



Office of Information Technology Services

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www.its.ny.gov

Office of Information Technology Services Policy	No: ITS-P23-002
ITS Policy: Offboarding	Updated: 2/4/2026
	Issued By: NYS Office of Information Technology Services Owner: Division of Legal Affairs

1.0 Purpose and Benefits

The Office of Information Technology Services (“ITS”) is entrusted with managing the Individual accounts and access privileges of ITS and its supported agencies (“Client Agency”). Part of managing these accounts means maintaining standardized offboarding of Individual accounts upon State employee, contractor, or consultant (collectively referred to herein as “Individual(s)”) separation from ITS or a Client Agency.

Offboarding is the process used to revoke accounts and access from separating Individuals. Proper offboarding is necessary to facilitate the appropriate deactivation of accounts, to ensure ITS and Client Agencies meet their legal obligations on this topic, and to secure the return of all ITS-owned equipment and assets. Proper offboarding also ensures the security of state resources and data.

This policy outlines the importance of appropriate offboarding, defines specific types of offboarding, and ultimately establishes a collaborative workflow that involves ITS technical staff, ITS Division of Legal Technology (“Legal Tech”), and Client Agency legal counsel, or their designee.

2.0 Authority

*Section 1 of Executive Order No. 117,*¹ established January 2002, charges the State Chief Information Officer (“CIO”) with overseeing and supervising the management and operations of ITS. *Section 102(2) of the State Technology Law* gives the Director of ITS responsibility for the administration of ITS. Details regarding this authority can be found in NYS ITS Policy, [NYS-P08-002 Authority to Establish State Enterprise Information Technology \(IT\) Policy, Standards and Guidelines](#).

3.0 Scope

This policy applies to ITS employees, contractors, consultants, and ITS supported agencies (“Client Agency”).

This policy applies to the Individual account(s) assigned to a specific Individual.

4.0 Information Statement

The employing agency, ITS or its Client Agency, must complete the types of offboarding described herein based on need and potential risk to the agency. ITS will assist the Client Agency by disabling the Individual’s access to accounts, technology, and associated assets. There are several services included in the ITS Offboarding and Deprovisioning process to ensure the appropriate deactivation of accounts, to ensure legal obligations are met, and to secure the return of all ITS-owned equipment and assets.

Failure to offboard appropriately can lead to the loss of necessary data and can result in legal implications. Legal Tech is a Division within the ITS Office of the Chief General Counsel. Legal Tech provides legal preservation services to ITS and Client Agencies for both email and non-email electronically stored information (“ESI”). During the offboarding process, to the extent the employing agency, ITS or a Client Agency, identifies a legal preservation obligation related to the separating Individual, it can engage Legal Tech to assist in meeting those obligations.

All references to Executive Order 117 refer to that which was originally issued by Governor George E. Pataki on January 28, 2002, and continued by Executive Order 5 issued by Governor Eliot Spitzer on January 1, 2007, Executive Order 9 issued by Governor David A. Patterson on June 18, 2008, Executive Order 2 issued by Governor Andrew M. Cuomo on January 1, 2011, and Executive Order 6 issued by Governor Kathy Hochul on October 8, 2021.

4.1 Types of offboarding

There are two (2) types of offboarding: Standard and Emergency. Please review the following to determine which is required.

1. **Standard:** This is a typical offboarding in which an Individual is separating from the employing agency. The employing agency can submit Standard offboarding requests 14 days prior to the requested decommission date, as defined in KB0027621 via utilizing the ITS ticketing system (“ITSM”) and searching “Employee Offboarding.” The requested decommission date is defined as the last day that an employee/contractor/consultant is being paid by a NYS entity, with specific access turned off prior to that date if necessary. The account is automatically deprovisioned on the decommission date and reviewed the next business day.
2. **Emergency:** This type of offboarding is due to Individual termination or a separation in which there is a potential risk to the agency if all access is not immediately disabled. The employing agency must get approval for these requests from their agency’s Chief Legal Counsel and must forward the requests to the ITS Legal Tech team shared mailbox at its.sm.legaltech@its.ny.gov for action. These offboarding requests cannot be processed through ITSM. Emergency offboarding can be scheduled with the ITS Legal Tech team if access termination is required outside of normal business hours (8A – 5P, Monday through Friday). Any requests outside of normal business hours will be handled on a “best-effort basis” until the following business day. Once the offboarding is complete, the employing agency must submit an offboarding request via utilizing ITSM and searching “Employee Offboarding” for tracking and equipment retrieval purposes.

