



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel		
Directive No.: 2155-P-07.0	CIO Approval: 12/28/2016	Transmittal No.: 17-003

*Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19, dated 07/07/2005*

Preserving Agency Information of Separating Personnel

1. PURPOSE

- To establish a process for all separating employees to manage their information assets before they separate from the Environmental Protection Agency (EPA) and a process for the Agency to manage all separating personnel's information once they have separated.
- To ensure that the information, including paper-based information and electronically stored information (ESI), of separating personnel is preserved for litigation and other affirmative preservation requirements.
- To be used in conjunction with and not to replace the procedure set forth in CIO 2155-P-04, the *Preservation of Separating, Transferring or Separated Personnel's Records in Accordance with the Federal Records Act*.

2. SCOPE

This procedure addresses information created or received by EPA personnel who are separating from the EPA. It is intended to address the steps that must be taken at separation to ensure the proper management and/or preservation of the personnel's information. This procedure should be followed regardless of whether the separating personnel is subject to a litigation hold or other affirmative preservation requirement, such as a Freedom of Information Act (FOIA) request or congressional inquiry.

3. AUDIENCE

While the driver behind this procedure is the need to preserve separating personnel's information that is subject to a litigation hold or other affirmative preservation requirement, this procedure applies to all EPA employees who are preparing to separate from the EPA and to EPA program and regional offices with a role in managing and/or preserving separating personnel's information, as appropriate.

The terms "employee" and "personnel" are not used interchangeably in this Procedure. An employee is an individual who has a direct employment relationship with the EPA. Personnel includes EPA employees as well as EPA contractors or grantees who have user and email accounts on EPA networks.

NOTE: Other, independent guidance may be communicated to contractors or grantees through their Contracting Officer Representative (COR) or Project Officer (PO), respectively.



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel		
Directive No.: 2155-P-07.0	CIO Approval: 12/28/2016	Transmittal No.: 17-003

4. BACKGROUND

Separating personnel should use this Procedure in conjunction with CIO 2155-P-04, the Procedure for the *Preservation of Separating, Transferring or Separated Personnel's Records in Accordance with the Federal Records Act* and EPA Form 3110-49, *EPA Records Management Checklist for Separating/Transferring or Separated Personnel*. CIO 2155-P-04 describes the process for identifying Agency records and properly transferring these records into a recordkeeping system or turning them over to a successor or supervisor when personnel separate, pursuant to the requirements of the Federal Records Act. EPA Form 3110-49 identifies the different potential sources of records that personnel must review to manage their records.

This Interim Procedure for *Preserving Agency Information of Separating Personnel* describes the process for ensuring that information that needs to be preserved for the purpose of a litigation hold or other affirmative preservation requirement, including information that may not qualify as a federal record, is preserved in the appropriate format when personnel separate from the Agency. Responding accurately and appropriately to discovery and other affirmative preservation requirements, including any pending FOIA requests or congressional inquiries, is critical to EPA's ability to meet its legal obligations.

5. AUTHORITY

The information directive is issued by the EPA Chief Information Officer (CIO), pursuant to Delegation 1-19, dated 07/07/2005.

Additional legal foundations for the procedure include:

- 40 U.S.C. Chapter 25 – Information Technology (IT) Management
- 44 U.S.C. Chapter 31 – Records Management by Federal Agencies
- 44 U.S.C. Chapter 33 – Disposal of Records
- 44 U.S.C. Chapter 35 – Coordination of Federal Information Policy
- 5 U.S.C. § 552 – FOIA (as amended)
- Federal Rules of Civil Procedure
- Federal Rules of Criminal Procedure
- Presidential Memorandum, Managing Government Records, November 28, 2011
- Memorandum for the Heads of Executive Departments and Agencies and Independent Agencies, from the Office of Management and Budget (OMB) and National Archives and Records Administration, Managing Government Records Directive, August 24, 2012



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel

Directive No.: 2155-P-07.0

CIO Approval: 12/28/2016

Transmittal No.: 17-003

- OMB Circular A-123 – Management’s Responsibility for Internal Control
- OMB Circular A-130 – Management of Federal Information Resources

6. PROCEDURE

6.1 Each EPA program and regional office shall develop or update organizational procedures for the preservation of information of separating personnel to conform to these procedures and notify OEI that its organizational procedures are in place within 30 days of issuance of this Procedure.

