



Alaska Department of



Transportation & Public Facilities

Keep Alaska Moving through service and infrastructure



National Environmental Policy Act (NEPA) PROCEDURES MANUAL TRAINING

MODULE 11

QUALITY ASSURANCE AND QUALITY CONTROL

2021 CLASSROOM GUIDE





Module 11: Quality Assurance and Quality Control

- 1 Discuss the procedural requirements for QA/QC.
- 2 Identify QA/QC activities during early project development.
- 3 Identify QA/QC activities during draft document development.
- 4 List the QA/QC requirements for final environmental document preparation.



Length of training module: Approximately 20 minutes.



This training presents the requirements for quality assurance and quality control, QA/QC, of environmental documentation throughout the environmental process. (Note: Chapters 3, 4, and 5 contain details on the QC specific to Categorical Exclusions, EAs, and EISes, respectively)

By the end of this module, you should be able to:

- Discuss the procedural requirements for QA/QC.
- Identify QA/QC activities during early project development.
- Identify QA/QC activities during draft document development.
- List the QA/QC requirements for final environmental document preparation.

Okay, now let's get started by learning about the difference between Quality Assurance and Quality Control.



QA/QC: *during document development*

- Implement procedures established in the EPM
- Prevent document errors and omissions
- Support the development of accurate National Environmental Policy Act (NEPA) documents and appropriate NEPA decisions

QA/QC: *after document is complete*

- Ensure procedures were followed, including:
 - Complete environmental analysis
 - Project file documentation
- Identify and correct errors and omissions



This slide outlines the timing and aims of QA, which happens during development, and QC, which takes place after document completion.

QA is a process that occurs during document development to:

- Implement procedures established in this manual
- Prevent document errors and omissions
- Support the development of accurate National Environmental Policy Act (NEPA) documents and appropriate NEPA decisions

QC is a review process that occurs after the document is complete, and prior to document approval to:

- Ensure procedures were followed, including:
 - o Complete environmental analysis
 - o Project file documentation
- Identify and correct errors and omission

In general, QA occurs through collaborative development of the environmental document, and QC occurs through a series of review steps once the document is complete.



MOU Requirements

Part 8.2.4:

In carrying out the responsibilities assumed under this MOU, DOT&PF agrees to carry out regular QA/QC reviews to ensure that the assumed responsibilities are being conducted in accordance with applicable law and this MOU. At a minimum, DOT&PF's QA/QC process will include the review and monitoring of its processes and performance relating to project decisions, completion of environmental analysis, project file documentation, checking for errors and omissions, and legal sufficiency reviews, and taking appropriate corrective action as needed.



The DOT&PF Statewide Environmental Office (SEO) is responsible for the management, control, and oversight of the NEPA Assignment Program environmental review and approval process, including as specified in NEPA Assignment Program Memorandum of Understanding (MOU) (Part 8.2.4.) for QA and QC.



Procedural Requirements

- *Highway Preconstruction Manual:*
 - Project Management Plan (PMP)
 - Public Involvement Plan (PIP)
- *Civil Rights Office*
 - Title VI Program Plan
 - Section 504/ADA Work Plan

The Alaska Department of
Transportation & Public
Facilities
("AKDOT&PF")
Civil Rights Office



The Highway Preconstruction Manual has procedural requirements for developing a Project Management Plan (PMP), included in Chapter 4, and Public Involvement Plan (PIP), included in Chapter 5.

DOT&PF's Civil Rights Office maintains a Title VI Program Plan and a Section 504/ADA Work Plan containing specific public involvement required language and processes. These plans, and the requirements within, are periodically updated and the Civil Rights Office should be regularly consulted for compliance with the current program plans.

Note that when requirements from these DOT&PF resources overlap, the more extensive process will apply.



Early Project Development



Forming the Project Development Team

- Comprised of regional staff: Engineering Manager, Environmental Impact Analyst, REM, and others as needed
- An SEO staff member is assigned to the team when the COA consultation process is initiated
- The collaborative formation of this team is a QA activity, that will be documented in the project file



QA of an environmental document, specifically an EA or EIS, begins with the project development team. The team is comprised primarily of regional staff with one SEO member added when the COA consultation process is initiated. The SEO staff is usually a NEPA Program Manager but must be the Statewide Environmental Program Manager for an EIS.

The collaborative formation of the team for the development of an environmental document is a QA activity that can be documented in the region project file with emails, project meeting summaries, and other similar items demonstrating the coordination effort.



Early Project Development

PMPs, PIPs, and Schedule

- QA is built into the development of these through collaboration and consultation with support groups and subject matter experts
- Identify environmental constraints early in the process
- Establish timelines, tasks, and responsibilities



After the project development team is formed, the next step is PMP development, including development of the PIP, and project schedule.

