



OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: ADM 03-01-006

SUBJECT: Electronic Casefile Guidelines for OSHA Enforcement Records

DIRECTORATE: Directorate of Administrative Programs

SIGNATURE DATE: August 24, 2023

EFFECTIVE DATE: September 15, 2023

ABSTRACT

- Purpose:** To establish guidelines for the consistent creation, maintenance, and disposition of an electronic casefile (ECF) for official OSHA enforcement records, including unprogrammed activities (UPAs) and inspections.
- Scope:** This instruction applies to OSHA regional and area offices and subordinate offices that maintain enforcement casefiles and related files.
- References:** DAA-0100-2018-0002 – OSHA Records Disposition Authority [Inspections Records System \(archives.gov\)](#)
CPL 02-02-072 - Rules of agency practice and procedure concerning OSHA access to employee medical records [Rules of agency practice and procedure concerning OSHA access to employee medical records | Occupational Safety and Health Administration](#)
ADM 03-01-004 - Revised OSHA Records Management Program [Revised OSHA Records Management Program. | Occupational Safety and Health Administration](#)
ADM 03-01-005 - OSHA Compliance Records [OSHA Compliance Records. | Occupational Safety and Health Administration](#)
CPL 02-00-164 - Field Operations Manual (FOM) [Field Operations Manual \(FOM\) | Occupational Safety and Health Administration \(osha.gov\)](#)
- Cancellations:** None
- State Impact:** No impact
- Action Offices:** National, Regional and Area Offices
- Originating Office:** Directorate of Administrative Programs, Office of Technology Assistance (OTA)

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By and Under the Authority of

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Executive Summary

This instruction establishes policy for the consistent creation, maintenance, and disposition of official OSHA enforcement records, including unprogrammed activities (UPAs) and inspection casefiles in an electronic format. This transition aligns with the 2019 OMB/NARA memorandum (M-19-21) that explains the President’s Management Agenda to establish an overarching vision to improve mission delivery, customer service, and accountable stewardship on behalf of the American public. OSHA is making a recordkeeping transition to an electronic environment housed within the OSHA Information System (OIS) to the fullest extent possible, to meet this vision and comply with records management laws and regulations.

Significant Changes

None

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I. Purpose.

This instruction provides guidelines for the consistent creation, maintenance, and disposition of an electronic casefile (ECF) for official OSHA enforcement records, including unprogrammed activities (UPAs) and inspections.

II. Scope.

This instruction applies to Directorate of Enforcement Programs, Directorate of Construction, OSHA regional offices, area offices and subordinate offices maintaining compliance casefiles and related files.

III. References.

- A. [DAA-0100-2018-0002 – OSHA Records Disposition Authority [Inspections Records System \(archives.gov\)](#)
- B. CPL 02-02-072 - Rules of agency practice and procedure concerning OSHA access to employee medical records [Rules of agency practice and procedure concerning OSHA access to employee medical records | Occupational Safety and Health Administration](#)
- C. ADM 03-01-004 - Revised OSHA Records Management Program [Revised OSHA Records Management Program. | Occupational Safety and Health Administration](#)
- D. ADM 03-01-005 - OSHA Compliance Records [OSHA Compliance Records. | Occupational Safety and Health Administration](#)
- E. CPL 02-00-164 - Field Operations Manual (FOM) [Field Operations Manual \(FOM\) | Occupational Safety and Health Administration \(osha.gov\)](#)

IV. Cancellations.

- A. None

V. Action Offices.

- A. **Responsible Office.**
Directorate of Administrative Programs, OTA
- B. **Action Office.**
Regional, Area and District Offices
- C. **Information Offices.**
OSHA National Office, Office of the Solicitor

VI. Federal Program Change.

None

VII. Significant Changes.

- A. None

VIII. Definitions

- A. [OIS - OSHA Information System – Official system used for data entry of OSHA inspections and Unprogrammed Activities (UPA) such as Complaints and

Referrals

- B. File of Record – All items contained in the OIS Casefile section are considered part of the agency’s official file of record for the activity
- C. UPAs – Complaints, referrals, and fatalities/catastrophes (FAT/CATs)
- D. ECF – Electronic Casefile

IX. OIS Electronic Casefile Storage

- A. The OIS Casefile section is the designated area to store OSHA’s official Inspection and UPA file of record. All documents contained in the OIS Casefile section should be considered as part of the Official OSHA file of record for that activity.

