

CECW-CP
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SUPPLEMENTAL INFORMATION FOR THE “PEER REVIEW PROCESS”
MEMO, DATED MARCH 2007

APPLICABILITY

- Review Plans are required for all authorized studies that have a signed FCSA, regardless of date
- Review must be coordinated by the appropriate PCX for all applicable studies
- For multi-purpose studies, Districts should contact all appropriate PCXs and develop a recommendation for which PCX should lead the Peer Review process
 - In general, a PCX different than the originating MSC is preferable from the standpoint of independence
 - If there is disagreement among the district and the PCXs over a district’s recommendation about which Center should lead a given Review, the issue should be brought to the attention the district’s MSC for resolution
- The HQ point of contact for Peer Review oversight is CECW-CP

REVIEW PLAN POSTING

- Peer Review plans will be posted on the originating District’s public website
 - Most Districts have a separate website for each study/project – this seems ideal, but is not required at this time. Each plan must be posted on a District’s public site, and easy to find
- PCX and HQ postings will link to the District’s site
- **CHANGE:** Based on current interpretations of DOD security considerations, names of PDT and review team members may be included within the posted document. Past documents where names have been removed do not need to be retrofitted, unless desired by the originating District. Lists of names of Corps employees should still be excluded from web “front” pages.
- The names of External Reviewers must be reported, per OMB guidance, to support credibility and transparency in the external peer review process.
 - The names of external reviewers will likely not be established when the Review Plan is developed, but can be added to the Review Plan as they are known; they must also be reported in the EPR documentation
- Review Plans must be posted for public comment, but public comment does not need to be actively solicited. Per OMB guidance, there are no fixed requirements for acknowledging and responding to the public comment (in contrast to NEPA, for example). Nonetheless, active participation by stakeholders at all stages of the study is beneficial and approaches should be considered by the PDTs.

REVIEW PLAN CONTENT

- To meet the requirements of both the OMB Final Bulletin on Peer Review and the Corps' QA/QC and PMPs processes it is recommended that each Review Plan be prepared as a separate appendix (QC and Peer Review) to the PMP
- The basic format for a Review Plan is specified in EC 1105-2-408; it must address the full scope of the review, including specification of the ITR and EPR if applicable
- Review Plans must be tailored to meet the specific circumstances of each study – this is not a boilerplate exercise.
 - The scope must be sufficient and appropriate to the level of study.
 - Review Plans should be detailed enough to assess the necessary level and focus of peer review – which parts of the study will likely be challenging, which models and data are proposed, etc.
 - Review Plans should address model certification needs per EC 1105-2-407

REVIEW PLAN APPROVAL

- Review Plans are developed and jointly agreed upon by the originating District and the appropriate PCX
- Approval of the Review Plan is the responsibility of the MSC that oversees the originating District
 - If there is disagreement over the scope, content or other aspects of the Review Plan, the MSC should coordinate resolution between the District and the PCX
- HQ will sample Review Plans for QA/QC on content and approval, and use of EPR

REVIEW PLAN UPDATES

- Like any aspect of a PMP, the Review Plan is a living document and may change as the study progresses. Changes to a Review Plan should be approved by following the process used for initially approving a Review Plan.
- In all cases the MSCs will review the decision on the level of peer review, and any changes made in updates

EXTERNAL PEER REVIEW CONSIDERATIONS

- External Peer Review refers to review conducted outside of the Corps of Engineers
- External Peer Review will cover the entire decision document, addressing the underlying engineering, economics and environmental work, not just one aspect of the study. Certain aspects of the review may warrant special emphasis, for example a novel economics technique or a complex hydraulic routing.
- The decision to conduct an EPR is made by the vertical team including the PCX.

- Given the current climate, expensive studies are going to warrant EPR even if they don't trigger the other criteria. There is no fixed trigger amount at this time, but big studies will have EPR.
- The National Academies of Science is frequently cited for the type of EPR process the Corps should follow, however NAS reviews are expected to be rare
 - Decisions to approach NAS must be made by HQ
- Procedures for securing EPR services from Battelle are currently being developed by IWR

A number of existing contracting vehicles have been utilized by PCXs to date (existing IDIQ contracts, etc). Additional EPR contracting vehicles are being developed by IWR.

TRACKING AND REPORTING REQUIREMENTS

- Peer Review metrics will be monitored along with the broader array of PCX metrics to be reported at DMR/CMR, etc., to include the total number of studies that should have Review Plans; the number of Review Plans posted; and the number of EPRs underway and the number of EPRs completed.
- P2 applications in support of Peer Review management and reporting need to be explored and developed – several offices have taken initiatives in this area
- CECI-A is required to report on Information Quality Act compliance for USACE, which includes some aspects of peer review. CECW-P will assist in fulfilling these requirements.
<http://www.hq.usace.army.mil/CECI/InformationQualityAct/index.htm>

FREQUENTLY ASKED QUESTIONS / TALKING POINTS

Q) Why is the Corps doing this?

