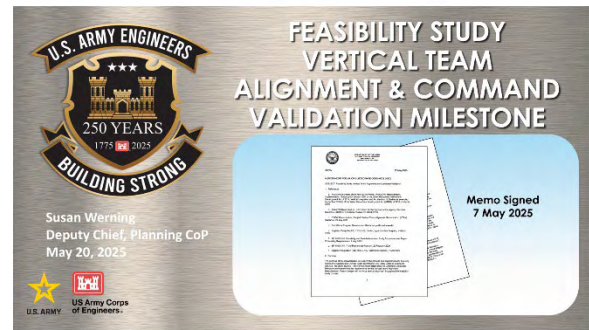


New Feasibility Study Vertical Team Alignment and Command Validation Guidance  
21 May 2025  
Q&A Summary

*This Special PCoP Webinar PCoP, presented by Susan Werning (PCoP Deputy), provided an overview of the recently released Feasibility Study Vertical Team Alignment and Command Validation memorandum, along with new guidance and requirements.*

*This summary of the Question/Answer session of the webinar is not a transcription; questions and responses have been edited and reordered for clarity.*



**Relevant Resource:**

- [Feasibility Study Vertical Team Alignment and Command Validation memo](#)
- Vertical Team Alignment Memorandum ([VTAM](#)) [template for feasibility studies](#) (MS Word)
- [Project placemat examples](#)

**Milestone Decision-Making and Process Changes**

**Why was the milestone decision-maker changed?**

The change to the milestone decision maker for the Tentatively Selected Plan milestone and the new Command Validation Milestone (CVM) ensures Command understanding and concurrence with the recommendations before the study process becomes too complete.

**With the change in decision makers for the Tentatively Selected Plan milestone and CVM, will this alter the types of decision information required for Tentatively Selected Plan selection?**

The readiness to identify the Tentatively Selected Plan and release the draft report should not change with the change in the Tentatively Selected Plan milestone decision-maker. The readiness of the study team to implement their project management plan and strategy for completing feasibility level design and producing a final feasibility report at the CVM should also not change with the change in decision-maker. No additional decision information is required.

**Will the practice of soliciting input from the policy and legal compliance review team, agency technical review team, and PCXs continue? Will the Policy and Legal Compliance Review team, the Agency Technical Review team, and Planning Centers of Expertise be able to provide/address concerns directly with the CVM decision maker, or should those be routed through Senior Planning Leadership at the MSCs and Headquarters?**

Study teams can anticipate the decision-maker asking direct questions of the Project Manager, Lead Planner, Engineering Technical Lead, as well as the representatives from the Planning Center of Expertise and the policy and legal compliance and agency technical review teams at milestone meetings. The change to milestone decision-makers should not change how coordination or issue resolution occurs. While the decision maker may be different, the expectation is that teams will continue engaging as they have been. There is no planned shift in how the Policy and Legal Compliance Review team, the Agency Technical Review team, or the Planning Centers of Expertise provide input.

**Who can delegate milestone decision-making authority?**

If not otherwise stated in the memo (or other guidance), only the designated decision-maker can delegate their authority.

**Who determines whether the CVM has been successfully completed?**

The milestone decision-maker, the Chief of Engineers or their delegate, determines whether the CVM has been met.

**Meeting Logistics and Scheduling**

**Is the District Planning Chief a required participant for the Command Validation Milestone?**

Yes, they are a required participant for this milestone meeting. (See Table 2.)

**When should the CVM occur: within two months of the end of the review period or after all high-significance comments have been resolved?**

The CVM will be held within two months of the completion of the concurrent public, technical, and policy and legal compliance reviews of the draft report. During the period between the completion of the reviews and the CVM meeting, the PDT will summarize significant issues that arose during the review. These issues do not have to be resolved before the milestone meeting, but at the Command Validation Milestone, the study team should discuss the proposed path forward to resolve those issues before the final report. Unresolved issues should be addressed at an in-progress review after the CVM meeting. (Paragraph 4. g.)

**When are the CVM meeting read-ahead materials due?**

Read-ahead materials are to be provided to the coordinating MSC and RIT planner no later than one week prior to the milestone meeting (EP 1105-2-61, paragraph 4- 4.b.), unless directed earlier by your MSC.

**When should the CVM be scheduled?**

The CVM meeting should be scheduled as soon as the study project delivery team is confident they will be ready to discuss the path forward for the study and any high significance comments received during review. This may be different for every team – ideally teams can start coordinating this schedule around the time of the TSP. At the latest, once the draft report has been released, there should be sufficient confidence in the review periods to schedule the milestone meeting.

