Uniform Guidelines for Preparation of Hearing Exhibits

Effective July 1, 2025

1. Agency rules and the hearing assignment order govern prehearing procedure in cases before the agency, including the deadlines for the parties to exchange exhibit lists and intended exhibits, file exhibits with the agency on the Workers' Compensation Electronic System (WCES), and file motions to exclude or objections to intended exhibits.

2. Medical treatment records shall be organized by provider. Each provider's records shall be chronological. Providers shall be organized in chronological order.

3. Medical treatment records, before and after the alleged injury, are not to be offered separately by each party unless authentication of a record is in dispute. All such treatment records shall be contained in a separate joint exhibit.

4. No X-rays or other imaging films are allowed absent a showing that such will be helpful to the presiding deputy workers' compensation commissioner in addressing the disputed issues and such films do not require expert medical interpretation.

5. Medical and vocational opinion reports may be offered separately by the parties.

6. Any party submitting exhibits, including joint exhibits, shall include a table of contents.

7. Exhibits shall be identified as follows:

    A. Claimant's Exhibits, numerically (1, 2, 3, 4, etc.);

    B. Defendants' Exhibits, alphabetically (A, B, C, D, etc.);

    C. Joint Exhibits, numerically and preceded by "JE" (JE1, JE2, JE3, JE4, etc.); and

    D. Second Injury Fund (SIF) Exhibits, double-alphabetically (AA, BB, CC, DD, etc.).

8. Each page of every exhibit shall be numbered with the appropriate exhibit numbering or lettering and the page number. Page-numbering shall be consecutive across exhibits.

    A. Example of Claimant's Exhibits: 1-1, 1-2, 1-3, 2-4, 2-5, 2-6, 3-7, 3-8, etc.

    B. Example of Defendants' Exhibits: A-1, A-2, A-3, B-4, B-5, C-6, D-7, D-8, etc.

    C. Example of Joint Exhibits: JE1-1, JE1-2, JE2-3, JE3-4, JE4-5, JE4-6, JE5-7, JE6-8, etc.

D. Example of SIF Exhibits: AA-1, AA-2, BB-3, CC-4, CC-5, DD-6, DD-7, DD-8, etc.

9. Highlighting is permitted, but not required.

10. Any handwritten evidence shall be legible or shall contain a typewritten translation initialed by the original author of the handwritten evidence.

11. No duplicate pages or documents should be included.

12. Any audio or video files shall not exceed 500 MB for each filing. Any audio or video files shall use MP3 or MP4 format and be submitted with a virus-scanned USB drive. Mail the virus-scanned USB drive, with an enclosure identifying the case name and number and "Attention:" to the presiding deputy, to the following address:

Workers' Compensation Division
6200 Park Avenue, Suite 100
Des Moines, Iowa 50321

Be sure to take appropriate steps to allow time for the USB drive to be delivered to the presiding deputy before the date of hearing.

13. Page limits for exhibits will be enforced and are as follows:

A. 50 pages per party for individual exhibits; and

B. 100 additional pages for joint exhibits.

The requesting party's hearing time will be used to determine the relevancy of proposed exhibits that exceed these limits. The submission of extensive medical treatment records may not be allowed when only the extent of permanent disability is in dispute. A deputy in his or her discretion may allow a party, or parties, to exceed the above-stated page limits upon a showing of good cause.

15. If the agency holds an in-person hearing, paper copies of all proposed exhibits must be provided to the presiding deputy workers' compensation commissioner at the start of the hearing. This requirement is in addition to the electronic submission of proposed exhibits under agency rules. The presiding deputy may require the parties to provide paper copies of exhibits for a hearing held using internet-based video.

16. If a witness testifies by telephone or internet-based video, the witness must have access to all hearing exhibits during testimony.