2015

UW- Madison Guidance for
Managing the Records of Departing Employees*

*Changing positions, transferring to another agency, leaving University employment.

Questions? Contact the University Records Officer
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Introduction

The University of Wisconsin-Madison is committed to records management best practices such as ISO 15489 and the Generally Accepted Recordkeeping Principles, and remaining in compliance with the Wisconsin Records law (Wis. Stat. § 16.61 and § 16.62), Wisconsin Wis. Admin. Code ch. 12. Electronic Records Management-Standards and Requirements, and University of Wisconsin Board of Regents Policy 3-2.

After an employee leaves University employment, records created and/or held by the employee in the course of his or her employment must be accessible to the University. When an employee is departing, the employee and his or her supervisor must take steps to ensure this result, and to ensure that University records are not inadvertently destroyed, made inaccessible, or made public. This guidance is provided to ensure proper management of the records of departing employees in both physical and electronic formats. The records of previous employees should be available to the University for any purpose, including to respond to open records requests, to be produced in response litigation, and to meet guidelines for retention of records.

What is considered a University Record?

Under Wis. Stat. § 16.61(2)(b), University records are any papers, books, photographs, tapes, films, recordings, or other documentary materials, or any copies thereof, regardless of physical form or characteristics, made, produced, executed, or received by any department or office of the University or by any academic or administrative staff member in connection with the transaction of University business, and retained by that agency or its successor as evidence of its activities or functions because of the information contained therein.

Certain categories of materials are *not* considered records:

- Stocks of printed or reproduced documents kept for supply purposes when file copies have been retained for records purposes.
- Books, periodicals, newspapers, and other library and museum materials made or acquired and preserved solely for reference or exhibition purposes.
- Preliminary drafts of letters, memoranda, reports, worksheets, and informal notes which do not represent significant basic steps in the preparation of the record document.
- Convenience copies of reports, memoranda, etc., for which your office was not the originator or the office of record, and which have not been annotated by your office.
- Materials not filed as evidence for department operations that have no informational value, such as telephone call slips, letters of transmittal, route slips, etc.
- Electronic backup which is used to bring a system up after a disaster for recovery of systems only.

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When there is any doubt as to whether or not any document (paper or other format), record, or group of records is a University record, it should be considered an official record until determined otherwise.

While the definition of University records generally excludes books, periodicals, and other printed material, certain types of publications are collected by the UW-Madison Archives as official records of the University as defined in the University Records Schedules.

Other Definitions:
The following Definitions are from *ARMA International, Records and Information Management for Information Technology Professionals: An ARMA International Guideline, 2009.*

Archives:
1. The documents created or received and accumulated by a person or organization in the course of the conduct of affairs and preserved because of their continuing value.

2. The building or part of a building in which archives are preserved and made available for consultation. Also referred to as an archival repository.

3. The agency or program responsible for selecting, acquiring, preserving, and making available archives. Also referred to as an archival agency, archival institution, or archive program.

Archiving:
1. To back up electronic record or data or to store such information offline yet available for further use.
2. To conduct all activities related to caring for records of continuing value.

Back-up:
A copy of information or data to be used for recovery and created as a precaution in the event that the original is intentionally or inadvertently lost or destroyed.

Convenience File:
An unofficial file, containing copies of documents that is maintained for ease of access and reference, physically located near the point of usage. Usually considered non-records.

Data:
Groups of characters that represent a specific value or condition. Data provide the building block of information.

Destruction:
The definitive obliteration of a record beyond any possible reconstruction. *Also see Disposition*.

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Disposition:
The final administrative actions taken with regard to records, including destruction, transfer to another entity, or permanent preservations. *See also Destruction.*

Litigation Hold:
A hold placed on the scheduled destruction of records due to foreseeable or pending litigation, governmental investigation, audit, or special organizational requirements.

Migration:
The process of moving data from one information system or storage medium to another while maintaining the records' authenticity, integrity, reliability, and suitability. **Note:** Migration is done to ensure continued access to the information as the system or medium is replaced, becomes obsolete, or degrades over time.

Retention Period:
The length of time a record must be kept to meet administrative, fiscal, legal, or historical requirements.