- The EPA’s 10 regional offices have different IT tools and services to support regional EPA personnel in doing their jobs. Some EPA program offices also have computers and other IT services and equipment that are not supported by EZ Tech. To acknowledge these differences in IT tools and services and to allow for flexibility in Agency processes:
 - Each EPA program and regional office shall develop organizational procedures for the preservation of separating personnel’s information for the information sources identified in sections 6.3.4 and 6.3.5.
 - Each EPA program and regional office shall describe in writing how the information sources identified in sections 6.3.2 and 6.3.3 are saved in a local organizational preservation procedure. If there are processes and steps that vary from or are in addition to the processes and steps set forth in this Interim Procedure, those steps must be documented by the EPA program or regional office. The program or regional office should strive to write the procedure with sufficient simplicity, clarity and specificity that a reasonably competent IT Specialist not familiar with that program or regional office (such as a new hire) would be able to follow the process without receiving specialized training. Each program and regional Senior Information Official (SIO) shall approve his/her organization’s procedures and notify the Office of Environmental Information (OEI) that the local organizational procedures are in place within 30 days of the issuance of this Procedure, by sending an email to the EDD_SeparatingEmployees mail group.

6.2 When an EPA employee provides notice to the Agency that he/she plans to separate from the EPA, he/she should ensure that any records, documents and other files subject to a litigation hold, or subject to a pending FOIA request or a congressional inquiry are preserved.

- The separating employee should remove any personal, non-EPA content from EPA systems and remove any password protections from individual documents he/she may have created.
- The separating employee should continue to preserve any information subject to a litigation hold or a pending FOIA request or congressional inquiry, and adhere to the steps outlined in this procedure and any applicable organizational procedures to ensure this information is preserved once he/she separates.

6.2.1 Employee Action: Litigation Holds



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel

Directive No.: 2155-P-07.0

CIO Approval: 12/28/2016

Transmittal No.: 17-003

- Before separating, the employee should:
 - Confirm any litigation holds to which he/she is subject by checking the litigation hold portal at <http://litholdandcollect.epa.gov/portal>. If a 404 error is received when accessing the litigation hold portal, the appropriate Records Liaison Officer (RLO) or a Litigation Hold Administrator should be contacted to obtain a litigation hold report. (NOTE: Separating personnel should have already been notified by the case attorney that he/she has been identified as someone with information that is potentially relevant to a specific case and is therefore subject to an identified litigation hold.)
 - Continue to check the litigation hold portal until he/she separates from the Agency to ensure that no new litigation holds are issued between the time when the employee gives notice to separate and when he/she separates from the EPA.
 - Print the results of the list appearing on the litigation hold portal, even if he/she is not subject to any litigation holds and attach this document to his/her completed EPA Form 3110-49.
 - Contact the lead case attorney for any specific instructions relevant to the applicable litigation hold.

6.2.2 Employee Action: FOIA Requests and Congressional Inquiries

- Before separating, the employee should:
 - Have already been notified if he/she has been identified as a custodian with potentially relevant information for a pending FOIA request or congressional inquiry by the EPA employee who is managing the Agency's response to that FOIA request or congressional inquiry.
 - Notify the EPA employee managing the Agency's response to the FOIA request or congressional inquiry that he/she will be separating from the EPA and obtain any further instructions.

6.3 To ensure that the different types of information, including paper-based information and ESI, of separating personnel are preserved, the steps below describe the actions the separating employee is expected to take before he/she separates and the steps the Agency takes once the personnel have separated. For each of the different types of information, actions are described for either the separating employee or the Agency, and in some cases both the separating employee and the Agency are expected to take certain actions.

6.3.1 Email – MS Outlook Email (including email, calendars and tasks) and Legacy Lotus Notes Email (including email and calendars)

- **Employee Action:**
 - Before separating, the employee should review his/her Microsoft (MS) Outlook and Lotus Notes email accounts and ensure any email, Skype for Business message or calendar records (as defined by the Federal Records Act) have been captured in the Agency's electronic recordkeeping system, Enterprise Content Management System



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel

Directive No.: 2155-P-07.0

CIO Approval: 12/28/2016

Transmittal No.: 17-003

(ECMS), using the EZ Email Records tool. (For more information, visit the Agency's EZ Email Records Intranet site at <http://intranet.epa.gov/emailrecords/>.)

