ALIGNING EXPECTATIONS

How to Effectively Write and Respond to Review Comments

PEOPLE AND PROJECTS BENEFIT FROM EFFECTIVELY WRITTEN COMMENTS AND RESPONSES

Effectively written comments and responses:

- ✓ *Improve the quality of planning products, decision making, and project implementation,*
- ✓ *Save time and funding,*
- ✓ *Minimize schedule delays due to prolonged review engagements, and*
- ✓ *Make your life a little bit easier … and less stressful.*

Effectively written comments and responses also promote communication and transparency, which:

- ✓ *Minimize potential misunderstandings between PDT members and reviewers,*
- ✓ *Document the review history so that previously raised concerns are not rehashed over and over,*
- ✓ *Inform decision makers about how concerns were resolved, and*
- ✓ *Result in an accountable and professional public record.*

COMPONENTS OF A COMMENT-RESPONSE RECORD

COMMENT → **RESPONSE** → **DISCUSSION*** → BACKCHECK

*Optional, use as appropriate

This handout describes the key components and best practices, including things to avoid, when writing effective comments, responses, and discussions.

UNIVERSAL BEST PRACTICES

- ✓ Be succinct
- ✓ Be professional
- ✓ Be respectful
- ✓ Focus on improving the products, decision making, and project implementation
- ✓ Review proposed comments and responses to ensure consistency

EFFECTIVE REVIEW COMMENTS: BEST PRACTICES

- ✓ Review comments should be limited to those that are required to **ensure adequacy of the product**; that is, comments that **substantively improve** the quality of the planning product, decision making, or project implementation.
- ✓ Review comments should be **succinct** and enable **timely resolution** of the concern.
- ✓ The 4 key parts of an effective comment (**4 Part Comment Structure**) are outlined in Appendix C of EC 1165-2-214, Paragraph 3. i.
- ✓ EC 1165-2-214 requires use of the 4 Part Comment Structure for Agency Technical Review (ATR) and Independent External Peer Review (IEPR); however, its use **adds value to ANY level of review**.
- ✓ The 4 Part Comment Structure is a useful tool for writing effective comments; however, reviewers should still **think critically** when using the 4 part structure.

THE FOUR PART COMMENT STRUCTURE

1. **THE REVIEW CONCERN** Identify the product's information deficiency or incorrect application of policy, guidance or procedures. Simply put, this component should succinctly state the problem the reviewer is pointing out.

2. **THE BASIS FOR THE CONCERN** Cite the appropriate law, policy, guidance, procedure, or state of the practice that has not been followed. Failure to meet the basic communcation aspects of a decision document (informing decision makers and the public) may also be the basis for a concern.

3. **THE SIGNIFICANCE OF THE CONCERN** Indicate the importance of the concern with regard to its potential impact on the plan selection, recommended plan components, efficiency, effectiveness, implementation responsibilities, safety, Federal interest, or public acceptability. Be specific; this is not just a statement of low, medium, or high significance.

4. **THE PROBABLE SPECIFIC ACTION NEEDED TO RESOLVE THE CONCERN** Identify the recommended action(s) to be taken to resolve the concern. Be specific, such as where possible revisions to the report or additional analysis may be needed.

Well written review comments are the foundation of an effective review process
– just as well written problem statements are the foundation of an effective planning process.

WHAT TO AVOID WHEN WRITING AN EFFECTIVE REVIEW COMMENT

- Attempts to enforce personal preferences over otherwise acceptable practices
- The use of personal pronouns or opinions
- Criticism of an individual rather than comments on the product
- Any other issues that do not add value towards planning decisions and recommendations or do not make the plan safer, more functional, or more economical

DO NOT INCLUDE

Provide editorial and informal comments off-line; not as part of the formal comment-response record.

For example:

- Spelling, grammar, format or language
- Repetitive comments on the same subject
- Issues that will not contribute to the quality of decision making or the project
- Minor numerical errors that do not affect validity

These concerns can be most efficiently provided and addressed informally, and don't significantly benefit from use of the 4 part comment structure.

Effective use of the 4 Part Comment Structure can be challenging, and using all four parts may not always be practical depending on the nature of a given concern, but reviewers should endeavor to use the 4 parts to the whenever possible.

- For example, when addressing incomplete or unclear information, comments may seek clarification in order to then assess whether further specific concerns may exist. In such situations, comments generally would defer identifying a probable solution pending further clarification and discussion.