A) The U. S. Army Corps of Engineers independent technical review (ITR) and peer review processes are essential to improving project safety and quality of the products we provide to the American people. The 2002 report on “Review Procedures for Water Resources Project Planning” from the National Research Council and the recent Interagency Performance Evaluation Taskforce (IPET) report clearly show the importance of external peer review in improving our plans, projects and programs. The Corps will adopt and continue to strengthen a more open and vigorous peer review process.

Q) My study has been underway for some time, and we don't have the time or funds left to meet these new requirements. How do we get an exemption from the requirement for external peer review?

A) There are several parts to this question. First, this guidance does not require external peer review, but it does require that a Review Plan be developed as part of the study's QA/QC plan in the PMP to scope out the appropriate peer review approach. Scoping a

Review Plan involves a dialogue between the District, its MSC, the appropriate Planning Center of Expertise, and stakeholders who can make public comment on the proposed Review Plan. There is no process for exemption from the requirement. The Director of Civil Works is committed to a high level and quality of review on all of our products. Time and funding constraints are not an excuse for seeking to avoid this responsibility.

Q) Our PMP already has a QA/QC plan. What is the point of having a separately described Review Plan?

A) The Review Plans have been established to meet the needs of Corps regulations for PMPs as well as OMB requirements for Peer Review. EC 1105-2-408 lists the topics that must be addressed in a Review Plan. The Review Plan serves as the basis for a scope of work between the District and the Planning Center of Expertise that will be conducting the review. The Review Plan is customized to fit the needs of each study, and must be detailed enough to identify the aspects of the study that may or may not trigger an external peer review. The Review Plans must engage the many stakeholders interested in the study (local sponsor, vertical chain, PCX, general public) to ensure that the peer review approach is responsive to our wide array of stakeholders and customers, both within and outside the Federal Government.

Q) Who decides the appropriate scope and approach to Peer Review?

A) The approach to Peer Review, documented in the Review Plan, is a negotiated approach involving the many stakeholders of the study (see answer above). It is possible that there will be differing opinions or disputes over the appropriate approach to peer review, including whether or not to conduct an external peer review. The MSC that oversees the District leading the study is responsible for the final decision on the scope of the Peer Review. MSCs are mindful of the importance that the Director of Civil Works places on the value of external reviews.

Q) What does a good Review Plan look like? Where can I find examples?

A) A good review plan will meet all of the requirements of PMP regulations and EC 1105-2-408, whereby it will specify the scope and important details to be covered in the review. Ideally, a Review Plan will be a separate appendix to the PMP, supplementing the QA/QC section of the PMP. As a self-standing appendix, it is more accessible for public comment required under OMB guidance, and possibly easier to update as the study progresses.

There is no template for Review Plans, but existing Review Plans are posted on the Planning CoP website. As we gain more experience with developing Review Plans it is expected that more good examples will emerge, and made available through the PCXs or the Planning CoP:

http://www.usace.army.mil/cw/cecw-cp/peer/rev_plans.html

What are the requirements for responding to public comments on a Peer Review plan?

Q) What if we disagree with comments from an external review panel?

A) The Corps is not required to agree with all items from a peer review panel, but must consider and address the response and action for each comment. The OMB Final Bulletin on Peer Review addresses this issue. “Accordingly, agencies should consider preparing a written response to the peer review report explaining: The agency’s agreement or disagreement, the actions the agency has undertaken or will undertake in response to the report, and (if applicable) the reasons the agency believes those actions satisfy any key concerns or recommendations in the report.”

Q) The Engineering Chief in my district is uncomfortable with the idea that the quality of his staff’s work will be left up to Planners outside our district. How can the assurance of quality be left up to a Planning Center of Expertise?

A) First, the quality of engineering components in a planning study is still the responsibility of the Engineering Chief in the home district. Peer Review does not eliminate the need for quality control within the PDT. Second, the technical reviews led by the Planning Centers of Expertise are conducted by senior specialists in all of the disciplines appropriate to the review. So, engineering work in an ITR would be reviewed by senior engineers from a different part of the country, not by “planners” per se. The important part of ITR and EPR is getting fresh and qualified perspectives from senior professionals who were not involved in doing the original work.

Q) The National Academy of Science is frequently cited as the “gold standard” for doing independent reviews. How can I get them to do peer review for my study quickly and on my limited budget?

A) The National Academies of Science is frequently cited for the type of EPR process the Corps should follow, however NAS reviews are expected to be rare. The NAS has conducted external reviews and assessments for the Corps on the Upper Mississippi River System, the Everglades, and the Louisiana Coastal studies; these reviews typically take place over several years and cost hundreds of thousands of dollars each. Decisions to approach NAS must be made by HQ and will be coordinated on a case by case basis.