

Northeastern University

HUMAN RESOURCES

Effective Date: October 1,
2013

Date Revised: May 4, 2015

Supersedes: I-9 Standard
Operating Procedure

Related Policies:

Responsible

Office/Department: Human
Resources Management

Keywords: I-9 verification;
E-Verify; Electronic Form I-9

Policy on Electronic I-9 Employment Eligibility Verification & E-Verify

I. Purpose and Scope

This policy is to provide guidance on complying with U.S. immigration laws, which require employers to hire only individuals who have authorization to work in the United States. The university must verify the identity and employment authorization of each person hired in the United States, complete and retain electronically a Form I-9 for each employee, and refrain from discriminating against individuals on the basis of national origin or citizenship. This policy applies to all employees hired in the United States, including faculty, staff, part-time/temporary employees and students.

Effective February 2009, the university is an E-Verify employer for all newly hired employees. Effective May 2010, the university is also an E-Verify federal contract employer for current employees who are working on/assigned to federal contracts with the Federal Acquisition Regulation (FAR) E-Verify clause.

II. Definitions

Electronic Form I-9 is an employment eligibility verification form that is required to be completed by all employees hired in the United States after November 6, 1986.

E-Verify is an Internet-based system of the U.S. Department of Homeland Security that compares information entered from an employee's completed Form I-9 to data from U.S. Department of Homeland Security and Social Security Administration records to confirm an employee's identity and eligibility to work in the United States.

Assignment to a federal contract is defined at the university as receiving payment from a contract, except for senior personnel listed on a contract who are automatically assigned as working on a

contract regardless of payment and the contract award effective date is used to determine assignment date.

III. Policy

The university only hires employees to work in the United States who have employment authorization. Accordingly, an electronic Form I-9 and E-Verification must be completed within the time periods provided by applicable laws. The electronic Form I-9 and E-Verify process cannot be completed until after an offer has been extended and accepted. Newly hired employees must electronically complete and sign Section 1 of the Form I-9 after acceptance of the offer of employment but no later than the first day of employment. Thereafter, all employees must complete the electronic Form I-9 within three business days of the start of employment by providing appropriate documentation that establishes identity and employment authorization. Any employee who fails to complete the electronic Form I-9 within the three day time period cannot continue to work at the university.

The appropriate university designee must also electronically certify Section 2 of the Form I-9 and prepare the E-Verify case report within three business days of the employee's first date of employment.

Current employees who are working on/assigned to federal contracts with the FAR E-Verify clause must be E-Verified by the appropriate university designee, unless exempt, within 90 calendar days after the date of award or 30 calendar days of the employee's assignment to the contract, whichever is later.

IV. Additional Information

Electronic Form I-9s for all employees, except students, must be retained for either three years after the date of hire or one year after the employment ended, whichever is later. Electronic Form I-9s for all student employees must be retained for seven years after graduation or the official inactive date.

The Electronic Form I-9 is located on the Human Resources Management website.

V. Contact Information

HRM Customer Service Center: 250 Columbus Place; 617-373-2230; HRMInfo@neu.edu