Records Management Policy: RMP-2021-12

Subject: Records Transition for Transferring and Departing Departmental Staff

1. Effective Date:

This policy is effective as of August 3, 2021.

2. Version:

Version #	Description	Comment
1.0	Initial Policy	Initial Policy Issued

3. Rescissions:

None.

4. Prepared By:

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5. Purpose

This policy outlines:

- 1. the requirements for Departmental Staff to properly allocate Federal Records before their departure from the U.S. Department of the Interior (Department, DOI), (whether by transfer, separation, retirement, or removal); and
- 2. the criteria for transfer of email in cases of bureau to bureau transfers.

6. Scope

This policy applies to all departing or transferring Departmental Staff. Bureaus and offices may issue implementing procedures consistent with this policy.

7. Authorities

- A. 380 DM 1 Records Management Program Roles and Responsibilities
- B. Office of Management and Budget Memorandum M-20-33- *Guidance on Presidential Transition* <u>Preparations</u>
- C. <u>National Archives and Records Administration (NARA) 2016 Web Publication Documenting</u> <u>Your Public Service</u>
- D. <u>NARA Bulletin 2013-03</u> *Guidance for agency employees on the management of Federal records, including email accounts, and the protection of Federal records from unauthorized removal*

8. Policy

- A. Departing Departmental Staff must manage their records in accordance with Federal Records management laws, regulations, and policies.
 - 1. Federal Records that have not met disposal dates must be left with the bureau or office from which the employee is departing. Departing staff must formally identify record locations and ensure those are accessible to the appropriate Managers and Supervisors or other designated Departmental Staff.
 - 2. Federal Records responsive to active Freedom of Information Act (FOIA) requests, or subject to litigation or other independent preservation holds should be identified and preserved inplace for ease in finding. Litigation preservation requirements cannot be superseded without written release authority from the Office of the Solicitor.
 - 3. Temporary Federal Records past their disposition date may be destroyed in accordance with RMP-2020-03 Records Disposal Authorization.
 - 4. Transferring Departmental Staff may retain copies of Federal Records in rare cases only after review and approval of the originating Responsible Records Officer (RRO). The RRO approval must be based on a documented business need for the records to be retained by the employee in their new role, and the retention must be relevant to the organization they are transferring to:
 - a. The original record must be maintained by the bureau or office from which the Departmental Staff is leaving.
 - b. Transferring Departmental Staff may retain copies only if transferring to another DOI bureau or office with responsibilities that are inherently the same.
 - c. Departmental Staff may request to have selected personal email and documents transferred to their new accounts. Items such as their own Employee Performance Appraisal Plans (EPAPs) and email contacts are examples of such personal documentation.
 - 5. Separating, retiring, or removed Departmental Staff may not take copies of records unless approved by the RRO. Departmental Staff will typically not be allowed to take copies of Deliberative Material or materials that contain personally identifiable information of other individuals.
 - 6. High Level Officials (HLOs) including Political Appointees (PAs) have more stringent requirements for their records. All information on their government furnished equipment (GFE) are backed up after departure, are retained in the Department's electronic records management system, and may be transferred to NARA in accordance with NARA-approved records schedule retentions.
- B. The Active Directory Account of Departmental Staff transferring from bureau to bureau is updated to align with the new bureau. The employee transfer requires new certificates to be loaded on the Personal Identity Verification (PIV) card and disables access to the previous network, shared drives, OneDrive, and email from the separated bureau. Only the new email account reflecting the new organization may be used by any employee after they transfer to the new bureau; the employee may not use the previous email account. Specific email or shared files

can be copied on an exception basis with the approval of the RRO from the separated bureau.

9. Responsibilities

All Departmental Staff are responsible for managing Federal Records and completing necessary documentation before separation.

- A. Departing Departmental Staff:
 - 1. Notify Supervisor and Human Resources Office of impending departure and departure date once known.
 - 2. Complete Bureau/Office Exit Clearance and Records Management Exit Clearance (DI-4013) forms.
 - 3. Coordinate identification and maintenance of all Federal Records with the office Administrative Staff.
 - 4. Remove all personal (non-business related) information from GFE and systems.
 - 5. Contact the RRO for validation and authorization if intending to take copies of records prior to exiting. Depending on the volume for consideration, coordination days in advance are required to ensure timely handling of the request.
- B. Office Administrative Staff:

Maintain Federal Records identified by departing Departmental Staff.

- C. Managers and Supervisors:
 - 1. Ensure Bureau/Office Exit Clearance form is completed and signed by all required offices. Maintain form in the departing employee's Supervisory Personnel Folder.
 - 2. Complete the records clearance process on behalf of their Departmental Staff if the employee is unavailable for any reason.
- D. Responsible Records Officer
 - 1. Send "Pending Departure" email to departing employee when identified as being in a High Level Official or Political Appointee position. Include DI-4013.
 - 2. Perform, or delegate to Records and Information Management Staff, the pre-exit brief to answer records management questions and review records transfer when requested.
 - 3. Coordinate with IT Help Desk to approve email transfer to the new account.
 - 4. Coordinate with IT Staff to collect GFE and backup data of HLOs and PAs.
 - 5. Maintain completed DI-4013 as an official record.
 - 6. Maintain backup data for HLOs and PAs in the DOI electronic record keeping system.