- Note: Skype for Business messages are saved in the "Conversation History" folder within the user's email box and managed like all other email.
- Separating employees should not delete or destroy potentially relevant emails subject to a litigation hold or pending FOIA request or congressional inquiry or other affirmative preservation requirement.
- **Agency Action:**
 - After personnel separate from EPA, the Agency's MS Office 365 email contractor team identifies the separated personnel based on an eBusiness cancellation order and preserves the separated personnel's MS Outlook email files.
 - The separated personnel's email file is saved in an inactive state in the MS Office 365 Government Computing Cloud indefinitely.
 - Legacy Lotus Notes email files currently remain stored on email servers and continue to be preserved after personnel has separated. In the future, the EPA expects to migrate remaining Lotus Notes emails into the MS Outlook email system where they should be managed like MS Outlook emails.

6.3.2 Removable Storage Devices (CDs, DVDs, USBs, external hard drives, etc.)

- **Employee Action:**
 - Before separating, the employee should, whenever possible, move any information that may be subject to a litigation hold or other affirmative preservation requirement that is stored on a removable storage device (e.g., CD, DVD, USB, external hard drive, etc.) to the employee's "My Documents" folder or the employee's OneDrive using the "Safe Move to My Docs" instructions located at: <http://intranet.epa.gov/NIS/NISdochome/windows/What-is-Safe-Move-to-My-Docs.pdf>. However, for large volumes of data, this may not be possible and the separating employee should contact his/her Information Management Officer (IMO) for further instruction.
 - In addition, the separating employee should not delete the information subject to a litigation hold or other affirmative preservation requirement from a removable storage device. Instead, the separating employee should deliver these devices to the lead case attorney, the RLO or another designated employee with the information still stored on the device.

6.3.3 Agency Issued Mobile Devices (Windows Phone, iPhone, iPad, cell phone, etc.)

- **Employee Action:**
 - Before separating, the employee should ensure any information on his/her mobile device—including text messages, pictures, or other



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel

Directive No.: 2155-P-07.0

CIO Approval: 12/28/2016

Transmittal No.: 17-003

files—that may constitute a record or may be subject to a litigation hold or affirmative preservation requirement, is saved into EPA’s MS Outlook email system. Guidance on mobile devices and records management is available on the Agency’s intranet site at <http://intranet.epa.gov/records/faqs/pda.html>.

- Separating employees should not delete any data, including text messages that are subject to any litigation hold or other affirmative preservation requirement, prior to separating and returning his/her mobile device to EPA. Employees are required to certify compliance with all procedures, including the process for forwarding to their government email accounts any content that may constitute records or may be subject to a litigation hold or other affirmative preservation requirement, prior to separating and returning his/her mobile device to EPA. The certification form must be uploaded into EPA’s eBusiness system before an eBusiness cancellation order is placed and before the device is inactivated for disposal or reuse.

6.3.4 Personal Network Files

- **Employee Action:**
 - Separating employees should not delete or destroy any network files containing data, which are subject to any litigation holds, FOIA requests, congressional inquiries or other affirmative preservation requirement.
 - EPA records must be preserved, consistent with EPA’s Procedure CIO 2155-P-04.0, *Preservation of Separating, Transferring, or Separated Personnel’s Records in Accordance with the Federal Records Act*. Other files or data not subject to litigation holds or other affirmative preservation requirement should be disposed in accordance with the governing EPA records schedule(s).
- **Agency Action:**
 - The EPA program or regional office responsible for managing the user’s network files moves the separated personnel’s personal network drive data into a Separated User Data Archive accessible to the EPA eDiscovery function.
 - The Separated User Data Archive must be managed in compliance with the requirements in section 6.5 of this procedure.

6.3.5 Local Hard Drive (C: Drive)

- **Employee Action:**
 - Before separating, the employee should review his/her computer’s local hard drive to ensure any information subject to a litigation hold or other affirmative preservation requirement that is not stored in the “My Documents” directory on the local hard drive (C: drive) are moved to the “My Documents” folder using the “Safe Move to My Docs” instructions located at: <http://intranet.epa.gov/NIS/NISdochome/windows/What-is->



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel

Directive No.: 2155-P-07.0

CIO Approval: 12/28/2016

Transmittal No.: 17-003

[Safe-Move-to-My-Docs.pdf](#). Other than following the “Safe Move to My Docs” instructions, the separating employee should not otherwise delete or destroy this information.

- **Agency Action:**
 - The EPA program or regional office responsible for managing the PC or Laptop moves the separated personnel’s “My Documents” folder to a Separated User Data Archive accessible to the EPA eDiscovery function. The move is performed using the "Safe Move to Target" utility.
 - The Separated User Data Archive must be managed in compliance with the requirements in section 6.5 of this procedure.

