

# MAINTAINING OUR CREDIBILITY: AN OVERVIEW OF QC/QA AND POLICY & LEGAL COMPLIANCE REVIEW PROCEDURES

## PCoP WEBINAR SERIES

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# **BUILDING IN QUALITY FOR PLANNING PRODUCTS – QUALITY CONTROL/QUALITY ASSURANCE**



# SENIOR LEADERS COMMITMENT TO QUALITY



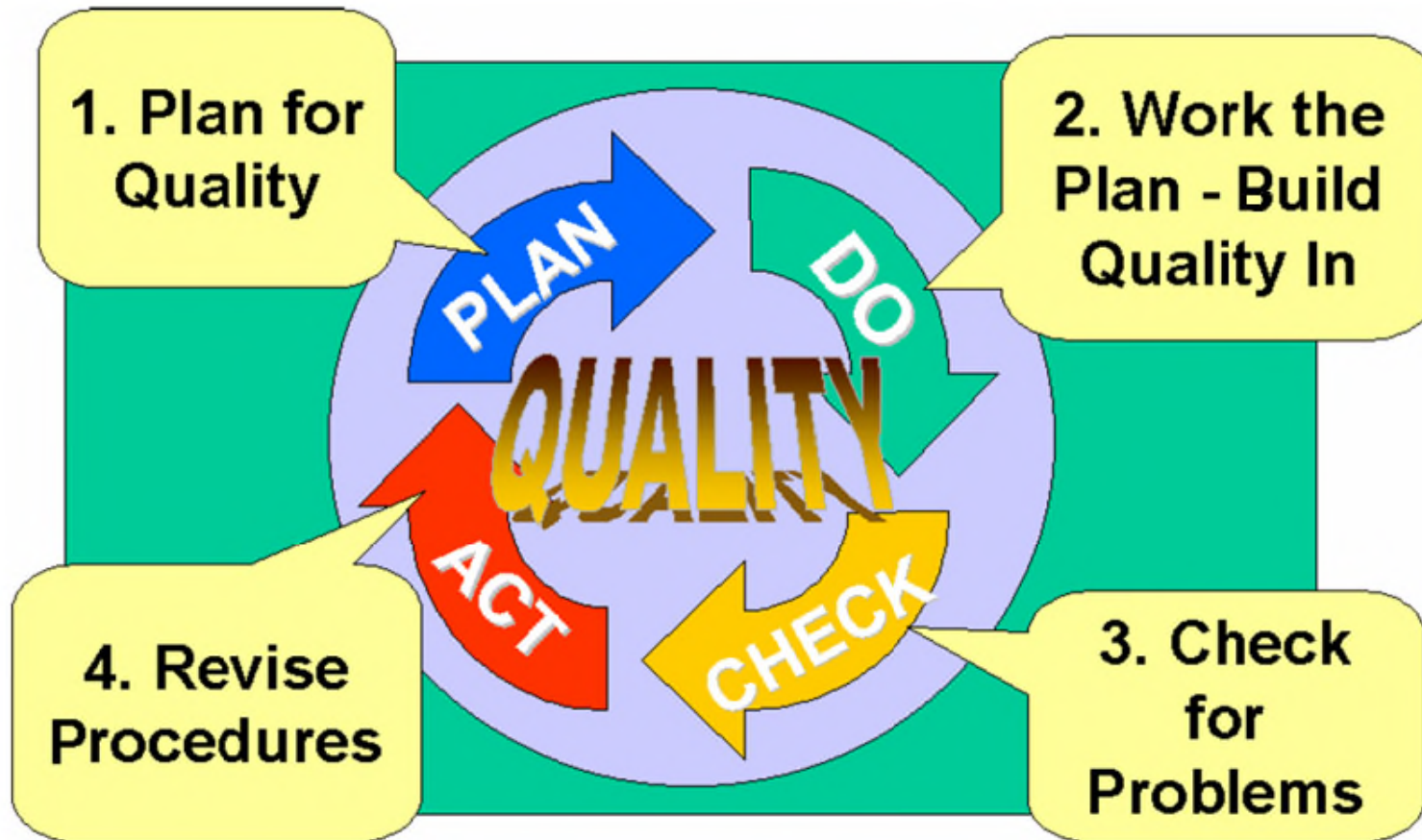
- Deliver quality solutions and services
- Deliver timely, effective, high quality products
- Take personal accountability for quality
- Risk-informed decision making – focus on the right things

