

How Texas agencies should organize personnel records, prepare for OTRR, and manage the employment-record lifecycle.

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How Texas law-enforcement agencies should organize personnel, department, and credentialing files, prepare for TCOLE OTRR, and manage records from hire through separation and later background requests.

TCOLE has introduced the OpenText Records Repository (OTRR) as its statewide confidential employment-record sharing system. The useful question for a Texas agency is not merely how to log in. It is what employment records the agency is supposed to maintain, where those records belong, what happens when a license holder separates, and what the agency must be able to produce when another department conducts a background investigation.

A small Texas police department should care because these responsibilities do not wait for a dedicated HR or compliance staff. The agency may need to maintain required personnel and department files, organize credentialing and other employment records, upload applicable records when a license holder separates, respond to another agency's employment-record request, conduct background investigations using records from prior agencies, and demonstrate compliance with applicable personnel-file and misconduct requirements. In a small agency, that work often belongs to the chief, an assistant chief, a TAC, a training coordinator, or an administrative employee who already has several unrelated jobs.

OTRR did not create those personnel-file, hiring, and misconduct obligations. Texas law-enforcement agencies already create employment records throughout an officer's time with the agency. The model policies and commission rules set the underlying requirements. OTRR is how applicable records are now submitted and shared. That distinction matters. This guide organizes the employment-record lifecycle so a small agency can keep the file while the officer is still employed-not reconstruct it after separation.

The easiest time to prepare an officer's personnel file is while the officer is still employed-not thirty days after separation.

OTRR at a glance

These points reflect current official TCOLE OTRR materials reviewed in September 2026. They are a starting orientation, not a substitute for current TCOLE rules, model policies, or OTRR instructions.

Topic	Current official practice
What	Statewide confidential employment-record sharing system for Texas license holders. TCOLE also describes it as the confidential statewide employment database.
Who	Texas law-enforcement agencies, academies, designated File Uploaders, Background Investigators, and applicable license holders.
Available	June 2026.

Replaces	TCOLE SecureShare (TSS) over a transition period. Both systems run concurrently for a period. Use TSS only if the target agency does not yet have OTRR uploaders. Existing TSS users do not automatically transfer.
Access	TCOLE Login Hub after the chief administrator or delegate assigns OTRR roles in the Assignment Status Manager in TCLEDDS. Users need a PID and a TCLEDDS association as licensed or non-licensed staff. OTRR access does not itself require TCLEDDS access.
Primary uses	Uploading applicable personnel files and Misconduct Investigation Reports, and requesting or reviewing employment records for hiring-agency background investigations with licensee consent.
Accountability	The chief administrator remains responsible for applicable agency obligations while OTRR and TSS operate.

Requirement, guidance, and recommendation

This guide marks TCOLE requirements, TCOLE guidance, and Thin Line practical recommendations as distinct. A recommended workflow is not a TCOLE-prescribed sequence unless a current official source says so.

Understand the personnel-record system TCOLE expects

"The personnel file" is not simply one folder containing every document associated with an officer. Current TCOLE preparation guidance tells agencies to organize records into four categories, using TCOLE's terminology: Personnel (A-File), Department (G-File), TCOLE Credentialing Files, and Other Agency Files.

That structure already existed in the Personnel Files model policy and in Texas Occupations Code § 1701.4535. OTRR makes the quality and organization of those records more operationally important because the records now have to move through a defined statewide sharing process.

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OFFICER RECORDS
+-- Personnel / A-File
+-- Department / G-File
+-- TCOLE Credentialing Files
+-- Other Agency Files
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Personnel File - A-File

TCOLE REQUIREMENT. The Personnel Files model policy and Occupations Code § 1701.4535 define the personnel file as three kinds of records: (1) a letter, memorandum, or document relating to a commendation, congratulation, or honor bestowed on the license holder by a member of the public or by the agency for an action, duty, or activity that relates to the license holder's official duties; (2) misconduct by the license holder if the document is from the employing agency and resulted in disciplinary action; and (3) the periodic evaluation of the license holder by a supervisor. 37 TAC § 211.29 requires the chief administrator to maintain a personnel file for each appointed licensee and to submit a complete copy of that personnel file to TCOLE within 30 days after separation.

TCOLE GUIDANCE. TCOLE's current OTRR File Types and Folders matrix and OTRR FAQs identify the personnel-file documents uploaded to the Confidential Statewide Employment Database (CSED) folder as commendations and awards; final disciplinary actions and any licensee response; periodic performance evaluations and any response; and Misconduct Investigation Reports. TCOLE's file-type note states that final disciplinary actions are for suspensions, demotions, and terminations, and should identify the allegations, the investigative findings, the disposition of each allegation, and the discipline imposed.