X. Casefile Types and Structure

- A. UPA Inquiries/Investigations:
 - 1. UPAs are results of complaints and referrals that do not meet the threshold of initiating an inspection. When these items are valid complaints or referrals they are handled through the “non-formal” (aka “phone/fax/email”) process. UPA Inquiry/Investigation electronic casefiles are created and managed in accordance with the FOM and in the OIS.
 - 2. The following casefile structure is used for UPAs in the OIS.
 - a. Diary Sheet
 - b. UPA Intake & Forms
 - c. Source Correspondence & Documentation
 - d. Employer Correspondence & Documentation
 - e. Combined File
 - f. Related Activities
 - 3. See Appendix A for a detailed listing of folders and content description
- B. Inspections:
 - 1. Inspections are on-site activities that are the result of complaints, referrals, FAT/CATs, programmed activities and other initiating activity types. Inspection electronic casefiles are created and managed in accordance with the FOM and OSHA Compliance Records directives in the OIS.
 - 2. The following casefile structure is used for Inspections in the OIS.
 - a. Diary Sheet
 - b. Citation/Notice Issuance

- c. Inspection/Investigation/Narrative Reports
- d. Violation Information
- e. Field Notes
- f. Statements
- g. History
- h. Initiating Documents
- i. Sampling
- j. Employer Provided Documentation
- k. Official Documents
- l. Technical Documents
- m. Electronic Media
- n. General Correspondence
- o. Informal Conference Documentation
- p. Abatement Information
- q. Penalty Collection Information
- r. SOL Related Information
- s. Combined File
- t. Related Activities

3. See Appendix B for a detailed listing of folders and content description.

XI. Linking UPAs and Follow-Up Inspections to Inspections Files

- A. UPAs: Where a UPA is related to an inspection, they shall be linked in the OIS inspection using the Related Activities section. The UPA ECF contents will then automatically be part of the inspection's ECF in OIS. The linkage will be shown in the Related Activities section of the Casefile section of all related activities.
- B. Follow-Up Inspections: In the OIS, follow-up inspections must be entered in the Inspection Type section as a Follow-Up. They must also be linked to the original inspection in the Previous/Subsequent Inspections section of the Related Activities section. This ensures the files will eventually be archived together and can be accessed from any of the linked inspections. The linkage of these inspections will be shown in the Related Activities section of the Casefile section of all related activities.

XII. Contents and Document Naming Protocol

- A. The naming of contents and documents within files must make sense so that anyone accessing or looking for information in the file can access with relative

ease. The Non-mandatory guideline for naming files in UPAs and Inspections is contained in Appendices C and D.

XIII. File Format and Saving

- A. In most cases, it is recommended that final documents will be saved in .PDF format. This includes paper document scans and emails. Emails are not to be saved in Outlook format but must be saved as a PDF. If, during litigation, SOL requires original emails and other electronically stored information (ESI), it should be retrievable directly from Outlook. Attached documents must be saved separately from emails and in their original format, unless using Adobe functionality (PDF portfolio) that attaches the attachments to the PDF email. All correspondence, including citations, generated and sent by OSHA must be signed and saved as a PDF prior to adding it to the electronic casefile.
- B. Other documents collected during UPA and inspection activities are evidence for the file and should be saved in their original format, including metadata. These include those received in electronic form in Microsoft Word, Excel and other formats. This also includes photos and videos received via e-mail or other electronic means.
- C. During litigation, the Solicitor of Labor may place a litigation hold on all documents and evidence, including electronically stored information. This does not place any additional obligation or content on ECF. All original documents obtained, and all original emails in their electronic format must be maintained according to records management and Department email retention policies.

XIV. Archiving and Deleting Electronic Casefile Documents

- A. All applicable file retention policies should continue to be followed as per DAA-0100-2018-0002. For casefiles fully maintained in OIS, no archiving is necessary at this time as there is enough storage capacity to store all the files in OIS. File destruction rules should still be followed for files stored in OIS and the ECF documents destroyed when applicable.

