

**North Carolina Department of Labor
Occupational Safety and Health Division**

Raleigh, NC

Administrative Information System

Administrative Procedure Notice 24F

Subject: OSH File Management

A. Purpose.

This APN describes and establishes responsibilities for file management in each Occupational Safety and Health OSH/ASH Division field office.

B. Field Office Procedures.

The OSH Division has five Compliance Bureau field offices and an Agricultural Safety and Health (ASH) Bureau office with administrative specialists (AS) and administrative associates (AA). In each field office, administrative staff employee(s) are responsible for file management in their respective offices. File management includes paper and paperless open files, contested files, files to budget, closed files, along with complaint and referral investigation files.

1. Asheville.

- a. The following inspection file types listed below are kept in a lateral file cabinet in the back area of the office and managed by the AS I. They are separated by category and are filed alphabetically. Each drawer is labeled according to the type of file located in the drawer. Files are placed in the cabinet as follows:
 - i. Open paper inspection files; top drawer, left side
 - ii. Contested files; top drawer, center
 - iii. Collection paper files (financial services); top drawer, right side
 - iv. Closed paper inspection files; bottom drawers
- b. The AS I will ensure all paperwork for the collection process is in the Documents Section of OSHA Express (OE) before sending an email to Financial Services to start the collection process on the Inspection file. The Documents section should include proof of service.
- c. Closed, paper complaint and referral investigation files, prior to March 1, 2016, are in labeled boxes stored in the office and are managed by the AS I.
- d. Paperless complaint and referral investigation files (open and closed) are maintained by the AS I in OE.

- e. Paper files removed by any office staff from the closed file area, or the open files area must have an “Out Card” filled out by the CSHO or Supervisor and placed in the location of the file that is being removed. When the file is returned to the AS I, it is documented on the “Out Card”.

2. Charlotte.

- a. Open paper inspection files are kept by the CSHO in their individual workarea.
- b. Contested files are kept by the CSHO in their individual workarea.
- c. Collection paper files are kept up front in the AA file cabinet and filed alphabetically by federal fiscal year the AA II will ensure all paperwork for the collection process is in the Documents section of OE before sending an email to Financial Services to start the collection process on the Inspection file. The document section should include proof of service.
- d. Closed paper inspection files are stored alphabetically by federal fiscal year in the rotary cabinet filing system and maintained by the AA II.
- e. Paperless complaint and referral investigation files (open and closed) are maintained by the AA II in OE.
- f. Closed paper complaint and referral investigation files, prior to March 1, 2016, are stored alphabetically by federal fiscal year in the rotary file cabinet. The AA II is responsible for the closed complaint and referral files.
- g. Paper files removed by any office staff from the closed file area, or the open files area must have an “Out Card” filled out by the employee removing the file. The “Out Card” is placed in the location of the file that is removed. The file is returned to the AS I who removes and initials the “Out Card” and replaces it with the file.

3. Raleigh.

- a. Open paper inspection files are kept by the CSHO in their individual workarea.
- b. Contested files are kept by the CSHO’s in their individual work area.
- c. Collection paper and paperless files are maintained by the AA II who ensures all paperwork for the collection process is in the Documents section of OE before sending an email to Financial Services to the start the collection process on the Inspection File. The file if paper is then placed alphabetically in a filing cabinet maintained by the AA II. The document section should include proof of service.
- d. Closed paper inspection files are stored alphabetically in the Lektriever by the AA II and are filed by federal fiscal year.
- e. Complaint and referral paper investigation files, prior to March 1, 2016, are

filed by federal fiscal year and maintained by the AA II.

- f. Paperless complaint and referral investigation files (open and closed) are maintained by the AA II in OE.
- g. Paper files should only be removed from a file storage area (e.g., closed, collections, complaints, referrals) by the AA II, or any other administrative staff in her absence, and an “Out Card” must be completed. The “Out Card” is completed by the administrative staff pulling the file entering the date, and the person’s name requesting the file. The “Out Card” is then placed in the location of the file that is removed. When the file is returned, the employee should give the file to the AA II or other administrative staff to be filed back in the proper area and the “Out Card” should be updated appropriately.

