

TECHNICAL SUPPLEMENT · 001-INV-H

JRS™ Investigator Field Guide

Assessing Evidentiary Traceability in Administrative Records: Fair Housing / HUD Investigations

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Applies to	Fair-housing / HUD-referred and FHA administrative investigations; FHAP intake; tenant-screening, availability, and reasonable-accommodation / modification determinations.

PURPOSE

This supplement introduces the Justification Review Standard (JRS™) for fair-housing investigators, FHAP intake staff, housing providers, and compliance personnel. It provides an operational method for evaluating whether housing administrative records contain sufficient, traceable support for their conclusions, particularly where automated drafting tools have contributed to the record. It supplements existing investigative procedures; it does 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. References to agency contexts describe where the method may be applied and do not imply endorsement or affiliation.

01 Purpose and Scope

This supplement introduces the Justification Review Standard (JRS™) for fair-housing investigators, FHAP intake staff, housing providers, and compliance personnel. It provides an operational method for evaluating whether housing administrative records contain sufficient, traceable support for their conclusions, particularly where automated drafting tools have contributed to the record. It supplements existing investigative procedures; it does not replace them.

SCOPE

Applies to fair-housing intake and FHAP investigations, tenant-screening denials, availability records, reasonable-accommodation and reasonable-modification determinations, and pre-finalization review of housing administrative records. Intended to supplement existing investigative procedures. Does not replace applicable procedural manuals or legal requirements.

THE CONDITION THIS DETECTS: DECISION RECONSTRUCTION RISK

The failure this supplement is built to detect is **Decision Reconstruction Risk (DRR)**: the condition in which a record cannot explain, on its own terms, why a consequential decision was made. The decision may have been sound; the record still cannot demonstrate how it was reached. Each of the five conditions below tests one aspect of a record's freedom from DRR, and each Justification Gap identified in Section 4 is a documented instance of it. The tolerable level of DRR falls as the stakes of the decision rise.

02 Standard of Review: The Five Conditions

Each condition is evaluated independently. Failure of any single condition identifies a documentation-traceability gap, an instance of Decision Reconstruction Risk.

- I **Record Self-Sufficiency.** 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 **Evidentiary Anchoring.** Each material conclusion is supported by specific, identifiable evidence: screening criteria, application and availability records, tenancy and correspondence records, documented interactions, or witness accounts. General impressions and unsupported characterizations do not satisfy this condition.
- III **Chronological Integrity.** Relevant events, dates, and their sequence are identifiable from the record. Missing or unidentified dates are the most common single gap.
- 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.
- 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.

03 AI Documentation Risk

Automated drafting tools introduce review conditions not present in manually drafted records. Reviewers should recognize the following patterns.

Unsupported Narrative Generation

Automated systems can produce plausible, professionally worded summaries not anchored to identifiable source material. The wording may appear complete while the evidentiary basis is absent.

Characterization Without Anchor

Terms such as “problem tenant,” “unqualified applicant,” or “uncooperative resident” introduced by an automated tool require the same anchoring as manually drafted language. The origin of the language does not change the traceability requirement.

Conflict Obscuring

Automated summarization may resolve or omit conflicting accounts, partial recollections, or qualifications present in source notes. The final record may read as settled while the underlying material is contested or incomplete.

Cross-Record Wording Carry-Forward

Where tools reference prior records during drafting, unanchored characterizations from earlier entries may carry forward. Each repetition appears to corroborate the last, though no individual entry contains independent support.

04 Identifying the Justification Gap

When a record fails one or more conditions, document the deficiency as a Justification Gap, a documented instance of Decision Reconstruction Risk and a structured trigger for additional review or return to the originating reviewer.

RECORD INTERROGATION FRAMEWORK

Record Statement	Reviewer Question	Traceability Check
“The applicant was denied for failing to meet screening criteria.”	What criteria, applied how, and were they applied consistently to comparators?	Screening policy and the applicant's failing data point must be identifiable. Comparator treatment supports consistency.
“The reasonable-accommodation request was found unreasonable.”	What was requested, what interactive process occurred, and what documented basis supports the denial?	Dated interactive-process record required. An undue-burden or fundamental-alteration basis must be stated, not asserted.
“Multiple residents complained about the tenant.”	Which residents, what specific conduct, on what dates, and is each complaint documented?	Anchored, dated complaints required. Aggregated “multiple complaints” without individual records is a gap.
“The unit was unavailable when the applicant inquired.”	What availability record exists for that date, and how were comparator inquiries handled?	Contemporaneous availability log and inquiry record required. Post-hoc reconstruction is insufficient.
“The record was refined for clarity via an automated tool.”	Is the original source material available? Were characterizations introduced that are absent from source notes?	Source verification and human confirmation required before system entry.

05 Administrative Integrity and Neutrality

JRS evaluates documentation sufficiency independently of the underlying administrative outcome. A record may satisfy all five conditions even when the underlying decision is later disputed on substantive grounds. Documentation quality and decision quality are separate questions.

For Investigators	A consistent, neutral framework for identifying documentation-traceability gaps. Reduces reliance on recollection to reconstruct the basis for housing determinations.
For FHAP Intake	Supports pre-incorporation review of intake and complaint summaries before they enter the investigative file.
For Housing Providers	A structured reconstruction check for tenant-screening decisions, accommodation and modification determinations, and formal administrative-action documentation.
For Compliance Personnel	Supports audit sampling and documentation-quality review across housing record types.

REVIEWER NOTE

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

06 Implementation Guidance

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

REVIEW WORKFLOW

Draft prepared → reviewer checks the five conditions → traceability gaps flagged → secondary review if triggered → human confirmation completed → record enters system

Fair-Housing Intake Review

Apply the five-condition review at intake to screening denials, availability records, and accommodation determinations. Records failing one or more conditions should be flagged before incorporation into the investigative file.

Complaint and Investigation Record Review

Apply the Record Interrogation Framework to complaint summaries, incident records, and narrative conclusions. The interactive-process record and comparator treatment must be traceable. Conflicting accounts must be acknowledged, not resolved by omission.

AI-Assisted Record Review

Apply the Evidentiary Sufficiency condition before any AI-assisted content enters a record. Confirm source materials were reviewed and no unverified characterizations were introduced before finalization.

Audit Sampling

Apply the failure-mode catalog periodically to sample housing records for traceability deficiencies. Results identify record types and workflow stages where documentation quality is consistently insufficient.

07 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, criteria, 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 applicable criteria 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, or timeline / criteria basis absent. Do not submit.
REVIEW	Clarification required. Conclusion may be accurate but the basis is 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.

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