XV. Non-Digital Source Document Retention

- A. Field offices are strongly urged to collect documents in a digital format whenever possible. This will eliminate the need for a paper-based file to be kept that contains the physical documents received during an inspection. When physical documents are received, follow OSHA's Practices for Digitizing Inspection and Other Investigation Case File Records. See Appendix E for details on the policy.
- B. Offices shall preserve non-OSHA generated physical documents received in their original condition for an inspection until the matter is over. The matter is considered over when all violations are a final order. In some rare instances, such as a criminal referral, it may be necessary to retain the physical documents past the final order when instructed by the RSOL for that specific case.

- C. The method and process for storing the physical documents received during inspections will be left up to the individual Regions to determine a policy for their Area Offices to follow.

XVI. Implementation Timeframes

- A. The use of the OIS ECF as the location of the agency's official file of record for OSHA enforcement records is to be implemented into use by all federal OSHA offices by October 1, 2023

Appendix A
Mandatory UPA File Structure

UPA Section Names	Section Content Description
Diary Sheet	<ul style="list-style-type: none"> • Diary sheet of applicable case related actions and activities
UPA Intake & Forms	<ul style="list-style-type: none"> • eComplaint Report • OIS Sensitive Report • Original complaint referral (email, hotline msg, letter, etc) • Original Document (UPA source) • Duty Officer notes
Source Correspondence & Documentation (Not Employer)	<ul style="list-style-type: none"> • OSHA Acknowledge letter to Source • OSHA Results letter (Closing) to Source • OSHA Notice of Time Extensions to Source • OSHA Notice of Intent to Inspect to Source • Source responses and supporting documents • All Source emails
Employer Correspondence & Documentation	<ul style="list-style-type: none"> • OSHA Notice of Complaint Letter to Employer • OSHA Rapid Response Investigation Letter • OSHA Sat Response to Inquiry (Closing) letter to Employer • Employer Request for more time (& OSHA response) • Employer response and supporting documents • All Employer emails
Combined File	<ul style="list-style-type: none"> • Generated PDF of combined Selected Files for the case
Related Activities	<ul style="list-style-type: none"> • Links to related activities (Inspection or UPA) for the case. • This section does not contain actual files or documents. It is only a quick way to navigate to the related activities.

Appendix B
Mandatory Inspection File Structure

Inspection Section Names	Section Content Description
Diary Sheet	<ul style="list-style-type: none"> • Diary sheet of applicable case related actions and activities
Citation/Notice Issuance	<ul style="list-style-type: none"> • Signed Citation and Notification of Penalty (OSHA-2) • Signed Notice of Unsafe or Unhealthful Working Conditions (OSHA-2H) • Expedited Informal Settlement Agreement (EISA) • FINAL Hazard Alert Letter (HAL)/Ergonomic Hazard Alert Letter (EHAL) • U.S. Postal Service Certified Mail Receipt • U.S. Postal Service Domestic Return Receipt (Green Card) • Receipts related to delivery via United Parcel Service • Delivery receipt for hand delivery • Process Server Affidavit of Delivery
Inspection/ Investigation/ Reports/ Narrative Reports	<ul style="list-style-type: none"> • FINAL version of Inspection Report (OSHA-1) signed/dated by the CSHO • FINAL version of Investigation Summary if applicable (OSHA-170) • FINAL version of Fatality/Catastrophe Report if applicable (OSHA-36) • FINAL Narrative Form, OSHA entered 300 log summary forms, and any other formal written inspection summary • FINAL Significant Case template and talking points • FINAL Press Release
Violation Information	<ul style="list-style-type: none"> • FINAL Violation Worksheets (OSHA-1B) as issued with all supporting documentation located directly behind it. Example Willful worksheets, 5(a)(1) worksheets, photo mounting sheets, portions of consensus standards, portions of programs etc. • For Repeat violations include a copy of the citation (OSHA-2) for the prior violation, violation Worksheet (OSHA-1B) describing the prior violation, U.S. Postal Service Domestic Return Receipt (Green Card), signed Informal

