**CHAPTER 37 – SUBMITTAL OF FINAL PROJECT DOCUMENTATION**

The PM must ensure that Project documentation is performed as Project Work progresses.

Throughout the life of each Project, the Region Assurance Specialist (RAS) and the Office of Civil Rights (OCR) Field Coordinator will periodically review Project documentation at the Project Manager’s (PM) office.

At the completion of the Project, the PM shall:

- Compile all original records and supporting data for the final quality, quantity and labor compliance documentation.
- Update the “corrected estimate quantity amount” to match the “performed to date quantity amount” in CPS, with the exception of any Pay Items with an Establishment Period. [Refer to Chapter 25 – Payments to Contractors/Retainage.]
- Prepare the documentation submittal package, commonly referred to as the Project “semi-final” package.
- Coordinate with the RASs on scheduling a final Project review (The RAS final review will involve reviewing the remaining items necessary, including the release of any retainage, and confirming the contents of the semi-final package)
- Sign off on the final DRR (once the RAS has determined that all Project documentation is complete).
- Forward the semi-final package to the Contract Administration Unit (CAU) in the Construction Section.

The CAU is responsible for the final review, Project Acceptance, and archiving.

Electronic documentation via Doc Express is required by specification (or Contract Change Order) for all projects unless otherwise approved by the State Construction & Materials Engineer (SCME) or the SCME designee.

**For Projects started with paper documentation:**
DO NOT submit documentation in 3-ring binders or legal sized folders. These will not fit in the special, letter-sized archive boxes the Agency is required to use for archiving Project documentation. Use prong pads or folders with metal fasteners for all the Project documentation. Contact the CAU if you have any questions.
37-1 COMPILING THE PROJECT SEMI-FINAL DOCUMENTATION

The semi-final package will consist of the following:

(a) Semi-Final Documentation Checklist, form 734-2706

This is the transmittal letter used to identify all the documentation being submitted to the RAS as part of the semi-final package. Each item listed on the checklist must be marked as:

- “S” – Submitted This Date. Mark all items included in the semi-final package with an “S”.
- “D” – Distributed. Mark all items, such as the Project Manager’s Narrative Form and Warranties, which are distributed by the PM with a “D”.
- “X” – Previously Submitted. Mark all items which have been submitted separately from the semi-final package, such as the Recommendation of Project Acceptance and Force Order Completion Notice, with an “X” to indicate they have been previously submitted and are not included in the semi-final package.
- “T” – To Be Submitted. Any items required to be included in the semi-final package, but are not being transmitted with the package when submitted to the RAS, must be marked with a “T” to indicate it will be submitted at a later date.
- “N/A” – Not Applicable. If any of the items listed on the semi-final transmittal do not apply to the Project, mark the item with a “N/A”.

DO NOT leave any checklist item blank. This will delay the processing of the semi-final review by CAU.

The Semi-Final Documentation Checklist, form (734-2706) also lists items to be submitted electronically to the ODOT Contract Services Mailbox.
(b) Semi-Final Documents

1. **Documentation Review Report (DRR), form 734-1903**

The RAS will complete a final DRR after the Project documentation has been reviewed and found acceptable.

The RAS will list the following on the final DRR:

- Any quantity or quality items that pertain to a PM exception
- Any remaining Establishment Period comments
- Any other Project related comments

This form is only used when the Material installed on the Project uses an alternate method of acceptance, or if payment is made due to an alternate method of measurement instead of what is specified in the Contract.

- The PM must discuss the use of this form with the RAS prior to its use. There are limitations as to what is considered an exception. [Refer to Exception vs. CCO guidance document].
- The PM must also obtain the concurrence to use the Exception method of acceptance from the Technical Resource (TR) and Professional of Record (POR).
- The [Technical Resource List](#) includes both the general specifications (00110 – 00199) and technical specifications (00205 – 03020).
- Items that require an exception to the general specifications (00110 – 00199) will also need concurrence from the applicable Technical Resource.
- Items that require an exception to the measurement (.80) or payment (.90) subsections of the technical specifications will only need concurrence from the CAU Technical Resource.