**Will Tribal concerns factor into the scheduling of the CVM site visit?**

If there are significant concerns from Tribes expressed during public comment or Government-to-Government consultation on the draft report, the strategy to address these concerns and/or continue consultation should be discussed at the CVM and/or site visit. If the study area is on Tribal lands or the non-federal sponsor is a Tribe, Tribal concerns will definitely factor into scheduling the site visit and milestone meeting. Should a Tribe request a government-to-government/nation-to-nation consultation as part of the CVM and site visit, the Chief, or his designee, would consider scheduling the CVM and site visit to accommodate this request.

**What does the CVM site visit typically include?**

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This will be different for every project. Typically, the Chief's site visits have included a project summary/presentation using a placemat as a guide, engagement with the study's non-federal sponsor, and discussion of significant issues on-site. The site visit should include significant locations of the tentatively selected plan and appropriate technical staff to discuss the formulation, engineering, and the recommendation.

### **Are both a site visit and a separate meeting space required for the CVM, and must MSC members attend in person?**

They are not required to be separate. The team, with permission from the Chief or their delegate, may choose to combine the site visit and the milestone meeting. The [Feasibility Study Vertical Team Alignment and Command Validation memorandum](#) does anticipate that the site visit participants will be a more limited number than the total participants (virtual and in person) at the milestone meeting to both keep the site visit logistics as reasonable as possible and enable participation for all who have a role or a direct interest in the milestone meeting.

### **If the site visit is delayed but the CVM meeting can still occur, can the CVM be completed without the site visit, or is the site visit a mandatory requirement?**

This is, ultimately, up to the CVM meeting decision maker. The Chief has indicated that the site visit is expected to accompany the CVM, but flexibility may be possible in certain situations. In general, if the site visit is scheduled—even if it hasn't yet occurred—it's likely that the milestone meeting could proceed. That said, completing the CVM and the site visit concurrently remains the preferred approach. If the Chief (or their delegate) is unavailable, alternatives—such as having the MSC Commander or the Deputy Commanding General (DCG) conduct the visit or scheduling a site visit for the Chief prior to or following the CVM to coincide with other travel—might be considered. These situations will be handled on a case-by-case basis by the Front Office.

### **How will scheduling conflicts be managed when multiple studies compete for calendar space?**

We anticipate the Front Office will coordinate schedules based on the Chief's priorities.

### **Who funds travel for CVM site visits for attendees outside the PDT?**

GE-funded participants would be funded from their own offices. Virtual participation, however, is anticipated for most of the CVM meeting participants unless otherwise directed by the decision-maker.

## **CVM Content, Reviews, and Documentation Requirements**

### **Does the list of required reviews to be completed before the CVM include Independent External Peer Review (IEPR)?**

No, the timeline for the CVM does not include the completion of IEPR, which may extend beyond the public review, Agency Technical Review, and policy and legal compliance review periods for the draft report. "If IEPR is needed, the CVM will not wait for receipt of IEPR findings." If the IEPR identifies significant issues that conflict with Command direction, those issues will be addressed during the comment resolution IPR. (Paragraph 4.g.)

### **What does "required engineering sufficiency" mean in the second bullet of the CVM overview slide (slide 2)?**

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“Required engineering sufficiency” means an appropriate design maturity that will result in a class 3 estimate that includes the full scope of the design in the final feasibility report. (See ER 1110-2-1302 and CECW-EC memorandum, Guidance on Cost Engineering Products update for Civil Works Projects in accordance with Engineer Regulation 1110-2-1302 – Civil Works Cost Engineering, dated 5 June 2023).

### **What is the process if review outcomes deviate from the decision endorsed by the Chief?**

A summary of high-significance review comments, along with a recommended path forward, should be prepared and discussed at the Command Validation Milestone, which should prevent this situation from happening. Significant deviations from the decision made by the Chief should be coordinated through the vertical chain, up to HQUACE leadership, for consideration by the HQ Chief of Planning and Policy.

### **What is the expected timeframe between CVM and final report submittal?**

This will depend on the study. The study’s project management plan should account for the breadth of engineering, real estate, and planning (including environmental, economics, etc.) activities required during feasibility level analysis to move from a draft feasibility report to the final report.