	<p>Settlement Agreement, Formal Settlement Agreement and Notice of Docketing, or Judge’s Decision and Notice of Docketing</p> <ul style="list-style-type: none"> • Anytime there is a second issuance of citations these worksheets will be identified as such. • NO DRAFT VIOLATION WORKSHEETS – Do not maintain copies of additional violations not issued or drafts of violations in this folder
Field Notes	<ul style="list-style-type: none"> • CSHO notes, diagrams, walk around check sheet, construction information sheet (English/Spanish), itineraries and call lists
Statements	<ul style="list-style-type: none"> • Statements/interviews both signed/unsigned from employees (include confidentiality provision)
History	<ul style="list-style-type: none"> • Documentation of inspection history of the company • General establishment/business information • State Corporation Search • Information about the company obtained from a website or other public source • Copies of citations and supporting documentation obtained from other case files from our office or from another OSHA office • Newspaper and magazine clippings • Information from Pre Inspection Preparation Checklist
Initiating Documents	<ul style="list-style-type: none"> • UPA (Complaint) documents and all associated letters, notes, voicemails (.wav files) • Referral documents and all associated letters, notes, hotline message, voicemails (.wav files) • Rapid Response Investigation (RRI) intake form • Assignment and all associated notes and records • For Follow-Up inspections, a copy of the previous inspection that initiated the follow-up
Sampling	<ul style="list-style-type: none"> • OSHA sampling forms regarding company employees, calculations sheets, sampling results, sampling protocols and other supporting documentation • NOTE: All forms and documentation related to CSHO self-sampling activities should not be included in the inspection file. CSHO self-sampling activities should be kept in the OIS self-sampling activity module.
Employer Provided Documentation	<ul style="list-style-type: none"> • All correspondence between the CSHO and company (including emails) • Pre-issuance documentation provided by the company, such as, but not limited to, emails,

	<p>programs, SDS, consultation reports, company conducted sampling results, internal accident reports including statements taken by the company, pictures, manuals, maintenance reports, sampling reports, fax cover sheets, correspondence, personnel records, etc.</p> <ul style="list-style-type: none"> • Injury/Illness Records (OSHA 300, 300A, and 301 incident or equivalent) • Additional documents provided by the company related to the 301 Incident Report • Business cards of the employer and any consultants, attorneys or representatives of the employer
<p>Official Documents</p>	<ul style="list-style-type: none"> • All correspondence (emails) with other governmental agencies • Signed Medical Access Order (MAO) and supporting documentation; see NOTE at the end Appendix B and refer to CPL 02-02-072, “<i>Rules of agency practice and procedure concerning OSHA access to employee medical records</i>” or the most current version of similar guidance, for more instruction on proper handling of medical records • Any protocol documents signed between the company and OSHA regarding establishment access, company enforced site procedures or the handling of physical evidence gathered at inspection sites • Agreements signed prior to inspection regarding the sharing of information between area office and other agencies on site • A record of any permissions granted by the company should the company be contacted by OSHA for permission to use pictures obtained during this inspection in OSHA related training or publications • Documents, statements and pictures/video/audio supplied from other government agencies directly to OSHA, such as the Fire Department, the Police Department and the Coroner. EMS records (medical records) which contain patient vitals should NOT be in the casefile. <i>See note at the end of this appendix</i>
<p>Technical Documents</p>	<ul style="list-style-type: none"> • All correspondence (emails) with equipment manufacturers, industry related associations, and consensus groups • This will include but not be limited to OSHA