Retention Schedule:
A comprehensive list of records series, indicating for each the length of time it is to be maintained and its disposition. Also referred to as records retention schedule or records schedules. [ARMA-Filing systems]

State Records Center:
UW-Madison's offsite storage facility for inactive records.

Roles and Responsibility's

This document provides guidance to University employees and supervisors and defines their roles and responsibilities. It is the joint responsibility of the Department/Division Supervisors and Managers, and the IT Administrators to have a defined process for management of a departing employee's records.
See Appendix 1 for the Public Records Board Guidance to Transitioning Employees.

Employee's Responsibility
Employees have a responsibility to manage and maintain all records that they create as part of their job and as an employee of the University. Responsibilities are covered in *"Your Work Responsibilities and University Records"* on page 4 under *"Upon Leaving Your University Position."*

When an employee leaves a position, all records under the control of that employee should be reviewed by the employee. This includes records in shared spaces about which the employee has sole or substantial knowledge.

Prior to separation the employee should inventory his or her records and provide to his or her supervisor information including the nature (i.e. electronic or hard copy) and the location of the

records.   The employee should dispose of any non- records such as duplicates, drafts, work notes, and working copies of other copy files and may dispose of any other records that have reached their retention period.

Manager's/Supervisor's Responsibility
It's the Manager or Supervisor's responsibility to ensure that the departing employee have identified the records he or she was managing and the location of those records. The Manager or Supervisor is further responsible for ensuring that the records are properly stored, transferred, or destroyed as indicated by the UW-Madison Records Retention and Disposition Schedules.

Records should be transferred to the appropriate co-worker or colleague, or to another location such as a Service Account where email and other electronic records can be accessed to ensure continued smooth operation. Managers or Supervisors should also be in contact with their IT Administrator to ensure appropriate management and accessibility of records. Employee access is to be removed from databases or other electronic records to preserve integrity of the records and protect confidential and sensitive information.

IT Administrators Responsibility
IT Administrators should follow IT best practices when managing data. When an employee leaves the University or transfers to a new unit, IT staff should work with the departing employee's Manager or Supervisor to ensure that electronic records are identified, captured and maintained. Attached is a Sample form which IT Administrators can reference. This form is not required, but is to be used as guidance if there is no current process in place.
See Appendix 3.

Employee Controlled Sources of Records
Employee records can exist in many storage locations such as on employee desktops or laptops, email, file share and other collaboration spaces such as OneDrive and UW-Madison Box, GoogleDocs, and Dropbox, portable storage media such as external hard drives, flash drives CD/DVD's, mobile devices if used for University business, cloud-based storage, social media, and hard copy records.

The following is a checklist of locations which would be controlled by the employee:

Paper Records:
  ✓ Review the piles of records on the desk, and around the desk
  ✓ There may be records or documents in boxes
  ✓ There may be records stored in the workspace or down the hall in a closet
  ✓ File cabinets should be reviewed in the employee's individual workspace

Electronic Records:
The employee may have electronic records stored on their hard drive and drives on their

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desktop. There may also be collaborative areas, email, personal devices, and laptops, etc. which may contain the employee's work and files which are University related.

Collaborative areas:
These areas are usually tied to the person and not to the department and should only be used to share documents and collaborate with others. Examples of collaborative areas are UW-Madison Box, Google Apps or Dropbox and OneDrive. Any University records should be moved to a shared drive or UW-Madison Box Project Directory.

If using UW-Madison Box, contact IT to set up a project directory so those that are authorized to have access can get to the information. See Knowledge Base on UW-Madison Box Project Directory https://kb.wisc.edu/box/page.php?id=36230.If using Microsoft Office OneDrive clear it off onto the Box Project Directory if possible.

If you are no longer affiliated with the University and lose your NetID eligibility, you will no longer be covered under the UW-Madison Enterprise agreement with Box. The University will no longer be able to access your UW-Madison Box account. Therefore, it is your responsibility to work with your supervisor to identify, migrate, and/or properly store all UW-Madison records so that they can be held in accordance with public records schedules and accessed by UW-Madison if necessary. In addition, you will have the option of migrating your Box account data to a personal account. Because personal accounts are only eligible for 1GB of storage space (as opposed to 50GB+ for an enterprise account), it will be your responsibility to make accommodations for the reduced space. The exact procedure for this enterprise to personal account migration has not yet been determined.