*“It is a priority for USACE to maintain the highest level of quality and professionalism in our products and services.”*

*- James Dalton, Director of Civil Works*



# PLAN-DO-CHECK-ACT CYCLE (ER 5-1-12)





# EC 1165-2-217 REVIEW POLICY FOR CIVIL WORKS



- Establishes a review process from planning to O&M
- Provides Guidance to implement WRDA 2007, 2016, 2018 & WRRDA 2014 review requirements as well as the Office of Management and Budget (OMB) peer review requirements under the "Information Quality Act" (Public Law [P.L.] 106-554) and the Final Information Quality Bulletin for Peer Review by the Office of Management and Budget (referred to as the "OMB Peer Review Bulletin")
- Provides procedures to assure quality

***“This EC puts quality on equal footing with cost and schedule compliance.”***



# WHICH IS WHICH – QC OR QA?



That part of quality management focused on...

- confidence that quality requirements of a project, product, service, or process will be fulfilled
- ensuring quality activities are being accomplished in line with planned activities to produce a product that meets the desired end quality

- fulfilling quality requirements of a project, product, service, or process
- includes those processes used to ensure performance meets agreed upon customer requirements
- ensure consistency with law, regulations, policies, sound technical criteria, schedules, and budget

QC

QA

Draw a line to either DQC or QA for the correct definition.



## EC 1165-2-217 DEFINITIONS OF DQC AND QA



**District Quality Control (DQC)** is an integrated review approach that includes a Quality Management Plan providing for seamless review, Quality Checks (supervisory reviews, PDT reviews), a detailed peer review/checking of the documents, computations, and graphics, etc. DQC is the trigger to identify both the key risk-informed decisions and timing of reviews for high risk items/features that warrant additional evaluation by the ATR Team. DQC is verified through a certification process at the completion of the product.

**Quality Assurance (QA)** are those procedures to verify that effective QC was performed. QA includes those processes employed to verify that QC activities are being accomplished consistent with planned activities and that those QC activities are effective in producing a product that meets the desired end quality to assure that the districts are able to plan, design, and deliver quality projects on schedule, within budget, and acceptable to the customer and the Federal government.



## BUT WHAT IS DQC REALLY ABOUT?



- Integrated review approach (seamless)

It is both,

- a detailed peer review/checking of the documents, computations, and graphics to properly develop the solution and
  - an overall higher level review of assuring the proper solution is pursued.
- DQC is NOT only milestone reviews!!!!





# DQC – OUR MOST IMPORTANT REVIEW!



District Quality Control is the **backbone** of the Corps of Engineers' quality process. All work products and reports, evaluations, and assessments will undergo necessary, robust, and appropriate DQC.



- OWNED BY...THE DISTRICT!
- PERFORMED BY...QUALIFIED REVIEWERS NOT DIRECTLY INVOLVED WITH PERFORMING THE WORK TO BE REVIEWED
- CAN BE PERFORMED BY SOMEONE IN ANOTHER DISTRICT

## Some Best Practices – See Chapter 8 of EC 1165-2-217 for DQC Minimum Requirements!

- Schedule seamless reviews to occur after products are complete but BEFORE they are used in decision making for the study!
- Schedule time for the overall DQC review prior to sending to ATR.
- Entire document needs to be read for grammar and editorial issues before concurrent review!
- Assign and use your DQC Lead



NOT an afterthought...just sign this certification for me...I know it is good work!



# WHAT BEST PRACTICES – ARE YOU FOLLOWING?



Type here or in the chat box...



