

NEPA Assignment Course: Project File and Records Management

Slide 1 (ppt s01)

Welcome to National Environmental Policy Act, also known as NEPA, Assignment Course on Project File and Records Management provided by the Florida Department of Transportation's Office of Environmental Management, or OEM. To begin, select the start button or press Shift+N on your keyboard.

Slide 2 – Welcome (ppt s01)

OEM continues to maintain and retain its environmental project files according to FDOT and Federal Highway Administration, or FHWA, policy requirements, which will be familiar to District and OEM management and staff. Document storage is made simpler through use of the Statewide Environmental Project Tracker, or SWEPT, System, which provides a standard statewide platform.

Slide 3 – Learning Objectives (ppt s02)

The Learning Objectives for this course are definition and file contents, data management and retention requirements, and maintaining the project file in SWEPT.

Slide 4 – What is a ‘Document’? (ppt s03)

“Documents” or “records” include, but are not limited to, letters, staff reports, emails, meeting minutes, studies, models, and guidance documents. The format does not matter, and could be hand-written notes, transcripts, and comment cards. Basically, a document is anything the decision-making authority considered, or presented, or the information was reasonably available during the process. Also, include documentation of contrary opinions or conflicting data and resolution of same.

Slide 5 – What is included in the project file? (ppt s04)

When we talk about records management under FDOT's NEPA Assignment, we are talking about maintaining the environmental project file. First, the project file includes the Environmental Document itself, such as the Environmental Impact Study or Environmental Assessment. Other documents help to complement the Environmental Document by providing supporting information and explaining how they were developed.

Slide 6 – What is included in the project file? (cont.) (ppt s04)

Technical Reports prepared by the project team compile supporting data for major topics included in the NEPA documents. Ideally they include a description of the methodology used to generate the data, key supporting data, and other back-up materials. If the technical report involves specialized expertise, the report may include the qualifications of the experts involved in preparing it.

Slide 7 – What is included in the project file? (cont.) (ppt s04)

Meeting Summaries can be used to document coordination with resource agencies and stakeholders. It also is helpful to include copies of meeting handouts and sign-in sheets along with the meeting summary.

Telephone Memos document telephone conversations used to gather substantive information for the NEPA study. For example, if an EIS includes a reference to a “personal communication” on a particular date, the project file should include a telephone memo or meeting summary documenting that communication.

Slide 8 – What is included in the project file? (cont.) (ppt s04)

The project file also includes correspondence, including significant e-mails, to and from resource agencies and key stakeholders. In general, keep a record of Comments and Responses. Close collaboration with resource agencies can result in a large number of comments being received from agencies. It may be useful to prepare matrices that track all of the comments and demonstrate how they have been addressed. These types of matrices can strengthen the record by documenting both the extent of the resource agencies' involvement and FDOT's responsiveness to their concerns.

Slide 9 – What is included in the project file? (cont.) (ppt s04)

Pictured here is a good general reference about the NEPA project file - AASHTO's Practitioner's Handbook: Maintaining a Project File and Preparing an Administrative Record for a NEPA Study. This is available by selecting the link in the course resource materials. Specific content and requirements for documents in FDOT's NEPA studies are identified in the PD&E Manual.

Slide 10 - What is an Administrative Record? (ppt s05)

The Administrative Record is all documents and materials directly or indirectly considered or relied upon by the agency decision-maker at the time of final decision in the NEPA review process, including the decision documents and documents generated or received by the agency during the environmental project review.

Slide 11 - What is an Administrative Record? (cont.) (ppt s05)

The Administrative Record is FDOT's official record of the NEPA decision-making process. The Administrative Record is NOT the Project File. Stated briefly, the Administrative Record is the "paper trail" of the agency's decision-making process and the basis for the agency's decision. The Administrative Record will be covered in a separate course prepared by the Office of General Counsel.

Slide 12 - Most Important Factor Relating to the Project File (ppt s06)

The most important factor of documenting environmental reviews is to ensure your environmental document and supporting materials are in the SWEPT project file. If it is not in the record, it didn't happen. The project file is where we as the department will look for project documents and where auditors will look for project documents. This point will be repeated throughout the training.

Slide 13 - Lesson 1: Data Management and Retention Requirements (ppt s07)

Lesson 1 covers the requirements for data management and retention established in the NEPA Memorandum of Understanding, dated December 14, 2016.

Slide 14 - Record Retention and Access (ppt s08)

Under the NEPA Assignment Program, we must follow both Florida and federal requirements for handling NEPA and related documents. We have updated our PD&E Manual with the Project File and Records Management Chapter, PD&E Manual, Part 1, Chapter 15. These requirements fall into the two categories of Records Management and Disposal Requirements, and Access to Information.

