

# JRS<sup>TM</sup>

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## JUSTIFICATION REVIEW STANDARD

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*A Standard for Decision Defensibility*

For HR, Public Records, Compliance, Investigations, Audit, and AI Governance

## | SCOPE

The Justification Review Standard (JRS) evaluates whether an organizational record independently explains the documented basis for a decision. It is applied to a record before that record is finalized, so a later reviewer can recover the basis for the decision from the file alone.

The standard evaluates the sufficiency of the documentation. It does not judge whether the underlying decision was correct, lawful, or sound. A record can meet the standard and still describe a decision that is later disputed on its merits. Those are two separate questions, and this standard addresses only the first.

The requirements apply to a record regardless of how it was produced, whether by a person, an automated tool, or a combination of the two.

## | TERMS AND DEFINITIONS

**Record.** A documented account of events, observations, or decisions meant to enter or inform an official system of record.

**Reviewer.** A person who evaluates a record against this standard. The reviewer may have no knowledge of the original events and no access to the people involved.

**Basis.** The specific support within the record for a stated conclusion: a date, a documented interaction, a log entry, or a referenced record.

**Evidence.** The factual material in the record on which a conclusion rests.

**Conclusion.** A determination, characterization, or decision stated in the record.

**Supporting information.** Material referenced by or attached to the record that establishes the basis for a conclusion.

**Reconstructability.** The property of a record that lets a later reviewer recover how a conclusion was reached from the record alone.

**Reviewability.** The property of a record that lets an independent reviewer, without outside context, judge whether its conclusions are supported. Reviewability is the objective the five requirements serve.

## | OVERVIEW

Records are read later by people who were not there. A reviewer may join after the events, inherit a case in progress, or audit a file months or years after it was written. By then the people involved have often moved on, and the file is what remains.

This standard supports records that stay reconstructable from the file, with no one available to explain them. What felt obvious while a record was being written is often not recoverable later.

The standard works inside existing workflows. It needs no new software, no system change, and no proprietary tool.

## | REVIEWER LENS

The reviewer evaluating a record may have no knowledge of the underlying events, no access to the original participants, and no institutional memory of the context. Staffing changes, elapsed time, and organizational transitions are routine. The file usually outlives the people who made it.

## | CORE REVIEW REQUIREMENTS

The five requirements are not separate tests. They are the parts of one objective, reviewability. Reconstructability is the whole-record requirement the other four serve.

### 01 Reconstructability

The conclusion shall be reconstructable from the record alone, by a later reviewer with no access to the author and no institutional memory. No added context or outside explanation should be needed.

## 02 Basis Identification

The basis for each conclusion shall be identifiable within the record: a date, a documented interaction, a log entry, or a referenced record. Supporting material may include correspondence and timestamps, access logs, interview and meeting notes, coaching notes, policy references, and personnel and performance records.

## 03 Chronology

The sequence of events shall be followable from the record, with enough dates and intervals that one event can be seen to follow another. This covers prior interventions, escalation steps, and the period under review. Missing dates are the most common single gap.

## 04 Decision-Process Traceability

The path from evidence to conclusion shall be visible within the record. A conclusion that rests on an unstated assumption, or on context that is not in the file, does not meet this requirement. A smooth narrative is not the same as a traceable one.

## 05 Evidentiary Sufficiency

The evidence in the record shall be sufficient to support the conclusion. Where an automated tool helped draft the record, the source behind each conclusion shall be identifiable and reviewed by a person. Wording that adds characterizations not found in the source does not meet this requirement.

Applied as questions. In practice a reviewer asks the requirements as plain questions. Can the conclusion be reconstructed from the record alone? Is the basis for each conclusion in the file? Can the chronology be followed? Can the path from evidence to conclusion be traced? Is the evidence enough to support the conclusion?

### REVIEWABILITY

the objective

is established by

### Reconstructability

the whole-record requirement

supported by

Basis Identification

Chronology

Decision-Process Traceability

Evidentiary Sufficiency

## | CONFORMANCE

A record conforms to this standard when it meets all five requirements. Conformance is judged on the record as it stands, by a reviewer with no access to the people involved and no memory of the events. Conformance shall be based solely on the documented record presented for review.

A record does not conform when one or more requirements are not met. The review shall name the requirement or requirements that are missing.