TCOLE REQUIREMENT. If a negative letter, memorandum, document, or other notation of negative impact is included in the personnel file, the Personnel Files model policy requires notice to the license holder and gives the license holder 30 days after receipt to file a written response. The policy also entitles the license holder, on request, to a copy of any document placed in the personnel file.

A-File is a defined set of records

Do not treat every hiring, training, medical, or internal-affairs document as an A-File item simply because it concerns the officer. TCOLE's personnel-file definition is specific. When a document does not clearly belong there, use the current TCOLE file matrix and the agency's adopted personnel-files policy.

Department File - G-File

TCOLE REQUIREMENT. The Personnel Files model policy defines the department file as information not included in the personnel-file definition. A letter, memorandum, or document relating to alleged misconduct may not be placed in the personnel file if the agency determines there is insufficient evidence to sustain the charge. Agencies also maintain a file for the agency's use that includes all information not in the personnel-file definition. The model policy says that file should be marked "Designated as Confidential for Statewide Employment Database under Texas Occupations Code § 1701.168." 37 TAC § 211.29 requires the chief administrator to maintain a department file for each appointed licensee and to submit both the personnel file and the department file to TCOLE upon request as part of an ongoing investigation relating to the licensee.

TCOLE GUIDANCE. Preparing for OTRR describes the Department (G-File) as misconduct not resulting in formal discipline plus all non-A-File records. The current OTRR file-type matrix places, among other records, internal-affairs complaints and investigations, informal discipline, reprimands, counseling, corrective training, training and hiring records, and HR employment records in the Secure Share transfer path rather than in the CSED personnel-file upload.

TCOLE REQUIREMENT. The model policy states that the agency may not release department-file information to another agency or person without the license holder's written permission, unless the release is required by Occupations Code § 1701.451. A hiring law-enforcement agency is entitled to view the contents of the license holder's department file as provided by that statute.

TCOLE Credentialing File

TCOLE GUIDANCE. Preparing for OTRR identifies a separate TCOLE Credentialing Files category. Current examples include the Personal History Statement (PHS), F-5R, Background Confirmation Form (BCF), L-2/L-3, Misconduct Investigation Reports, firearms qualifications, and similar credentialing records. The OTRR file-type matrix lists the agency credentialing file-TCOLE also calls it the "TCOLE file"-as including, where applicable, the PHS, L-1/L-2/L-3, F-5R, National Decertification Index (NDI) records, court documents, and firearms qualifications.

Those records are part of the employment-record system even when they are not A-File documents. They are created during hiring and appointment, and later hiring agencies may need them. Do not assume every credentialing record belongs in the same OTRR folder as the CSED personnel file.

Do not share certain records through OTRR

TCOLE's current OTRR File Types and Folders matrix states: "Do not share CCH/fingerprint returns or proof of citizenship." The Hiring Procedures model policy still requires a fingerprint search and proof of citizenship or applicable legal-permanent-residence documentation as part of the background investigation, and it tells agencies to maintain a copy of the fingerprint-check return. Maintain those records as the current hiring policy and local retention schedule require. Do not upload or share them through OTRR.

Other Agency Files

TCOLE GUIDANCE. Preparing for OTRR identifies Other Agency Files as documents required by the agency's local retention schedule. OTRR FAQs state that files uploaded into OTRR are still kept according to the local retention schedule set by the city or county. Uploading records to OTRR does not eliminate the agency's own record-retention obligations.

PRACTICAL RECOMMENDATION. Identify which local HR, payroll, medical, leave, or other employment records the city or county retention schedule requires the agency to keep, even if those records are not part of the A-File, G-File, or TCOLE credentialing categories used for OTRR. Keep that inventory written down so a separation or background request does not become a hunt through unrelated city files.

Build the file throughout the officer's employment

Do not wait until separation to determine what should have been maintained. Records accumulate from the first application through training, evaluation, assignment changes, and-when they occur-misconduct and discipline. The operational job is to create each record when the work happens, classify it under the current TCOLE structure, and keep it retrievable.

HIRE -> CREDENTIAL -> TRAIN -> EVALUATE -> MAINTAIN -> SEPARATE -> SHARE

Appointment and hiring

TCOLE REQUIREMENT. Texas law-enforcement agencies were required to adopt TCOLE's Hiring Procedures model policy, or a substantively similar policy, by June 1, 2025, and submit the adopted policy to TCOLE. Current TCOLE model-policy guidance repeats that adoption date. The policy requires a completed Personal History Statement and written consent before the agency reviews background-investigation information.