Removable media: such as USB sticks or thumb drives, CD's, floppies, etc., and record/data should be inventoried and accounted for and transferred to a shared network if available.

Email:
Delete e-mail records which have met retention under the Business Communication Schedule and those that are considered non-records under Wis. Stat. 16.61. Delete e-mails and their attachments depending on the application and empty the Trash.

Contact your IT Department to get assistance to pass e-mail on to the appropriate co-worker or colleague.

Set up an email Service Account to keep email that will be needed to meet retention or open records requests.

If the retention schedule indicates a disposition to transfer to the archives, contact UW-Madison Archives to find out the appropriate way to get electronic records transferred and correct format.

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In all cases the email attachment is to be kept as part of the record.

For Office 365 email a group email can be requested. See Office 365 Getting Started with Groups. https://kb.wisc.edu/office365/page.php?id=52404

What to do with Records?
Supervisors and the employee should review the records to ensure that coworkers who are working on those projects have the records that they will need. Records not currently needed should still be stored in an accessible location.

Records that do not need to be passed along to another coworker should be reviewed to determine if the records should be destroyed by referencing the UW-Madison Records Retention and Disposition Schedules for appropriate records schedules. Note that the retention and disposition schedule applies to all records in all formats and medium in both electronic and paper.

Transfer any records to the State Records Center that are not needed on-site, but have not met retention according to the records retention schedule.

If records are eligible to transfer to the UW-Madison Archives, contact UW-Madison Archives for instructions on how to transfer or see Archives: Transferring Materials from Campus Partners.

See Resources on the next page.

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Resources used for this guideline include:

1. Generally Acceptable Recordkeeping Principles, ARMA International

2. Board of Regents Policy 3-2 (University of Wisconsin System. Public Records Management

3. Wisconsin Wis. Admin. Code ch. 12. Electronic Records Management-Standards and Requirements

4. International Standard ISO-15489 2001-09-15. "7.2 Characteristics of a record," p13

5. "Records and information management for information technology professionals: an ARMA International guideline." Cynthia Hodgson - ARMA International - 2009

6. Archives & Records Management Bulletin. UW-Madison Records Management Program. A Periodical Bulletin from University of Wisconsin-Madison. Bulletin#1. "Your Work Responsibilities and University Records," page 4 under "Upon Leaving Your University Position."

7. Harvard Records Management Services Harvard University Archives, "Managing The Records Of Departing Employees." Accessed 08/03/2015

8. Vestuto, Richard, JD. "Critical Steps to Creating a Consistent Preservation Hold Process." Information Management Journal July/Aug (2015): 16-22

9. UW-Madison Box - Project Directories

10. Office 365 Knowledgebase on Office 365

11. UW-Madison Records Retention and Disposition Schedule

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Records Guidance for Transitioning* Employees
*Changing positions, transferring to another agency, leaving state employment, moving office locations

What are Employee Responsibilities?

Basic obligations regarding state records:

- Know how to identify public records and how long to retain them.
- Manage paper and electronic records created as part of your job duties.
- File e-records (including email) according to a filing plan in a shared drive location.
- Dispose of information that is not a record.

When to Review?

Review electronic and paper files for official department records:

- when employees change positions, transfer or terminate.
- when office locations change.
- during monthly or annual cleanup events.

What is a Record?

A record is a final form of information (not work in process), in any medium, preserved because it is either (a) of historical value or (b) evidence of departmental functions; for example:

Policies and procedures	Operations and activities
Decisions	Programs and Projects

What about Email?

Email may contain official records, particularly in the Sent folder, which contains messages that you authored. Email messages that are records must be kept according to the appropriate Records Disposal Authorization (RDA) or General Records Schedule (GRS) for the information carried in the e-mail. There is no single retention period for email. Check with your supervisor as to how email records should be retained in your agency.