### **CVM Process Streamlining, Templates, and Efficiency**

#### **Is there a template available for placemats?**

There is no template for placemats for Command visits to study areas. Several example placemats from previous briefings to the Chief are available on the [PCoP KMP site](#). (This folder can be found under the Feasibility Tools and Frameworks link on the "Planning Resources" dropdown menu across the top of the [PCoP KMP](#).)

### **EP 1105-2-61 Table 4-2 states that policy exceptions should be submitted to ASA(CW) before ADM.**

#### **Does this mean those policy exception requests are now submitted after CVM?**

Clear communication through the vertical chain to the ASA(CW) before, during, and after a policy exception request is more important than the timing. A policy exception to the ASA(CW)’s 3x3 policy, for example, may be submitted before the Tentatively Selected Plan milestone or draft report release – or after the CVM meeting. A policy exception that rests on Command decision/direction at the CVM meeting should not be submitted until after that decision is made. A policy exception should be suggested whenever the team feels confident it is needed for the study.

### **Is the in progress review (IPR) after the CVM optional or required?**

The IPR is required. The intent of the post-CVM IPR with the vertical team is to ensure comment resolution once additional study tasks are complete. This IPR will be led by the District Planning Chief and, as with all IPRs, will be documented in a Memorandum for the Record. The format and timing of the IPR is flexible.

**If a study re-releases its draft report for public comment, is a second CVM required?**

It depends on the reason. If an additional draft report is needed due to the decision at the CVM, another CVM is not needed. If the study team has had an actualized CVM meeting and then later re-released a draft feasibility report for public and agency comment due to later changes post-CVM decision, a second CVM meeting is at the discretion of the Chief of Engineers (the decision maker). The project delivery team should coordinate with their vertical team, who will elevate this to the HQ Chief, Planning and Policy. The intent of the milestone meeting – the corporate endorsement of the recommended plan, the engineering strategy, and the proposed way forward to complete feasibility level design, the final feasibility report, and the Chief’s Report – is as/more important when conditions have arisen to release a second draft report.

**Vertical Team Alignment Memorandum Content, Reviews, and Documentation Requirements**

**Should the review plan now include specific review requirements for the VTAM, and will RP templates be updated accordingly?**

Yes, the review template is being updated to include a section on VTAM review. The updated Review Plan template will be available on the [Planning Community Toolbox](#).

**Is it acceptable to complete the VTAM ahead of the Alternatives Milestone meeting once the review plan and project management plan are finalized?**

The MSC Commander could sign the VTAM before the Alternatives Milestone meeting if the study’s scope, schedule, and funding stream have been vertically aligned and the project management plan and review plan have been developed.

**Is it acceptable to deviate from paragraph 9 of the VTAM template and complete Review Plan approval after the VTAM has been signed to not delay VTAM signature?**

Yes, the MSC Commander may modify paragraph 9 from the exact language in the VTAM template to reflect the status of the Review Plan as under review, pending approval, etc. However, it must be noted that in order to receive second-year funding for a feasibility or watershed study, a completed Review Plan MUST be posted and documented in PROMIS.

**If the VTAM is an MSC memo, why is the District Planning Chief responsible for notifying OWPR of delays to meeting the timelines for VTAM submittal? Should the MSC be included in the communication chain when a VTAM delay is reported?**

District notification to the Office of Water Project Review of the anticipated delay to VTAM signature is for situational awareness. Both coordination with the MSC before notifying Headquarters of the anticipated delay and including the MSC in the communication chain would be expected.

**If the VTAM is included as part of a policy exception package, does it still bypass Headquarters review?**

Yes, even if a VTAM supports a study scope beyond 3 years and \$3M, the VTAM still bypasses Headquarters and any additional review. The signed VTAM will be reviewed by the appropriate RIT and then, once determined complete, goes directly to the Deputy Commanding General for Civil and Emergency Operations (DCG-CEO) as part of the exception package transmitted to the Assistant Secretary of the Army for Civil Works ASA(CW). A complete policy exception package will include the

information and attachments requested by the ASA(CW), including a transmittal memo to the Secretary, the VTAM, and other supporting materials that have been requested by the ASA(CW) to consider the 3 year / \$3M policy exception. (See EP 1105-2-61, paragraph 2-12.c.)

**Vertical Team Alignment Memorandum: Courses of Action**

**If the feasibility study's scope, schedule, and funding stream are vertically aligned, why is a scope that meets the 3-year / \$3M policy required to be included as an alternative "course of action" (COA)?**

As the current agency policy is for studies to be 3x3 compliant, when a VTAM is submitted for more, the teams consistently receive the question of what can be completed for 3 years / \$3M. If the vertically aligned study scope, schedule, and funding stream is beyond 3 years and/or \$3M, the inclusion of a 3x3 policy compliant COA and description of the risks of a reduced schedule and/or budget in the VTAM reflects the expectation of the follow-up question that consistently comes from the ASA(CW) when they receive a 3x3 policy exception package.

