

# ODOT NEPA Manual

## 453 PCE/CE Quality Assurance & Control

The *Programmatic Agreement Between The Federal Highway Administration, Oregon Division (FHWA) And The Oregon Department Of Transportation (ODOT) Regarding Approval Of Actions Classified As Categorical Exclusions For Federal-Aid Highway Projects*, discussed herein as the Programmatic CE (or PCE) Agreement, requires that 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 section outlines the QA/QC procedures implementing ODOT's Statewide QA/QC Program for PCEs. ODOT also uses these procedures for projects covered by FHWA-approved CEs.

These statewide QA/QC procedures will be applied to all ODOT PCEs and CEs and supporting documentation whether produced by consultants, local public agencies (LPAs), or by ODOT staff.

### Quality Management

Quality Assurance (QA) and Quality Control (QC) measures for the PCE Agreement are the standards and procedures that PCE-qualified ODOT staff and managers implement to ensure decision-making, performance, and documentation (including document revisions) relating to the PCE Agreement are accurate and consistent on a statewide basis. 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 and improvements as necessary.

### Quality Assurance

Quality Assurance is the process ODOT uses to ensure PCE decisions made by Region and the ODOT Environmental and Hydraulic Engineering Section's (EHES) NEPA Program staff and managers who prepare and approve PCE and supporting documents are consistent with the PCE Agreement. ODOT also uses the same QA procedures for projects covered by FHWA-approved CEs.

In general, the goal of quality assurance is *prevention*. Quality assurance measures promote consistency of practice and documentation in compliance with the PCE Agreement, the PCE/CE Procedures (Section 420 of this Manual), and these QA/QC Procedures in order to assure accuracy and consistency, and prevent redundancies and gaps relating to information gathering and documentation.

Quality assurance measures include:

- Keeping Section 420 and all subsections of this Manual related to PCE procedures up-to-date and readily accessible.
- Ensuring ODOT forms, templates, and other process tools that are created and/or revised for use in preparing PCE/CE and supporting documents are reviewed and approved by FHWA and are up-to-date.
- Ensuring recommendations and corrective actions identified from quality assurance reviews of completed PCEs/CEs, and FHWA PCE program reviews, are incorporated into statewide ODOT trainings, Region Environmental Coordinator (REC) team meeting discussions, Section 420 of this Manual, or other processes as appropriate, following the PCE/CE Communication Plan (Section 456 of this Manual).
- Ensuring professional qualification requirements, per the PCE Agreement (Section IV.A.8-9), are achieved and maintained by all ODOT staff and managers who prepare and approve PCE and supporting documents.
- Ensuring consistent PCE document record keeping.

## Quality Assurance Reviews

Regular QA Reviews are conducted on completed PCE/CE and supporting documents by EHES NEPA Program staff, in coordination with Region and FHWA staff as available. Standard questions developed by EHES NEPA Program and FHWA staff are used to assess the accuracy and consistency of PCE/CE documents and processes using the CE/PCE Procedures (Section 420 of this Manual). Written summaries are produced by EHES NEPA Program staff using a standard format agreed to by the EHES NEPA Program and FHWA that provide QA Review Findings and Recommendations. The QA Review Summaries (Findings and Recommendations) are then shared with RECs and their managers via email, and discussed at REC and environmental managers meetings.

## Quality Control

Quality Control is the process ODOT uses to prepare and approve complete and accurate PCE and supporting documents consistently statewide. ODOT also uses the same QA procedures for projects covered by FHWA-approved CEs.

In general, the goal of quality control is *detection*. Quality control measures identify inconsistencies, inaccuracies, redundancies, and gaps in PCE/CE and supporting document preparation processes prior to when approval is made. Quality control measures include:

- Ensuring PCE Approval and CE Closeout documents receive a consistent quality control peer review by using the *Statewide PCE (or CE, or NGD) Quality Control Peer Review Checklist & Comment Log* and attaching the completed form to draft PCE Approvals for review and signature by the appropriate environmental manager (or

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designee).