Employee Actions

1. Review piles on your desk, items in boxes, file cabinets and binders.

   - If you have paper records that should be transferred to the State Records Center or the Wisconsin Historical Society, contact the department Records Officer for assistance.

   - For paper no longer needed, there should be containers placed within the area for recyclable, garbage, and confidential. Put confidential documents or documents with personally identifiable information on them in the properly marked containers or shred them.

2. Move department e-records, including email, to a shared drive or records repository subject folders that are backed up so the information can be accessed by anyone who might need it.

3. Work with supervisor or department Security Officer to determine where agency confidential records should be retained.

Wisconsin Public Records Board (PRB): Protecting the legal, financial and historical interests of the state in public records.
For more information visit: http://publicrecordsboard.wi.gov

4. Check with supervisor on how email records should be retained for the agency.

   ▪ For those agencies that do not allow saving email outside the email program, remember to follow paper records management guidance for printed email records.

   ▪ Notify your supervisor of email records that need to be saved and ask to whom to transfer them.

   ▪ Empty email mailbox, saving records to the Local Area Network (LAN) and deleting non-record and transitory record messages (see examples below).

5. Empty local drive and personal user directories.

6. Seek permission from your supervisor if you wish to obtain copies of any of the department's files for use in your new job, such as examples of your work.

RETENTION REQUIREMENTS: To find retention policies for your business area, contact the department Records Officer for assistance. Agency Records Disposition Authorizations (RDAs) and statewide General Records Schedules (GRS) provide requirements on the length of time an office must keep particular records.

NOTE FOR ALL EVENTS: Dispose of any non-records not subject to a legal hold, such as drafts, work notes, and working copies of other files. Dispose of transitory (short-term) records that have reached their retention period, typically 7 days.

Non-Record Examples:

1. Personal information not related to business.
2. Reference material.
3. Duplicate copies maintained for convenience purposes only.
4. General announcements (received by all staff).
5. Computer-generated responses or confirmations.

Transitory (short-term) Record Examples:

1. Correspondence and information of short-term interest that has no documentary or evidentiary value.
2. Routine requests for information or agency communications.
3. Mail transmittals that add nothing of substance to the enclosures (e.g. "FYI").
4. Internal meeting notices are transitory to the recipient if no action is required.
5. Communications or announcements from distribution groups or listservs that:
   a. Don't direct action or require compliance.
   b. Don't relate to recipients' work project or decision making.
   c. Are used for reference purposes only.

Wisconsin Public Records Board (PRB): Protecting the legal, financial and historical interests of the state in public records.
For more information visit: http://publicrecordsboard.wi.gov

Appendix 2

Sample IT Guidelines and Form

IT Inventory Locating & Evaluation Electronic Files for Employee Separation

This form is to be completed by the employee's appropriate supervisor and turned in to the Departments IT and HR Rep on or before the date of departure.

Employee Name: _____

Employee Supervisor/Manager:
_____

Employment Type (please circle): FTE   LTE   Student   Project   Other_____

Last Day of Employment: _____ (mm-dd-yyyy)

RECORDS RETENTION
In order for the university to be in compliance with the approved university records retention schedules and request for public records supervisors are to review where records are stored and work with IT to relocate to a share space for new employee to access.

Have you reviewed the separating employee's work related data and email for any records retention requirements specific to your area?

　　　___Yes   ___No

Please check below where university records/data were stored by the separating employee.

CHECKSHEET WHERE RECORDS MAY BE STORED

_____ Paper Record in Cabinets, Closets, Attics, Basements, Off-site
_____ University E-Mail account
_____ Outside E-mail accounts used for University Business
_____ Employee /Personal Desktops/ and if applicable hard drives for back-up purposes
_____ Electronic Share Drives folders
_____ UW- Madison branded Box.net or other collaborative application like Sharepoint
_____ Personal Device – What it used for university business?
_____ Other media such as photos, audio etc.
_____ Turn in jump drives or other media if they were UW Property
_____ Social Media sites
_____ Websites

Official University Records Schedule are found on the UW-Madison Records Mgt. Program site - http://archives.library.wisc.edu/records/Index.html

IT Network Account, University Email, and Data Retention

The supervisor is required review all work related data and email files for the separating employee for any relevant **records retention requirements** specific to their area.