Once the PM has obtained concurrence from the TR and POR to use an Exception, the PM should:

- Send the draft to the RAS to ensure the Exception form addresses the issues on the DRR prior to submitting it to the TR and POR
- Attach the TR and POR's written concurrence to the PM Exception Explanation form prior to submittal.
- Note the name and date of when the TR and POR provided concurrence.
- Attach any additional supporting documentation to the Exception form.
- Sign and date the form.

If all the above items have been completed, the RAS will review the Exception form and all the supporting documents and then sign and date the form.
## Document Review Report

**Supporting Documentation: PM Exception Explanation**

### Project Name
REGION 3: ROCKFALL HAZARD MITIGATION (EAST)

<table>
<thead>
<tr>
<th>Bid Item No.</th>
<th>Spec No.</th>
<th>BI Description</th>
<th>Missing Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>0107</td>
<td>00190</td>
<td>Aggregate Shoulders</td>
<td>Check Weight</td>
</tr>
</tbody>
</table>

**NOTE:** If bid item is for HMA, please indicate if exception is for aggregate production, mix production or placement. Be specific when identifying exactly what the exception applies to. If the exception applies to a missing verification test, please indicate how many tests were performed, results of any verification tests obtained, and why testing was missed.

**Explain why missing documentation could not be obtained:**
Contractor failed to obtain a check weight in accordance with Section 00180.20(f-2) for material placed from Kester Quarry utilizing a production scale without an automatic printer.

**QUALITY DEFICIENCIES** ☒ N/A
What was the alternate method used to accept the material?

**QUANTITY DEFICIENCIES** ☐ N/A
How was the quantity of the material verified?
Using yield calculations (attached) for the areas of placement, the PM Office verified that the quantity of material represented by the weigh memos on file are accurate and representative of the amount of material required to fill the area volumes in the field. The production scale in question was inspected prior to placement and subsequent to placement. The inspection reports indicate that the scale was operating within tolerance during the placement period in question. The PM Office has no reason at this time to adjust the amount of material paid for during the placement period in question. Refer to attached documentation.

**CONSULTATIONS**
(attach email concurrence showing exception approval)

<table>
<thead>
<tr>
<th>Specification Technical Owner</th>
<th>Name: Gene Willborn</th>
<th>Date: 4/11/2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Professional of Record</td>
<td>Name: Wade Holaday</td>
<td>Date: 4/15/2014</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Quantity of Material Incorporated</th>
<th>Quantity of Material Affected</th>
<th>Unit Price x Unit Price</th>
<th>Affected Cost (Affect Qty x Unit Price)</th>
</tr>
</thead>
<tbody>
<tr>
<td>430.69</td>
<td>288.25</td>
<td>$74.09</td>
<td>$21,356.44</td>
</tr>
</tbody>
</table>

**PM Signature**

<table>
<thead>
<tr>
<th>PM Signature</th>
<th>DATE</th>
<th>RAS Signature/Concurrence</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paselk</td>
<td>4/15/14</td>
<td></td>
<td>4/21/14</td>
</tr>
</tbody>
</table>

**Contract Administration Action**

<table>
<thead>
<tr>
<th>Accepted</th>
<th>Not Accepted</th>
<th>Prepare Contract Change Order</th>
<th>Other (explain)</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ Participating</td>
<td>☐ Not Participating</td>
<td>☐ Prepare Contract Change Order</td>
<td>☐ Other (explain)</td>
</tr>
</tbody>
</table>

**Contract Administration Engineer Signature**

724-2704 (4-2012)

Updated 02/19
3. **Final Materials Certification, form 734-1979**

The Final Materials Certification form will list all of the quality-related price adjustments, both positive and negative, made on the Project. This includes:

- ACP bonus
- ACP Smoothness Bonus
- Adjustments made for failing Materials
- Adjustments made for missed quality control tests, etc.

