



BUILDINGS 2024-007 BULLETIN OPERATIONAL

ISSUANCE DATE
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PURPOSE: This Bulletin clarifies requirements regarding maintaining site safety documents in an electronic format at the jobsite.

SUBJECT(S): Electronic Records, Site Safety Documents, Sidewalk Shed Inspection Documents, Scaffold Inspection Documents

RELATED CODE SECTIONS

BC 3301.7, 3301.11, 3301.12, 3301.13.13, 3301.13.19, 3307.6.5, 3310.8.4, 3314.4.3, 3321.1

I. BACKGROUND

Section 3301.7 of the New York City Building Code requires documents necessary to verify compliance with the site safety requirements of Chapter 33 of the Building Code (site safety documents) and the sidewalk shed and scaffold inspection requirements of Chapter 33 of the Building Code (sidewalk shed and scaffold inspection documents) to be maintained at the jobsite for the duration of the job and made available to the commissioner upon request. Site safety documents include the site safety log required by BC 3310.8.4, the construction superintendent log required by BC 3301.13.13, safety orientation and refreshers records required by BC 3301.11, pre-shift safety meeting records required by BC 3301.12, the weekly safety meeting required by BC 3301.13.19, and the site safety training (SST) log required by BC 3321.1. Sidewalk shed and scaffold inspection documents include the sidewalk shed installation inspection, periodic (six month) inspection, and daily inspection reports required by BC 3307.6.5, and the installation inspection and pre-shift inspection reports required by BC 3314.4.3.

Site safety documents and sidewalk shed and scaffold inspection documents traditionally have been required to be made available at the jobsite in a paper format. The Department recently undertook a pilot program to ascertain the feasibility of allowing site safety documents and sidewalk shed & scaffold inspection documents to be made available in an electronic format. Based on lessons learned from the pilot, all jobsites are now eligible to make site safety documents and sidewalk shed & scaffold inspection documents available at the jobsite in an electronic format. Electronic site safety documents and electronic sidewalk shed and scaffold inspection documents must comply with the conditions set forth in this bulletin. Registering or taking part in the pilot program as a prerequisite to making site safety documents and sidewalk shed and scaffold inspection documents available in an electronic format is no longer required. Contractors may pick and choose which, if any, site safety documents and sidewalk shed & scaffold inspection documents they make available in an electronic format.

Site safety documents and sidewalk shed and scaffold inspection documents that are not made available in an electronic format compliant with the conditions set forth in this bulletin must continue to be made available in a paper format.

II. RESPONSIBILITY FOR COMPLIANCE

The permit holder or other entity responsible per Section 3301.7 of the New York City Building Code for maintaining and making the document available is responsible for ensuring compliance with this Bulletin when such document is made available in an electronic format.

III. ACCESSIBLE ON A TABLET OR SIMILAR DEVICE

A dedicated tablet or similar device with access to the electronic site safety documents and electronic sidewalk shed and scaffold inspection documents must be readily available at the site at all times for use by the Department. The tablet or similar device must:

1. have a minimum screen size of 10 inches, as measured diagonally across the screen; **and**
2. at all times possess sufficient power, connectivity, and access for the department to readily view the electronic document.

IV. EMAILABLE AS A PDF OR PRINTABLE AT THE SITE

Electronic site safety documents and electronic sidewalk shed and scaffold inspection documents must be capable of being readily:

1. emailed to the Department as a pdf document; **or**
2. printed from a printer located at the site.

V. ELECTRONIC DOCUMENT SYSTEM

Electronic site safety documents and electronic sidewalk shed & scaffold inspection documents must be created and stored as part of an electronic document system. Scans of paper documents, or malleable word or excel files, do not constitute compliance with this bulletin. The electronic document system must ensure that electronic site safety documents and electronic sidewalk shed and scaffold inspection documents are tamper proof, provide validation of signatures, and indicate when a record was created. This includes, but is not limited to, including the following safeguards:

1. **Compliance with ESRA.** Electronic site safety documents and electronic sidewalk shed and scaffold inspection documents must adhere to the Electronic Signatures and Records Act (ESRA).
2. **Document Finalization.** Once created, an electronic record cannot undergo further editing or alterations. Each document must bear a time stamp and digital fingerprint indicating who signed it and the date/time of the signature.
3. **Forgery Prevention.** Electronic site safety documents and electronic sidewalk shed and scaffold inspection documents must be secure against forgery.
4. **Record Retention.** Electronic site safety documents and electronic sidewalk shed and scaffold inspection documents must be preserved and accessible for up to seven (7) years following the completion of the job.
5. **Intent and Consent.** All involved parties must clearly intend to sign electronically and agree to conduct transactions electronically.
6. **Signature Integrity.** The software used must maintain the integrity of signatures, making any changes detectable after signing.

7. **User Authentication.** Individuals who sign electronic records must be verified. This can be achieved through various means such as email or phone verification, multi-factor authentication, in-person verification, or digital certificates.
8. **Association with the Document.** Software should ensure that signatures are clearly connected to the specific document they authenticate.

VI. BULLETIN NOT APPLICABLE TO OTHER DOB RECORDS

This Bulletin is not applicable to records and documents required to be maintained by the New York City Construction Codes other than site safety documents and sidewalk shed and scaffold inspection documents. Such other documents, which must continue to be maintained in paper format, include, but are not limited to, construction documents, shop drawings, temporary construction equipment records other than inspection documents for sidewalk sheds or scaffolds, monitoring reports, certificates of occupancy, letter of no objection, letter of verification, letter of completion, place of assembly certificate of operation, special inspection records, plumbing and gas inspection records, electrical inspection records, elevator inspection records, and fire, egress, and life safety inspection records.

VII. OTHER AGENCIES

Compliance with this bulletin does not relieve permit holders, contractors, registered design professionals, and others from also maintaining documents required by other agencies, including but not limited to FDNY, DOT, OSHA, EPA, and DEP, in accordance with the requirements of the agency having jurisdiction.