The Hiring Procedures model policy requires a thorough background investigation that includes, at a minimum, personnel files and other employee records from each previous law-enforcement employer, including the employment application submitted to the previous employer; employment-termination reports and misconduct investigation reports maintained by TCOLE; TCOLE service records; proof the person meets applicable training-program qualifications; military discharge records where applicable; criminal-history record information; pending-warrant information available through TCIC and NCIC; evidence of financial responsibility; a DPS driving record; proof of United States citizenship or, for an honorably discharged veteran with at least two years of service, proof of legal permanent residence and an application for citizenship; at least three personal and two professional references; National Decertification Index information; and, if applicable, a file or record obtained by TCOLE under Occupations Code § 1701.3035.

The same policy requires the investigator to provide the other agency with a copy of the applicant's signed Release of Information before obtaining and reviewing files; to review files electronically or in person, not by phone; to document findings in a background investigation report; and to complete applicable TCOLE appointment forms, including the L-1 or L1-T, L-2, and L-3. The policy also requires a fingerprint search before appointment and, for a current Texas peace officer, an official record of annual firearms qualification within the past 12 months or a qualification before employment.

TCOLE GUIDANCE. The OTRR file-type matrix classifies job applications, the background investigation report, interview notes, polygraph results, and L-2/L-3 reports as hiring records for Secure Share, and classifies the PHS, L-1/L-2/L-3, F-5R, NDI, court documents, and firearms qualifications as credentialing-file records. The Hiring Procedures model policy also says a copy of the background investigation report, the L-2, the L-3, a notarized L-1 or L1-T, and the fingerprint-check return shall be maintained in the employee's personnel file. That hiring-policy language uses "personnel file" more broadly than the Occupations Code A-File definition. For OTRR classification and sharing, follow the current TCOLE file-type matrix. Do not upload CCH or fingerprint returns through OTRR.

Training and field training

TCOLE GUIDANCE. The OTRR file-type matrix identifies training records such as FTO evaluations, probationary-officer documentation, remedial training, and course certificates as Secure Share records, not as CSED personnel-file uploads. Firearms qualifications appear in the credentialing-file list.

PRACTICAL RECOMMENDATION. Keep orientation, FTO, probationary, remedial-training, and qualification records as they are created. Not every training certificate belongs in the A-File or in the same OTRR folder. The later hiring agency may ask for them. The current agency should be able to find them without reconstructing the officer's training history from email and supervisor drawers.

Performance and employment changes

TCOLE REQUIREMENT. Periodic evaluations belong in the personnel file under the Personnel Files model policy and Occupations Code § 1701.4535. Commendations, congratulations, and honors relating to official duties belong there as well.

TCOLE GUIDANCE. The OTRR file-type matrix places promotions and demotions, changes in pay or assignment, and performance-improvement plans among HR employment records in the Secure Share path. Those records may be required by the local retention schedule even when they are not A-File documents.

PRACTICAL RECOMMENDATION. When an evaluation is completed, file it in the A-File and keep any licensee response with it. When an assignment, pay, or rank change occurs, file the supporting document in the category TCOLE's current matrix uses-typically the department or other agency file-not in a miscellaneous supervisor folder that later cannot be found.

Misconduct and discipline

This is the part of the file that most often becomes difficult after the officer leaves. Treat the underlying investigation requirements and the later OTRR upload as related but distinct.

TCOLE REQUIREMENT. Agencies were required to adopt TCOLE's Misconduct Allegations model policy, or a substantively similar policy, by June 1, 2025. The policy requires the agency to investigate allegations of misconduct that may result in suspension, demotion, or termination when the agency becomes aware of the alleged misconduct; to complete the investigation within 180 days, absent other applicable laws, agreements, or policies; and to complete the investigation even if the license holder separates. 37 TAC § 211.29 restates those chief-administrator duties, including completion of the investigation after separation.

TCOLE REQUIREMENT. Starting June 1, 2025, the agency submits a completed administrative investigation to TCOLE on the Misconduct Investigation Report (MIR) in a timely manner, but not later than 30 days after the license holder separates. TCOLE's misconduct FAQ states that the MIR is required whether the allegation is sustained or not sustained. If criminal charges are filed, the agency submits the Criminal Charges Notification (E-1) within 30 days after the criminal investigation is completed. If findings or discipline are appealed, the agency notifies TCOLE and reports the appeal disposition within 30 days after receiving the decision. Documentation of the completed investigation is included in the license holder's personnel file or department file, as appropriate.