6.3.6 Collaboration Tools (OneDrive, SharePoint etc.)

6.3.6.1 OneDrive

- **Employee Action:**
 - Separating employees should not delete or destroy any network files containing data, which are subject to any litigation holds, FOIA requests, congressional inquiries or other affirmative preservation requirement.
 - EPA records must be preserved, consistent with EPA’s Procedure CIO 2155-P-04.0, *Preservation of Separating, Transferring, or Separated Personnel’s Records in Accordance with the Federal Records Act*. Other files or data not subject to litigation holds or other affirmative preservation requirement should be disposed in accordance with the governing EPA records schedule(s).
- **Agency Action:**
 - After the personnel has separated, the EPA’s MS Office 365 email contractor team identifies separated personnel based on an eBusiness cancellation order who need to have their OneDrive files preserved and takes the following actions to preserve this information:
 - If the personnel has OneDrive data, the information is copied to the EPA-OneDriveBackup location in the MS Office 365 Government Computing Cloud.

6.3.6.2 SharePoint and Office 365 Groups

- **Employee Action:**
 - Before separating, the separating employee should contact his/her office’s SharePoint Site Collection Administrator (SCA) to request reassignment of any SharePoint sites or Office 365 Groups that he/she owns to another employee.
- **Agency Action:**



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel

Directive No.: 2155-P-07.0

CIO Approval: 12/28/2016

Transmittal No.: 17-003

- If separated personnel have not transferred ownership of a SharePoint site before separating from the Agency, responsibility for that SharePoint site reverts to the SCA for that organization once the personnel has separated. The SCA reassigns the SharePoint site or Office 365 Group to the new owner for the SharePoint site or Office 365 Group.
- The SCA periodically reviews reports of sites that are no longer being accessed to identify sites for deactivation and may use this process to reassign ownership of a site for separated personnel.

6.3.7 Paper Documents and Records

- **Employee Action:**
 - Before separating, the separating employee should identify any applicable litigation holds to which he or she is subject, and preserve any paper materials, including records, documents and other files that are under a litigation hold.
 - Before separating, the separating employee should give these paper materials to the lead case attorney, the RLO or another designated personnel, as appropriate.
 - Before separating, the separating employee should identify by name and/or number and preserve any paper materials subject to a pending FOIA request or congressional inquiry.
 - Before separating, the separating employee should give these paper materials to the lead for the FOIA response or the congressional inquiry, the RLO or another designated personnel, as appropriate.

6.4 Preserving information for personnel who were unable to provide notice before separating from the EPA

In instances where personnel has unexpectedly separated from the Agency and did not give prior notice, the separated personnel's supervisor working with the organization's RLO, FOIA coordinator, and the lead for responses to congressional inquiries, and in consultation with the Office of General Counsel or the Office of Regional Counsel, should complete the steps laid out in sections 6.2 through 6.3 to ensure the separated personnel's records and other information are preserved in accordance with federal and EPA requirements.

6.5 Requirements for Region and Program Separated User Data Archives

EPA program and regional offices responsible for managing personnel data must maintain a separated personnel data archive (Archive) in compliance with the following requirements:

- The repository must be managed with appropriate controls to ensure that files and folders cannot be inadvertently deleted and that all data can be recovered without loss in the event of a system failure, administrative error or disaster.
- The Archive must be maintained on an EPA network drive that can be accessed remotely by the Agency's standard e-discovery search and collection tools. Off-



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel		
Directive No.: 2155-P-07.0	CIO Approval: 12/28/2016	Transmittal No.: 17-003

line storage on tape, non-networked drives or portable devices is not acceptable other than for back-up purposes.

- The up-to-date location of the Archive must be sent to the EDD_SeparatingEmployees mail group with the Subject Line: [Region or Program Name] Separated User Data Archive Location as of [Date specified as MM-DD-YYYY]. Any change in location of the Archive must be sent to the email group within 24 hours of the change. The body of the email shall indicate the full network path of the up-to-date location of the Archive.
- Separated personnel data must be stored using the following standard folder hierarchy and naming conventions.

Office/RegionAcronym_SeparatedUserData
 lastname_firstname_adaccountname
 NetworkFiles
 PCDiskFiles
 RemovableMediaFiles

Examples

ORD_SeparatedUserData\user_example_euser\NetworkFiles\ ..content..

