

TECHNICAL SUPPLEMENT

JRS™ Investigator Field Guide

Assessing Evidentiary Traceability in Administrative Records

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PURPOSE

This supplement introduces the Justification Review Standard (JRS™) for use by investigators, fact-finders, and EEO counselors. It provides an operational method for evaluating whether administrative records contain sufficient traceable support for conclusions, particularly where automated drafting tools have contributed to the record. Intended to supplement existing investigative procedures, not replace them.

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DOCUMENT NOTICE

This document is issued as an open technical reference. It does not constitute legal advice and does not replace applicable procedural requirements. Applicable jurisdiction and organizational procedures govern.

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Purpose and Scope

This technical supplement introduces the Justification Review Standard (JRS™) for use in investigative and administrative review environments. It provides an operational method for assessing whether administrative records contain sufficient, traceable support for conclusions, particularly where automated drafting tools have contributed to the record.

Increasing use of AI-assisted drafting tools in employment documentation has created documentation-review conditions not addressed in standard investigative guidance. These tools can produce coherent narratives that lack traceable factual grounding. The JRS provides a structured method for identifying documentation traceability gaps during investigative review.

SCOPE

Applies to workplace investigations, EEO intake review, administrative record assessment, and pre-finalization documentation review. Intended for use within existing workflows. No dedicated software or process redesign required.

Intended to supplement existing investigative procedures, not replace them. Does not replace applicable procedural manuals or legal requirements.

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Standard of Review

An administrative record satisfies the Justification Review Standard when it meets the following five conditions. Each is evaluated independently. Failure of any single condition identifies a documentation traceability gap.

I Reconstructability

A neutral reviewer can identify the basis for the administrative conclusion using only what the record contains, without verbal explanation or outside context. The record functions without the original author available to explain it.

II Basis Identification

Each material conclusion is supported by specific, identifiable evidence: timestamped logs, correspondence, performance records, documented interactions, or witness accounts. General impressions and unsupported characterizations do not satisfy this condition.

III Chronology

The sequence of events can be followed from the record. Dates and intervals for prior interventions, escalation steps, and the period under review are present. A record that depends on undocumented timing does not satisfy this condition.

IV Decision-Process Traceability

The path from evidence to conclusion is visible within the record. Conclusions that depend on unstated assumptions or context absent from the file do not satisfy this condition. A coherent narrative is not equivalent to a traceable record.

REVIEWER NOTE

When Condition IV is absent, a record may contain valid evidence but still fail reconstruction review. The reasoning was in the author's knowledge, not on the page. That distinction becomes significant when the author is no longer available.

V Evidentiary Sufficiency

The evidence in the record is sufficient to support the conclusion. Where automated drafting tools contributed, the source material is identifiable and was reviewed by a human before finalization. AI-assisted wording that introduces characterizations absent from source notes is a traceability deficiency.

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AI Documentation Risk

Automated drafting tools introduce specific documentation-review conditions not present in manually drafted records. Investigators should be familiar with the following patterns when reviewing AI-assisted administrative records.

Unsupported Narrative Generation

Automated systems can produce plausible, professionally worded summaries that are not anchored to identifiable source material. The wording may appear complete while the evidentiary basis is absent. Reviewer note: source documentation unavailable for verification.

Characterization Without Anchor

Terms such as "unprofessional," "uncooperative," or "resistant to direction" introduced by an automated tool require the same behavioral anchoring as manually drafted language. The origin of the language does not affect the traceability requirement. Reviewer note: evaluative characterization present in summary. No documented behavioral anchor in source file.

Conflict Obscuring

Automated summarization may resolve or omit conflicting accounts, partial witness recollections, or qualifications present in source notes. The final record may appear settled while the underlying source material is contested or incomplete. Reviewer note: narrative more definitive than source notes support.

Cross-Record Wording Carry-Forward

Where automated tools reference prior records during drafting, unanchored characterizations from earlier entries may carry forward. Each repetition appears to corroborate the prior entry. No individual entry contains independent support. Reviewer note: consistent language across multiple records. No individual record contains an anchored behavioral basis.