	<p>interpretations, portions of Consensus Standards (i.e.ANSI, ASME, etc.)</p> <ul style="list-style-type: none"> • Equipment manufacturer’s manuals, cut sheets, data sheets - not provided by the employer
Electronic Media	<ul style="list-style-type: none"> • All photos/Videos/Audio collected by the CSHO during the inspection
General Correspondence	<ul style="list-style-type: none"> • Notification of Inspection Results letter to complainant • All correspondence with the employer, sources, and unions <i>AFTER</i> citations have been issued <i>AND</i> that are not specific to other Post Issuance topics (i.e. Contest Info, Abatement Info, Informal Documentation) • FINAL Fatality Memo • FINAL Next of Kin (NOK) Letters • Any internal OSHA (ex. National Office/Regional Office) communications during preparations of the inspection file • Severe Violators Enforcement Program (SVEP) information
Informal Conference Documentation	<ul style="list-style-type: none"> • Informal conference notes • All correspondence (emails) with Employer/Employers representative during informal settlement negotiations • Documentation provided by the Employer during the informal conference • Executed Informal Settlement Agreement • Executed Expedited Informal Settlement Agreement
Abatement Information	<ul style="list-style-type: none"> • Certification of Corrective Action Worksheet (CCAW) • Documentation supporting abatement • Employer statement of abatement • Petition for Modification of Abatement (PMA) request and correspondence • Letter of past due abatement • Progress report abatement • List of detailed expenditures for abatement • Contract work proposal (abatement agreements) • Letter requesting/correspondence relating to planned method of abatement • Letter of transmittal of planned method of abatement to field office for the Solicitor • OSHA acknowledgement of receipt of planned method of abatement
Penalty Collection	<ul style="list-style-type: none"> • All correspondence (email) with Employer • Copy of request for payment

Information	<ul style="list-style-type: none"> • Copy of penalty reminder • Copy of check(s) • Copy of OIS Penalty Payment Report • U.S. Postal Service Certified Mail Receipt (to Lockbox) • U.S. Postal Service Domestic Return Receipt (Green Card) (to Lockbox) • Letter of refusal to pay past due penalty • All correspondence (email) with the Debt Collection Accountability Team (DCAT)
SOL Related Information	<ul style="list-style-type: none"> • Attorney/Client Privileged Information • Solicitor correspondence (email traffic) • Notice of Contest/Late Notice of Contest • Subpoena related information and supporting documentation • Warrant related information and supporting documentation • Denial of entry memos/narratives regardless if a warrant was attempted or not. • Interrogatories/Depositions • Formal Settlement Agreements • Litigation Hold documents • Review Commission orders
Combined File	<ul style="list-style-type: none"> • Generated PDF of combined Selected Files for the case
Related Activities	<ul style="list-style-type: none"> • Links to related activities (Inspection or UPA) for the case • This section does not contain actual files or documents. It is only a quick way to navigate to the related activities
	<p>NOTE: Electronic Information obtained via a Medical Access Order will not be contained in the OIS electronic casefile. This information will be password protected and stored on a device such as a thumb drive or CD-ROM and kept under lock and key by the Area Director in the Area Office. In accordance with CPL 02-02-072, "Rules of agency practice and procedure concerning OSHA access to employee medical records", or the most current version of similar guidance, this information will be maintained for enforcement purposes until the case/inspection has become a final order and any appeal period has expired. The information will then be properly destroyed.</p>

Appendix C

Non-Mandatory File Naming Suggestions – UPA

To ensure consistency/accuracy of documents, the following protocol has been developed regarding the naming of UPA documents that are saved, uploaded, or sent by email attachment. Only final documents will be kept (others removed). Where there is more than one document with the same name, use number after title, example Field Notes (2).

*NOTE: Documents generated by OIS can keep the OIS derived name in lieu of the recommend naming conventions below.

Document Description	Standard Document Name	Name Example
Diary Sheet	[UPA#]DIARY	1433889DIARY
OIS Final Summary	[UPA#]Summary	1433889Summary
eComplaint Report	[eComplaint#]Source-eCP	43022272Source-eCP
OIS Sensitive Report	OIS Generated name	OIS generated name.
Original Referral	Source-Referral	Source-Referral
Original Complaint	Source-Complaint	Source-Complaint
Duty Officer Notes	Notes	Notes
Fatality/Catastrophe Report	Source-FATCAT	Source-FATCAT
OSHA Acknowledgement	Ack Letter	Ack Letter
OSHA Results (closing, not ER)	SourceClose Letter	SourceClose Letter