TCOLE GUIDANCE. Current OTRR FAQs say Misconduct Investigation Reports must be submitted within 30 days of separation and may be uploaded anytime during the appointment. TCOLE's OTRR Resource Center and file-type matrix include MIRs among the CSED personnel-file documents. Preparing for OTRR also lists MIRs among TCOLE Credentialing Files. Use the current TCOLE upload path for MIRs, and place the underlying investigation documentation in the A-File or G-File according to the Personnel Files and Misconduct Allegations policies: sustained misconduct that resulted in disciplinary action belongs in the personnel file; alleged misconduct that is not sustained does not.

When TCOLE guidance does not clearly say whether a particular real-world document belongs in the A-File or the G-File, do not guess. Confirm with current TCOLE guidance, the agency's adopted policies, and TCOLE when needed.

Prepare for separation before the officer leaves

Current TCOLE materials say applicable personnel files and Misconduct Investigation Reports must be uploaded within 30 days of a license holder's separation. The agency should not begin identifying the required records on day 29.

What happens at separation

PRACTICAL RECOMMENDATION. TCOLE prescribes the 30-day submission duty. It does not prescribe this exact internal sequence. A workable agency workflow is:

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SEPARATION
|
Confirm separation information
|
Review the officer's files
|
Identify records subject to TCOLE submission
|
Confirm the documents are complete
|
Upload through OTRR
|
Confirm submission
|
Preserve agency copies under the applicable retention schedule
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TCOLE REQUIREMENT. 37 TAC § 211.29 requires the chief administrator to notify TCOLE electronically when a person under appointment resigns or is terminated, following Occupations Code § 1701.452, and to submit a complete copy of the personnel file to TCOLE within 30 days after separation in a manner prescribed by TCOLE. Current TCOLE OTRR materials identify OTRR as that manner for applicable personnel-file and MIR uploads.

The 30-day requirement

TCOLE REQUIREMENT. The trigger is the license holder's separation from the agency. Current OTRR FAQs state that the licensee's personnel files must be uploaded within 30 calendar days after separation. The Personnel Files model policy and 37 TAC § 211.29 use the same 30-day personnel-file submission deadline. Current OTRR FAQs and the OTRR Resource Center also require MIR upload within 30 days of separation.

TCOLE GUIDANCE. Agencies do not have to wait until separation to upload applicable personnel-file items. Current OTRR FAQs state that personnel files and MIRs may be uploaded anytime during the appointment. TCOLE's official upload training makes the same point: items can be added to a licensee's personnel file throughout the officer's time at the agency.

TCOLE GUIDANCE. The personnel-file upload requirement is not retroactive. Current OTRR FAQs state that agencies are only expected to upload files for license holders separating now and in the future. If a later hiring agency requests records, the responding agency still has to produce applicable records that it retained.

30 calendar days

Current OTRR FAQs use calendar days for the separation-upload deadline. Do not treat the deadline as a reason to start the file. If the A-File, evaluations, discipline documents, responses, and MIRs were maintained during employment, the 30-day window is a submission step.

Missing or nonexistent records

TCOLE GUIDANCE. Current OTRR FAQs address a license holder or cadet who was not appointed long enough to create a personnel file: if the licensee does not have a personnel file, upload a memo explaining that. Do not invent a substitute packet. If a document was required and does not exist, the memo should say so. If a document exists elsewhere in the agency, find it and classify it. TCOLE also tells agencies that if a file is uploaded by mistake, email the TCOLE Records Division at records@tcole.texas.gov to request removal.

Respond when another agency is hiring your former officer

An officer leaves Agency A. Later, Agency B considers hiring the officer. Agency B's background investigator may request records from Agency A. The system therefore has two operational responsibilities. Outgoing: maintain and provide required records. Incoming: request and review prior-employment records when hiring.

Responding agency

TCOLE GUIDANCE. Current Accessing OTRR materials assign File Uploaders the duty to respond to record requests from investigators. Current OTRR FAQs state that agencies must upload requested documents within 10 calendar days of the request. That is the current OTRR response deadline. Do not carry forward an older TCOLE SecureShare deadline unless current OTRR guidance still states it.

TCOLE REQUIREMENT. The Hiring Procedures model policy tells the requesting investigator to provide the applicant's signed Release of Information before obtaining files. Current OTRR FAQs say the requesting agency uploads the applicant's signed Authority to Release Information form with the request. Uploaders at the prior agencies, academies, and TCOLE are notified. Records are not provided automatically. When the responding organization finishes uploading, OTRR emails the investigator that files are ready to review.

