NEPA Quality Assurance and Quality Control (QA/QC) Plan CBT

Welcome

Welcome to National Environmental Policy Act, also known as NEPA, Course on the Quality Assurance and Quality Control Plan provided by the Florida Department of Transportation's Office of Environmental Management.

This course will provide a high level overview of the QA/QC Plan, which is divided into the 3 parts - the QA/QC Process, Self-Assessment Process, and FHWA Audit Support. Since this is an overview of the QA/QC Plan, this training is accompanied by more detailed trainings on the Self-Assessment Process and FHWA Audit Support.

QA/QC has been a central focus of the environmental document development and review process for many years to ensure document accuracy and completeness. OEM will continue this focus under NEPA Assignment.

Learning Objectives

The three lessons in our learning objectives follow the parts of the QA/QC Plan and are QA/QC process, Self-Assessment Process and FHWA Audit Support.

Lesson 1: Quality Assurance and Quality Control Process

Lesson 1 covers the QA/QC Process, including an overview of the authority for QA/QC, linking planning and NEPA, diagrams of the Environmental Review Process and documentation steps in SWEPT, which is the electronic information system for document storage, approvals, and data reporting. This lesson will also cover data management and record retention.

Authorization of Quality Assurance/Quality Control Process

The Florida Department of Transportation is required to perform QA/QC reviews pursuant to FDOT QA/QC Policy, Topic Number 260-030-005-a, and NEPA Assignment Memorandum of Understanding (MOU) executed December 14, 2016, Section 8.2.4.   The MOU Section requires a QA/QC Plan be developed within 6 months of execution of the agreement.

Efficient Transportation Decision-Making

Efficient Transportation Decision-Making (ETDM) is part of FDOT's approach for Planning and Environmental Linkages (PEL), used to incorporate environmental considerations into transportation planning to inform project delivery for NEPA.

MOU requirements relating to PEL as found in MOU, *Section 3.2.1*, are Planning and Environmental Linkages, *23 U.S.C. §168*, with the exception of those FHWA responsibilities associated with *23 U.S.C. §§134 and 135;* and Efficient Project Reviews for Environmental Decision-Making *23 U.S.C. §139.*

ETDM includes planning and programming screens, development of Scope of Services, Alternative Corridor Evaluation, Advance Notification, and Class of Action Evaluation.   The QA/QC Plan describes the quality reviews and formal approval and/or concurrence on the products developed within the ETDM process.

Overview of Environmental Review Process

The Overview of Environmental Review Process flowchart shows the overall environmental document review process. Activities that occur at the district are shown in green boxes. Activities that occur at central office at OEM and Legal are shown in blue boxes. Some of the steps are specific to projects that require approval to go

to public hearing. The legal sufficiency review only occurs for Environmental Impact Statements (EIS) and individual section 4(f) evaluations.

Technical Studies are conducted to address specific issues. This process is completed with OEM approval of the final environmental document. There are other OEM training courses that have been developed that provide a detailed breakdown of this process.

Environmental Review Process for Type 2 CEs

The illustration shows the process from District's preparation and QA/QC of the Type 2 CE, to the Initial OEM review using ERC, to the Request for Approval phase in SWEPT, and finally to the OEM Director's approval. The chart also details the number of days OEM has for review during initial review and the final approval stages.

During the Request for Approval phase at the end of the process, the Project Delivery Coordinators and the Environmental Program Administrators have minor edit authority in which they can make minor edits without starting the process over again.

Environmental Document Review Quick Reference

This Environmental Document Review Quick Reference demonstrates how FDOT uses SWEPT to document that the QA/QC actions in the environmental document review process are occurring. For each Class of Action, this diagram shows the steps for review and comment, document submittal, District approval, and OEM approval. There is an OEM recorded webinar which covers details describing this process.

SWEPT System Controls

SWEPT is a powerful tool that checks for errors and omissions as environmental documents progress through the review and approval process. This internet-based system provides smart forms and wizards for documenting Type 1 Categorical Exclusions, Type 2 Categorical Exclusions, and Re-evaluations. These form prompt users for required information, providing guidance to build consistent and complete environmental documents. The documents cannot be processed for approval until required information is provided, including supporting files such as technical studies and attachments.

When an environmental document is ready, the project team uses SWEPT to route it for approval through the appropriate reviewers. Each person in the process receives an email letting them know that it is ready for their review. As the document progresses through the process, SWEPT maintains an approval log for the project record. SWEPT also has reports and tools to help reviewers check that supporting documentation has been included in the project file. One example is an Excel spreadsheet listing all of the documents available in SWEPT for a project that can be used as a checklist.