- Documenting how PCE preparers address PCE peer reviewer comments and incorporate needed clarifications and/or corrections into those PCE documents as appropriate and relevant.
- Documenting that the appropriate environmental manager (or designee) ensures that a Region QC peer review has been done on the Environmental Prospectus, draft PCE Approval (or CE Closeout, or NDG Document) and final supporting and environmental discipline documents (see section below) before that environmental manager signs the draft PCE Approval, CE Closeout, or NGD Document (signifying Region QC peer review is complete).
- Ensuring PCE/CE files and project records in EHES NEPA Program PCE/CE file folders are kept consistent with PCE filing protocols including but not limited to: current ODOT file naming conventions, storage locations, documents to be retained, and file retention timeframes.
- Regular ongoing QC reviews are performed on all PCE/CE and supporting documents by EHES NEPA program staff in preparation of the PCE Mid-Year and Annual Reports. Any performance, data entry, or documentation issues found by EHES NEPA Program PCE/CE program staff are resolved immediately with the appropriate PCE/CE preparer and/or approver upon the discovery.

## PCE Project Record Retention

All PCE/CE Project Records maintained in Regions, and PCE/CE documentation maintained by EHES NEPA Program staff, will be readily available for review, and be made available to FHWA upon request. Region PCE Project Records must be retained for 13 years following project construction completion (the date that the final construction voucher is approved by FHWA). See below for what constitutes “project records” as per the PCE Agreement:

## ODOT Regions (Project Records)

The “project record” for each PCE or CE will be retained by ODOT Regions and will include the following at a minimum (page 5, Section V.B.(1-5) of the PCE Agreement):

1. *Any checklists, forms, or other documents and exhibits that summarize the consideration of project effects and unusual circumstances.*
2. *Summary of public involvement complying with the requirements of FHWA A-approved public involvement policy.*
3. *Stakeholder communication, correspondence, consultation, or public meeting documentation that supports project and environmental decisions.*
4. *The name and title of the document approver and the date of ODOT’s approval.*
5. *For cases involving re-evaluations, any documented re-evaluation.*

## EHES (PCE and CE Document Filing)

ODOT Regions will include the following final PCE/CE documentation in the current established ODOT project file system (currently, ProjectWise). Document management and filing/storage for PCEs and CEs is discussed in detail in Section 427 of this Manual:

- Final/signed PCE Determinations, and all final (signed and dated as relevant) required attachments (as per the PCE Determination).
- Final PCE Approvals and CE Closeouts, and all final (signed and dated as relevant) required attachments (as per the PCE Approval/CE Closeout).

## Professional Qualification Requirements

ODOT will ensure that only individuals who meet the PCE Agreement qualifications, below, will prepare and approve PCE documents. As per the PCE Agreement (page 4, Section IV.8.(A-C)), each ODOT 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.*

EHES NEPA Program staff will ensure all PCE preparers and approvers have completed, at a minimum, the web-based FHWA-NHI-14052 NEPA course. All relevant ODOT staff and manager credentials, including dated certificates, are on file for FHWA review upon request. EHES NEPA Program staff will alert statewide NEPA staff (RECs/EPMs) and their managers about relevant training opportunities, and will provide relevant training as necessary.

EHES NEPA Program staff will provide a hyperlink to the PCE/CE filing system that contains the following information to FHWA as part of annual reporting, per the PCE Agreement (page 5, Section IV.A.9):

- *Date individual completed course FHWA-NHI-142052 (and/or other NHI-NEPA course(s)); and*
- *Brief statement of the individual's experience.*
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## Roles and Responsibilities

The following table lists the primary roles and responsibilities of ODOT and FHWA personnel involved in the preparation and approval of PCE/CE 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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QA/QC Role	QA/QC Responsibility
<p><b>ODOT Region Environmental Coordinator (REC)</b></p>	<p>Maintain appropriate level of oversight and coordination with technical specialists for preparation of all applicable PCE/CE supporting discipline documentation.</p> <p>Perform documented quality control peer review of PCE/CE documents using the applicable PCE, CE, or <i>NGD Statewide Quality Control Peer Review Checklist &amp; Comment Log</i>.</p> <p>Ensure the following documents are accurate and complete prior to submitting to environmental manager, or qualified designee, for review and approval:</p> <ul style="list-style-type: none"> <li>• PCE and CE documents               <ul style="list-style-type: none"> <li>• PCE Determination                   <ul style="list-style-type: none"> <li>▪ Environmental Prospectus &amp; EP QC Checklist</li> <li>▪ Project Vicinity Map</li> </ul> </li> <li>• PCE Approval                   <ul style="list-style-type: none"> <li>▪ (if applicable) Revised Vicinity Map</li> </ul> </li> <li>• CE Closeout</li> </ul> </li> <li>• Supporting environmental discipline documents—ESA, Section 106, Tribal Coordination Summary, Section 4(f)—as listed in the PCE Approval or CE Closeout</li> <li>• Evidence of signed/dated environmental discipline deliverable quality control documents, as relevant and as listed in the PCE Approval or CE Closeout</li> <li>• (if applicable) Re-evaluation of PCE Determination and/or PCE Approval Document</li> <li>• Participate in QA Reviews of completed PCE/CE and supporting documents.</li> <li>• Enter project information into the current PCE/CE filing system for mid-year and annual reporting purposes.</li> <li>• Maintain complete environmental project</li> <li>• record in Region files as per PCE Agreement.</li> </ul>