Only quality-related adjustments (both standard and non-standard) are listed on the Final Materials Certification. [Refer to Chapter 12B – Quality and Chapter 12C – Quality Price Adjustments].

Quantity price adjustments, such as liquidated damages or adjustments to Lump Sum Pay Items, are not listed on this form. [Refer to Chapter 12-E Adjustments to Lump Sum and Other Items].

---

**FINAL MATERIALS CERTIFICATION**

<table>
<thead>
<tr>
<th>ITEM NUMBER</th>
<th>DESCRIPTION</th>
<th>AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td>6072</td>
<td>HMAC Adj. Lot 1/Level 3, 1/2&quot; Dense HMAC</td>
<td>$10,794.23</td>
</tr>
<tr>
<td>6073</td>
<td>Statspec Bonus Lot 2/Level 4, 1/2&quot; Dense HMAC</td>
<td>$16,756.26</td>
</tr>
</tbody>
</table>

[Details of the form are shown with the specific sections and adjustments listed, but the image is not transcribed here.]
4. **Foreign Steel Summary, form 734-1968**

A completed Foreign Steel Summary is required on Federal Aid and certain State funded Projects which contain the Buy America provisions in 00160.20. The PM must list all foreign origin steel Materials incorporated into the Project. Attach copies of all foreign steel CMOs to the Foreign Steel Summary.

5. **Quantity Ledger Report**

Include the latest report from the Contract Payment System (CPS). The RAS will verify that all final quantities match the quantities from the accepted quantity calculations and sign and date the document.

Example of a Final Quantity Ledger Report:

<table>
<thead>
<tr>
<th>Group</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Quantity</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>LUMP SUM</td>
<td>$8,409.00</td>
<td>100.0000</td>
<td>$8,409.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ret note/suff</th>
<th>Description</th>
<th>Entered</th>
<th>Completed</th>
<th>Pay Quantity</th>
<th>Pay Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/ 1/ 5% CONTRACT COMPLETE</td>
<td>03/07/2016 02/29/2016</td>
<td>50.0000</td>
<td>$4,260.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2/ 2/ &gt; 10% CONTRACT COMPLETE</td>
<td>04/04/2016 03/31/2016</td>
<td>50.0000</td>
<td>$4,260.00</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals for group 11: 100.0000 $8,460.00

---

Contract No: C14858  printed September 21 2016  Quantity Ledger Report  Page 1
6. **Preliminary Progress Payment Report**

Include the latest Preliminary Progress Payment Report from the CPS. The RAS will verify that the quantities match the Quantity Ledger and sign and date the document.

Example of a Final Preliminary Progress Payment Report:

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Unit Price</th>
<th>Quantity</th>
<th>Corrected Quantity</th>
<th>Performed To Date</th>
<th>Performed Since Last Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Item 0001: Mobilization</td>
<td>$9,400.00</td>
<td>100.000</td>
<td>100.000</td>
<td>100.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Item 0002: TEMP PRT &amp; DIR OF TRAFFIC</td>
<td>$60,121.00</td>
<td>100.000</td>
<td>100.000</td>
<td>100.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Item 0003: TEMP SIGN</td>
<td>$12.00</td>
<td>350.000</td>
<td>350.000</td>
<td>350.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Item 0004: TEMP BARRECADES</td>
<td>$90.00</td>
<td>2.000</td>
<td>2.000</td>
<td>2.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Item 0005: TEMP INF ATTCH, TRUCK MOUNTED</td>
<td>$9,500.00</td>
<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Item 0006: TEMP INF ATTCH, TRUCK MOUNTED</td>
<td>$500.00</td>
<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Item 0007: TEMP PLASTIC DRUMS</td>
<td>$20.00</td>
<td>12.000</td>
<td>12.000</td>
<td>12.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Item 0008: TEMP IDN SIGN</td>
<td>$350.00</td>
<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Item 0009: PORTABLE CONTLG MESSAGE SGN</td>
<td>$850.00</td>
<td>2.000</td>
<td>2.000</td>
<td>2.000</td>
<td>0.000</td>
</tr>
</tbody>
</table>

**Contract No:** CI456B

\[\text{Preliminary Progress Payment Report, } 9/21/2016\]
7. **Order for Force Work (State Force Order) Notification of Completion**

   The SFO completion notification is required, even if there is no SFO on the Project.
   - Submit an email to [ODOT Contract Services Mailbox](mailto:ODOT.Contract.Services.Mailbox@oregon.gov) stating that all State Force Order Work on the Project is complete. Include the Contract number and the Project name in the email.
   - Mark this item on the semi-final checklist with an “X” to indicate it was previously submitted.

