

**Forest Service Handbook
National Headquarters (WO)
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Forest Service Handbook 1909.15 – National Environmental Policy Act Handbook

Chapter 70 - Oversight and Quality Assurance

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Superseded Directive:

Approved by: Leslie A.C. Weldon, Deputy Chief, NFS

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Responsible Staff:

Explanation of changes: Following is an explanation of the changes throughout the directive by section.

Posting Instructions: Amendments are numbered consecutively by handbook number and calendar year. Post by document; remove the entire document and replace it with this amendment. Retain this transmittal as the first page(s) of this document. The last amendment to this handbook was 1909.15-2011-5 to FSH 1909.15_20.

70: Establishes chapter code and caption and set forth direction for “Oversight and Quality Assurance.”

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This chapter provides guidance for establishing, maintaining, and using the oversight and quality assurance framework to facilitate meeting agency NEPA analysis objectives, policies, and procedures (see FSM 1950). Performance indicators and measures have been developed as a separate tool, (http://fsweb.wo.fs.fed.us/em/nepa/nepa_oqaf.htm) to assist units and programs at all levels and branches of the Agency in assessing their NEPA program capacity, project management and efficiencies, document quality, legal compliance, and oversight responsibilities.

NEPA oversight and quality assurance framework elements include:

1. Oversight Assessment:

- a. Assesses current NEPA capacity and evaluates program strengths and weaknesses.
- b. Identifies management concerns.

2. Quality Assurance Plan;

- a. Provides compliance oversight.
- b. Corrects problems identified in the oversight assessment.
- c. Continually helps to improve the NEPA processes over time.

NEPA objectives FSM 1950.2

1. Fully integrate NEPA requirements into agency planning and decisionmaking (36 CFR 220.4(c)(2))
2. Use a systematic, interdisciplinary approach to fully consider the impacts of Forest Service proposed actions on the physical, biological, social, and economic aspects of the human environment (40 CFR 1507.2(a), 40 CFR 1508.14)
3. Involve interested and affected agencies, state and local governments, tribes, Alaska Native corporations, organizations, and individuals in planning and decisionmaking (40 CFR 1500.1(b), 40 CFR 1500.2(b) and (d), 40 CFR 1501.7, 40 CFR 1503.1, 40 CFR 1506.6)
4. Conduct and document environmental analyses and subsequent decisions appropriately, efficiently, and cost effectively

71 - Oversight Assessment

Oversight assessments are conducted at a scale appropriate to the unit or program area's workload and level of complexity. Assessments should be conducted in an integrated manner, including representatives of all resource areas responsible for compliance with NEPA and/or associated policies, regulations, and laws. One or more units or program areas may be included in a single assessment. Assessments provide information necessary for developing a quality assurance plan. Assessments identify strengths to be maintained as well as systemic problems and concerns that affect the NEPA process and quality of documentation.

Assessments are approved by the unit's line officer or program director to ensure accuracy and accountability. It is at the discretion of the line officer or program director at the next higher reporting level to determine the degree of reporting or oversight requirements necessary for the region or station, national forest or grassland, Job Corps Center, or Area.

Research and Development, Job Corps Centers, and state and private forestry programs and projects located on National Forest System lands, including those within an experimental area,

should be included in the assessment. A representative from the station and/or center should assist with developing assessments and subsequent quality assurance plans.

To meet the objectives of FSM 1950.2, three quality assurance areas of NEPA should be considered: program management, project management, and process and documentation management.

Oversight assessments can be done in a variety of ways; however, they should evaluate the unit's ability to perform in each of the three quality assurance areas described in FSH 1909.15, sec. 73. Each region and all levels of the Agency have the flexibility to design their own assessment, but when a higher reporting level determines a need for a consistent approach within their jurisdiction, subordinate units will follow their direction. Examples of different approaches to conducting an assessment can be found at (http://fsweb.wo.fs.fed.us/em/nepa/nepa_oqaf.htm).

There also is a list of existing methods available at the same Web site to help produce ideas for approaching the assessment.

Once the initial assessment has been completed, assessments should be updated as needed at the discretion of the line officer or program director. This is important due to employee turnover, organizational changes, and the emergence of new issues and management concerns.

71.1 - Assessment Components

When designing an assessment, consider the following:

Ability to fulfill regulatory and policy requirements by:

1. Ensuring compliance with environmental laws and regulations.
2. Achieving agency actions required by 40 CFR 1500 and 36 CFR 220.
3. Meeting FSM 1950.2 NEPA objectives.
4. Ensuring forest plan consistency and compliance.
5. Having adequate access to analytical skills for select resource areas within a unit to meet NEPA analysis and documentation requirements in a timely and efficient manner.
6. Ensuring best practices for project management are employed.
7. Examining the degree of clear direction or changing direction and ability to adapt.
8. Ensuring consistency of NEPA direction in different resource program directives.
9. Ensuring an adequate level of line officer involvement and communication with the interdisciplinary team.