TCOLE GUIDANCE. At separation, current FAQs say the agency uploads the CSED personnel-file documents: commendations and awards; MIRs; final disciplinary memos; the licensee's written responses to a negative document in the file; and periodic performance reviews. Upon request from a hiring agency, the rest of the files are uploaded to the Secure Share folder in OTRR. TCOLE's file-type matrix states that agencies may not withhold those Secure Share-type records based on non-disclosure agreements if they receive a signed Authorization for Release of Information. The chief administrator remains accountable for compliance.

The Hiring Procedures model policy also tells a requesting investigator that if a release was provided and an agency does not respond within ten business days, and the investigator has made direct contact, the investigator should contact the TCOLE Field Service Agent for assistance. That is hiring-policy escalation guidance. It does not replace the current OTRR FAQ's 10-calendar-day upload deadline for the responding agency.

Hiring / background agency

TCOLE GUIDANCE. Current Accessing OTRR materials assign Background Investigators the duty to request licensee files from prior agencies and to review documents within the secure 14-day access window. Current OTRR FAQs state that files are available in OTRR Secure Share for 60 days after their creation date and no longer expire in 72 hours. Once files are opened, they are marked late if not viewed within 14 days.

TCOLE REQUIREMENT. The Hiring Procedures model policy requires written consent before reviewing background-investigation information, review of prior-agency personnel files and other employee records, and documentation of the investigation in a background investigation report. Current OTRR materials require the licensee's Authority to Release Information form to be uploaded into OTRR before records are requested. People who have never held a TCOLE license or been appointed will not be in OTRR.

TCOLE GUIDANCE. The current file-type matrix shows the investigator completing the BCF and L-1 and submitting them to TCOLE; receiving TCOLE service records such as the Personal Status Report, F-5R return including the history of F-5R inquiries, and the BCF; making the OTRR inquiry; and reviewing returned records. Multiple people may work on the same background investigation if the person assigned to the task marks it complete when everyone is done. OTRR allows downloading, but current FAQs warn that downloaded records become the requesting agency's records and are subject to that agency's local retention schedule.

Why organized files matter

PRACTICAL RECOMMENDATION. A records request should not require the former agency to reconstruct an officer's employment history from email, paper folders, network drives, training systems, supervisor files, and miscellaneous HR documents. The better process is to maintain the record as the employment relationship unfolds. That is operational guidance, not a TCOLE quote. OTRR makes the cost of a scattered file visible: the 10-day request window is short if the agency has to find the records first.

Make the process sustainable for a small agency

A sustainable process does not depend on one person remembering every folder under a deadline. The agency should name the work, assign the OTRR roles TCOLE actually uses, and keep the file current while the officer is still employed.

Assign the OTRR roles

TCOLE GUIDANCE. Current Accessing OTRR materials describe three agency-facing responsibilities. File Uploaders upload personnel files within 30 days of separation and respond to record requests from investigators. Background Investigators request licensee files from prior agencies and review documents within the secure 14-day access window. Chief administrators or delegates assign file uploaders and investigators through the Assignment Status Manager in TCLEDDS and remain responsible for statutory deadlines and obligations.

TCOLE's July 2026 Briefing and OTRR FAQs further distinguish CSED Uploaders, who handle confidential statewide employment-database files, from Secure Share Uploaders, who handle the temporary Secure Share documents requested for background investigations. Users may hold more than one OTRR role. Each person counts as one OTRR user regardless of how many roles that person holds. Existing TSS users are not automatically moved to OTRR. The chief administrator counts as an OTRR user only if designated as a File Uploader or Background Investigator.

Current TCOLE user-allocation guidance, pending additional funding TCOLE has said it is requesting, is 10 users for agencies with 500 or more peace officers, 5 users for 100-499 officers, 2 users for 0-99 officers, and 2 users for academies. A typical small Texas agency therefore has two OTRR seats to assign. TCOLE training materials also indicate that an Assignment Status Manager change can take 24 to 48 hours to take effect in OTRR.

Decide who owns each step

PRACTICAL RECOMMENDATION. Do not prescribe one staffing structure. Small agencies may assign several functions to the same person. The important issue is that ownership is explicit.