Notice of Time Extension	Extension Notice	Extension Notice
Notice of Intent	Intent Notice	Intent Notice
Source responses (not ER)	File name (adjusted when appropriate)	[file name]
Source emails (not ER)	[mm.dd]-subject [email]	11.19-Close Letter email
Notice of Complaint	Complaint Letter	Complaint Letter
RRI Letter	RRI Letter	RRI Letter
Sat Response (close) Letter	ERClose Letter	ERClose Letter
Time Extension Request	[mm.dd]-extension request	11.19-extension request
OSHA Extension Approval	[mm.dd]-extension [approved, denied]	11.19-extension approved
ER response	File name (adjusted when appropriate)	[file name]
ER emails	[mm.dd]-subject [email]	11.19-OSHA standard question email

Appendix D

Non-Mandatory File Naming Suggestions – Inspection

To ensure consistency/accuracy of documents, the following protocol has been developed regarding the naming of UPA documents that are saved, uploaded, or sent by email attachment. Only final documents will be kept (others removed). Where there is more than one document with the same name, use number after title, example Field Notes (2).

*NOTE: Documents generated by OIS can keep the OIS derived name in lieu of the recommend naming conventions below.

Document Description	Standard Document Name	Name Example
Diary Sheet	[inspection #]DIARY	1433889DIARY
Litigation Hold Letter	[inspection #]LITHOLD	1433889LITHOLD
Citations OSHA2	OSHA2 or Citations	OSHA2 or Citations
Notices OSHA2H	OSHA2H or Notice	OSHA2H or Notice
EISA, Original	No name – part of OSHA2	(no name, kept with OSHA2)
HAL, EHAL	HAL, EHAL	HAL, EHAL
Postal and Delivery receipts/ affidavits	[type]Receipt	Cert Mail Receipt, UPS Receipt, etc.
Inspection Long Report	Inspection Long Report	OSHA-1 or Insp Report
Investigation Summary	Inspection Summary	OSHA-170 or Insp Summ
Fatality/Catastrophe Report	FAT/CAT Report	FAT/CAT Report

Narrative Form	Narrative	Narrative
OSHA 300 log summary	OSHA 300 - [year]	OSHA 300 - 2018
Significant Case template	Significant Case Template 1, or 2	SIGCASE Template 1, SIGCASE Template 2
Press Release	Press Release	Press Release
Violation Worksheets	Violation Worksheets OSHA-1B	OSHA-1B or Violation Wkst
Field Notes	Notes, diagrams, check sheets, itineraries, call lists, etc	Simplified name
Statements	[date]Statement_[name]	10.14.21Statement_EE1
Inspection History	Inspection History	History
ReferenceUSA	ReferenceUSA	ReferenceUSA
State Corporation Search	StateCorp	StateCorp
Info about company from website or public source	[source]Company Info	Website Company Info BBB Company Info
Copies of citations and supporting documents from other casefiles	[Ref#]Repeat	1234567_Repeat
Initiating documents	Entire UPA included in file	N/A
Sampling Forms	[type] Sample	CO Sample

Forms related to self-sampling/monitoring	[type] Self Sample or Name of file	Noise Self Sample, ATAR, Lab Report, etc
Email Correspondence with Employer	Employer Email	Employeremail
Employer Provided documentation	Name	Simplified name
Employer Provided Video/photo/audio	Name_Vid, Name_photo, etc	Security VID
Email Correspondence with other Gov Agencies	Official Email	Official Email
Medical Access Order (MAO) and supporting documents	MAO	MAO
Protocol Documentation	[type] Protocol	PhysEvidence Protocol
Sharing of Information Agreements	[agency] Agreement	FAA Agreement
Special permissions	[type] Permission	Photo Permission
Material provided from other government agencies	[agency][type]	SDFD Incident Report
Email Correspondence with equipment manufacturers, industry associations and consensus groups	[date][name] Email	10.15_TX Instruments_email
Documentation of technical research	[resource]-[subject]	ANSI – Forklift