Overview of Data Management and Record Retention

Another element of the QA/QC Plan is a short discussion regarding data management and records retention. FDOT maintains its project and administrative files pertaining to its NEPA Assignment responsibilities as required by law and FDOT's retention program covered in the PD&E Manual, Part 1, Chapter 15, Project File and Records Management.

To support its recordkeeping and retention responsibilities, SWEPT is used in conjunction with the Electronic Document Management System, as defined in FDOT's Information Technology Resource User's Manual, Procedure, Topic Number 325-000-002 (Chapters 12 and 13) as the environmental file system of record for NEPA Assignment projects.

FDOT has a Records Management Procedure, Topic Number 050-020-025 established by Office of Support Services. For documents pertaining to FDOT's discharge of responsibilities under the NEPA Assignment Program, FDOT complies with the requirements of FHWA Records Disposition Manual (Field Offices) Chapter 4 and *FHWA Order No. 1324.1B*, issued July 29, 2013.

Training for OEM Review Processes

As part of the NEPA Assignment Series, more detailed training is available in the courses named "NEPA Assignment – OEM NEPA Review Process," "NEPA Assignment Course: Moving Forward with FDOT the Driver's Seat," and "ETDM /SWEPT Training."

Lesson 2: Self-Assessment Process

Lesson 2 covers the NEPA Assignment Self-Assessment Process.

OEM Self-Assessment Authority

The Self-Assessment is the second part of the QA/QC Plan and will be used to fulfill FDOT Quality Assurance and Quality Control Policy, Topic Number 260-030-005-a. The self-assessment also satisfies the provisions in the executed FDOT NEPA Assignment Program MOU to conduct annual self-assessments. The purpose is to annually gauge effectiveness of environmental procedures and to determine compliance under NEPA Assignment

OEM Self-Assessment Purpose and Scope

The purpose of the self-assessment is to annually gauge effectiveness of environmental procedures and to determine compliance under NEPA Assignment. The scope covers adherence to MOU and Performance Measures, review of Approvals and Decisions, and issues from previous Self-Assessments and FHWA Audits.

OEM Self-Assessment Process

Self-assessments are program reviews to assess compliance with the provisions of the MOU and NEPA requirements, and to identify successful practices and opportunities for improvement.

We have been doing quality assurance reviews (QAR) for a long time. OEM has modified the QAR process to include the MOU self-assessment requirements. Essentially, the Districts should see little to no difference between previous QARs and these self-assessment.

The 3 phases of a self-assessment are Planning taking at least 30 days, Evaluation taking at least 60 days, and Reporting taking at least 30 days. Planning involves selecting a review team, notifying districts, and identifying target topics for the NEPA project desk review. Evaluation involves conducting the desk review, including reviewing NEPA files and interviewing District staff as needed. Reporting involves drafting the Self-Assessment Report and the FHWA summary.

NEPA Performance Measures

The negotiated MOU established general performance measures FHWA will use to monitor FDOT's implementation of NEPA Assignment. The QA/QC Plan Self-Assessment Section and Appendix A describe FDOT's detailed implementation of these general measures including the establishment of targets, desired outcomes and tools and indicators to monitor progress.

The 4 general MOU measures are:
- Compliance with NEPA, FHWA & NEPA regulations and other federal environmental statutes and regulations
- QA/QC for NEPA (*nee-pa)* Decisions

- Relationship with agencies and the general public

Increased efficiency and timeliness in completion of the NEPA process.

Self-Assessment Training

As part of the NEPA Assignment Series, more detailed training is available in the course named "NEPA Assignment Course: FDOT Self-Assessments."

Lesson 3: FHWA Audit Support

Lesson 3 covers FHWA Audit Support, which is the last section of the QA/QC Plan.

Audit Support Process

OEM's Audit Support Process helps FDOT to prepare for FHWA audits. Tips for employee preparation are to be familiar with FHWA Audit purpose and scope and generally familiar with NEPA requirements, to make sure document files are complete in SWEPT, and to be courteous in interviews, respond accurately to auditor questions, and respond only to what the auditor asks. If an employee cannot answer a question, do not guess and stick to your area of expertise. If an employee has questions, discuss with local contact or central office for clarification.

OEM's Audit Support Process focuses on coordination and communication with FHWA, providing FHWA with needed information and access to records and staff, and keeping FDOT and OEM management aware of audit activities and reporting.

FHWA Audit Support Training

As part of the NEPA Assignment Series, more detailed training is available in the course named "NEPA Assignment Course: FDOT Audit Support."

Questions

Questions. If you have questions, please contact the Quality Assurance and Quality Control Coordinator at the contact information on the Resources page.

Conclusion

This concludes the presentation on NEPA QA/QC. Please proceed to and complete the test to receive credit for this course.