8. **Right of Way (ROW) Monumentation Completion Notice**

   The ROW Monumentation completion notification is required, even if there is no ROW Monumentation on the Project.
   - Submit an email to [ODOT Contract Services Mailbox](mailto:ODOT.Contract.Services.Mailbox@oregon.gov) stating that all Right of Way (ROW) Monumentation on the Project is complete. Include the Contract number and the Project name in the email.
   - Mark this item on the semi-final checklist with an “X” to indicate it was previously submitted.

9. **Project Managers Narrative Form, 734-2756**

   The purpose of the Project Manager’s Narrative is to provide constructive feedback to both internal (ODOT) and external (Consultant) designers and Project delivery teams, so that needed improvements can be considered and incorporated on future projects.

   The Project Managers Narrative is required on all Projects, but it is not required to be submitted with the Quality and Quantity documents.
   - Submit the Project narrative via email to the [ODOT Contract Services Mailbox](mailto:ODOT.Contract.Services.Mailbox@oregon.gov). Include the Contract number and the Project name in the email.
   - Mark this item on the semi-final checklist with an “X” to indicate it was previously submitted.

10. **Recommendation of Project Acceptance, form 734-1384**

    The Recommendation of Project Acceptance is required on all Projects.
    - Submit the completed form Recommendation of Project Acceptance to [ODOT Contract Services Mailbox](mailto:ODOT.Contract.Services.Mailbox@oregon.gov) signed by the Area Manager, as described in [Chapter 36 – Acceptance of Project](#).
    - Mark this item on semi-final checklist with an “X”, to indicate previously submitted.
11. **Local Agency Letter of Acceptance**

For Projects with Local Public Agency funding, the Local Public Agency is required to submit a letter of acceptance to the PM at the completion of the Project.

- Submit the letter of acceptance to ODOT Contract Services Mailbox.
- Include the Contract number and the Project name in the email.

(c) **Price Adjustments Folder (Quality and Quantity Price Adjustments)**

Submit all series 6000 price adjustments in a separate pronged pad or folder. [Refer to Chapter 12C - Quality Price Adjustments]

Submit all price adjustment calculations along with copies of the appropriate correspondence that support the adjustment, including the following:

- Statistical Asphalt Bonus (StatSpec), include only the following StatSpec printouts in the price adjustment book:
  - Price Adjustment Computations Sheet
  - Statistical Testing Input Data Sheet
  - Statistical Computation Sheet
  - DO NOT include the test results, which should remain with the quality documentation.
  - Send an electronic copy of the final StatSpec data for the Project to the Pavements Unit.

- Smoothness Bonus, send a copy of the Smoothness data to the Pavements Unit.

- Asphalt, Fuel and Steel Escalation, pay documents and supporting data.

(d) **Test Summary Folder**

- Compile all completed Test Summary forms (“A”, “B”, and “B-QA”) in a separate pronged pad or folder.
- Include final quantities, signatures of reviewers, and dates reviewed. [Refer to Chapter 12B - Quality for instructions on completing the Test Summary forms].
(e) Project Quality Control Folder
Include the following Quality Control (QC) documents:
- Quality Control Technician Certifications (include copies of the certifications for all QC Technicians working on the Project).
- Random Numbers (include copies of all random numbers generated for the Project).