Work	Typical owner in a small agency	OTRR role, if any
Hiring / background records	Background investigator, chief, or assigned investigator	Background Investigator
Credentialing and appointment forms	Training coordinator, TAC, or administrative staff	None unless that person is also an uploader
Training / FTO / qualifications	Training coordinator or FTO supervisor	None unless that person is also an uploader
Evaluations and commendations	Supervisors, with a named file owner	None unless that person is also an uploader
Misconduct records and MIRs	Chief or assigned internal-affairs / command staff	File Uploader for required OTRR submission
File classification	Named records owner using the current TCOLE categories	None
Separation review	Chief or named delegate, before the 30-day clock is the emergency	File Uploader
OTRR CSED / Secure Share upload	Designated File Uploader	CSED Uploader and/or Secure Share Uploader

Incoming background request	Designated File Uploader	File Uploader
Oversight	Chief administrator	Assignment through Assignment Status Manager; remains accountable

Digitize and organize before you need the records

TCOLE GUIDANCE. Current OTRR FAQs recommend that agencies digitize files so they can comply with Secure Share requests more easily and upload personnel files within 30 days of a license holder's separation. Digitizing files does not change applicable retention requirements. It changes whether the agency can find and transmit the records it already has a duty to keep.

PRACTICAL RECOMMENDATION. Digitize as the file is built, not as a special project after someone resigns. The practical benefit is easier separation upload, easier response to background requests, easier internal review, and less dependence on institutional memory.

Turn the requirements into a repeatable personnel-file process

The memorable operating framework is:

HIRE -> FILE -> MAINTAIN -> REVIEW -> SEPARATE -> SHARE

The checklist and classification reference below turn that framework into working lists. Use them to run the process. Do not treat them as a second copy of TCOLE's rules or file matrix.

TCOLE Personnel File & OTRR Readiness Checklist

A practical readiness checklist for Texas law-enforcement agencies. Confirm that records are being created and placed in the appropriate TCOLE category. Do not treat every item as an A-File document or as a single OTRR upload.

Agency setup

- ☐ Confirm the current TCOLE Personnel Files policy has been adopted, or the agency has an approved substantively similar policy, as required (agency adoption date June 1, 2025).
- ☐ Confirm the current Hiring Procedures policy, or a substantively similar policy (agency adoption date June 1, 2025).
- ☐ Confirm the current Misconduct Allegations policy, or a substantively similar policy (agency adoption date June 1, 2025).
- ☐ Confirm adopted policies were submitted to TCOLE / the Field Service Agent as current TCOLE guidance requires.
- ☐ Identify agency File Uploader(s), including CSED Uploader and Secure Share Uploader assignments as applicable.
- ☐ Identify Background Investigator(s).
- ☐ Confirm required TCOLE Login Hub access for each assigned person.
- ☐ Confirm applicable Assignment Status Manager assignments in TCLEDDS. Allow 24 to 48 hours for an assignment to take effect in OTRR, as current TCOLE training describes.

- ☐ Confirm each assigned user has a PID and a TCLEDDS association as licensed or non-licensed staff.
- ☐ Identify who oversees personnel-file compliance. The chief administrator remains accountable.
- ☐ Document backup responsibility for uploads, background requests, and role assignment.

File structure

- ☐ Personnel / A-File established for each license holder.
- ☐ Department / G-File established for each license holder, marked as current TCOLE policy requires.
- ☐ TCOLE Credentialing File established.
- ☐ Other Agency Files identified as required by the local retention schedule.
- ☐ Existing documents reviewed for correct classification under current TCOLE categories.
- ☐ Restricted / non-shareable records identified, including CCH/fingerprint returns and proof of citizenship.
- ☐ Local retention requirements documented. Uploading to OTRR does not replace them.

During employment

- ☐ Appointment and hiring records created and filed in the appropriate category (application, PHS, consent/release, background investigation, interview materials, appointment forms).
- ☐ Credentialing documents maintained where applicable (L-1/L1-T, L-2, L-3, F-5R, BCF, NDI documentation, court documents).
- ☐ Training, FTO, probationary, and remedial-training records maintained in the training / department category-not assumed to be A-File documents.
- ☐ Periodic evaluations completed and placed in the A-File, including any licensee response.
- ☐ Commendations and awards placed in the A-File.
- ☐ Firearms qualifications maintained in the credentialing file as applicable.
- ☐ Employment-change records (promotion, demotion, assignment or pay change, performance-improvement plan) filed in the category current TCOLE guidance uses.
- ☐ Misconduct allegations investigated under the adopted Misconduct Allegations policy, including after separation when an investigation is pending.
- ☐ Completed investigation documentation placed in the A-File or G-File, as appropriate.
- ☐ Final disciplinary actions for suspension, demotion, or termination placed in the A-File, with required notice and any licensee response.
- ☐ MIRs prepared and available for timely TCOLE / OTRR submission. Current OTRR guidance allows upload during the appointment.
- ☐ CCH/fingerprint returns and proof of citizenship retained as required locally and excluded from OTRR sharing.

