Quality Assurance/Control Procedures

Introduction

The Programmatic Agreement Between The Federal Highway Administration, Oregon Division And The Oregon Department Of Transportation Regarding Approval Of Actions Classified As Categorical Exclusions For Federal-Aid Highway Projects [2015], discussed herein as the Programmatic CE (or PCE) Agreement, states that the Oregon Department of Transportation (ODOT) agrees to develop, carry out, and report on regular quality control and quality assurance (QA/QC) activities to ensure that PCE approvals are made in accordance with applicable law, regulation, guidance and the PCE Agreement. This document outlines those procedures.

QA/QC procedures will be applied to all ODOT PCE documentation whether produced by consultants, local public agencies, or by ODOT staff.

ODOT acts on behalf of the Federal Highway Administration, Oregon Division (FHWA) to approve all PCE documents for projects using Federal-aid Highway Program funds, including those projects sponsored by local public agencies.

Quality Management

Quality Assurance (QA) and Quality Control (QC) measures for the PCE Agreement are the standards and procedures that ODOT and FHWA implement to ensure statewide decision-making relating to the PCE Agreement is consistent. QA and QC measures can be accomplished consecutively or simultaneously and taken together represent quality management of the PCE Agreement and associated processes. The overall goal of quality management is to be able to measure and monitor use of those standards and procedures and provide corrections as necessary.

Quality Assurance

Quality Assurance is the process ODOT uses to ensure PCE decisions made by Region and Geo-Environmental Section (GES) NEPA staff and managers who prepare and approve PCE and supporting documents are consistent with the 2015 PCE Agreement.

In general, the goal of quality assurance is prevention. Quality assurance measures for PCE processes promote consistency of PCE processes and documentation in compliance with the PCE Agreement, the PCE Guidance, and the PCE QA/QC Procedures in order to assure accuracy and consistency, and prevent redundancies and gaps relating to PCE information gathering and documentation. Quality assurance measures include:
• Keeping the PCE Agreement Guidance and QA/QC Procedures up-to-date and readily accessible.

• Ensuring ODOT forms or templates that are created and/or revised for use in preparing PCE and supporting documents are reviewed and approved by FHWA, and are up-to-date. Providing program-level process review findings and recommendations to PCE preparers and approvers.

• Ensuring findings from program-level process reviews are incorporated into statewide ODOT trainings, Region Environmental Coordinator (REC)/Environmental Project Manager (EPM) meeting discussions, PCE Guidance, QA/QC Procedures, or other processes as appropriate.

• Ensuring professional qualification requirements, per the PCE Agreement (Section IV.A.8-9), are achieved and maintained by all staff and managers who prepare and approve PCE and supporting documents.

• Ensuring consistent PCE project record-keeping.

Quality Control
Quality Control is the process ODOT uses to prepare and approve complete and accurate PCE and supporting documents.

In general, the goal of quality control is detection. Quality control measures for PCE processes identify inconsistencies, inaccuracies, redundancies, and gaps in PCE and supporting document preparation processes. Quality control measures include:

• Ensuring PCE Approval Documents receive a peer review.

• Ensuring environmental manager review/signature (signifying approval) are on PCE and supporting documents.

• Ensuring project records are kept consistent with PCE filing protocols including but not limited to: file naming conventions, storage locations, documents to be retained, and file retention timeframes.

• Ensuring the implementation of corrective actions, as appropriate, from PCE quality assurance review findings and recommendations to remedy process and documentation inconsistencies, inaccuracies, redundancies, and gaps.

PCE Project Record Retention
All PCE Project Records retained in Regions, and PCE documentation retained in GES, will be readily available for review, and be made available to FHWA upon request. Project records must be retained for 13 years following project construction completion (date final construction voucher is approved by FHWA).

ODOT Regions
The project record for each PCE will be retained by Regions and will include the following at a minimum:

• Checklists, forms, maps, and other documents (including e-mail and other correspondence) and exhibits that summarize the consideration of project impacts, unusual circumstances, and decision-making;
• A summary of public involvement in compliance with the requirements of FHWA-approved public involvement policy;
• Stakeholder communications, correspondence, consultation, or public meeting documentation that supports project and environmental decisions; and
• Re-evaluation documentation, when produced.

GES
Regions will provide the following final PCE documentation to GES:
• Final PCE Determination Forms.
• Final PCE Approval Documents, and all required attachments.

Professional Qualification Requirements
ODOT will ensure that only qualified persons prepare and approve PCE and supporting documents. As per the PCE Agreement (Section IV.8.A-C), each PCE document preparer and/or approver must:
• Be knowledgeable with and follow the appropriate subsections 23 CFR 771 through 774, and FHWA and ODOT procedures for environmental analysis and NEPA compliance;
• Have completed, at a minimum, Introduction to NEPA and Transportation Decision-making web-based course FHWA-NHI-142052 (or other NHI-NEPA training); and
• Have adequate experience addressing NEPA compliance for transportation projects or until such time have their work reviewed by staff having the necessary experience.