## EC 1165-2-217 MSC QA ROLE

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- For QA, the responsible MSC has the primary role to verify that quality control was performed. MSCs are responsible for evaluating and recommending changes to subordinate districts' QC processes.
- MSC and district quality manuals will prescribe specific procedures for the selection of DQC team members and the conduct of DQC including documentation requirements that require inclusion of comments and responses, and maintenance of associated records for internal audits to check for proper DQC implementation. (NOTE: The MSC QMPs are being updated this FY for each MSC.)
- The MSC has the responsibility to ensure vertical and lateral integration of organizational capabilities, to include resource sharing, technical expertise, project management, and project delivery to broaden and enhance the range of services and quality within its region.



# POLICY AND LEGAL COMPLIANCE REVIEW



# PURPOSE OF POLICY AND LEGAL COMPLIANCE (P&LC) REVIEW



- Planning Bulletin 2018-01 - The objective of policy compliance review is to:
  - confirm that the appropriate water resource problems and opportunities have been addressed;
  - confirm that the recommended solution warrants Corps participation, is in accord with current policies, can be implemented in accordance with applicable law and regulation, including but not limited to environmental requirements, and has a sponsor willing and able to fulfill the non-Federal responsibilities; and
  - appropriately represent the views of the Corps of Engineers, the Army, and the President.
- DPM 2019-01: P&LC Review will be conducted by a single team of policy and legal experts drawn from HQ, MSC, PCX, and other review sources as needed.
- MSCs are developing Standard Operating Procedures to implement the delegated authority documented in DPM 2018-05.



# POLICY AND LEGAL COMPLIANCE REVIEW OVERVIEW



- Regardless of approval level, there will be only **One** Policy & Legal review team
- In Progress Reviews (IPR), Issue Resolution Conferences (IRC), milestone meetings should include members of the review team regardless of where they are located
- Approximately 30 days between log-in of complete report package and completion of the Project Guidance Memorandum
- MSCs are still responsible for Quality Assurance, regardless of approval authority
- Reminder of other Delegations:
  - PCX for Planning Model approval/certification
  - MSC for Type I IEPR exclusion (unless controversial)



# POLICY AND LEGAL COMPLIANCE REVIEW TEAM



- The Policy & Legal Review team:
  - provides support and advice to the PDT;
  - works the project through the Chief's Report;
  - may be called upon to provide support post-Chief's Report;
  - will be a mix of qualified PCX, MSC and HQ personnel;
  - will be GE Funded (No direct charge);
  - works with the Review Manager to implement an efficient and effective review;
  - is a vital component of vertical teaming;
  - will advise the decision maker and respond to the MSC Planning Chief or Chief, OWPR;
  - briefs senior level decision makers.



## REVIEW MANAGER (RM)

- Review Managers
  - can be at HQ, the MSC or a PCX;
  - respond to the Chief of Planning at the MSC or the Chief of OWPR;
  - are the POC for the review team;
  - ensure timely completion of the reviews;
  - are responsible for the review team products and finalizing the Director's/Chief's Report;
  - lead State and Agency review;
  - support the Regional Integration Teams during Director's/Chief's Report briefings.





# REVIEW MANAGER (RM) ROLES AND RESPONSIBILITIES



## *Tasks For Both Draft and Final Report Reviews*

- Ensure that reviews are completed on schedule
- Collect comments from all reviewers and develop the Project Guidance Memorandum (PGM)
  - a) read all comments to see if there are any duplications or conflicts, and proofread as needed
  - b) in the case of duplications or conflicts, work with the reviewers who made the comments to resolve
  - c) ensure consistent format in comments
  - d) organize comments by topic area
  - e) write PGM transmittal memo (to RIT/MSC POC) that summarizes key issues from the review