4. Wilmington.

- a. Open paper inspection files are maintained by the CSHO in a designated lateral file cabinet in the file room in alphabetical order with all files that are currently open (mixed years).
- b. Contested files are kept in the designated lateral file in alphabetical order in the file room.
- c. Collection paper and paperless files are maintained by the AS I who ensures all paperwork for the collection process is in the Documents section of OE before sending an email to Financial Services to the start the collection process on the Inspection File. The file, if paper, is then placed alphabetically in a filing cabinet maintained by the AS I. The Documents section should include proof of service.
- d. Closed paper inspection files are kept in a lateral file cabinet in the file room in alphabetical order by federal fiscal year. The AS I will maintain these files.
- e. Closed complaint and referral paper investigation files prior to March 1, 2016, are kept in lateral files in the file room and filed in alphabetical order by federal fiscal year. The AS I maintain these files.
- f. Paperless complaint and referral investigation files (open and closed) are maintained by the AS I in OE.
- g. Paper files should only be removed by the administrative staff from the closed file area. The administrative staff must have an “Out Card” filled out by the CSHO. The “Out Card” should include the date, inspection #, name of company, and who the file is being checked out to. The “Out Card” is placed in the location of the file that is being removed. The file is returned to the AS I or AAII who documents it on the “Out Card” and files it.

5. Winston-Salem.

- a. Open paper inspection files and contested files are kept by the CSHO in their individual work areas.
- b. Collection paper and paperless files are maintained by the AA II who ensures all paperwork for the collection process is in the Documents section of OE before sending an email to Financial Services to start the collection process on the Inspection File. The file, if paper, is then placed alphabetically in a filing cabinet maintained by the AA II. The Documents section should include proof of service.
- c. Closed paper inspection files are stored alphabetically by federal fiscal year in the filing system and are maintained by the AA II.
- d. Paperless complaint and referral investigation files (open and closed) are maintained by the AA II in OE.
- e. Closed complaint and referral paper investigation files prior to March 1, 2016, are stored alphabetically by federal fiscal year in the main filing system area in the back of office and managed by the AA II.
- f. Files should only be removed by the administrative staff from the closed file area. The administrative staff must have an "Out Card" filled out by the CSHO. The "Out Card" should include the date, inspection #, name of company, and who the file is being checked out to. The "Out Card" is placed in the location of the file that is being removed. The file is returned to the AS I or AAII who documents it on the "Out Card" and files it.

6. Agricultural Safety and Health Bureau.

- a. Open paper inspection files and contested files are stored alphabetically in lateral file cabinets in the ASH area. Open paper and paperless inspections and contested files are maintained by the CSHO.
- b. The AA II maintains the collection files. The files are placed alphabetically in a lateral filing cabinet and maintained by the AA II. The AA II ensures all paperwork for the collection process is in the Documents Section of OE before sending an email to Financial Services to start the collection process on the Inspection file. The Documents section should include proof of service.
- c. Closed paper inspection files are stored alphabetically by federal fiscal year in lateral file cabinets and are maintained by the AA II and AS I.
- d. Open paper complaint and referral investigation files are maintained in a lateral file cabinet in ASH and maintained by the AS I for each CSHO.
- e. Closed paper complaint and referral investigation files are stored alphabetically by federal fiscal year in a lateral file cabinet in the ASH area and managed by the AA II and AS I.

- f. Paperless complaint and referral investigation files (open and closed) are maintained by the AA II in OE.
- g. Files should only be removed by the administrative staff from the closed file area. The administrative staff must have an “Out Card” filled out by the CSHO. The “Out Card” should include the date, inspection #, name of company, and who the file is being checked out to. The “Out Card” is placed in the location of the file that is being removed. The file is returned to the AS I or AAII who documents it on the “Out Card” and files it.

