

NEPA – Self-Assessment CBT

Welcome

Welcome to National Environmental Policy Act, also known as NEPA, Course on Self-Assessment provided by the Florida Department of Transportation's Office of Environmental Management.

The self-assessment is a slightly different version of the quality assurance reviews we are used to, with more emphasis on Office of Environmental Management review of our systems and processes we have in place to ensure our environmental documents are complete and compliant. This means most of the work will fall to OEM reviewing project documents in SWEPT with very little impact on the District operations during this process.

Lesson Objectives

The 3 lessons in our learning objectives are OEM Self-Assessment Process, OEM and District Roles in the Self-Assessment, and Connecting the Self-Assessment and FHWA Audit.

Lesson 1: OEM Self-Assessment Process

Lesson 1 covers self-assessment authority and purpose, scope, performance measures, self-assessment process stages, and report drafting and distribution.

OEM Self-Assessment Authority and Purpose

The Self-Assessment will be used to fulfill FDOT Quality Assurance Review policy and procedure requirements. The self-assessment satisfies the provisions in the executed FDOT NEPA Assignment Program Memorandum of Understanding (MOU) to conduct annual self-assessments. The purpose is to annually gauge effectiveness of environmental procedures and to determine compliance under NEPA Assignment

Scope of Self-Assessment Process

The scope of the self-assessment is the 4 NEPA Assignment Memorandum of Understanding performance measures, identified target topics, evaluating a sample of NEPA Approvals and Decisions for a specified time period to determine compliance, and a review of previous self-assessment and FHWA audit unresolved matters. All of these sources will be used for target topics.

The self-assessment will also determine FDOT's readiness with policies and procedures in place for implementation.

MOU Performance Measures

Performance measurement is not new to FDOT. Our NEPA measures are based upon data and systems we currently have in place. Data compilation will happen in SWEPT and should not have an impact on the Districts.

Every self-assessment will evaluate the status of the four MOU performance measures on A) Compliance with NEPA, NEPA regulations and other federal environmental statutes and regulations; and B) Quality Assurance and Quality Control (QA/QC) for NEPA Decisions.

Also, we have C) Relationship with agencies and the general public; and D) Increased efficiency and timeliness in completion of the NEPA process.

OEM Self-Assessment Process

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

The 3 phases of a self-assessment are Planning taking at least 30 days, Evaluation taking at least 30 days, and Reporting taking at least 15 days. These phases will be explained in more detail in the coming slides.

OEM Self-Assessment Process – Planning Stage

Self-assessments include a planning stage that involves Review initiation, selection of a team, notification to districts, and identification and selection of target topics.

The OEM Director or designee appoints a self-assessment team at the beginning of each annual self-assessment. Team will be comprised of the QA/QC Coordinator and at least 4 staff from within OEM depending on the topics to be covered in the review.

The self-assessment team may consult with subject matter experts and consultants as needed during the self-assessment process. Team members will coordinate with District personnel as needed. Each team member is responsible for documenting all interviews, document reviews, file reviews and any work effort directly related to the self-assessment.

The Director of OEM notifies all Districts that a self-assessment is beginning.

The Director of OEM will select target topics based on NEPA (*nee-pa*) performance results, input from OEM staff, managers and Districts, and previous self-assessments and FHWA audits.

OEM Self-Assessment Process – Evaluation Stage

OEM QA/QC Coordinator will pull a sample of projects from a population of NEPA approvals and decisions of qualified projects per approved target topics from the given time period. The review team will conduct a desk review of selected projects.

SWEPT is the automated Statewide Environmental Project Tracker System and is the primary Self-Assessment Tool providing access to list of NEPA approvals and decisions, project files, tools for desk review, and document approval history and QA/QC.

OEM Self-Assessment Process – Reporting Stage

Self-Assessment Team will draft a report including Director Statement, scope and methodology, successful practices and areas needing improvement, corrective actions, if any, and progress of performance measures.

The QA/QC Coordinator will circulate the draft report to Review Team, OEM management, and Districts for review and final approval by Director of OEM. Final Report will be distributed to OEM and FDOT management, with Summary Report to FHWA at least 1 month prior to FHWA Audit.

