

Records Management Checklist for Separating Employees

The Records Management Checklist for Separating Employees is to document that all Federal records with ongoing retention requirements have been properly secured, including safeguarding records subject to litigation holds. All employees and their managers are responsible for ensuring the protection and integrity of HUD records prior to separating from the Service. Departing officials and employees should not remove Federal records from the agency as referenced in 36 C.F.R. § 1222.24(6). Managers must send the completed and signed checklist to records@hud.gov. Questions regarding this checklist or records management requirements should be sent to records@hud.gov.

Employee name (<i>last, first, middle initial</i>)	H#	Business unit
	Yes	No
1. Are you a HUD Senior Executive Service (SES)?	<input type="checkbox"/>	<input type="checkbox"/>
2. Have you received notification from General Counsel that you are under a Litigation Hold(s)? Guidance on how to conduct a Litigation Hold check can be found in number 2 under the instructions below. If you are under Litigation Hold(s), notify the General Counsel attorney of your expected separation and identify the cases in block 8.	<input type="checkbox"/>	<input type="checkbox"/>
3. Have you moved all Federal records stored on IT-issued equipment being turned in (<i>laptop, flash drive/thumb drive, external hard drive, or other removable media</i>) to an accessible, secure location? If Yes, explain in block 8 where the data is stored. If No, explain in block 8.	<input type="checkbox"/>	<input type="checkbox"/>
4. Have you removed all passwords for individual files, spreadsheets, or folders that you manage? Note, employees should not provide passwords or PIN numbers for any HUD systems (<i>such as HHRTS, CHUMS, etc.</i>).	<input type="checkbox"/>	<input type="checkbox"/>
5. Have you collected all hard copy Federal records in your possession (<i>safes, file cabinets, drawers, etc. including home office</i>) and returned them to their appropriate locations? If No, explain in block 8.	<input type="checkbox"/>	<input type="checkbox"/>
6. Have you safeguarded all documents subject to (<i>or potentially subject to</i>) Litigation, claims, audits, or other actions? If Yes, explain in block 8 all steps taken to safeguard documents. If No, explain in block 8.	<input type="checkbox"/>	<input type="checkbox"/>
7. Do you wish to take any non-record materials (<i>whether in paper or electronic format, other than personal papers or publicly available documents</i>) from the HUD? All requests for removal of materials must be approved by the designated officials under the instructions below.	<input type="checkbox"/>	<input type="checkbox"/>
8. Additional information (<i>Complete this section before signing below</i>)		

9. Certification - I hereby certify that all records management actions listed above have been addressed.

10a. Immediate Supervisor name	10b. Signature	
11a. HUD Records Officer or Designated Representative name	11b. Signature	11c. Date

Penalties for Unlawful Removal, Destruction of Records: Criminal penalties under 18 U.S.C. §§ 641 and 2071 may be imposed for the unlawful removal or destruction of Federal records (36 C.F.R. § 1230.12)

Instructions for Form 69 Records Management Checklist for Separating Employees

Managers must ensure completion of this checklist for all their separating employees. All questions must be answered by selecting either Yes or No. Block 8 should be used to provide additional information, if necessary.

Definition of Records:

- a. Federal Records - all recorded information (*hard copy or electronic*) created or received in the course of transacting government business that serves as evidence of the decisions, policies and other activities of the agency.
- b. Non-records - work related documents that do not qualify as records such as duplicate copies, convenient/reference copies, and stocks of publications.
- c. Personal Materials - anything belonging to an individual that is not used to conduct agency business.

The following reference is available for additional guidance: [HUD Records Handbook 2228.1](#).

1. SES members should not complete Form 69 checklist without scheduling an Exit Briefing with the HUD Records Officer. Contact the HUD Records Officer at records@hud.gov for an Exit Briefing.
2. If currently under a Litigation Hold, HUD offices must suspend normal records destruction activities in accordance with General Counsel's Litigation Hold notice. You can determine if you are currently under a Litigation Hold by searching for the words "Litigation Hold" on your desktop and in Outlook. If covered by a Litigation Hold, notify the General Counsel attorney who issued the hold and secure IT equipment pending instructions from General Counsel attorney and collection of data by IT.
3. Electronic Federal records with ongoing retention requirements stored on IT equipment that you are turning in must be moved so they are accessible for future use. Provide your supervisor with the specific location where you have moved the records. If you do not have any records stored on IT-issued equipment that is being turned in, explain in Block 8. For example, an employee's position may not involve use of any assigned IT equipment.
4. Records must be accessible to the agency after employee separation. Remove all passwords and any other restrictions on files and folders as appropriate.
5. Hard copy records must be returned to an appropriate office location or given to the supervisor or staff assuming recordkeeping responsibility. If you do not have any hard copy Federal records (*safes, file cabinets, drawers, etc. including home office*), explain in Block 8. For example, an employee's position may not involve hard copy recordkeeping requirements.
6. All other data preservation needs must be addressed with your supervisor. Explain in Block 8 why the actions are not applicable to you, or what you are doing to safeguard all records subject to Litigation Hold (*to ensure they are accessible to the agency*).
7. All request for removal of records must be approved via email by the HUD Records Officer records@hud.gov. If separating employees want copies of official records that are classified or otherwise restricted, they should consult via email the Disclosure staff records@hud.gov.
8. Include comments here from Blocks 2, 3, 5 and/or 6 with a reference to each specific block number.

Questions regarding this checklist or records management requirements can be sent to records@hud.gov

No equipment should be turned into IT prior to certifying by this checklist that all records management/legal needs have been met. If under Litigation Hold, DO NOT RETURN your laptop/electronic records storage device to IT prior to consulting with General Counsel via email to records@hud.gov. Contact IT if support is needed from IT via for moving electronic records to an accessible and secure network location.