QA/QC Role	QA/QC Responsibility
<p><b>ODOT Region Environmental Manager (or qualified designee)</b></p>	<ul style="list-style-type: none"> <li>• Ensure PCE documents have received a documented quality control peer review using the <i>Statewide PCE Quality Control Peer Review Checklist &amp; Comment Log</i>.</li> <li>• Responsible to provide EHES NEPA Program with information for mid-year and annual PCE reports that outlines any inconsistencies or performance issues that have been noticed over the appropriate mid-year or annual reporting periods.</li> <li>• Support Region staff to achieve PCE Agreement professional qualification requirements, and EHES NEPA Program Core Competencies, by providing training opportunities and by encouraging and supporting Region staff to be active participants during REC meetings and EHES NEPA Program or other sponsored/hosted trainings, as applicable.</li> </ul>
<p><b>ODOT Environmental and Hydraulic Engineering Section, NEPA Program staff</b></p>	<p>Using established standard QA review questions along with the current CE/PCE Procedures (Section 420 of this Manual), conduct regular quality assurance reviews of completed PCEs, in coordination with Regions and FHWA, for the following:</p> <ul style="list-style-type: none"> <li>• Appropriateness of PCE Determination</li> <li>• Appropriate application of 23 CFR 771.117</li> <li>• Completeness of PCE documentation</li> <li>• Accuracy of information documented in PCE and supporting documents</li> <li>• Appropriateness of Region QC peer review and approval signatories for PCE Approval Documents as per the applicable PCE, CE, or NGD <i>Statewide Quality Control Peer Review Checklist &amp; Comment Log</i> and associated procedures</li> <li>• Appropriateness of the potential need for re-evaluations</li> </ul>

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QA/QC Role	QA/QC Responsibility
	<ul style="list-style-type: none"> <li>• Provide a summary of PCE QA Review findings and recommendations to Regions (RECs and their managers), and follow up with any needed actions or process improvements including, but not limited to:               <ul style="list-style-type: none"> <li>• Training</li> <li>• Mentoring</li> <li>• Guidance</li> <li>• Policy</li> </ul> </li> <li>• Coordinate with Regions to prepare and provide timely submittal of mid-year and annual reports to FHWA, including summary of QA Review findings and recommendations provided to Region and EHES NEPA Program staff and managers, and implementation progress of any corrective actions, performance issues, and/or PCE program improvements.</li> <li>• Act as liaison with Regions and FHWA for answering questions, providing training/mentoring/assistance, etc. This does not eliminate the opportunity for Regions to contact FHWA directly.</li> <li>• Provide timely responses to PCE questions from Regions, in coordination with FHWA as needed.</li> <li>• Assist with and provide training, mentoring, and guidance to RECs as needed, and communicate any updates to the PCE program to RECs, their managers, and other Region and/or NEPA Program staff as outlined in the <i>PCE Communication Plan</i> (Section 456 this Manual).</li> <li>• Assure ODOT PCE preparers and approvers meet qualification provisions as per the PCE Agreement.</li> <li>• Maintain complete PCE/CE electronic files in the appropriate ODOT file location as per PCE Agreement.</li> </ul>

QA/QC Role	QA/QC Responsibility
FHWA (Oregon Division)	<ul style="list-style-type: none"> <li>• Timely review of and response to ODOT mid-year and annual reporting.</li> <li>• As available, participate with ODOT in regular quality assurance reviews of completed PCEs prior to mid-year and annual reporting.</li> <li>• Provide timely responses to PCE questions from Regions, in coordination with the EHES NEPA Program. Collaborate and cooperate with EHES NEPA Program and Regions to resolve any issues, solve problems, and provide assistance.</li> <li>• Perform on-going monitoring of ODOT's PCE program.</li> <li>• Monitoring includes "one or more program reviews" during the 5- year term of the PCE Agreement.</li> </ul>

## Quality Control (QC) Procedures for PCE/CE and Supporting Documentation Preparation for Subsequent ODOT or FHWA Approval

### QC Peer Review Procedures

PCE/CE document preparers<sup>1</sup> and approvers must have the minimum training, knowledge, and experience (i.e., professional qualification requirements) as per the PCE Agreement (IV.A.8-9).