GES will ensure all PCE preparers and approvers have completed, at a minimum, the web-based FHWA-NHI-14052 NEPA course. All ODOT staff and manager qualifications, including dated certificates, will be on file in GES for FHWA review upon request. GES will alert NEPA staff about relevant training opportunities, and will provide relevant training to keep NEPA staff and managers current in FHWA PCE work.

GES will submit the following information to FHWA as part of annual reporting, per the PCE Agreement:
• Date individual completed course FHWA-NHI-142052 (and/or other NHI-NEPA course(s)); and
• Brief statement of the individual's experience.

Roles and Responsibilities
The following table lists the primary roles and responsibilities of the ODOT and FHWA personnel involved in the preparation and approval of PCE and supporting documents developed for FHWA Federal-Aid Highway Program projects in Oregon.

Following this table, procedures for fulfilling these roles and responsibilities are described in more detail.
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<th>QA/QC Role</th>
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| Region Environmental Coordinator (REC) or Environmental Project Manager (EPM) | Prepare and provide peer review of PCE forms and documents. Maintain appropriate level of oversight and coordination with technical specialists for preparation of all applicable PCE supporting documentation. Ensure the following documents are accurate and complete prior to submitting to environmental manager for review and approval:  
- PCE documents  
  - PCE Determination Form  
  - PCE Approval Document  
    - Part 3 Attachment Document  
    - Vicinity Map with area of potential impact (API) identified  
- Supporting environmental documents—ESA, Section 106, Tribal Coordination Summary, Section 4(f), etc.  
- Public involvement summary, including EJ engagement  
- Environmental commitments  
- Re-evaluation of PCE determination, as applicable  
Enter project information into the applicable Region PCE project tracking spreadsheets for quarterly reporting purposes. |
<p>| Region Environmental Manager (or qualified designee) | Review PCE determinations, PCE Approvals and re-evaluations made by the REC or EPM, and all applicable supporting documentation; provide recommended changes to REC/EPM. Ensure PCE documents are complete, accurate, and have received a peer review and the appropriate level of technical specialist review. Responsible to provide GES with information for quarterly and annual PCE reports that outlines any inconsistencies or performance gaps that have been noticed over the appropriate quarterly or annual reporting periods. Review and approve PCE documentation. Support Region staff to achieve professional qualification requirements by providing training opportunities and by encouraging staff to be an active participant during REC/EPM meetings. Review and approve PCE Quarterly Reports within timeframes of PCE agreement. |</p>
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<td>Geo-Environmental Section (GES), NEPA Program staff</td>
<td>Conduct quarterly program-level process reviews, in coordination with Regions and FHWA, for the following:</td>
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<td>• Appropriateness of PCE determination</td>
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<td>• Appropriate application of 23 CFR 771.117</td>
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<td>• Completeness of project record</td>
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<td>• Accuracy of information documented in both PCE and supporting documents</td>
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<td>• Appropriateness of peer review and approval signatories for PCE Approval Documents as per the <em>PCE QA/QC Document Completeness and Accuracy Guidance</em> (to be developed by GES on or before January 4, 2016)</td>
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<td>• Appropriateness of the potential need for re-evaluations</td>
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<td>Provide findings of process reviews to Regions and GES, and follow-up with any needed corrective actions or adjustments including, but not limited to:</td>
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<td>Coordinate with Regions to prepare and provide timely submittal of quarterly and annual reports to FHWA, including summary of quality control and assurance findings, corrective action recommendations provided to Regions and GES staff and managers, and implementation progress of any corrective actions and/or program adjustments.</td>
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<td>Act as liaison between Regions and FHWA for answering questions, providing training/mentoring/assistance, etc. This does not eliminate the opportunity for Regions to contact FHWA directly.</td>
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<td>Provide timely responses to PCE questions from Region, in coordination with FHWA.</td>
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<td>Assist and provide training to RECs and EPMs as needed, and communicate any updates to the PCE program to RECs and EPMs, their managers, and other Region and/or GES staff as outlined in the <em>PCE Communications Plan</em>.</td>
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<td>Assure GES and Region staff and management remain qualified as per the PCE Agreement.</td>
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| FHWA       | Timely review of and response to ODOT quarterly and annual reporting.  
As available, participate with ODOT in process reviews of PCE and supporting document prior to quarterly and annual reporting.  
Provide timely responses to PCE questions from Region, in coordination with GES.  
Perform on-going monitoring of ODOT’s PCE program.  
Collaborate and cooperate with ODOT GES and Regions to resolve any issues, solve problems, and provide assistance. |

**PCE and Supporting Documentation Preparation and Approval Quality Control Procedures**

Following are quality control procedures for each PCE document.

**PCE and Supporting Documents**

PCE document preparers and approvers must have the minimum training, knowledge, and experience (i.e., professional qualification requirements) as per the PCE Agreement (IV.A.8-9).