At separation

- ☐ Confirm the separation date. The 30-calendar-day OTRR / TCOLE personnel-file deadline runs from separation.
- ☐ Complete any pending misconduct investigation. Separation does not end that duty.

- ☐ Review the Personnel / A-File for commendations, evaluations and responses, final disciplinary actions and responses, and MIRs.
- ☐ Confirm required documents are complete. If the licensee has no personnel file, upload a memo explaining that, as current OTRR FAQs require.
- ☐ Identify the applicable TCOLE / OTRR CSED submission records. Do not treat the entire employment file as the CSED upload.
- ☐ Upload required personnel-file records and MIRs in OTRR within 30 calendar days of separation. Records may also be uploaded before separation.
- ☐ Submit required separation reporting to TCOLE under Occupations Code § 1701.452 / 37 TAC § 211.29.
- ☐ Confirm the OTRR submission.
- ☐ Retain agency copies according to the applicable city or county retention schedule.

When another agency requests records

- ☐ Verify the OTRR request and the assigned File Uploader responsibility.
- ☐ Confirm the required authorization / consent (Authority to Release Information).
- ☐ Identify responsive CSED and Secure Share records using the current TCOLE file-type matrix.
- ☐ Review for current TCOLE sharing requirements and restrictions. Do not share CCH/fingerprint returns or proof of citizenship.
- ☐ Upload or provide records within 10 calendar days of the request, as current OTRR FAQs require.
- ☐ Do not withhold applicable Secure Share-type records based on an NDA if a signed authorization was received, as current TCOLE file-type guidance states.
- ☐ Document completion.

When your agency is hiring

- ☐ Obtain the applicant's completed Personal History Statement and written consent / Authority to Release Information before reviewing employment records.
- ☐ Assign or confirm the Background Investigator role in the Assignment Status Manager.
- ☐ Identify prior appointing agencies, academies, and applicable TCOLE records.
- ☐ Upload the signed Authority to Release Information in OTRR and request records. Do not expect instant production.
- ☐ Review returned records within the current access window (opened files marked late after 14 days; Secure Share files available 60 days after creation).
- ☐ Review files electronically or in person. File review may not be done by phone.
- ☐ Document findings in the background investigation report and complete the current BCF / L-1 process.
- ☐ Complete remaining Hiring Procedures steps (medical and psychological examinations, fingerprint search, firearms qualification as applicable) before appointment.
- ☐ If a prior agency does not respond, follow current Hiring Procedures escalation, including Field Service Agent assistance after the policy's contact steps.

Checklist disclaimer

This checklist is a practical workflow aid. It does not replace current TCOLE statutes, commission rules, model policies, OTRR instructions, or guidance.

Personnel Record Classification Quick Reference

Classifications below come from TCOLE's current OTRR File Types and Folders matrix, Preparing for OTRR, and the Personnel Files model policy. They are not Thin Line categories. If TCOLE does not clearly classify an item, the table says to confirm with TCOLE or the current agency policy rather than guessing.

Record type	TCOLE category	OTRR handling	Notes
Commendation, congratulation, or award	Personnel / A-File	CSED personnel-file upload	Defined A-File contents under the Personnel Files model policy.
Periodic performance evaluation and any response	Personnel / A-File	CSED personnel-file upload	A-File document. Keep the licensee response with the evaluation.
Final disciplinary action and any response	Personnel / A-File	CSED personnel-file upload	TCOLE's file-type note: suspensions, demotions, and terminations; identify allegations, findings, disposition, and discipline imposed.
Licensee written response to a negative personnel-file entry	Personnel / A-File	CSED personnel-file upload	Required opportunity under the Personnel Files model policy after notice of a negative entry.
Misconduct Investigation Report (MIR)	CSED list; also listed among credentialing records	Upload within 30 days of separation; may upload during appointment	Required for completed administrative investigations, including not-sustained findings. Place underlying investigation documents in the A-File or G-File as the model policies require.
Complaint or investigation that did not result in formal discipline	Department / G-File	Secure Share on hiring-agency request	Unsustained alleged misconduct may not be placed in the A-File.
Informal discipline, reprimand, counseling, or corrective training	Department / G-File (internal-affairs records)	Secure Share on request	From the current OTRR file-type matrix. Confirm any close case with current TCOLE guidance.
FTO evaluation, probationary documentation, remedial training, course certificate	Department / G-File (training records)	Secure Share on request	Not a CSED personnel-file upload.

