Interim I-9 Procedure (Inspection of Personal Documentation)

PURPOSE:
The US Department of Homeland Security (DHS) is allowing employers to review Form I-9 documents outside of the employee’s presence under circumstances defined in this procedure. As of Wednesday, March 18, 2020, CSUSM Corporation has taken physical proximity precautions due to COVID-19, requiring personnel to work remotely. The purpose of this procedure update is to allow the ability to hire new employees and remain compliant with I-9 requirements during the COVID-19 telework period.

SCOPE:
The scope of this procedure update is limited to the completion of the I-9 (including reviewing of documentation to confirm the new hire’s ability to work legally in the United States) for the duration that telework for CSUSM Corporation is in place as a result of physical proximity precautions due to COVID-19.

PROCEDURE:
A representative of Human Resources is authorized to review Section 2 documents over video conference, fax, or e-mail and obtain and retain copies of the documents within three business days of the date of hire.

I. The HR representative that is completing the I-9 should enter COVID-19 as the reason for the physical inspection delay in the additional field in Section 2.

II. Once normal operations resume, all employees who were onboarded using remote verification must report to CSUSM Corporation HR within three business days for in-person verification of their identity and employment eligibility documentation.

III. Once the documents have been physically inspected, the HR Representative will add "documents physically examined" with the date of inspection to the Section 2 additional information field.

These provisions are in effect until May 19, 2020 or within three business days after the termination of the national emergency, whichever comes first.

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