED REPRESENTATIVE COMPLETES SECTION 2 WITH EMPLOYEE

The Authorized Representative will meet with the employee, **in-person**, and verify documents. Then, they will complete Section 2 on your behalf. It is critically important that you be available to answer any questions that the Authorized Representative may have. If an individual is not familiar with Form I-9 (such as numbers 4 through 7 above) you may need to be on a phone call with the Authorized Representative to guide them through the process.

If the authorized representative is not a member of the employee's household, it is suggested that both parties wear a face covering and/or maintain 6 feet of physical distance in accordance with CDC and State of Illinois guidance.

The Authorized Representative, using a link received in an email from the Tracker system, will complete and submit Section 2 in Tracker.

#### 5. I-9 MANAGER APPROVES REMOTE I-9

After the Authorized Representative completes and submits Section 2, you must log in to Tracker to review and approve the finished I-9. **Carefully review Section 2** to ensure it was completed properly, then accept the I-9 as completed.

**Be aware that when you approve Section 2, you are accepting responsibility for the completion of that I-9, along with any errors that exist.** It is critical that you reject Section 2 and have the Authorized Representative re-complete it if you notice any problems.

#### 6. CONTACT CENTRAL HR WITH QUESTIONS

If you have any questions about the process, are unsure whether a person is an appropriate Authorized Representative, or encounter any other issues, contact your central HR office (<https://hr.uillinois.edu/contacts>).