Slide 15 - Record Retention and Access (cont.) (ppt s08)

First, we will discuss Records Management and Disposal Requirements. Both FDOT and FHWA have requirements regarding the management of agency records. These requirements address issues such as the types of documents that must be filed and the process for disposing of old records. Key policies and procedures are listed here. For FHWA, these requirements are established by an agency order. At FDOT, we have our own policies and procedures. These affect the record-keeping procedures used in the NEPA process and we'll go over them in detail in a moment. Next, we will discuss Access to Information.

Slide 16 - Record Retention and Access (cont.) (ppt s08)

Our NEPA files are subject to public records laws, such as the federal Freedom of Information Act and Florida's Public Records Law. The universe of documents that are subject to these laws is quite broad. As a result, these laws may result in the release of documents well beyond those that would typically be included in an Administrative Record. For example, a request under Florida's public records law may result in disclosure of internal FDOT or consultant documents. It also is important to note that a public records request can be received at any time. The Public Records Computer based training is available any time. You can a link to it on the resources page or search for it in the Learning Curve.

Slide 17 - Record Retention and Access (cont.) (ppt s08)

In addition, FDOT is responsible for providing FHWA with information necessary to ensure we are carrying out the NEPA Assignment responsibilities. As specified in the MOU, FDOT makes files available for inspection by FHWA within 5 business days of receiving the request for information.

Slide 18 - PD&E Manual, Part 1, Chapter 1

PD&E (say each letter) Manual, Part 1, Chapter 15 includes sections for Project File, Administrative Record, Records Management, File Naming Convention, and Retention. The procedure is available at the FDOT (say each letter) Forms and Procedures Website.

Slide 19 - FDOT Records Management Procedure (ppt s09)

FDOT Records Management Procedure is Topic Number 050-020-025. The procedure is available at the FDOT Forms and Procedures Website. This procedure identifies the requirements for retaining and disposing of Department records.

Slide 20 - Retention and Disposal Schedule GS1-SL (167) (ppt s10)

FDOT's Records Management Procedure refers to the Retention and Disposal Schedule, which dictates record retention schedules for project information. According to the FDOT Records Management Procedure and the Retention and Disposal Schedule, records will be retained for 5 fiscal years after the completion of the project, reporting requirement or other applicable activity.

Slide 21 - Retention and Disposal Schedule GS1-SL (167) (cont.) (ppt s10)

FDOT's work program office tracks completion through a "Closed Financial Projects" report where the Financial Management Number, or FM#, Status 100 indicates the books have been reconciled between parties and the financial project is closed. We begin the 5 year count down when the PD&E FM# and all subsequent or related FM#s reach status 100 meaning the project is completely closed. This information is transferred nightly to SWEPT which flags that have met retention requirements.

Slide 22 - FHWA Records Disposition Manual (ppt s11)

FHWA Records Disposition Manual, or Field Offices, Chapter 4, FHWA Order No. 1324.1 B, issued July 29, 2013 contains FHWA's requirements for retaining and disposing of environmental records.

Slide 23 - FHWA Records Disposition Manual (ppt s11)

For example, Significant Transportation Projects are covered in the Manual and will be stored permanently. These are projects that significantly enhance the transportation system, or that have a significant impact upon the economic vitality of the surrounding community, such as the construction of a major tunnel or bridge; "first of a kind" or those establishing precedents that are expected to be historic in less than 50 years; or are the subject of widespread media attention or Congressional scrutiny as determined by the Director of OEM in consultation with FHWA Florida Division. The Director of OEM has a tool within SWEPT that allows projects to be categorized as significant transportation projects. The Manual is available at the FHWA website.

Slide 24 - 2 C.F.R. §§ 200.333-200.337 (ppt s12)

Our policies and procedures comply with the recordkeeping responsibilities found in the Code of Federal Regulations Section for Record Retention and Access. This Code is the over-arching federal regulation regarding records retention and access. The topics covered under the Code include retention requirements for records, requests for transfer of records, methods for collection, transmission and storage of information, access to records, and restrictions on public access to records.

Slide 25 - Summary of Laws and Requirements (ppt s13)

In summary, FDOT maintains its project and administrative files pertaining to its NEPA Assignment Program responsibilities, as required by law and FDOT's retention program. FDOT's Records Management Procedure and Retention and Disposal Schedule exceed or meet federal requirements.

Slide 26 - Summary of Laws and Requirements (ppt s13) (cont.)

In general, environmental project records are retained for at least five years following completion of construction of the last project segment and the project is completely closed or FM# Status 100 applies. Records for Significant Transportation Projects as defined in FHWA Order No. 1324.1B are flagged and permanently stored.

Slide 27 - Lesson 2: Maintaining the Project File in SWEPT (ppt s14)

Lesson 2 covers how to use SWEPT to maintain our environmental project files.

Slide 28 - Support for Records Management (ppt s15)

To support the recordkeeping and retention responsibilities under NEPA Assignment, SWEPT is used in conjunction with FDOT's Electronic Document Management System, or EDMS.