(f) Quality Documentation Folder
- Separate the documents into manageable-sized pronged pad or folder.
- Tab each bid item by number.
- Separate field-tested and nonfield-tested documentation into separate folders. (Include any required Blue and/or Green Sheets for Traffic Signal, ITS Projects or Illumination Work.)
- Include all supporting quality documentation, as noted on the Test Summary A, B and B-QA Sheets, for all Contract bid items and Contract Change Orders (CCOs).

(g) Quantity Documentation Folder
- Separate the documents into manageable-sized pronged pad or folder.
- Tab each bid item by number.
- Include all quantity documentation and source documents for all Contract Pay Items (including CCOs).
- Include all supporting and source documentation used to determine the final quantities, including but not limited to:
  - Earthwork Computation Summary and supporting source documentation (include field notes or validation information if a Digital Terrain Model was used).
  - Scale Diary - include scale certifications and check weights
  - Weigh Memos ("weight tickets") and tally sheets. For ACP, include the yield calculations on the Material Delivery and Yield Check Sheet, form 734-2792. [Refer to Chapter 12D – Quantities]
  - A copy of all Pile Record Books, form 734-3485. (If the Project includes furnishing and driving piles, use form 734-3485 or similar format). Submit the original Pile Record Book, or similar format, to the Sr. Geotechnical Engineer.
  - A copy of all Drilled Shaft Inspection Reports, form 734-2598. (If the Project includes Drilled Shafts, use form 734-2598 or similar format). Submit the original Drilled Shaft Reports, or similar format, to the Sr. Geotechnical Engineer.
A copy of all PDA / CAPWAP Test Reports (if applicable). Submit the original test reports to the Sr. Geotechnical Engineer,

- DO NOT include Materials on Hand (MOH), Extra Work Order (EWO), or Construction Engineering (CE) with the quantity documentation. MOH and CE documents must remain in the PM office. All EWO summaries and invoices must be previously submitted to CAU for processing.

**Miscellaneous Semi-Final Documentation Folder(s)**

1. **General Daily Progress Reports / Project Managers Diary**

   - Separate the Daily Reports/Diaries into manageable-sized pronged pad or folder. [Refer to Chapter 12A – Daily Reports/Diaries]
   - Include all original General Daily Progress Reports, form 734-3474, and Project Manager’s Diaries, form 734-3120 (if applicable), for all personnel who worked on the Project (Inspector(s), PM, Asst. PM, etc.).

2. **Traffic Control Inspection Reports (TP&DT Daily Reports)**

   - Separate the Traffic Control Inspection Reports into manageable-sized pronged pad or folder. [Refer to Chapter 12A – Daily Reports/Diaries]
   - Submit all original Traffic Control Inspection Reports, form 734-2474. This includes both Traffic Control Inspection Reports submitted by the Contractor (completed by the Traffic Control Supervisor (TCS)), and any Traffic Control Inspection Reports completed by the Contractor if the TCS is not on the jobsite or if the Project does not have a TCS Pay Item.

3. **Erosion and Sediment Control Monitoring Form**

   - Separate the Erosion and Sediment Control Monitoring forms into manageable-sized pronged pad or folder.
   - Submit all original Erosion and Sediment Control Monitoring forms, form 734-2361, which have been completed by the Contractor. Do not include the Erosion and Sediment Control Plan with the forms. [Refer to Chapter 12A – Daily Reports/Diaries]

4. **TV Pipe Inspection Reports**

   - If Television (TV) Pipe Inspections are required by the Contract, include the original inspection reports in a separate pad or folder and label the front of the pad with the contents.

5. **Turbidity Monitoring Reports**

   - If required by the Contract, separate the Turbidity Monitoring Report forms into manageable-sized pronged pads or folder.
   - Submit all original Turbidity Monitoring Report, form 734-2755, which have been completed by the Contractor. [Refer to Chapter 12A – Daily Reports/Diaries]
(i) Scale Diary Folder
Submit all scale certification(s), daily tare weights, and check weights in a separate pronged pad or folder. [Refer to Chapter 12D – Quantities]

(j) Labor Compliance Folder(s)
Submit the following labor compliance documentation [Refer to Chapter 19 - Labor Compliance] in separate pronged pads or folders for the Contractor and each Subcontractor:

- Certified Payrolls and Wage Certification Statements
- Employee Interview Reports
- The Project Manager’s Labor Compliance Certification form 734-1734 (electronically).

