

DEPARTMENT OF INDUSTRIAL RELATIONS  
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH*Headquarters Office*

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*Juliann Sum, Chief*

July 20, 2015

Christopher Lee  
[REDACTED]

Re: Electronic copies of documents

Dear Mr. Lee;

This letter is provided in response to your inquiry to the Division of Occupational Safety and Health (Cal/OSHA). The content and conclusions of this letter are based only on the facts described below and responsive only to the initial requester. They may not be construed as a statement of general Division policy or general interpretation of the regulations referenced in this letter.

**Question:**

Does Cal/OSHA accept electronic versions of documents such as an IIPP or Heat Illness Prevention plan when requested by a compliance officer? Many foremen and other company representatives carry smart phones and other hand-held devices with company documents loaded.

**Answer:**

California Labor Code section 6314 authorizes Cal/OSHA compliance officers to obtain documents or other materials from the employer that are directly related to the inspection. An excerpt from Labor Code section 6314:

The chief or his or her authorized representative may, during the course of any investigation or inspection, obtain any statistics, information, or any physical materials in the possession of the employer that are directly related to the purpose of the investigation or inspection, conduct any tests necessary to the investigation or inspection, and take photographs.

Cal/OSHA will accept electronic documents via email or equivalent means (such as a USB flash drive) in lieu of hard copies of documents, provided that the Cal/OSHA compliance officer has no objection to receiving an electronic version of a document in lieu of a hard copy. The compliance officer may consider factors such as, but not necessarily limited to, the following:

- 1) Document format that the compliance officer will be able to use
- 2) Legibility of the document(s)
- 3) Whether the document(s) are identical to those used by the employer and provided to employees

4) Length of the documents for printing purposes

In addition, for documents that are required to be available immediately upon request of the compliance officer, the employer should also provide a viewable electronic version to the compliance officer for immediate review, in addition to sending an electronic version to the compliance officer.

I hope this provides you with information you need. If you have any further questions regarding this or related safety concerns, please contact me at 925-270-9791 or [eberg@dir.ca.gov](mailto:eberg@dir.ca.gov).

Sincerely,



Eric Berg  
Acting Deputy Chief  
Research and Standards