Lesson 2: OEM and District Roles in Self-Assessment

Lesson 2 covers a refresher of QA and QC and roles for OEM and the Districts.

Role of OEM

This graph shows that OEM (*say each letter*) is the nucleus of the self-assessment process responsible for implementing and coordinating all aspects of the process.

QA/QC in particular are key to the success of the NEPA assignment program and will be a focus of both the self-assessment and the FHWA audit. The next slides provide a refresher on consultant, District and OEM roles with QA/QC.

Quality Assurance and Quality Control - Consultant

Quality Control and Assurance is currently required and is our FDOT process for checks and balances. Quality Control and Assurance start with the consultant, who must thoroughly understand FDOT requirements in the Project Development and Environment (PD&E) Manual, and conduct quality checks at every stage during and after document development.

To this end, consultants must develop individual QC plans, stick to those plans and the PD&E Manual requirements, check for errors and omissions before submitting documents to the District, certify that QC has been conducted along with submittal, and maintain a record of markups and the QC certification.

Quality Assurance and Quality Control - District

Once the District receives the environmental document, the District will assure quality has happened. The District will hold consultant accountable for sticking to QC plan and the PD&E Manual, provide feedback and changes through the Electronic Review Comment system, use technical reviewers and other District resources, ask OEM for help as needed, maintain QC records, ensure completeness and accuracy of project file, and upload final documents in SWEPT.

Quality Assurance and Quality Control - OEM

The final point in the process is the Office of Environmental Management review of the environmental document. These reviews include Office of Environmental Management staff and Office of General Counsel attorneys.

Reviewers use environmental policies and laws found in the PD&E manual as their basis for checking for compliance with state and federal environmental requirements. Reviewers look at project decisions, environmental analysis, file documentation, errors and omissions, and legal sufficiency.

District Role in Self-Assessment

In the self-assessment process, Districts help determine the annual target topics for the review of NEPA approvals and decisions. Districts will also be asked to answer questions and provide information related to NEPA projects, will be able to use self-assessments for establishing priorities for continual improvement, and will collaborate with OEM in developing an implementation action plan and in ensuring resolution of matters identified during the self-assessment if needed.

How does FDOT use Self-Assessment Results?

OEM will use self-assessments to share and promote successful practices, provide a summary report of findings and observations to FHWA, identify opportunities for improvement to promote quality initiatives, and review District Action Plans, if required, for feedback to Districts within 10 days. OEM will also track and monitor Action Plan implementation.

Lesson 3: Connecting the dots...Self-Assessment and FHWA Audits

Lesson 3 covers the connection between the self-assessment and the FHWA Audit.

Connecting Self-Assessment to FHWA Audit

The self-assessment and FHWA audit are connected by content, performance measures, and reporting requirements. The seven core FHWA Audit will also be a part of the self-assessment. These are Staffing, Technical Competency and Organizational Capacity,

Adequacy of the financial resources committed by FDOT to administer the responsibilities assumed, Quality Assurance and Quality Control Process, Attainment of Performance Measures, Compliance with MOU requirements, and Compliance with applicable Federal laws and policies in administering the responsibilities assumed.

At least 1 month prior to the date of a scheduled on-site FHWA audit, FDOT will send a summary of its self-assessment to the FHWA Florida Division Office. This must happen before the audit starts. The summary will include scope and areas reviewed, description of process, successful practices, areas needing improvement, corrective actions, and a statement from the Director of OEM.

Summary

FDOT is in a good position to showcase successful practices through self-assessments. Self-assessments will be used to fulfill the FDOT policy and procedure requirement for Quality Assurance Reviews.

The MOU requires annual self-assessments to review performance measure results and compliance with NEPA and federal environmental laws. Self-assessments will have a planning phase, evaluation phase and reporting phase.

Self-Assessments are connected to the FHWA Audit with core areas, performance measures and the required summary report to FHWA no later than 1 month before the FHWA audit

Questions?

If you have questions, please contact the Quality Assurance and Quality Control Coordinator at the contact information in this slide.

Conclusion

This concludes the presentation on NEPA Assignment Self-Assessments. Please proceed to and complete the test to receive credit for this course.