1. For Projects with no Establishment Period (seeding or plants):
   - Email the signed Labor Compliance Certification form to ODOT Contract Services. (The actual labor compliance documentation will remain with the PM until submittal of the semi-final documentation).
   - Submit all required quality, quantity, and labor compliance semi-final documents as a complete package to CAU.

2. For Projects with an Establishment Period (seeding or plants):
   - Submit the Project documentation as noted above, including the labor compliance documentation and Labor Compliance Certification form.
   - At the completion of the Establishment Period:
     - Email the (second) signed Labor Compliance Certification form for the remaining Establishment Period payrolls.
     - Send the remaining Establishment Period payrolls (and any related quality or quantity documentation) to the CAU.
     - The CAU will add the Establishment Period payrolls and quality or quantity documents to the previously submitted semi-final Project documentation.
(k) Miscellaneous Semi-Final Documents for PM Distribution
The PM is responsible for distribution of the following semi-final documentation:

1. As-Constructed Plans
   The PM is responsible for preparing and distributing the As Constructed Plans as specified in Chapter 12H – As Constructed Plans.
   
   - Submit one paper copy of the marked-up plans to the Region Tech Center. The Region Tech Center will complete the updates and forward to the ODOT Maps and Plans Center. The electronic As-Constructed Plans are then posted to FileNet.
   - The PM is **not** required to include a copy of these plans with the semi-final package.

2. Warranties and Guarantees
   If required by the Contract, note on the applicable Test Summary Sheet that they have been forwarded to the District Manager or other appropriate Unit.
   
   - Forward all original warranties and guarantees required by the Contract, to the Office of Maintenance.
   - Submit an electronic copy of all warranties to the ODOT Contract services mailbox as shown on the semi-final checklist.
   - Distribute copies to the appropriate District Manager, or other Unit responsible for maintenance of the Project, as specified on the Semi-Final Documentation Checklist form 734-2706, at the completion of the Project.

   [Refer to Chapter 41 – Warranties, Guarantees, Responsibility for Materials and Workmanship]
37-2 SEMI-FINAL REVIEW BY REGION ASSURANCE SPECIALIST (RAS)

The RAS will need to perform a final review prior to submittal of semi-final documentation to the Contract Administration Unit. During the final review of the Project semi-final documentation, the RAS will:

- Verify that the quality of Materials and Work on the Project is in close conformance with Contract requirements and that the Materials and Work are acceptable to remain on the Project.
- Assure that documentation fulfills the requirements of the Contract.
- Assure that price adjustments have been properly applied.
- Verify that methods, calculations, and quantities are appropriate and correct.

The RAS will complete a final Documentation Review Report (DRR) noting Establishment Period or any PM exceptions. The final Documentation Review Report will be signed by both the PM and the RAS.

The RAS may also provide other recommendations and advice as requested by the CAE.

37-3 RETAINAGE

When the Project is close to completion, the PM will:

- Release any remaining retainage of Pay Items in the Schedule of Items and Contract Change Order Work that has been satisfactorily completed and meets all requirements of the Contract. [Refer to Chapter 25 – Payments to Contractors/Retainage.]
- Communicate to the Contractor specifically what documentation is still needed in order to release retainage on items where the Work has been completed.
- Coordinate with the RASs on scheduling a final Project review to release any remaining retainage.
THE CONTRACT ADMINISTRATION UNIT (CAU)

The CAU will:

- Review and accept the final Project documentation
- Determine Final Acceptance of the Project, within its delegated authority.
- Process final payment to the Contractor
- Process any post-final payments
- Archive the Project documentation for the required retention period

Additionally, the CAU may perform a cursory review of the Project documentation to assure that:

- Documentation and review have been adequately performed, and
- Documentation practices are being performed uniformly statewide.