Conformance reflects the sufficiency of the documentation, not the merits of the decision. A conforming record can still be disputed on substance. A record that does not conform is not repaired by formatting, by rewording, or by a second review when the supporting information is simply absent.

## | EVIDENCE AND REASONING

A reviewable record holds two things, and each is reviewed on its own. Evidence is the factual material a conclusion rests on: dates, interactions, communications, system records, source documents. Reasoning is the path from that evidence to the conclusion.

A record can hold enough evidence but show no reasoning, so a reviewer sees what happened but not how the conclusion follows. A record can also read as sound reasoning with no evidence behind it, so

the account is fluent but cannot be checked. Basis Identification and Evidentiary Sufficiency test the evidence. Decision-Process Traceability tests the reasoning. A record meets the standard only when both are present in the file.

## | RESPONSIBILITIES

The author of a record is responsible for putting the basis for each conclusion in the record before it is submitted. The reviewer is responsible for testing the record against the five requirements, not for re-deciding the matter. The approver is responsible for confirming that the review happened and that any gaps were closed before the record was finalized. Where a record cannot meet a requirement, the exception and the reason for it should be written down rather than left out.

## | OPERATIONAL CONSTRAINTS

Application may involve incomplete records, conflicting accounts, time pressure, or qualitative information that calls for reviewer judgment. These conditions are acknowledged. They do not remove the need for documented support.

Documentation is sometimes written after the events, from memory, under pressure, or by people with partial information. The depth of review will vary by workflow and by staffing.

## | REVIEW LIMITATIONS

This is not a substitute for substantive review. Following the process does not cure weak documentation. The standard does not:

- sanitize poor documentation through formatting,
- enable box-checking in place of real review,
- substitute formatting for support visible in the record,
- create the appearance of rigor where the support is absent.

Where the support is missing, the review names the gap. The quality of the writing and the sufficiency of the evidence are separate things.

## | WHEN REVIEW IS TYPICALLY TRIGGERED

Review applies when documentation may face later scrutiny in employment, administrative, compliance, public-records, or investigative settings. Common triggers include:

- termination and separation documentation,
- disciplinary actions and performance-improvement records,
- performance escalation and formal counseling,
- formal complaints and grievance records,
- investigation summaries and witness accounts,
- records involving automated or AI-assisted drafting,
- accommodation-related documentation,
- public-records determinations and access decisions,
- high-risk actions and adverse decisions.

## | OPERATIONAL WORKFLOW PLACEMENT

The review happens at the documentation stage, before a record enters an official system or is relied on in a formal proceeding. No dedicated platform is required. Records are read later by people with no original context, sometimes years later, so the review is applied before the record leaves the drafting stage.

### Typical workflow position

1. A record is drafted (by a manager, investigator, HR, or an automated tool).
2. The review is applied before submission.
3. The record enters the official system.
4. The record is read later by HR, compliance, legal, or audit.

## | IMPLEMENTATION MATURITY

Organizations apply the standard at different levels, depending on the sensitivity of the documentation and on workflow. These levels are illustrative.

### 01 Foundational: self-correction

The reviewer applies the requirements before finalizing. No secondary review and no tooling are required.

### 02 Intermediate: secondary review

A second HR or compliance review for higher-risk records, applied selectively, as workflow and staffing allow.

### 03 Systemic: audit and governance

Periodic sampling of records for identifiable support and traceable reasoning. The reviewing function is independent of the drafting chain.

## | SECOND-LINE REVIEW

Higher-risk records may warrant a second review by HR, compliance, legal, audit, or supervisory staff. A second review is not always required, and it is calibrated to the type of record and the workflow.

Indicators for escalation include:

- evaluative language with no observable behavior behind it,
- missing source records for substantive conclusions,
- automated summaries with no documented human review,
- disciplinary conclusions with no referenced conduct,
- termination records with thin factual grounding.

A second review cannot repair unsupported drafting. A record that reaches escalation with no traceable basis carries the most exposure.

## | APPLICATION

The standard applies to organizational documentation across several settings:

### Performance documentation

Evaluations, feedback, and employment decisions that may be reviewed later.

### Hiring documentation

Recruitment records, candidate evaluation, and hiring decisions that can be reconstructed from the file.

### Termination documentation

Records supporting an employment termination, including the disciplinary record behind it.

### Public records

Determinations and access decisions where the basis and the applied exemption must be recoverable.