- The EPA program or regional office responsible for maintaining the separated personnel data archive must maintain a spreadsheet in Microsoft Excel format listing for each separated employee. The spreadsheet must be maintained in the same location as the data archive, and must contain at least the following information:

File Content:

Attribute	Value
User Firstname	Example
User Lastname	User
User Email	user.example@epa.gov
User WorkforceID	12345
User SeparationDate	11/8/2016
UserSeparationLocation	AnnArbor
UserSeparatingOffice	OAR
UserDesktopProvider	OEI EZ Tech
UserNetworkDriveProvider	OAR AnnArbor
UserMobileDeviceprovider	OEI MD Service
NetworkDriveDataStatus	HasData
NetworkDriveDataLink	\\OARfileservername\k\$\OAR_SeparatedUserData\user_example_euser\NetworkFiles
RemoveableMediaDataStatus	NoData
RemoveableMediaDataPath	None
LocalMachine01DataStatus	HasData
LocalMachine01DataPath	\\OEIfileservername\k\$\OAR_SeparatedUserData\user_example_euser\PCDiskFiles
LocalMachine02DataStatus	NoData
LocalMachine02DataPath	None



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel		
Directive No.: 2155-P-07.0	CIO Approval: 12/28/2016	Transmittal No.: 17-003

7. ROLES AND RESPONSIBILITIES

Information Management Officers (IMO)

- All IMOs are accountable for providing support to separating staff to assist with saving information on removable media devices, if needed.

Litigation Hold Administrator

- Accountable for assisting a separating employee in determining whether he/she is subject to a litigation hold.
- Accountable for ensuring that the litigation hold database is kept up to date.

Office of Enforcement and Compliance Assurance (OECA)

- Accountable for populating EPA's standard litigation hold software tool with litigation holds, identifying custodians associated with each litigation hold, and continuously updating the litigation hold database.

Office of Environmental Information, Office of Enterprise Information Programs (OEIP)

- Accountable for managing the Agency's Discovery Services Program, including the policies, tools and services that comprise the Program.

Office of Environmental Information, Office of Information Technology Operations (OITO)

- Accountable for preserving information of separated personnel in accordance with this procedure.

Office of General Counsel (OGC)

- Accountable for populating EPA's standard litigation hold software tool with litigation holds, identifying custodians associated with each litigation hold, and continuously updating the litigation hold database.

Offices of Regional Counsel (ORC)

- Accountable for populating EPA's standard litigation hold software tool with litigation holds, identifying custodians associated with each litigation hold, and continuously updating the litigation hold database.

Records Liaison Officers (RLO)

- Accountable for maintaining the completed EPA Form 3110-49 with the attached results from the litigation hold portal for separated personnel.
- Accountable for assisting a separating employee in determining whether he/she is subject to a litigation hold.

Regional Local Servicing Organizations

- Accountable for the preservation of separating personnel's ESI in a manner that is consistent with this procedure and related regional procedures.



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel

Directive No.: 2155-P-07.0

CIO Approval: 12/28/2016

Transmittal No.: 17-003

Senior Information Officials (SIO)

- Accountable for approving conforming procedures for their respective program or regional office within 30 days of the issuance of this Procedure and for notifying OEI that their organizational procedures are in place by sending an email to the EDD_SeparatingEmployees mail group.

Separating Employees

Separating employees in EPA headquarters or regional offices are required to review and manage all documents and records for which they are responsible prior to their separation from EPA. Separating employees are:

- Accountable for checking the litigation hold portal and determining whether they are under any litigation holds and contacting the lead case attorney for any applicable litigation holds.
- Accountable for considering whether they are subject to any pending FOIA requests or congressional inquiries and contacting the lead for the FOIA request or congressional inquiry.
- Accountable for reviewing the information sources in section 6.3 and taking appropriate action to ensure the preservation of their information.
- Accountable for attaching the results from the litigation hold portal to their signed EPA Form 3110-49 prior to their separation.

Supervisors

Supervisors are responsible for ensuring that their staff are managing all documents and records for which they are responsible prior to their separation from the EPA. Supervisors are required to assist in the preservation of information and records for their separating staff. Supervisors are:

- Accountable for having separating employees manage their documents and records prior to their separation in accordance with this Procedure.
- In instances where an employee has separated and did not give prior notice or did not complete the steps outlined in this Procedure, the employee's supervisor is accountable for working with the organization's RLO, FOIA coordinator, the lead for responses to congressional inquiries, and in consultation with the Office of General Counsel or the Office of Regional Counsel, to complete the steps laid out in sections 6.2 through 6.3 to ensure the separated employee's records and other information are preserved in accordance with this Procedure.