Equipment manufacturer's manuals, cut sheets, data sheets not provided by ER	[equipment][type]	Hyster 36-38T Manual
Electronic Media (CSHO)	[subject] file name, or just file name	Workpench jpg or DSC00125, Interview EE1.wav, etc
Post-Citation correspondence and documentation	(email date*)[subject][type] *if applicable	Insp Results letter to Complainant
Next Of Kin (NOK) Letters	Assistant Secretary NOK Letter	AS NOK Letter
Informal Conference Notes	IC Notes	IC Notes
Executed Informal Settlement Agreement	[inspection #]ISAEXECUTED	1556324ISAEXECUTED
EISA, signed	[inspection #]EISA	1556324EISAEXECUTED
Cert of Corrective Action worksheet	Complete CCAW, or Partial CCAW (Items covered) Consider adding DIS/APP for denied or approved status	Partial CCAW (1-1a, 2-1) Complete CCAW CCAW DIS Partial CCAW (1-1a DIS)
Petition for Modification of Abatement, Certification of PMA posting	PMA [type]	PMA Req, PMA Approval letter, PMA Cert of Posting
Penalty related documents with ER	[date*][short name] *if applicable	10.15_Overdue Pmt email, Demand Letter, Refusal Letter, Payment in Full, Payment Installment (1), etc.
DCAT Correspondence	[date*]DCAT [type]	DCAT letter

	*if applicable	
Legal documentation	[name][type*] *if applicable	Notice of Contest letter, Subpoena, Denial of Entry memo, Depositions, FSA, Notice of Docketing, Order Terminating Proceeding, etc.

Appendix E

OSHA's Practices for Digitizing Inspection and Other Investigation Case File Records

1. General

- a. These practices apply to all electronic case file records that were not originally obtained or created in a digital format, including employer-provided paper documents, paper field notes, witness statements, and other non-digital case file records (collectively, original documents). When an OSHA office intends to digitally reproduce (digitize) case file records the office must:
 - i. Digitize the record in accordance with the OSHA Digitization Process
 - ii. Validate the digital record.

2. OSHA Digitization Process

- a. When digitizing employer-provided records, the digital record must:
 - i. Capture and contain all information in the original source documents;
 - ii. Include all the pages or parts from the original source;
 - iii. Include both sides of all non-blank pages;
 - iv. Appear legible;
 - v. Accurately reflect the original hard copy document.
- b. The digitization process must:
 - i. Ensure that OSHA can use the digitized versions for all the purposes the original source documents serve, including the ability to attest to transactions and activities;
 - ii. Protect against unauthorized deletions, additions, or alterations to the digitized versions; and
 - iii. Ensure the agency can locate, retrieve, access, and use the digitized versions for the records' entire retention period.

3. Validating Digitization.

- a. Offices must validate that the digitized versions are of suitable quality to replace original source records. The document must be saved in Portable Document Format (PDF) or an equivalent format that presents documents, including text formatting and images, in a manner independent of application software, hardware, and operating systems.
- b. Compliance officers with custody of the original document or designated persons performing digitization of original documents must evaluate each page; front and back; of the source record and compare it to each page; front and back; of the digitized document.
- c. The metadata/properties of the digitized document must be updated to include the identity of the person performing digitization of the record and the statement:

- i. This document is a digitally reproduced record and is a true and correct representation of an original source record created in accordance with the OSHA Digitization Process.
- d. The metadata/properties must be retained with the digitized record for the life of the case file.
- e. National Archives and Records Administration (NARA) may review validation documentation as needed.
- f. As soon as practical after validation, the digitized document should be uploaded to the electronic case file to assure chain of custody and maintain the location of and proper access to the case file material.
- g. To update the metadata/properties of a pdf, Choose File > Properties. Click on the Description tab in the Document Properties dialog box (it is generally defaulted to this tab). Enter the person performing digitization of the record into the Author area. Enter the statement from section C in the Subject area. This procedure may vary slightly depending on the version of Adobe you are using.

4. Disposing of Original Documents

- a. After an office has validated that the digitized versions meet the OSHA Digitization Process, the office may destroy the original source records pursuant to Section XV.B of this document, subject to any pending legal constraint, such as a litigation hold.
- b. All documents containing Personally Identifiable Information (PII) or any other sensitive information (e.g., financial, business or process information, etc.) shall be shredded or otherwise suitably destroyed to prevent unintended release.
- c. OSHA must treat the digitized versions, now the official record, the same way it would have treated the original source records. The office must retain the digitized versions for the duration of the specified retention period established by the applicable records schedule.
- d. OSHA offices do not need to obtain NARA approval to destroy scheduled temporary records which have been digitized according to this process.