EFFECTIVE COMMENT RESPONSES: BEST PRACTICES

- ✓ Comment responses should clearly address the stated concern(s), with a focus on **improving the adequacy of the product**; that is, substantive improvements to the quality of the planning product, decision making, or project implementation.
- ✓ Comment responses should be **succinct** and provide **specific and relevant** information to enable **timely resolution** of the concern.
- ✓ Responses should clearly **explain the agreement or disagreement** with the comment, the **actions undertaken or to be undertaken** in response to the comment, and the reasons those actions are believed to **satisfy the stated concerns**.
- ✓ Responses should be provided by the product author or by an individual experienced in the subject matter of the comment, but should also **reflect an organizational rather than individual perspective**.
- ✓ Responses should **summarize pertinent vertical coordination or direction** that supports resolution of the concern.

5 KEY COMPONENTS TO AN EFFECTIVE COMMENT RESPONSE

Clear statement of agreement or disagreement with the comment

- Be professional and respectful in tone.
- Responses reflect the character of the team as well as the individual.

Address all stated concerns and actions

- Conduct a team quality review on all proposed responses for the entire document and appendices to ensure consistency and that all comments have been addressed adequately.

Provide information relevant to the concern, including supporting rationale

- Address relevant factors: who, what, why, where, when, how, and/or how much?
- Cite specific policy or technical standard to support the response.

Summarize pertinent discussions with the reviewer or other subject matter experts

- Contact reviewer or PDT if clarification is needed or you cannot concur.
- Avoid back-and-forth in the review record.
- Keep the review lead informed of discussions, especially non-concur responses.

Describe how the concern has been (or will be) addressed in the document

- Include modified text in the response (if reasonable), OR
- Summarize proposed changes and provide revised document separately.
- Clearly cite where changes in the document have been (or will be) made.

WHAT TO AVOID WHEN WRITING AN EFFECTIVE COMMENT RESPONSE

- Expression of personal opinions or perspectives
- Use of personal pronouns
- Criticism of an individual rather than responding to the concern
- Becoming defensive
- Unsupported statements
  - *Provide policy or technical basis*
- Ambiguous statements
  - *Be specific and direct, allow reviewer to react*

DO NOT INCLUDE

EFFECTIVE DISCUSSION DOCUMENTATION: BEST PRACTICES

- Best practices mirror those for a comment response, and should:
  - ✓ **Summarize pertinent points** of discussion, including explaining how any disagreements were resolved (or elevated),
  - ✓ **Confirm understanding** between PDT member and reviewer,
  - ✓ Serve to **improve clarity and completeness** of the comment-response record, and
  - ✓ **Provide transparency** in the event the concern is raised later in the study or in another level of review, or should there be questions about the how the concern was resolved.

KEY COMPONENTS TO DISCUSSION DOCUMENTATION AND WHAT TO AVOID

Clear statement of point of confusion or disagreement

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Concise description of how issue was resolved

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Description of any actions taken (or to be taken), including citing where in the documentation any changes are made

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Explanation of when/how the issue will be elevated if not resolved

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Inclusion of supporting policy/technical methodology & subject matter expert (SME) consultation

- Verbatim record of back and forth discussion
- Expression of personal opinions/perspectives
- Criticism of an individual
- "Agree to disagree" statement; acceptable outcomes are the concern was:
  - *Resolved to the satisfaction of all parties*
  - *Determined to not be substantive after discussion*
  - *Elevated for resolution*

DO NOT INCLUDE

REASONS TO HAVE AND DOCUMENT A DISCUSSION

REVIEWER

- **When:** Prior to writing a comment.
- **Why:** To seek clarification or additional information to better identify or describe a potential concern.
- **Value:** Enables the reviewer to write a more effective comment or possibly to determine a comment isn't warranted.
- **Documentation:** The discussion should result in an improved written comment.

PDT MEMBER

- **When:** Prior to writing a response.
- **Why:** To seek clarification about a comment OR if the PDT member does not agree with the comment.
- **Value:** Ensures understanding of the comment and helps the PDT member to provide a relevant and effective response.
- **Documentation:** The response should include a succinct summary of the pertinent points of discussion that clarify the comment and/or the response.

REVIEWER

- **When:** During comment backcheck.
- **Why:** To seek clarification about the response or to resolve disagreement.
- **Value:** Ensures understanding of the response and how it did or did not address the concern. When applicable, also facilitates timely and effective resolution of any disagreements or identification of key issues to be elevated for resolution.
- **Documentation:** Succinct summary of the pertinent points of discussion that clarify how the concern was addressed, how any disagreements were resolved, or the specific issues to be elevated for resolution.