8. RELATED INFORMATION

U.S. EPA, OEI. (2012). *Preservation of Separated Personnel's Electronically Stored Information Subject to Litigation Holds*. CIO 2156.0.

U.S. EPA, OEI. (2014). *Preservation of Separating, Transferring or Separated Personnel's Records in Accordance with the Federal Records Act*. CIO 2155-P-04.

U.S. EPA, OEI. (2014). *EPA Records Management Checklist for Separating/Transferring or Separated Personnel*, EPA Form 3110-49.



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel		
Directive No.: 2155-P-07.0	CIO Approval: 12/28/2016	Transmittal No.: 17-003

9. DEFINITIONS

Custodian: For the purpose of this Procedure, custodians are EPA personnel who currently have or formerly had possession, control, or custody of ESI subject to a litigation hold, a FOIA request or congressional inquiry.

Discovery: Pre-trial actions or activities used by one party to obtain facts and information about a case from the other party to assist in preparation for trial.

Electronically Stored Information (ESI): Includes, but is not limited to, emails, instant messages, text messages, conference call transcriptions, word processing documents, spreadsheets, personal and shared calendars, information contained in databases, digital photographs, and related metadata for all types of ESI.

Employee: An individual employed by the EPA.

EPA Network: A system containing any combination of EPA computers, computer terminals, printers, audio or visual display devices, or telephones interconnected by communication equipment or cables.

EZ Tech: A Working Capital Fund service which provides and coordinates all IT end user support and services for the EPA's headquarters program offices and program offices' sites at various locations across the country. The EPA's regional offices are not included in the EZ Tech service.

Litigation Hold: Written communication from an attorney notifying recipients or custodians that litigation exists or is reasonably anticipated regarding a specific matter and notifying each recipient or custodian that he/she is under an obligation to preserve all potentially relevant information regardless of format (hard copy or electronic) in the form it presently exists (i.e., native format).

Metadata: Data that provide information about other data, such as the creation date, last modification date, creator, file path and location, etc.

Personnel: EPA employees, contractors or grantees who have a relationship with EPA through employment, contract or grant, respectively, and who have user and email accounts on EPA networks.

Separated Personnel: EPA personnel, who no longer have an employment, contract or grant relationship with the EPA, whether by retirement, permanent transfer to another federal agency, public or private organization, or any other situation in which an employment relationship, contract or grant with EPA is severed.

Separating Employee: EPA employee who has given notice and is in the process of leaving the Agency, whether by retirement, permanent transfer to another federal agency, public or private organization, or any other situation in which an employment relationship with EPA is severed.



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel		
Directive No.: 2155-P-07.0	CIO Approval: 12/28/2016	Transmittal No.: 17-003

Separating Personnel: EPA personnel who have given notice and are in the process of leaving the Agency, whether by retirement, permanent transfer to another federal agency, public or private organization, or any other situation in which an employment, contract or grant relationship with EPA is severed.

Separation: Permanent severing of employment, contract or grant relationship with EPA, whether by retirement, permanent transfer to another federal agency, public or private organization, or any other situation in which an employment, contract or grant relationship with EPA is severed.

Abbreviations including acronyms are summarized in *Appendix: Acronyms & Abbreviations*.

10. WAIVERS

N/A

11. MATERIAL SUPERSEDED

N/A

12. CONTACTS

For further information about this Procedure, please contact the Office of Environmental Information (OEI), Office of Enterprise Information Programs (OEIP).

Ann Dunkin
Chief Information Officer
U.S. Environmental Protection Agency



INFORMATION DIRECTIVE INTERIM PROCEDURE

Preserving Agency Information of Separating Personnel		
Directive No.: 2155-P-07.0	CIO Approval: 12/28/2016	Transmittal No.: 17-003

**APPENDIX:
ACRONYMS & ABBREVIATIONS**

CIO	Chief Information Officer
COR	Contracting Officer Representative
ESI	Electronically Stored Information
EPA	Environmental Protection Agency
ECMS	Enterprise Content Management System
FOIA	Freedom of Information Act
IMO	Information Management Officer
IT	Information Technology
MS	Microsoft
OEI	Office of Environmental Information
OEIP	Office of Enterprise Information Programs
OITO	Office of Information Technology Operations
OMB	Office of Management and Budget
PO	Project Officer
RLO	Records Liaison Officer
SCA	Site Collection Administrator
SIO	Senior Information Official