Below are the default disabled and retention time frames for the separating employee's network account, email account, and home drive/personal data files and personal UW-Madison Box account or other accounts.

The network account, home, local desk top, drive data. Notification to DOiT to have email accounts are disabled at the end of business on their last day of employment.

Unless the supervisor completes an extension/exception all accounts and data are deleted after the default retention date.

See below extension and exception options.

For any clarification or employee situation not covered by this form please contact your IT directly.

Account / Data	Disabled Date	Default Time Retained
Network Account	Last Day of Employment	180 Days
Email Office 365	Last Day of Employment	180 Days
Drive Home/Personal Data	Last Day of Employment	180 Days
UW-Madison Box Account	Last Day of Employment	180 Days

IT NETWORK ACCOUNT INFORMATION

Separating Employee's Network Account Name:_____

Will you require IT to keep the separating employee's IT network account longer than **180 days** after their last day of employment?

___**Yes**   ___**No**

If **Yes,** how long will you require IT to keep the network account?

If **Yes,** please provide the reason for keeping the account.

_____

UNIVERSITY E-MAIL AND NET ID

- University Email accounts includes username@**.wisc.edu**, Contact your DOiT for any questions.

- If you require assistance setting up a rule for the separating employee's University E-mail account to indicate they are no longer working for the unit please contact your IT directly.

1) List Email Address that the Separating Employee used:

_____
_____
_____

2) Will you require IT to **retain** the former employee's University email account longer than **180 days** after the last day of employment?

___**Yes**   ___**No**

If **Yes,** please provide the reason for keeping the account.

_____

Please list any staff that will need access to the separating employee's **University e-mail** account while it is retained:

_____

_____

NETWORK SHARED FILES

Drive – Home Folder, Bookmarks/Desktop Files and Documents

Will you require IT to **retain** the former employee's network files located on their home drive and personal files longer than **180 days** after their last day of employment?

___**Yes**   ___**No**

If **yes,** please provide the reason for keeping the account.

_____

Please list any staff that will need access to the separating employee's drive, personal folder while retained:

_____

Appendix 3
E-RECORDS INVENTORY CHECKLIST

The purpose of this checklist is to provide assistance in identifying where electronic files may exist. Just as with paper, files should be kept according to university records retention and disposition schedules and maintained as directed. When a staff member transfers to a different agency or is leaving or transferring university employment, the electronic files need to be examined before any deletion of media or cleansing of PC's takes place.

LOCATING & EVALUATING ELECTRONIC FILES

Electronic files may consist of correspondence, spreadsheets, word processing documents, databases, presentations, e-mail, reports and other file types.(unstructured records)

Check all that apply:
- ☐ Laptop
- ☐ Personal Desktop
- ☐ Electronic
- ☐ Phone, I-Pad, or other device
- ☐ University E-mail acct
- ☐ UW-Box.net

Media (UW Property)
- ☐ Flash Drive / Memory Stick
- ☐ CD-ROM
- ☐ DVD
- ☐ PC's Hard Drive
- ☐ Network Drive
- ☐ Laptops

Access Rights
- ☐ Network
- ☐ Mainframe
- ☐ Intranet/Internet

To better understand where your electronic documents may be located, take a minute to inventory all the potential technology devices you may have available to you.

This checklist is a good start in identifying the places where your electronic files may currently reside, but with technology changes there may be more.

Removable storage media such as floppy disks, CD-ROMs, and ZIP disks are the most difficult to track down because they could be almost anywhere.

Electronic documents may reside in multiple directories on your agency network drives, PC hard drive and/or laptop, including the "temp" directories.

Once your Technology Toolbox has been inventoried, the next step is to examine all the electronic files residing in those devices.

For each file, you must decide, in accordance with Records Retention and Disposition Schedules, whether it is to be retained or deleted or transferred.

Important Note: For electronic files that must be retained, be sure they reside on specific network drives where they are properly filed and named and will be backed up regularly. (Reference opposite side)