

**PSOM-SPECIFIC ADDENDUM TO UNIVERSITY GUIDANCE
FOR DISPOSITION OF DOCUMENTS, DATA & ACCESS
FOR FACULTY AND STAFF WHO ARE LEAVING PSOM OR HAVE LEFT PSOM**

Effective October 1, 2025

Preamble

PSOM is subject to the University of Pennsylvania “Guidance for Disposition of Documents, Data, & Access for Faculty and Staff who are Leaving Penn or Have Left Penn,” dated October 17, 2024 (“University Guidance”). This PSOM-specific Guidance is intended to facilitate adherence to the University Guidance, with additional PSOM specificity included.

PSOM has been faced with the question of how to handle the electronic information, materials, documents, data (tangible and electronically stored) (“Data”), and other personal information or assets (“Assets”) of faculty, staff members and individuals who either leave PSOM during their lifetime (for employment elsewhere or by means of retirement) or are deceased. With the growth of electronic communications, the amount of Data created and maintained by individuals has increased while working at PSOM; and the ability to search, destroy, and share Data has expanded correspondingly.

In the case of deceased individuals, questions about who should have access to certain assets may be apparent – for example, a family photograph. Often it will be possible to identify and contact next of kin and discuss the appropriate disposition of Data and Assets. However, it may sometimes be unclear who has the right to access Data and Assets; and in other cases, next of kin may not wish to cooperate or may be difficult to reach.

In any event, appropriate decisions about how to handle Data and Assets must be made, with due regard to the privacy interests of the individual, legal and other obligations to preserve certain Data, institutional history and other interests, and the public good.

The guidance below is intended to highlight the importance of coordinating the review, maintenance, archiving, preservation, retention, sharing, disposition, and destruction of Data and Assets of faculty and staff who leave PSOM, and to highlight issues that may require special attention.

Guidance

When a faculty or staff member is deceased or otherwise leaves PSOM for other employment or by means of retirement, a number of issues arise regarding the handling of Assets formerly under their care. In the case of deceased individuals, questions about what material and Assets should be shared with whom should be handled with great sensitivity to the difficulties faced by next of kin and loved ones; and in all cases, handling of Data and Assets should consider the interests of colleagues and collaborators, institutional interests in Data and information, as well as legal and contractual obligations.

The following practices are recommended:

1. Ownership of Process. The Department Chair in the case of faculty, and Senior Business Administrator in the case of staff, or a designee of either, is the appropriate person to process and coordinate decisions and actions regarding Data and Assets in the individual's possession.
2. Immediate Review. Prior to a planned departure, or within one month after the departure or death of the individual, or as otherwise reasonable, the Department Chair, Senior Business Administrator ("SBA"), or designee should seek to identify the types of Data or Assets in the possession or under the control of PSOM, as well as Data developed as a function of the individual's role at PSOM, and to determine appropriate review, maintenance, archiving, preservation, retention, sharing, disposition, and destruction measures. In the case of individuals who are leaving or have left PSOM, this review should include efforts to involve the individuals themselves in identifying types of Data and Assets, and in determining appropriate disposition.
3. IT Inventory: At the discretion of the department chair or SBA, an IT inventory may be requested.
 - a. Such an inventory will be conducted by an Information Technology (IT) professional reviewing electronic data on the appropriate desktop, laptop, server and other media as reasonable, as well as departmental administrative staff reviewing Data in the office.
 - b. In some cases, there may be sensitive information about the individual who is no longer at PSOM or others (consider for example the health information of patients or research subjects.) The department Chair or SBA should consider whom to involve in the inventory of the information in light of sensitive information, and should ensure that the processes adopted maintain confidentiality and reasonable data security. If reasonably feasible, it is recommended that there be two individuals involved in taking the inventory.
 - c. The department Chair or SBA should offer guidance to individuals involved in taking inventory, such as search terms or information related to research, to assist them in providing a useful inventory in common categories. See below for more information.
4. Retention of Information – One Year. Some of the interests and the appropriate handling of information will be readily apparent early on; some will not and will depend on other individuals coming forward and making requests for Data or Assets. If there is a reasonable question about the value, need, and interests in the Data or Assets, it is recommended that reasonable efforts be made to maintain the information for at least one year or longer if another policy suggests (See Section 6 below), to afford time for collaborators, family, research sponsors or others to come forward and request Data, with the costs of Data retention

borne by the former employee's department or unit.