The team works collaboratively with support groups and subject matter experts to identify environmental constraints early in the process and to establish timelines, tasks, and responsibilities.

Documentation of the collaborative plan and schedule development (e.g., emails, meeting notes/summaries, and phone logs) is included in the region project file.



Early Project Development, continued

Plan and Schedule Approvals

The Engineering Manager and REM perform a QC review of the PMP, PIP, and schedule prior to approval, including:

- Review of the project name, state and federal project numbers, project scope, and project description, including project limits, for accuracy and consistency
- Confirmation that the COA recommended is appropriate for the project description, any known environmental issues and probable environmental impacts
- Review the identification of appropriate technical reports, public involvement, agency coordination, and permit approvals
- Review of the project schedule for consistency with the PMP and PIP



COA Recommendation and Concurrence

The NEPA Program Manager performs a QC review of the COA Consultation form and recommendation before concurrence, verifying the COA recommendation is appropriate.



The Engineering Manager and REM perform a QC review of the PMP, PIP, and schedule prior to approval, and of the COA Consultation Form recommendation for their joint concurrence. The review includes

Review of the project name, state and federal project numbers, project scope, and project description, including project limits, for accuracy and consistency • Confirmation that the COA recommended is appropriate for the project description, any known environmental issues and probable environmental impacts • Review the identification of appropriate technical reports, public involvement, agency coordination, and permit approvals • Review of the project schedule for consistency with the PMP and PIP

The PMP, PIP, schedule approval, and COA recommendation are placed in the region project file as evidence the QC review is completed. The NEPA Program Manager performs a QC review of the COA Consultation Form and recommendation before concurrence. This QC review verifies the COA recommendation is appropriate for the project description, any known environmental issues, and probable environmental impacts. This review is evidenced by documented communication requesting additional information or clarification, and/or concurrence with the recommendation, and is included in the region project file.



Prior Concurrence

23 CFR 771.125(c)

- May apply to approvals of Draft EISs and Final EISs, and rarely, Draft and Final EAs
- Identified on a case-by-case basis by the Statewide Environmental Program Manager
 - Based on input and recommendations from NEPA Program managers, REMs, and LAW
 - Impacts of unusual magnitude
 - High level of controversy
 - Major unresolved issues
 - Emerging or national policy issues
 - Issues for which a Region or SEO seek policy assistance
- The decision will be made by the Chief Engineer, advised by LAW



For selected projects, “prior concurrence” pursuant to 23 CFR 771.125(c), will be obtained before proceeding with key approvals under NEPA. The prior concurrence decision will be made by the Chief Engineer, advised by the Alaska Department of Law (LAW), and will ensure that the project and document in question are acceptable from a policy and program perspective.

Prior concurrence may apply to DOT&PF approvals of Draft EISs and Final EISs. On rare occasions prior concurrence may apply to Draft EAs and Final EAs. Projects requiring prior concurrence will be identified on a case-by-case basis by the Statewide Environmental Program Manager, based on input and recommendations from the SEO NEPA Program Managers, REMs, and LAW and may include projects meeting one or more of the following criteria outlined on this slide.



Draft Document Development

- Technical Reports (QA during development, QC formalized)
- Public and Agency Involvement
- Draft Environmental Document
 - Preparation
 - Review
 - Certification
 - Legal Review



In the next slides we will go over issues pertaining to draft document development, including Technical Reports, Public and Agency Involvement, and steps necessary for the Draft Environmental Document.



Technical Reports

Quality Assurance (QA):

- ✓ Incorporated during development
- ✓ Coordinated through project team, support groups, and subject matter experts



Quality Control (QC):

- ✓ Confirm accuracy
- ✓ Ensure coordination is complete
- ✓ Ensure regulatory and DOT&PF standards are met
- ✓ Verify consistency
- ✓ Document comments and changes in project file



During early project development, the project development team identifies the necessary technical studies to support development of the environmental document. Quality Assurance (QA) is incorporated into the development of the technical reports through coordination between the team, support groups, and subject matter experts, as appropriate, regarding methodologies and approaches for the technical studies.

Required technical reports undergo a technical report Quality Control (QC) review, and can be conducted by:

- A member of the project development team who was not directly involved in the report preparation
- A peer reviewer
- Another subject matter expert, depending on the resource area

Technical report QC review should:

- Confirm adequacy and accuracy of the report
- Ensure appropriate coordination and regulatory requirements are met
- Ensure applicable regulatory requirements and DOT&PF standards are met
- Verify clarity, grammar, and internal consistency of the information
- Document review comments and responses and place in the project file as evidence of the review and to communicate any necessary report changes



Public and Agency Involvement

Quality Assurance (QA):

- ✓ Development of public involvement materials
- ✓ Responses to comments
- ✓ Captured in summary/report



Quality Control (QC):

- ✓ Confirm accurate record in summary/report
- ✓ Accuracy of responses to comments
- ✓ QC record is in project file