C. Responsible Staff.

Refer to Appendix A for the list of responsible administrative staff in each field office.

D. Paperless Process.

The paperless process for OSH/ASH Inspections began October 1, 2019. However, between Oct 1, 2019, and April 20, 2020, duplicate hard copies of files were also created and maintained to ensure the process was effective. All inspections opened April 1, 2020, or later no longer had a duplicative hard copy file created. All processing requests should be routed in OE to the assigned AA II or AS I for processing.

All CD/DVD photos and videos will be stored in the Medical Records cabinet in each field office. Except for LBT, theirs will be stored in the Lektriever. ***Note:** All photos should be converted to JPGs and videos should be converted to WAV or MOV when saved to a CD/DVD. Photos should be converted to a JPG before being saved to OE. Videos will not be saved to OE.*

- a. Once a file has been processed (Citation Package, No Inspections, In Compliance), the CD/DVD photos and videos associated with the specific file will be given to the AS I to place in the Medical Records cabinet. A 6x9 manila envelope will hold the CD/DVD photos and videos. The envelope should be marked with the inspection number, the name of the employer and the CSHO ID utilizing the label that will be attached to the envelope by an AA II. The AS I will affix the alpha labels on the photo/video envelope centered at the top when received for filing, or mark legibly with a black marker, the first three letters of the establishment’s name. Photo and video records will be filed by federal fiscal year and establishment name.
 - i. When more than five photos, and all videos, are received with responses to Complaints and Referrals, they will be placed on a CD/DVD for storage in the Medical Records cabinet using the same process as inspection photos and videos. The label on the 6x9 manila envelope will reference the Complaint/Referral number, company name and Supervisor ID. Photo and video records will be filed by federal fiscal year and establishment name.
 - ii. There will be an Evidence Sheet that the CSHO will complete that will state that there is a photo and/or video CD/DVD that belongs to the specific file and will tiff that document into the OE Documents section. A blank Evidence Sheet (Receipt of Evidence or Property) is available in

the Forms section of the FIS on the One Stop Shop.

- iii. Any photo request from CSHOs or Supervisors will come through the administrative staff using a sign out/in form.
- b. To import photos into OE for violations, the Photo Icon on the top right of the Violation screen should be utilized to enter photos associated with the specific violations.
 - i. Each violation should contain no more than three photos; however, all violations should contain at least one photo.
 - ii. For fatalities and high-profile cases, additional photos can be added for case file review.
 - iii. Abatement photos will be exported into the “Pictures” section and should be labeled as “Abatement Photo 01 001, etc.
- c. All incoming and outgoing mail will be scanned into the OE by the AA II. This will include all returned abatements, letters, and requests (e.g., ISA, Contest) receipts (green cards).
 - i. When photos and videos are received through the mail with abatements, the AA II will scan/convert the photos and videos that come in at the Bizhubs. The AA II will email the CSHO with subject header “Abatement Photos – 318123456”. Abatement photos and videos will be the responsibility of the CSHO or Supervisor to input into the “Pictures” section in OE. ***Note:** Refer to the Case File Retention/Disposition Guide (Field Operations Manual Chapter XVI – Administrative File Activities, appendices). The guide lists where forms, documents, attachments, and pictures are in OE and who is responsible for them.*
 - d. Signature and dates should be completed electronically on the OSHA-1 form in OE for all files opened on or after October 1, 2019. Administrative staff will review the OSHA-1 for signatures and tracking dates when they receive the notification to process in their queues.
- E. **Expiration.** This APN is effective on the date of signature. It will remain in effect until revised or canceled by the director.

Deidre Duncan
Deidre Duncan
Program Coordinator


Kevin Beauregard
OSH Director

1/19/2022
Date of Signature