5. Verification of Requesters. In cases where a third party is requesting access to Data or Assets such as, for example, a research sponsor, an academic collaborator, or an executor of the estate, it is important to verify the identity and the authority of the individual to access the requested information. For example, in the case of Assets of deceased individuals, it is recommended that there be proof of executorship or, in the absence of such proof, a signed certification of the right to such information. Any questions about executorship or other authority to access Data or Assets should be referred by the Department Chair or Senior Business Administrator to the Office of General Counsel.
6. Categories of Interests. The following are examples of situations that should be considered in determining appropriate handling of information:
 - a. Required Retention: There may be legal, policy, or contractual requirements to retain Data. These are difficult to exhaustively enumerate in advance, but several examples are provided below. In addition, Penn's [Records Retention Schedules](#) should be consulted.
 - b. Destruction of Data, hard copy and electronic: Prior to destroying personal or professional Data and other material, refer to the University Record Center [Guidelines for the Destruction of Confidential Records](#). If faculty are retired or separated for other termination reasons, reasonable attempts, including at least three attempts at direct communication (which should include one phone call if feasible), should be made to contact them before destroying personal or professional Data. It should be made clear that if they do not respond within 30 days, the documents may be placed in archives and/or destroyed.
 - c. Business Continuity: Departing faculty and staff may hold Data that are important for ongoing operational reasons. Examples include student grades in current courses that are critical to determining final grades, or status notes of an existing project necessary for completion. The Department Chair, SBA, or designee, should determine appropriate handling of Data to ensure continuation of important activities.
 - d. Research grants: If a research grant is involved, Penn's [Office of Research Services](#) must be informed of the departure or passing of the individual and must be consulted to determine, for example, whom to notify (e.g., the Principal Investigator, the sponsoring agency) and in general to address the handling of the Data. Compliance with government regulations and University research policies should be ensured. Information and guidance can be obtained from the [Office of the Vice Provost for Research](#).
 - e. Academic collaborators: If a faculty member was collaborating with another individual at Penn or PSOM or elsewhere, the Department Chair or designee should take appropriate steps to address the interests of the collaborators, the individual, PSOM and Penn. These should include seeking objective evidence of the collaboration.

- f. Potential litigation: If there is an actual or likely claim against Penn, there is a duty to preserve all evidence, hard copy or electronic, that might become relevant to the lawsuit. The [Office of General Counsel](#) must be consulted.
 - g. Intellectual Property: If the Data are likely of interest as Penn's intellectual property, the Center for Innovation should be consulted.
 - h. Institutional History: If the Data are potentially of interest to Penn for institutional history purposes, the [University Archivist](#) should be consulted.
 - i. Assets: In the case of deceased individuals, Assets requested by family members or close friends can be provided, most typically through the executor or as otherwise ordered by the court. As described above, documentation of executorship should be requested by the department and reviewed by the Office of General Counsel.
 - j. Department Owned Equipment: Before separating, all University, PSOM, and Department-purchased equipment must be returned to the issuer, including: computer, laptop, keyboard, mouse, monitor, printer, scanner, webcam, speakers, headphones, docking station, cellular phone, etc. If permitted by the department, individuals may keep their cellular phone number(s). The approving manager should submit a ticket requesting a transfer of billing responsibility. Refer to [IS Self Service Portal](#).
 - k. System Access: All system access should be terminated unless the individual is in good standing and in active retirement status or being proposed for an active appointment after separation and there is a clear business need for access. It may be determined that access to all systems is no longer necessary. Continued access is at the applicable school or department's discretion.
7. Questions – If you have any questions or seek advice regarding how to handle the above, please contact the [Office of General Counsel](#).