4.2 Legal Obligations and the Attestation Clause

Once an Individual is offboarded the employing agency will no longer have access to the Individual’s home drive or mobile device data. Home drive data will be purged in accordance with ITS-P21-005, Offboarding and Automatic Deprovisioning of Mailbox and Home drive(s). An offboarding will not affect legal holds placed on an Individual’s account(s) in the O365 eDiscovery solution.

The person submitting the offboarding request must check an attestation box confirming that they consulted the Client Agency legal department regarding any pending legal preservation and retention obligations pursuant to ITS-P18-007 and ITS-P21-001, and that they are authorized to submit the request for the devices to be returned to ITS for sanitization. The employing agency must determine their legal hold obligations.

If a legal preservation obligation exists, and the employing agency must maintain the Individual’s data, the employing agency legal department must contact the ITS Legal Tech team at its.sm.legaltech@its.ny.gov for assistance.

4.3 Transfer of Devices, Accounts and Data Prohibited

Upon separation of employment, an individual's access to ITS-issued devices and state data is terminated and all devices must be returned. Individuals are not permitted to transfer any ITS-issued device, account, data plan, or any state business data to another account or device, including but not limited to a personal account or device, or an account or device associated with another individual, another state agency, or other third-party. If an exception to this prohibition is required, the Chief Legal Counsel of the agency where the individual's accounts and data resides must approve the transfer. If data is to be transferred to another agency, the Chief Legal Counsel of the onboarding/receiving agency must also approve of the transfer. This prohibition does not apply to authorized requests for delegate access.

5.0 Compliance

This policy shall take effect upon publication. Compliance is required with all enterprise policies and standards. ITS may amend its policies and standards at any time. Compliance with amended policies and standards is required.

If compliance with this policy is not feasible or technically possible, or if deviation from this policy is necessary to support a business function, Client Agency's must request an exception from the Legal Tech team via the following email address: its.sm.legaltech@its.ny.gov.

6.0 Definitions of Key Terms

Except for terms defined in this policy, all terms shall have the meanings found in <http://www.its.ny.gov/glossary>.

7.0 Contact Information

Submit all inquiries and requests for future enhancements to the policy owner at:

Office of the Chief General Counsel
Reference: ITS-P23-002
NYS Office of Information Technology Services
State Capitol, ESP, P.O. Box 2062
Albany, NY 12220
Telephone: 518-473-5115
Email: its.sm.legaltech@its.ny.gov

ITS policies, standards, and guidelines may be found at: <https://its.ny.gov/policies>.

8.0 Revision History

This policy should be reviewed consistent with the requirements set forth in [ITS-P24-003 Process for Establishing Information Technology Policies, Standards, and Guidelines](#).

Date	Description of Change	Reviewer
04/06/2023	Issued policy	Division of Legal Affairs
07/24/2023	Updated policy	Division of Legal Affairs
10/2/2025	Updated policy – removed “immediate” offboarding type and added prohibition on transfer of devices	Division of Legal Affairs
02/4/2026	Updated policy – added requirement for offboarding and onboarding general counsel sign off on data transfers	Chief General Counsel

9.0 Related Documents

[ITS-P21-005, Offboarding and Automatic Deprovisioning of Mailbox and Home drive\(s\)](#)

[ITS-P18-007, Mobile Device Provisioning, Deprovisioning, and Replacement](#)

[ITS-P21-001, Workplace Computing Device](#) [NYS-S13-003, Sanitization/Secure Disposal](#)

[NYS-P08-002, Authority to Establish State Enterprise Information Technology \(IT\) Policy, Standards and Guidelines](#)

[ITS-P10-003, ITS Telecommuting Policy KB0027621](#)