

Instructions for Updating Form I-9 (for physical inspections of remote workers hired under the COVID-19 Temporary Flexibilities Program)

COVID-19 Temporary Flexibilities Program for Form I-9 ended on July 31, 2023. Employers were required to return to in-person inspection of documents (unless using the [alternative method](#)) and should have gone back and **physically reviewed** the documents of any employees that were not physically reviewed at the time of hire, no later than August 30, 2023. Below are the instructions to help you determine if all of your Form I-9 documents have been reviewed.

1. Pull a list of your employees from the Questco Portal.
 - a. Reports – Client – Report – Data Retriever
 - b. Include – Last Name, First Name, Employment Status, Last Hire Date, Resident City, Resident County, Resident State, Resident Zip Code, Work Email Address
 - c. Identify active employees that were hired remotely between March 2020 and July 2023.
2. Download the I-9's of the employees that need documents examined. Use the Advance Search feature in the Questco Portal. Instructions are included on page 5 of the [Document Management User Guide](#). Clients can contact our Customer Care Center at 1-800-256-7823 for further guidance. Clients can also provide a list of affected employees to their Client Success Manager who will request the I-9's to be downloaded for the client.
3. Ensure the employees and company authorized representatives who are physically examining the documents are trained to do so. Provide samples of completed and updated I-9's from the [USCIS website](#) for direction.
4. Provide the original completed I-9's to the employees or company authorized representatives who are physically examining the employee documents. Also provide blank copies of the Form I-9 in case there is a need to complete a new Section 2.
5. Ensure all E-Verify queries were processed at hire, if applicable. Do not E-Verify again.
6. Once the physical inspections have been completed, follow the directions in the Document Management User Guide on page 2 for uploading the updated I-9's into the employee documents section in the Questco Portal.
7. Ensure that you have a written Remote Onboarding and Teleworking Policy for remote employees. Contact your Questco HR partner for assistance if needed.



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Examples

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When the employee was hired remotely, and the I-9 documents were inspected remotely, (scanned and emailed, uploaded to system, viewed virtually through Zoom, Teams, or other online platform), a comment in the Additional Information area in Section 2 was required at time of hire.

Additional Information Remote inspection completed on 03/30/2020
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Note: If a comment was not included at hire, the person who is updating the I-9 can insert a comment such as, “*Due to COVID-19, I-9 was completed remotely at hire*”. If they are the same person that completed the I-9 at hire, they can just put their initials and date. If they are not the same person that completed the I-9 at hire, they should type their whole name and date.

Same Documents AND Same Person Who Remotely Inspected

If the employee presents the same documents they used at hire to complete the I-9 as they are now using for the physical inspection AND the same person who remotely inspected the documents at hire is the one completing the in-person inspection, they will write in the Additional Information area in Section 2, “Documents physically examined on [date] by [initials]”.

Additional Information Remote inspection completed on 03/30/2020 <i>COVID-19 Documents physically examined on mm/dd/yyyy by AA</i>



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Same Documents AND Different Person Who Remotely Inspected

Follow the same steps as above with the exception of adding full name and title in the Additional Information area in Section 2.

Additional information Remote inspection completed on 03/30/2020 <i>COVID-19 Documents physically examined on mm/dd/yyyy by HR Manager Betty Ross</i>
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Different Documents AND Same Person Who Remotely Inspected

Employees can provide their choice of identity and work authorization documents when presenting documents for physical inspection updates.

If an employee presents different documentation than what was given at hire for remote verification, there are two options:

Option 1 - Complete a **new** Section 2 of Form I-9

- a. Physically review the presented documents and complete List A or List B AND List C.
- b. In the Additional Information area, note “Documents Physically Examined” with the date of inspection and the reviewers initials.
- c. Complete the employee’s first day of employment field in the middle of the page as well as the signature, today’s date, title, last name, first name, employer’s business name, employer’s business address, city, state, and zip code.
- d. Add the new Section 2 to the original I-9 and scan into employee documents in the Questco Portal.

Option 2 - On the **same I-9**, in Section 2 in the Additional Information area, the document(s) title, document(s) number, issuing authorities, and expiration date(s) (if any) of the new document can be listed and notate “Documents Physically Examined”. Initial and date when reviewed.

Please note that DHS recommends option 1 as a best practice.

Different Documents AND Different Person Who Remotely Inspected

Follow Option 1 or Option 2 above. In Additional Information area, note “Documents Physically Examined” with the date of inspection and the reviewers full name and title.



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