**If the feasibility study's scope, schedule, and funding stream are vertically aligned, and a 3-year / \$3M "course of action" (COA) has been developed, what other COAs could be included in the VTAM?**

Additional courses of action beyond the recommended vertically aligned scope, schedule, and funding stream can be developed that reflect different trade-offs, such as:

- 1) A COA that could be completed in three years and is within the DCG's approval level for funding (between \$1.5M and \$3M Federal study cost).
- 2) A more expansive COA that would result in a feasibility report that would address a larger area, or systems perspective to address the study authority.
- 3) A COA that would result in a feasibility report that only addresses a portion of the study authority, with a recommendation of follow-on feasibility studies.
- 4) A COA that is less than the vertically aligned scope, but greater than 3 years / \$3M that addresses some of the most significant shortcomings/challenges of a 3x3 scope.

**Why does the VTAM require a 3-year / \$3M course of action instead of a 4-year / \$5M federal course of action, given the change in WRDA 2024?**

Although the target completion for a feasibility study was updated in [33 USC 2282c](#) in WRDA 2024 to "not later than four years after the Secretary determines the Federal Interest" and a "maximum total cost of \$5M," the ASA(CW)'s policy of requiring their approval of studies beyond 3 years and greater than \$3M remains in place. See EP 1105-2-61, paragraph 2-5.

**Where in the VTAM should the discussion of alternate COAs be addressed?**

Discussion of additional courses of action should be included in the "Study Scope" paragraph (Paragraph 4 of the VTAM template). If the vertically aligned study scope, schedule, and funding stream is beyond 3 years and/or \$3M, this paragraph should include a 3x3 policy-compliant COA and describe the risks of a reduced schedule and/or budget. The tables for study schedule and funding stream (Paragraph 5) are for the vertically aligned schedule and funding stream (not alternative courses of action).

**Applicability to Other Study Types and Special Cases**

**If a study is completing a second or subsequent VTAM, is the requirement to develop a 3x3-compliant course of action still applicable?**

If a study already has an approved alternate schedule and funding stream (beyond 3 years and/or \$3M total study cost), the approved schedule and funding stream should be included as a Course of Action in the place of the 3x3-compliant COA. Instead of focusing on 3x3 compliance in subsequent VTAMs, the emphasis shifts to outlining clear courses of action based on updated project context and justification for why the original approved schedule and funding stream are now insufficient.

**Does this memo apply to the Continuing Authorities Program (CAP), Dredged Material Management Plans integrating beneficial use of dredged materials, or the Tribal Partnership Program (TPP)?**

The CVM replaces the Agency Decision Milestone as a feasibility study decision milestone (EP 1105-2-61), so it does not apply to CAP, dredged material management plans, or programmatic TPP studies, but will apply to non-programmatic TPP studies.

The VTAM requirements in the memo apply to all new and ongoing feasibility, post-authorization, and watershed studies. Dredged material management plans, CAP projects, and programmatic TPP studies are not required to prepare a VTAM.

**The VTAM template in the memo enclosure doesn't work as well for validation studies or watershed studies which don't have the same milestones as feasibility studies and are not subject to the same 3 year / \$3M policies. Can the VTAM deviate from the template provided for these other types of studies?**

Yes. The MSC Commander may modify the memo from the exact language in the VTAM template to reflect the parameters of the subject study, including the references, study schedule table (milestones), 3x3 rule compliance paragraph, and design maturity paragraph (for watershed plans). The Planning Community of Practice is developing a template that can be used for validation studies and watershed studies.

**For any study expected to be completed within 3 years and costing \$3M, can VTAM approval be delegated to the MSC Planning Chief?**

Yes. If the study is expected to be completed within 3 years and \$3 million total study cost, the MSC Commander may choose to delegate the VTAM signature to the MSC Chief of Planning. (Paragraph 6.a.)

**Is there any difference in how this memo applies to mega studies, and are there special considerations or requirements tied to that designation?**

There is no difference in how this guidance applies to mega studies, although the participation in decision milestone meetings and verification of vertical alignment may include the designated Senior Study Executive (CECW-P memorandum, C, 15 October 2021).