DRAFTING VS. CONFIRMING

An automated tool may assist in drafting. Only a human reviewer can confirm that the record accurately reflects documented interactions and that no unverified characterizations have been introduced. Where human confirmation has not been completed before system entry, the record presents a source integrity gap.

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Identifying the Justification Gap

When a record fails one or more review conditions, document the deficiency as a Justification Gap. This is a structured trigger for additional review or return to the originating reviewer.

RECORD INTERROGATION FRAMEWORK

Record Statement	Reviewer Question	Traceability Check
<i>"Employee demonstrated a pattern of unprofessional conduct."</i>	What specific conduct occurred, on what dates, and is it documented?	Observable anchor required. Pattern claims require at least two dated, identified instances.
<i>"Performance was consistently below the expected standard."</i>	What standard applies, over what period, and what source data supports this conclusion?	Standard and timeframe must be identifiable from the record. Source data must be referenced.
<i>"The review was refined for clarity via an automated tool."</i>	Is the original source material available? Were characterizations introduced not present in source notes?	Source verification and human confirmation required before system entry.
<i>"Employee exhibited resistance to supervisory direction."</i>	What specific instructions, on what dates, and what documented behavioral record supports this?	Characterization requires a documented behavioral anchor. Reviewer cannot verify from file as written.
<i>"The incident was thoroughly investigated."</i>	What source materials were reviewed? Are witness accounts identified? Are conflicting accounts acknowledged?	Source materials must be identified. Conflicting accounts must be preserved, not resolved by omission.

COMMON DOCUMENTATION FLAGS

Underlying documentation not attached.	Timeline support incomplete. Dates not identified.
Conclusion unsupported by referenced records.	Primary source verification unavailable.
Narrative exceeds what identified evidence supports.	Reviewer unable to verify referenced interaction.
Pattern claim requires at least two anchored instances.	AI-assisted characterization present. Source material not identified.

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Administrative Integrity and Neutrality

The Justification Review Standard evaluates documentation sufficiency independently of the underlying administrative outcome. A record may satisfy all five review conditions even when the underlying decision is subsequently disputed on substantive grounds. Documentation quality and decision quality are separate questions.

For Investigators	Provides a consistent, neutral framework for identifying documentation traceability gaps. Reduces reliance on witness recollection to reconstruct the basis for administrative conclusions.
For HR Reviewers	Supports pre-submission review of elevated-risk records before system entry. Identifies records that would not hold up under independent review.
For Compliance Personnel	Supports audit sampling and documentation quality review. Identifies systemic traceability deficiencies across organizational record types.
For Administrative Reviewers	Provides a structured reconstruction check for accommodation decisions, separation records, and formal administrative action documentation.

ADMINISTRATIVE NEUTRALITY

The JRS evaluates whether the record contains the documented basis for conclusions. It does not assess whether the underlying administrative decision was substantively correct. A record may be fully compliant and still reflect a decision that is later disputed on other grounds.