Slide 29 - Support for Records Management (ppt s15) (cont.)

EDMS serves as the environmental file of record for NEPA Assignment projects. It stores and archives files. It maintains appropriate retention and disposal schedules. When the files are imported into EDMS, they are reviewed and made available to other FDOT computer applications.

Slide 30 - Support for Records Management (ppt s15) (cont.)

SWEPT provides an interface to EDMS, integrated with the project work flow. This gives easy access to the environmental project record throughout the environmental review process. When files are uploaded to SWEPT, they are attributed according to EDMS standards, mapped to the appropriate group and type and retention and disposal schedule. When an environmental document is approved in SWEPT, it is automatically transferred to EDMS with associated records.

Slide 31 - Responsibility for Record Management (ppt s16)

The Project Manager is responsible for maintaining an accurate and up-to-date project file in SWEPT. The project team members may assist by uploading files and checking that they are accurate and up-to-date.

Slide 32 - Electronic Document Management System (EDMS) (ppt s17)

The Electronic Document Management System, or EDMS, serves as the environmental file of record for NEPA actions. EDMS has multiple uses, including storing and backing up files, disaster recovery, and managing records to appropriate retention and disposal schedules. Files in EDMS are reviewed and made available to other FDOT computer applications.

Slide 33 - EDMS Groups/Type (ppt s19)

EDMS groups and types are ways that the electronic database is organized to store project files into logical groupings. These groups and types are identified per document and mapped to its corresponding document retention schedule.

Slide 34 - SWEPT to help meet MOU requirements for NEPA (ppt s20)

SWEPT helps FDOT meet requirements for retention and access by providing tools for the project teams to archive documents in EDMS, organize project files consistently, apply consistent naming conventions, provide timely access to files, and provide system quality assurance checks to ensure document accuracy and completeness.

Slide 35 - SWEPT to help meet MOU requirements for NEPA

The NEPA Assignment MOU (say each letter) also requires us to monitor and report our compliance with the NEPA performance measures. SWEPT has on-going system checks to restrict progress or prompt users unless required documentation and information is provided. SWEPT also includes tools that help our QA/QC (say each letter) teams and managers monitor performance measures, use NEPA performance reports to verify compliance with NEPA Assignment requirements, and support self-assessments and FHWA audits.

Slide 36 - Document Naming Convention (ppt s22)

Document naming conventions in SWEPT help to organize and access the documents more efficiently. All files input into SWEPT and uploaded into the EDMS follow an established naming convention. The document name concatenates or links together important project and document information, including financial management number and class of action, District number, document name and date. SWEPT applies this naming convention when you upload files, if it has not been applied yet.

Slide 37 - SWEPT Project Page (ppt s23)

On SWEPT, each project has a page where you can find general information about the project, people assigned to the project, an overview map, the project schedule, and the project documents. Scroll down past the schedule data and you'll find the Project Documents section.

Slide 38 - Project Documents (ppt s24)

The project documents are organized in folders by PD&E topics. When a project is set up in SWEPT, the project manager indicates what products are expected. The project cannot be sent to OEM for review until the required documents are complete. Project team members can add, replace, and delete documents on this page. They can also send them to EDMS throughout the course of the project.

Slide 39 - Project Documents (cont.) (ppt s24)

The files are automatically sent to EDMS at certain milestones, such as when the document is approved. If a document that is required for the project has not been uploaded yet, it is indicated by an exclamation point. For example, this project is missing the Public Involvement Plan. You will select the Add Now button to start uploading the missing document.

Slide 40 - Project Documents (ppt s25)

A dialogue box appears asking for information describing the document. The wizard will only ask for those required EDMS attributes that are not known, and allow you to enter optional information if desired. SWEPT will automatically apply the standard naming convention if the source file did not already use it.

Slide 341 - Project Documents (ppt s26)

After the file is uploaded, the exclamation point goes away, and the file name appears. When you are ready to make the file available through EDMS, select the Send to EDMS button.

Slide 42 - Key Take-away Points (ppt s45)

There are several key take-away points from this training on Project File and Records Management. We have updated policies and procedures in the PD&E Manual for your easy reference, and always remember if your document or record is not in the project file or Administrative Record, it did not happen.

Slide 43 - Key Take-away Points (cont.) (ppt s45)

To ensure your documents are where they should be, the District Project Manager and project teams should upload all relevant documents into SWEPT early and throughout the review and approval process. The District Project Manager should periodically check that the files are accurate and kept up-to-date. SWEPT is intended to make Project File and Records Management easier with customized tools specifically for you. SWEPT has system checks to ensure you upload your NEPA documents and include required information.

Slide 44 - Questions (ppt s46)

If you have questions, please contact the SWEPT Help Desk at the contact information on the resources page.

Slide 45 – Conclusion (ppt s46)

This concludes the presentation on NEPA Assignment Project File and Records Management. Please proceed to and complete the test to receive credit for this course.