The *Statewide PCE Quality Control Peer Review Checklist & Comment Log*<sup>2</sup> is a required attachment to the PCE Approval and the template for the form is found in EHES's current filing system.

Completing the QC checklist/comment log documents that the PCE files have received the EHES established quality control review. The following Region quality control procedures are

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<sup>1</sup> Consultants hired by ODOT or an LPA who prepare PCE/CE documents (as listed below) may only provide a draft of those documents to ODOT for review and approval by the REC or EPM assigned to that ODOT or LPA project.

<sup>2</sup> Similar quality control peer review checklist/comment logs are also available for CEs and NGDs.



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required prior to ODOT approval of a PCE: The PCE Preparer makes the draft PCE Approval, its required attachments, and a *Statewide PCE Quality Control Peer Review Checklist & Comment Log* (checklist/comment log) available to the appropriate PCE-qualified Peer Reviewer (in-Region or outside of Region, as appropriate).

1. The PCE-qualified Peer Reviewer reviews the appropriate PCE files to verify compliance with the CE/PCE Procedures (Section 420 of this Manual) and completes the questions/checkboxes on the QC checklist/comment log. The PCE Peer Reviewer provides their comments for corrections and suggestions for clarity/improvement and consistency with the CE/PCE Procedures (Section 420) in the QC checklist/comment log, and submits the completed QC checklist/comment log to the PCE Preparer.
2. The PCE Preparer makes necessary changes in the PCE documents based on substantive comments received, as relevant, and will contact the reviewer for clarification as needed. PCE Preparer will provide responses to substantive comments to the PCE Peer Reviewer and include those responses in the checklist/comment log.
3. The PCE Preparer includes the completed checklist/comment log with all associated final/signed PCE files in the current EHES filing location.

The same process stated above is followed for NGD PCEs as well as for CEs using those appropriately titled QC checklist/comment logs.

## PCE/CE and Supporting Documents

PCE/CE and supporting environmental documents include:

- Environmental Prospectus (i.e., replacement for the “Part 3”)
- Completed Environmental Prospectus (EP) QC Checklist
- Project Vicinity Map
- PCE Determination (for PCEs only)
- PCE Approval or CE Closeout
- Supporting environmental documents as outlined in the PCE Approval or CE Closeout
- (if applicable) Revised Project Vicinity Map
- Completed PCE, NGD, or CE *Region Quality Control Peer Review Checklist & Comment Log*

## Environmental Prospectus

The REC is responsible for preparing<sup>1</sup> and signing the Environmental Prospectus, a required attachment to the PCE Determination, as part of documenting project environmental scoping. The Environmental Prospectus provides the support and justification for the NEPA decision (CE classification) made in the PCE Determination. For CEs, the Environmental Prospectus is a required attachment to the CE Closeout.

## Project Vicinity Map

The REC should use the statewide standard Project Vicinity Mapping Web Application found on the NEPA Program website to create a dated map that clearly shows the project location

and limits as per the Project Description written in the Environmental Prospectus and/or the PCE Determination (for PCEs). The project vicinity map is a required attachment to the PCE Determination, the NGD Document, and the CE Closeout.

## **PCE Determination**

The REC is responsible for preparing<sup>1</sup> and signing the ODOT PCE Determination. This is generally done shortly after project kickoff (or at the Project Initiation milestone), and after the Environmental Prospectus is completed signifying that environmental scoping was done.

The PCE Determination requires that the following be attached:

- REC-signed Environmental Prospectus
- Dated Project Vicinity Map

The Region Environmental Manager, or PCE-qualified designee, approves/signs the PCE Determination.

## **PCE Approval or CE Closeout**

Once the PCE Determination and required attachments have been completed, the REC will then prepare<sup>1</sup> the PCE Approval or CE Closeout. The PCE Approval or CE Closeout will be peer reviewed by a different REC using the *Statewide PCE Quality Control Peer Review Checklist & Comment Log*. As appropriate, the PCE/CE preparer will respond to substantive comments from the PCE/CE peer review in the *Statewide PCE Quality Control Peer Review Checklist & Comment Log* and will make any necessary changes to the PCE documentation.