Prior to public and agency involvement activities, Quality Assurance (QA) review occurs through the collaborative development of public notices, scoping letters/emails, meeting presentation materials and handouts, and through the development of any responses to comments by the project development team. Following the public and agency involvement activities including scoping efforts, meetings and public hearings, the Environmental Impact Analyst, consultant, or other team member completes a scoping, meeting, or hearing summary/report. The team conducts the Quality Control (QC) review of the summary/report to ensure the scoping activity, meeting or hearing is accurately recorded, and reviews participant comments and team responses for consistency and accuracy. The QC review also confirms the summary/report includes scoping letters/emails, and meeting or public hearing materials. Once the review is completed, the summary/report and any team comments are included in the region project file to document the QC review.



Preparation of the Draft Environmental Document

Quality Assurance (QA):

- ✓ Emails, phone notes, meeting notes
- ✓ Collaborative discussions
- ✓ Included in project file
- ✓ Consistent with supporting attachments



Quality Control (QC):

- ✓ Reviews by regional staff
- ✓ Reviews by SEO



Quality Assurance (QA) occurs through collaboration and project meetings during the preparation of the draft environmental document. Evidence of QA includes emails, phone conversation notes, and meeting notes summarizing collaborative discussions involving project development team members about any aspect of the draft document development (i.e., alternatives, resource areas, methodologies). The Environmental Impact Analyst is responsible for ensuring that evidence of this process is included in the region project file, and that the draft environmental document is consistent with any technical reports prepared to support the environmental document.

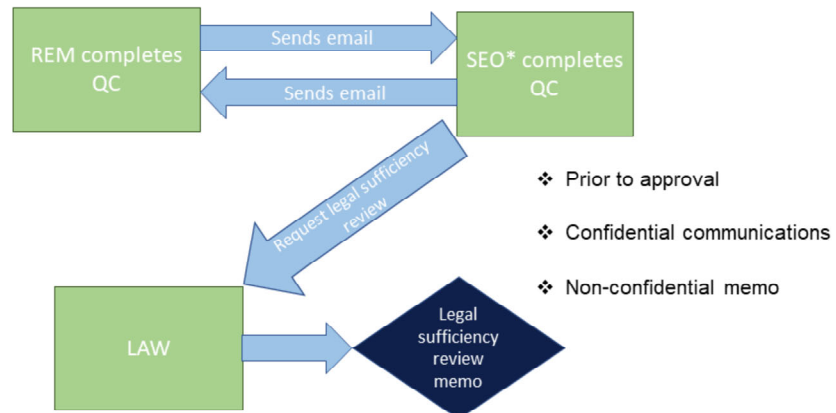
QC occurs through a series of QC review steps that include region and SEO review.



Legal Sufficiency Review

Required for all:

- Individual Section 4(f) Evaluations



Legal sufficiency review is required for any Individual Section 4(f) evaluation. Communications with LAW and legal advice are confidential and are maintained in a separate file for privileged communications, which is not available for consultant, public, or agency distribution or review. When all legal comments have been appropriately addressed, LAW provides a memorandum documenting that the legal sufficiency review has been completed. The LAW memorandum documenting completion of the legal sufficiency review is included in a non-confidential folder of the project file.



Preparation of the Final Environmental Document

Quality Assurance (QA):

- ✓ Emails, phone notes, meeting notes
- ✓ Collaborative discussions
- ✓ Included in project file
- ✓ Consistent with supporting attachments



Quality Control (QC):

- ✓ Reviews by regional staff
- ✓ Reviews by SEO



QA occurs during preparation of the final environmental document, like preparation of the draft environmental document. Evidence of QA includes emails, phone conversation notes, and meeting notes summarizing the collaborative discussions involving project team members about any aspect of the final document. The Environmental Impact Analyst is responsible for ensuring evidence of this QA process is included in the project file, and that the final environmental document is consistent with any reports prepared to support the environmental document.



Learn More!



QA/QC Process for Environmental Assessments



QA/QC Process for Environmental Impact Statements



If you'd like to learn more about the QA/QC process for EAs, please click the link on the T2 Online Training Page under Chapter 11.

If you'd like to learn more about the QA/QC process for EISs, please click the link on the T2 Online Training Page under Chapter 11.

To complete the QA/QC Module, continue to the next slide.



Module Review

Module 11: What You've Learned...



- What is QA/QC and why it is required
- How project teams are formed and how they conduct QA and QC
- How environmental processes relate to processes in the Highway Preconstruction Manual and those delineated by the Civil Rights Office
- What Prior Concurrence is
- QA/QC steps for both Draft and Final Environmental Document Preparation



This concludes Module 11 of DOT&PF's Environmental Procedures Manual Training Program.

To take the module quiz, please click the link on the T2 Online Training Page under Chapter 11.