Job application, background investigation report, interview notes, polygraph results	Hiring records; treated as non-A-File / Secure Share records	Secure Share on request	Hiring Procedures also say maintain the background report in the employee's personnel file. For OTRR sharing, use the current file-type matrix.
Personal History Statement (PHS)	TCOLE Credentialing File	Secure Share on request	Required in the hiring process. Not an A-File commendation/evaluation/discipline document.
L-1 / L1-T, L-2, L-3	TCOLE Credentialing File	Secure Share on request	Hiring Procedures say include passing L-2/L-3 and a notarized L-1 or L1-T in the employee's personnel file. OTRR file types place L-1/L-2/L-3 in the credentialing file for sharing.
F-5R, BCF, NDI, court documents, firearms qualification	TCOLE Credentialing File	Secure Share on request; TCOLE also returns PSR, F-5R, and BCF to investigators	From Preparing for OTRR and the current file-type matrix.
Promotion, demotion, change in pay or assignment, performance-improvement plan	Department / G-File or Other Agency Files (HR employment records)	Secure Share on request	From the current OTRR file-type matrix. Also check the local retention schedule.
L-2/L-3 failure, FFDE final failure, drug-screen final failure	TCOLE Service Records	Report to TCOLE within 30 days of the applicable failure or final determination	Current Preparing for OTRR guidance still directs failed psychological, medical, and drug-screen reporting to fitforduty@tcole.texas.gov in this phase. Confirm the current submission method before a deadline.
CCH or fingerprint-check return	Restricted	Do not share through OTRR	Hiring Procedures require the fingerprint search and local retention of the return. OTRR file types prohibit sharing CCH/fingerprint returns.
Proof of citizenship or applicable legal-permanent-residence documentation	Restricted	Do not share through OTRR	Required in the Hiring Procedures background investigation. OTRR file types prohibit sharing proof of citizenship.
Out-of-state or military records, TCOLE investigative reports, non-jurisdictional complaints, TCLEDDS notes	Secure Share-type records in the current file-type matrix	Secure Share on request	Use the current official matrix rather than a local folder name.
Local HR, payroll, medical, or other retention-schedule records not listed above	Other Agency Files	Not a substitute for local retention; upload only if current TCOLE guidance requires it	Uploading to OTRR does not satisfy the city or county retention schedule by itself.

Use the official matrix when a case is close

This reference restates current TCOLE classifications. It is not an independent legal opinion about a particular officer's file. Confirm close questions with current TCOLE File Types and Folders guidance, the adopted agency policies, and TCOLE.

Build the file before you need the file

The difficult time to organize an officer's employment history is after the officer has separated and a deadline is running. A sustainable process creates, classifies, and maintains records throughout employment. Separation and later background requests then become records-management work rather than records reconstruction.

OTRR did not invent the personnel file. It made the file move. The agency that already knows what belongs in the A-File, the G-File, the credentialing file, and the local retention file can meet a 30-day separation upload or a 10-day background request without assembling the officer's career from leftover folders.

The best separation workflow starts on the officer's first day.

Official TCOLE resources

This guide does not replace current TCOLE rules, model policies, instructions, or guidance.

[OpenText Records Repository \(OTRR\) Resource Center](#)

[Preparing for OTRR](#)

[Accessing OTRR](#)

[OTRR FAQs](#)

[OTRR File Types and Folders](#)

[TCOLE OTRR training resources, videos, and reference guides](#)

[Adopted TCOLE Model Policies](#)

[TCOLE Model Policy Guidance](#)

[Personnel Files Model Policy](#)

[Hiring Procedures Model Policy](#)

[Misconduct Allegations Model Policy](#)

[Reporting Misconduct Allegations FAQ](#)

[TCOLE Commission Statutes and Rules](#)

[TCOLE The Briefing \(July 2026\) - OTRR and Assignment Status Manager](#)

Important notice

This resource is provided for general informational and operational-planning purposes. It is not legal advice, an official interpretation of TCOLE requirements, or a determination of agency compliance. Requirements and TCOLE systems may change. Agencies should verify obligations against current TCOLE statutes, rules, model policies, OTRR instructions, and guidance and contact TCOLE when clarification is needed.

Generated from the Thin Line Software resource library. Read this guide online: <https://thinline.software/resources/texas-law-enforcement-personnel-files-otrr-guide>