# REVIEW MANAGER (RM) ROLES AND RESPONSIBILITIES



## *Additional Tasks for Final Report Reviews*

- Ensure that reviewers have back checked comments from the Draft
- Develop the Documentation of Review Findings (DORF) and transmittal memo and provide to OWPR Chief for signature and transmittal to RIT
- Finalize Chief's Report/Director's Report\*
- Oversee preparation of State & Agency (S&A) Review Letters\*\* (Chief's Report)
- Assess comments received during S&A review to determine if an agency response is required
- If district support is needed to respond to comment letters, review and finalize responses provided by District\*
- Review and Finalize Draft Agency IEPR responses\*

\*With assistance of RIT and Review Team

\*\*Signed by HQ Chief of Planning and Policy



# PROJECT GUIDANCE MEMORANDUM (PGM)



- Official compilation of comments received during the policy review
- Developed for Draft and Final Report Reviews
- Comments should be provided using the 4 part comment structure
- Use of the four part comment structure provides the format to facilitate communication and aid in resolution of issues
- PDT is responsible for filling out discussion and response sections of the PGM
- The response should include the action taken and where in the report it is documented
- Review team fills out assessments
- Concurrence on the path forward for resolution of draft report comments prior to the Agency Decision Milestone



# OUTLINE OF PGM



- Concern
  - Issue should be clearly stated
- Basis of Concern
  - Specific guidance and reason for the concern
  - Why is this a problem?
- Significance of Concern
  - High, Medium, or Low
  - The reason why the reviewer gave that rating
- Action needed to resolve the concern
  - Clear statement of what needs to be done to resolve the comment
- Discussion (if needed)
- District Response
  - Includes action taken and where in the report the action is documented
- Assessment



# THE DOCUMENTATION OF REVIEW FINDINGS

- Purpose of DORF is to “demonstrate that the decision document has received policy and legal review and that the document complies with all legal and policy requirements”. (ER 1105-2-100)
- Intended audiences are the Director of Civil Works, Chief of Engineers, OASA(CW), and OMB.
- PGM is backbone of the DORF. DORF should include all policy review comments and resolutions from Draft and Final policy reviews.
- Also include high level summary of other reviews such as DQC, ATR, State and Agency, NEPA, and IEPR reviews.
- Include any project specific policy guidance (e.g., memos from ASA(CW), DCG-CEO).
- Does not include MFRs from IPRs and milestone meeting. However, the summary of reviews may include a discussion of a significant issue that was discussed or resolved at an IPR or milestone meeting.



## BEST PRACTICES



- Coordinate with your review team often, particularly when the PDT is considering high risk or controversial decisions
- Resolve issues early in the process
- Be prepared to discuss risk, consequences, ways to manage the risk, and alternative courses of action
- Seek clarification on any review comment as needed
- Document discussions and decisions in the decision log, MFRs, and PGM
- Include the action taken in the comment response and where the information is located in the report



# STATE AND AGENCY REVIEW



## S&A REVIEW HIGHLIGHTS



- HQUSACE led process
- Separate from the NEPA review of the Final EIS
- Required by the Flood Control Act of 1944 as amended
- Takes place after review of the final report
- Permission to release the draft Chief's Report to start S&A review is received at the Sr. Leaders' Panel briefing
- Review Manager is responsible for conduct of the review
- Letters prepared by OWPR for signature by Chief of Planning and Policy
- Once signed, letters are sent to the districts
  - Districts date the letters and mail to pertinent agencies
- 30-day review period
- District may be asked to develop responses to the S&A response letters
- S&A review is not required for Director's Reports





## IMPORTANT TAKE-AWAYS



- There is one P&LC review team made up of subject matter experts from multiple offices
- P&LC review teams provide support and advice to PDTs and decision makers
- The PGM documents study issues and the path to issue resolution
- The PGM is a major component of the Documentation of Review Findings which is provided to the Director of Civil Works, the Chief of Engineers, OASA(CW), and OMB
- State and Agency review, while concurrent with final NEPA review, is not the same and governed by different laws

# Questions?

Type questions in the chat box.  
We will answer as many  
as time allows.

This webinar will be posted to the  
Planning Community Toolbox:  
<http://www.corpsplanning.us>



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