Once the PCE/CE documentation is ready for approval signature, the REC will submit the following PCE/CE and supporting documents to the Region Environmental Manager or EHES NEPA Program staff/manager, or qualified designee, for approval of the PCE:

- (only for PCEs) Final signed PCE Determination (including Environmental Prospectus and associated QC checklist, and Project Vicinity Map)
- Draft PCE Approval or draft CE Closeout (signed by the REC preparer)
- Completed dated *Statewide PCE Quality Control Peer Review Checklist & Comment Log*
- All required final PCE or CE supporting documentation (including environmental discipline documents) as per the draft PCE Approval or draft CE Closeout

The Region Environmental Manager, or PCE-qualified designee, approves/signs the PCE Approval; and also signs the CE Closeout so the REC can send it to FHWA to review, sign, and approve.

## **PCE/CE Supporting Environmental Discipline Documents**

The appropriate PCE/CE supporting environmental discipline document preparer should meet the minimum professional qualification requirements as is appropriate for their particular discipline per their specific statewide QC protocols. Typically the ODOT biologists,

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archaeologists, historians, noise specialists, and other environmental specialists as applicable will prepare and/or oversee the preparation of most ODOT environmental compliance documents used to inform PCE Approvals/CE Closeouts and support the PCE Determinations that were made.

The REC will ensure the required PCE/CE supporting documents are included with the PCE Determination and the PCE Approval/CE Closeout as per Section 423 of this Manual, and as per the above QA/QC Roles and Responsibilities.

## PCE/CE and Supporting Document Filing

RECs and EPMs will file their final PCE and CE documents and final required supporting documents on the current ODOT PCE/CE filing and document storage system (ProjectWise, iCERT, or other established system that is current at that time) for file retention and accessibility purposes. Documents should be uploaded to the system as they are completed, and all final PCE/CE documents and final required supporting documents should be located in the established ODOT filing and document storage system as soon as the PCE, NGD, or CE is approved.

## Maintaining Technical Competency

In order to assure ODOT PCE preparers and approvers meet professional qualification provisions as per the PCE Agreement (i.e., knowledge, education, and training), the EHES NEPA Program maintains a database of the professional credentials of all ODOT staff and managers who meet those PCE professional qualification requirements. 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 approve any PCE or PCE supporting document. The EHES NEPA Program will also work with any new staff and their managers to help them meet those minimum PCE Agreement requirements.

The EHES NEPA Program will work with FHWA to provide training, as needed and/or as recommended through PCE QA Reviews and to meet identified PCE process improvements as appropriate, to help ensure Region and/or EHES staff and managers maintain their core competencies as per the PCE Agreement.

## PCE Communication Plan

The *PCE/CE Communication Plan* (Section 456 of this Manual) outlines protocols for when and how PCE and CE information is disseminated by the EHES NEPA Program to and throughout ODOT Regions and FHWA. PCE/CE information might include, but is not limited to, the following:

- Process or documentation updates, including changes to forms, procedures, and other related documents or processes.
- Routine PCE program updates at REC team meetings (including findings and

recommendations from regular PCE QA Reviews).

- Meeting announcements.
- Filing and other PCE process administrative guidance and/or updates.
- Training opportunities and/or identified needs.

The PCE Agreement and EHES NEPA Program updates will be regular agenda topics to be discussed during REC team and Region Environmental Manager meetings and will generally follow PCE QA reviews and the completion of QA Review Summaries. Findings, recommendations, and issues discovered during the QA reviews may also be discussed at other discipline team meetings as necessary. Topics may include the following:

- Process or documentation issues.
- Opportunities for improvement and/or revising procedures to add clarity.
- Examples of best practices, efficiencies, and other observations.

## **PCE Program Reviews and Monitoring**

As per the PCE Agreement (Section VII.C., page 7), program 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 PCE approvals.

FHWA will conduct one or more program reviews as part of its oversight activities during the term of the PCE Agreement. EHES NEPA Program staff will prepare and implement any needed corrective action plan to address findings or observations identified in FHWA program reviews. EHES NEPA Program staff 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 addressed at the time the PCE Agreement is considered for renewal.