### Investigation records

Workplace investigation files, including witness accounts and incident records.

### Compliance and audit

Compliance and audit records where a traceable decision process is needed.

## | COMMON DOCUMENTATION FAILURE MODES

Each example shows a pattern that does not meet the requirements, what a later reviewer would ask, and a revision that does meet them.

### 01 UNSUPPORTED GENERALIZATION

*Record statement: "Employee has attendance issues."*

*Later review risk: A reviewer cannot identify the dates, the conduct, or the policy behind the conclusion.*

Supported revision: Absent on January 5, January 12, and February 3 with no advance notice, against the attendance policy acknowledged January 2. Counseling note issued February 4.

### 02 MISSING OBSERVABLE BEHAVIOR

*Record statement: "Employee was unprofessional."*

*Later review risk: A reviewer cannot tell what happened or find any support in the file.*

Supported revision: Interrupted two client meetings on April 4 and April 11 after being asked not to. Incident report dated April 12 on file.

### 03 MISSING PERFORMANCE STANDARD

*Record statement: "Employee does not meet expectations."*

*Later review risk: A reviewer cannot identify the standard, the timeframe, or the evidence.*

Supported revision: Missed three deadlines (January 20, February 17, March 1) against the plan set January 5. Check-in notes and an improvement discussion on file.

### 04 PUBLIC-RECORDS DETERMINATION WITHOUT BASIS

*Record statement: "Request denied under an applicable exemption."*

*Later review risk: A reviewer cannot tell which records, which exemption, or the reasoning applied.*

Supported revision: Request for inspection reports denied under the open-investigation exemption per the August 3 determination. Responsive records identified and withheld pending case closure. Basis memo dated August 3 on file.

### 05 AUTOMATED SUMMARY WITHOUT VERIFICATION

*Record statement: "Summary: employee is difficult to work with."*

*Later review risk: A reviewer cannot tell what source records, if any, support the summary.*

Supported revision: Summary checked against meeting notes dated March 4, 11, and 18. No unverified characterization added. Reviewed by a person on March 19 before finalizing.

## | DOCUMENTATION SOURCE VERIFICATION

A record may come from direct observation, interview notes, written communications, system records, or automated drafting. The requirements apply the same way regardless of source.

### Source verification

Wording from an automated tool should be checked against identifiable source material before the record is finalized. Substantive conclusions should trace to:

- documented interactions and communications,
- referenced records, correspondence, and logs,
- meeting notes, coaching records, and witness statements,
- personnel records and policy references.

Drafting and attesting are different. An automated tool may help draft. Only a person can attest to the accuracy, completeness, and sufficiency of the final record, and that attestation shall confirm that assisted wording added no characterization that is not in the source. Content that cannot be checked against the source does not meet the Evidentiary Sufficiency or Decision-Process Traceability requirements.

## | ADMINISTRATIVE NEUTRALITY

The standard evaluates documentation sufficiency on its own, apart from organizational intent, legal liability, or the merits of the decision. A record may meet all five requirements even when the decision behind it is later disputed.

A supported record can still be disputed. The review looks at the file, not at whether people agree with

the outcome. A record conforms when the supporting basis is clearly present, whatever a second reviewer thinks of the decision. Conformance reflects the quality of the process, not the correctness of the decision.

### | RECORD REVIEW PRINCIPLES

- A record should stay reconstructable with no outside explanation.
- A conclusion should be understandable by someone with no direct knowledge of the events.
- The basis for each conclusion should be in the record itself.
- The chronology should be followable from the record.
- The decision process and the evidence should be traceable before the record is finalized.
- Application of this standard shall not replace reviewer judgment.

### | DISCLAIMERS

**Not legal advice.** Organizations should consult legal counsel about the law and documentation rules in their jurisdiction.

**Legal sufficiency.** Use of the standard does not establish legal sufficiency or remove legal risk.

**Jurisdiction.** Documentation standards and legal rules differ across jurisdictions and regulators.

**Operational context.** Intended for use under reasonable operational constraints. It does not replace reviewer judgment.

**Implementation.** The standard works inside existing workflows and needs no dedicated software, system change, or proprietary tool.

**Illustrative examples.** Workflow models, failure-mode examples, and maturity levels are illustrative and may be adapted.

**Purpose.** The goal is not more paperwork. It is documentation that is actually useful later: supported, self-contained, and recoverable.