

POLICY

Effective Date: May 31, 2007
Revised: April 3, 2012
Approved By: President's Council

Authority: [8CFR274a](#); [26CFR31.3402\(f\)\(2\)](#);
[29 CFR 516](#)

See Also: [PRO-U5400.11A](#) Processing New Hire Documentation Through Human Resource
[POL-U1600.02](#) Ensuring Equal Opportunity and Prohibiting Discrimination and Retaliation

POL-U5400.11 ONBOARDING AND VERIFYING EMPLOYMENT ELIGIBILITY

This policy applies to all temporary or permanent faculty and staff including students. FLSA exempt and FLSA non-exempt professional staff, and faculty positions that are either temporary or permanent.

Definitions:

Appointing Authority: An individual lawfully authorized to appoint (hire), transfer, layoff, reduce, dismiss, suspend or demote employees.

Employee: An individual who receives wages or other remuneration from the University for performing labor or services and is not an independent contractor.

Employment Eligibility: Providing documentation required by the U.S. Citizenship and Immigration Services (see 1-9 form), and proof of a valid social security number or that an application for one has been made.

Hiring Authority: An individual designated by the Appointing Authority to exercise responsibility for requesting employment applications, interviewing eligible candidates, and recommending appointment of individuals to positions.

Onboarding: The process by which new employees acquire skills, knowledge and understanding to become effective and productive members of the University. This includes new hire paperwork, new hire orientation, and building and establishing engagement through extensive employee/human resources interaction through the first six months of employment.

1. Vice President For Business And Financial Affairs Ensures Compliant Process for Determining Employment Eligibility All Employees

The Vice President for Business and Financial Affairs (BFA) will ensure hiring procedures are implemented to:



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- a) Verify the identity and employment eligibility of all employees in accordance with applicable laws and guidelines, and
- b) Preclude unlawful employment.

The Vice President delegates the daily operations of verifying employment eligibility to the Director of Human Resources (HR).

2. Employment Is Contingent Upon Eligibility Verification and Completion of Required Paperwork

All offers for and continuation of employment with the University are contingent upon verification of employment eligibility. Hiring authorities must ensure new hire paperwork is completed and that any newly hired/rehired employee does not perform University work until authorized by HR. New hires and rehires must complete required paperwork with HR.

Exceptions:

- a) With approval from the Vice President for BFA and completion of required training, a department or program may be delegated authority to complete 1-9 forms in compliance with HR procedures.
- b) With HR approval, new hires, rehires or current employees who reside and work out of the area may have their 1-9 forms completed by a notary, WWU extension site or HR representative of another employer.

Original I-9 forms completed by a) or b) above must be submitted to HR for final approval and retention.

Hiring authorities must ensure current employees with temporary staff authorization perform University duties only within the timeframe authorized by HR. No exceptions will be made.

HR will contact hiring authorities to facilitate the termination of any employee found to be without valid work authorization.

3. Employment Will Be Delayed or Terminated Without Valid Work Authorization

If employment eligibility and required paperwork is not completed within required timeframes, employment shall be delayed or terminated as required by HR. Employees with temporary work authorization shall provide updated eligibility documentations no later than the expiration date to maintain employment eligibility.

Exception: Only exceptions allowed by the U.S Citizenship and Immigration Services (USCIS) will be allowed.

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Employees who intentionally provide falsified information will be denied employment or be immediately terminated.

4. HR Director Ensures Employee Records are Completed and Maintained Appropriately

Completed employment documents will be maintained by HR. No other University department personnel will keep any original or copies of employment eligibility forms or employee documents (i.e. passport, social security card) including departments given authorization to complete I-9 forms.

Exception: The official designee for International Programs and Exchanges may maintain copies of documents for the purposes of assisting foreign nationals in applying for visas for academic purposes.

5. Personnel Shall Use Information for Employment Eligibility Purposes Only

Employment eligibility documents will be reviewed by authorized personnel and used only for employment, auditing and Internal Revenue purposes. Personnel found to be using employee information for fraudulent and unfair practices will be subject to disciplinary action including termination.

6. Leadership Ensures Compliance

Executive officers and chairs/directors will ensure that internal procedures are established and compliance is achieved in their respective areas.

7. New Employee Orientation Is Required

Supervisors are responsible for ensuring their new hires complete New Employee Orientation within the first two weeks of employment. Upon approval by the appropriate Vice President, extensions may be granted.

Exception: Orientation may not be required for student employees.

8. Human Resources Director Will Ensure Training Is Provided

The Human Resources Director will ensure training on this policy and relevant procedures is provided to hiring departments.