REVIEWER NOTE

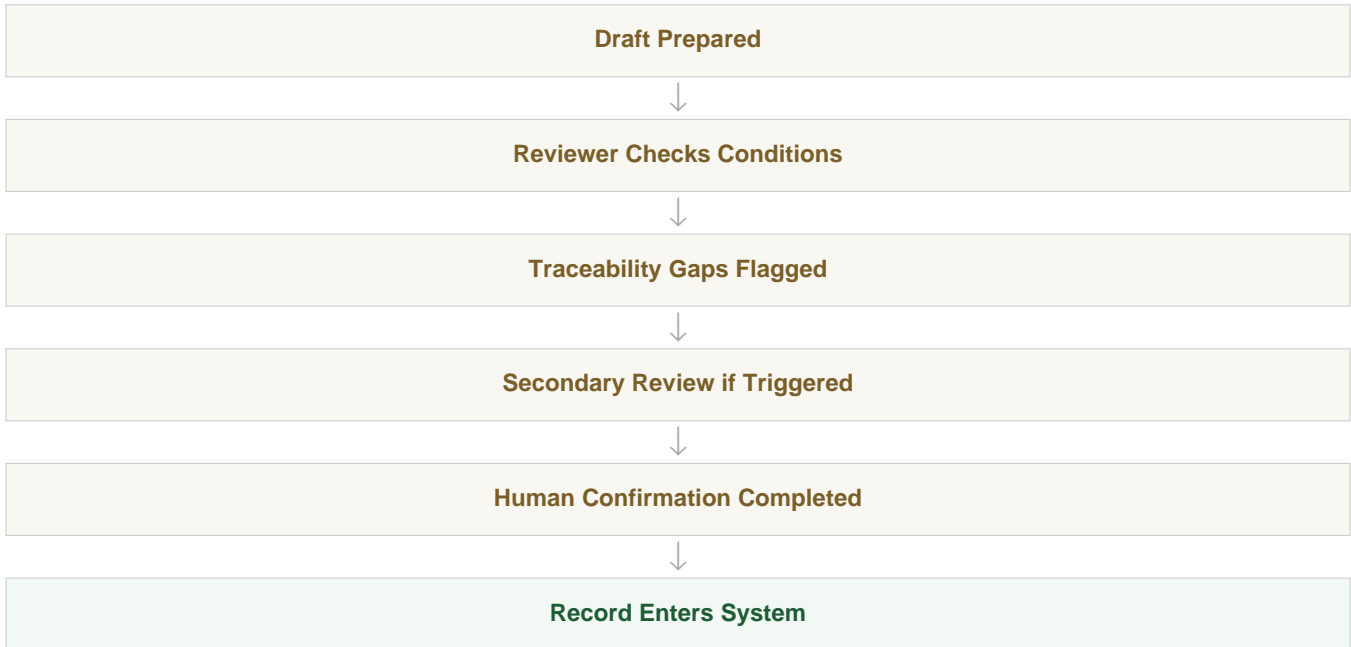
Documentation quality is not the same as decision quality. A record can be thoroughly documented and still reflect an incorrect or contestable decision. The review evaluates the file, not the outcome.

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Implementation Guidance

The JRS is intended for use within existing investigative and administrative-review workflows. No dedicated software, system replacement, or structural change is required. Can be introduced incrementally at the pre-submission stage.

REVIEW WORKFLOW



EEO Intake Review

Apply the five-condition review at intake when receiving administrative records for investigation. Records failing one or more conditions should be flagged before incorporation into the investigative file.

Investigation Record Review

Apply the Record Interrogation Framework when evaluating witness summaries, incident records, or narrative conclusions. Source materials must be identified. Conflicting accounts must be acknowledged, not resolved by omission.

AI-Assisted Record Review

Apply the Evidentiary Sufficiency condition before any AI-assisted content enters an official system. Human reviewer must confirm that source materials were reviewed and that no unverified characterizations were introduced before finalization.

Audit Sampling

The documentation failure-mode catalog may be applied periodically to sample organizational records for traceability deficiencies. Results identify record types and workflow stages where documentation quality is consistently insufficient.

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Reviewer Quick Reference

BEFORE FINALIZATION, ASK:

1 Can this record stand on its own?

Would a later reviewer understand the basis without calling the original author?

2 What specific evidence anchors each conclusion?

Dates, logs, documented interactions, or referenced records. Verify attachments are on file.

3 Is the path from evidence to conclusion visible in the record?

Not in the author's memory. In the document itself.

4 Are dates, timelines, and policies identifiable?

Missing dates are the most common single gap. Pattern claims require specific dated instances.

5 Were characterizations verified against source material before finalization?

Human reviewer must confirm. Source records must be identified before system entry.

SUBMISSION READINESS

STOP	Return to Drafter. Evaluative language without anchors. Timeline or policy basis absent. Do not submit.
REVIEW	Clarification Required. Conclusion may be accurate but basis not visible in the record. Additional anchoring or secondary review needed.
READY	Self-Contained. Evidence identifiable. Reasoning traceable. Basis holds without explanation from the author.

NOTE

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