PCE and supporting environmental documents include:

- PCE Determination Form
- PCE Approval Document
- Prospectus Part 3
- Vicinity map with area of potential impact (API) outlined
- Supporting environmental documents as outlined in the PCE Approval Document

**PCE Determination Form Preparation**

The REC or EPM is responsible for completing the ODOT PCE Determination Form. This can generally be done shortly after project kickoff.

**PCE Supporting Document Preparation**

The appropriate PCE supporting environmental document preparer should meet the minimum professional qualification requirements as is appropriate for their particular discipline. Typically the Region or GES Biologists, Archaeologists, Historians, and other environmental specialists as applicable will prepare and/or oversee the preparation of most ODOT environmental compliance documents, used to inform and/or support PCE determinations.

The REC or EPM will ensure the required PCE supporting documents are attached to the PCE Approval Document as per the PCE Guidance.
**PCE Approval Documentation**

For PCE documents, the REC or EPM is responsible for completing the ODOT Project Prospectus Part 3 (a required document attachment to the PCE Approval Document) as part of the project scoping phase. Once the PCE Determination Form and Part 3 have been completed, the REC or EPM will then prepare the PCE Approval Document. The PCE Approval Document will be peer reviewed by a reviewer outside of the Region per the *PCE QA/QC Completeness and Accuracy Guidance*, which will be developed by GES by January 4, 2016 or sooner, to help guide the peer review process for consistency and promote exchange of best practices.

The REC or EPM will submit the following to the Region or GES Environmental Unit Manager, or his/her qualified designee, for approval of the PCE documents:

- PCE Determination Form
- PCE Approval Form
- Prospectus Part 3
- All required PCE supporting documentation

**PCE Approval Document Completeness and Accuracy Guidance**

PCE Approval Documents will be peer reviewed by a reviewer outside of the Region to assure they are complete, accurate, use the most up-to-date FHWA approved formats and ODOT/FHWA guidance, and refer to the most current and relevant regulations.

The REC or EPM will refer to the *PCE QA/QC Document Completeness and Accuracy Guidance* (to be developed by GES on or before January 4, 2016).

**PCE and Supporting Document Filing**

Various methods are currently in use for submitting PCE and supporting documents to GES electronic file folders. In addition, ODOT is currently refining electronic filing protocols on a department-wide basis. New electronic filing procedures for PCE and supporting documents will be completed and implemented on or prior to December 15, 2015.

**Maintaining Technical Competency**

GES will maintain files documenting that Region and GES staff and managers who prepare and/or sign for approval of any PCE or supporting document meet professional qualification requirements (i.e., knowledge, education, and training), as per the PCE Agreement. These files will be updated at least annually, and any time there is a change in personnel, especially new hires who will prepare and/or sign for approval any PCE or supporting document.

GES is responsible to ensure that Region and GES staff and managers maintain the required professional qualification requirements, as per the PCE Agreement, and will work with any new staff and their managers to help them become qualified.

GES will work with FHWA to provide training, as needed and/or as recommended through program-level process reviews and other PCE process monitoring results, to help ensure Region and/or GES staff and managers maintain their core competencies as per the PCE Agreement.
PCE Communication Plan

GES will develop a PCE Communications Plan that outlines protocols for when and how PCE process information is disseminated to and throughout GES, Regions, and FHWA. PCE process information might include, but is not limited to, the following:

- Process or documentation updates, including changes to forms, guidance, and other related documents or procedures;
- Routine PCE process updates at REC and EPM meetings;
- Meeting announcements;
- Filing and other PCE process administrative guidance and/or updates; and
- Training opportunities.

The PCE Communication Plan will be completed and incorporated herein on or prior to February 15, 2016.

The PCE Agreement will be a regular agenda topic that is discussed during REC/EPM meetings. Discussions may include the following topics:

- Process or documentation;
- Project record and filing;
- Opportunities for improvement;
- Potential training or assistance needs; and
- Best practices, efficiencies and redundancies.

PCE Process Monitoring and Process Reviews

As per the PCE Agreement (Section C.), monitoring by FHWA will include consideration of the technical competency and organizational capacity of ODOT, as well as ODOT's performance of its PCE processing functions. Performance considerations include, without limitation, the quality and consistency of ODOT's PCE approvals, project environmental documentation, CE submissions to FHWA for approval, adequacy and capability of ODOT staff and consultants, and the effectiveness, quality and consistency of ODOT's administration of its internal PCE approvals.

FHWA will conduct one or more program reviews as part of its oversight activities, during the term of the PCE Agreement. GES will prepare and implement a corrective action plan to address any findings or observations identified in FHWA program reviews. GES will draft the corrective action plan within 45 calendar days of FHWA finalizing its review. The results of that review and corrective actions taken by ODOT will be considered at the time the PCE Agreement is considered for renewal.

GES NEPA Program staff and managers will collaborate with Region and FHWA staff to perform quarterly program-level process reviews of PCE project record files prior to each quarterly report preparation. Findings from all PCE reviews may dictate the need for further reviews.

Michelle Eraut, Program Development Team Leader
Federal Highway Administration
October 27, 2015

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10/22/15

Date

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