10. Reviewing the use of and monitoring the effectiveness of public involvement tools, such as ongoing collaboration efforts.
11. Having the ability to track NEPA efficiencies, such as the number of projects meeting original deadlines, and measuring the time spent on each NEPA project.
12. Tracking lessons learned from loss of efficiency due to delays in decisions and implementation.
13. Ensuring a system is in place to monitor the quality of NEPA document preparation.
14. Monitoring re-occurring appeal instructions or remands or litigation, settlements, withdrawals or losses.
15. Ensuring a system is in place to monitor implementation of decisions.

71.2 - Management Concerns

Management concerns should be identified, prioritized, and documented as an outcome of the oversight assessment. Subsequent assessments should revisit previously identified management concerns to ensure that corrective actions have been implemented and to determine whether these actions have been effective in helping resolve the management concern.

72 - Quality Assurance Plan

A quality assurance plan will be prepared using the assessment results. The plan should take into account information collected during the initial oversight assessment and subsequent reviews while strategically seeking better ways to meet unit and/or program NEPA objectives, to address management concerns, and to improve effectiveness and efficiency. Plans are approved by the unit's line officer or program manager to ensure accuracy and accountability.

Regions should consider posting each field unit's plan and results to the intranet, thereby, sharing information, lessons learned, and best practices with all units. The Washington Office shall conduct reviews to identify best practices that will benefit all units and programs in the Agency, and to identify potential concerns affecting the Agency as a whole. A list of existing tools available at (http://fsweb.wo.fs.fed.us/em/nepa/nepa_oqaf.htm) provides different ideas for resolving management concerns.

73 - Performance Indicators and Measures

Performance indicators are critical to assessing the effectiveness and efficiency of NEPA programs, project management, NEPA analysis, and associated legal and policy requirements. Measures are a subset of the indicators that are used to focus the assessment on specific areas of concern.

Based upon oversight assessments, unit and program managers can select the indicators and the appropriate associated measures for areas they want to improve. Unit and program managers may also develop their own indicators and measures to evaluate progress. The Agency may elect to require each unit or program to measure certain indicators to respond to a specific agency goal at a higher level.

1. NEPA Program Management Goals:

- a. Ensure that a unit or program responsible for implementing the NEPA process employs, or has access to, a sufficient number of specialists to provide an efficient and effective program of work.
- b. Clarify the roles and responsibilities of employees involved with NEPA analysis.
- c. Ensure that project selection, budgeting, quality control, and employee development lead to successful project implementation.
- d. Ensure that the Agency is complying with NEPA and associated laws, regulations, and policies and are consistently applied across the agency.
- e. Facilitate resolution of both regional and national corporate weaknesses or gaps in NEPA policy and procedures.

For example, measures for the NEPA Coordination indicator can include identifying who within the unit is responsible for communicating agency policy and direction and ensuring it is followed.

The Workforce Strategy for the NEPA Activities indicator may include a measure designed to determine the level of access to employees who have the skills needed to accomplish NEPA related work.

2. NEPA Project Management Goals:

- a. Ensure that the NEPA analysis document is appropriate to the scope of the project and decision to be made.
- b. Ensure that projects are managed efficiently and effectively.
- c. Ensure that each ID team has the technical and leadership support necessary to effectively perform for the duration of the effort.
- d. Ensure that key roles and responsibilities are identified and met.

For example, the team leader indicator includes various measures focused on an interdisciplinary team leader's experience level, recent training, and whether or not it is commensurate with the complexity of the project.

Another important measure related to team dynamics examines the relationship between the team leader and team members, to determine if everyone reports to a different supervisor, and how that affects team efficiency and accountability.

3. NEPA Process and Document Management Goals:

- a. Ensure NEPA analysis is documented efficiently and effectively.
- b. Ensure that existing NEPA procedural requirements are met and comply with applicable laws, regulations, policies, and case law.
- c. Ensure public involvement is sufficient and coordination with other agencies is effective.
- d. Ensure that NEPA documents are formatted clearly, well written, use plain language, and are easily understood by the intended audience.
- e. Ensure that the analysis is easy to follow and leads to logical conclusions.

For example, the NEPA Compliance indicator includes measures not only for tracking regulatory requirements for each document, but also to determine if units are preparing concise proposals with a clear purpose and need.

The Compliance with other Associated Laws, Executive Orders, and Treaty and Trusts Obligations indicator objective is to ensure that consultations and coordination occur in conformance to law and regulation, required permits are obtained in a timely fashion, and outcomes reflect collaboration rather than perfunctory observance of law or regulation.

Summary: A complete set of performance indicators and measures are available on the national NEPA intranet at http://fsweb.wo.fs.fed.us/em/nepa/nepa_oqaf.htm. These indicators and measures should be used for assessing a unit or program area's NEPA and/or oversight performance. Indicators and measures should also be incorporated into a quality assurance plan as benchmarks for selected oversight, quality control, and monitoring methods, such as document and project management reviews and site visits geared towards overall program management.

The performance indicators and measures displayed at the national NEPA intranet site are flexible and easily customized. There are no requirements to use all of the indicators and measures. They are designed to accommodate a broad array of situations and organizational levels. Different indicators and measures may be used over time, depending on management concerns identified through the program or unit's assessment and quality assurance plan.