

## **Document Reviews: the Key to Quality**

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Early and ongoing reviews are essential for document quality. I state this in all Shipley Group writing workshops, including the one I recently taught for the Corps of Engineers in Alaska. The participants agreed with my statement but did comment that recent U.S. Army Corps of Engineers (USACE) guidance already required extensive and multiple reviews. These reviews include non-Corps review panels for projects with potential risks to human safety and health.

The newly issued USACE guidance on project reviews is EC 1165-2-209 (issued 31 Jan 2010). This guidance expands on earlier engineering circulars. The expansion is important because it addresses questions about the adequacy of Corps decisions relating to water resource planning in New Orleans prior to Hurricane Katrina. See pp. 1-3 of EC 1165-2-209 for a survey of recent studies and reports dealing with Corps actions preparing for major hurricanes affecting New Orleans.

The following newsletter does not summarize all major points from the EC 1165-2-209. Instead, my purpose is to highlight several of the USACE review recommendations that would be helpful for writers of any important document. Here are the recommendations I found most relevant:

- 1. Prepare a written peer review plan for all important documents.**
- 2. Make sure reviews are “scalable, deliberate, life cycle and concurrent with normal business processes” (p. 3 of the EC 1165-2-209).**
- 3. Ensure that the originating office or unit has completed thorough reviews before going outside for an external review (as suggested in recommendation 4).**
- 4. Use an unbiased external review for projects that would merit such scrutiny.**

These four recommendations paraphrase four of the USACE “fundamental principles” dealing with review processes (p. 3 of EC1165-2-209). I discuss these four recommendations below. For additional information, see Shipley Group Newsletter 49 (February 2006), which recommended a clear and written review policy for all organizations. Newsletter 49 and other recent newsletters are available on the Shipley Group website:

<http://www.shipleygroup.com/environmental/index.html?pg=news>

- 1. Prepare a written peer review plan for all important documents.**

A written review plan signals that an organization is responsible for ongoing peer reviews. Unfortunately, many organizations consider reviews as an unplanned, late-stage phase in a project. Reviewers, when assigned, are too few and too late to be helpful. Such reviews become unfortunate delays when an organization wants to push a project to completion.

A useful written review plan has these features:

- **Identified peer reviewers with expertise in either technical content or sound writing and editing skills.** Reviewers should include senior managers, legal counsels, and well-trained staff support. When appropriate, reviewers include outside or external contributors. (Outside reviewers may trigger legal questions for a Federal agency under the Federal Advisory Committee Advisory Act. Agencies should check with their legal counsel if questions exist.)
- **Allocated money and time to support all necessary reviews,** from conceptual reviews of the early planning steps to late-stage editing and proofreading of the final documents. Reviews should be well integrated into every project schedule.
- **Clear priorities for each review step.** Early reviews, for example, should focus on key content questions. Mid-point reviews should evaluate the organization and clarity of key information. Late-stage reviews should shift over into content consistency and final proofreading for spelling and punctuation problems.
- **Stated content and writing standards.** Standards are the key to useful and efficient priorities (the preceding suggestion). Reviewers who don't have checklists of quality standards often begin reading until something catches their eye. Often the most obvious problem is a misspelling. Even in NEPA content terms, standards should be clearly stated. One such might be the legal requirement for a "range of reasonable alternatives." A checklist of legal minimums should give reviewers several content suggestions as to whether a list of alternatives does represent a "range of reasonable alternatives."
- **An organizational tracking process for ensuring that all review questions and suggestions have been addressed.**
- **Meaningful rewards and recognition for reviewers** who make important contributions to the quality of the final documents for a project.
- **Steps for an organization to use in improving its documentation process, especially by using early and ongoing peer reviews.**

Without a written peer review plan, management of key projects becomes chaotic and uncontrolled. Managers often wind setting up ad hoc process steps. No wonder project documents are sometimes published with obvious gaps and embarrassing inconsistencies. Remember as American writer Ambrose Bierce said over a century ago:

**"If you write and edit alone, you are in bad company."**

## **2. Make sure reviews are "scalable, deliberate, life cycle and concurrent with normal business processes" (p. 3 of the EC1165-2-209).**

This recommendation explains what and when to conduct peer reviews. Note that here and elsewhere in the USACE guidance, process/project information and the parallel documents merge and are equally important. So the following comments apply to both project process information and parallel documents.

Here are brief explanations of the four review criteria listed above in this recommendation.

**Scalable reviews.** I interpret this criterion to mean that reviews match process points in regard to their extent and intensity. That is, review decisions are scaled to match project specifics. For instance, if a Corps survey of soils finds conditions to be unstable and likely to cause construction difficulties, a more extensive and intensive project review would be necessary. In other words, scalable reviews mean that a Corps District makes careful priority decisions in preparing its Review Plan, as described in recommendation 1 above. The same priority decisions are appropriate in, for example, documents for the National Environmental Policy Act (NEPA). In NEPA terms, a Federal agency is supposed to conduct early scoping in order to identify project features, interested parties, and incomplete and unavailable resource information.

**Deliberate reviews**—Identifying reviews as “deliberate” signals that reviews are expected and planned, not added in a last-minute flurry of ad hoc confusion. Again, as with scalable reviews, deliberate reviews are a clear part of any adequate review plan, as discussed above in recommendation 1.

**Life cycle reviews.** Reviews are appropriate from day 1 of the project analysis to the final maintenance activities years or decades later. During project planning and its documents, reviews are clearly appropriate, beginning early and continuing up until the final organizational decision on project details. But reviews don’t end then. Useful reviews occur as on-the-ground actions begin during project implementation and even during later maintenance actions. Note that such late-stage operational or maintenance reviews are usually called project monitoring (to use NEPA terminology). A NEPA monitoring report is actually a project/document review. Such a monitoring report necessarily starts with the signed NEPA disclosure document and its accompanying decision document.

**Concurrent reviews with business processes.** This point reminds organizations that review strategies are even appropriate for business decisions, as distinct from technical or scientific decisions. After all, for the Corps as for most other organizations, business decisions about budgets, schedules, and staffing clearly affect and are affected by technical and scientific decisions.

### **3. Ensure that the originating office or unit has completed thorough reviews before going outside for an external review (as suggested in recommendation 4).**

Each office-- governmental or private—must be responsible for the quality of its own decisions, including both scientific and technical information and the documents recording such information.

A written organizational review/quality assurance plan is the best way for an office to achieve the preceding goal. See recommendation 1 above for details about what should go in such a written plan.

A written plan should, at a minimum, establish a procedure for an organization to review each major document its employees create. Given today's email/text-messaging culture, an employee's response to an external request or clarification is often sent without any organizational review. Such haste in responding is a possible problem. Benjamin Franklin in the eighteenth century realized that a document written rapidly and sent in haste was a problem even then. He recommended that writers keep hastily written letters in their desk overnight before sending them.

#### **4. Use an unbiased external review for projects that would merit such scrutiny.**

USACE EC 1165-2-209 also covers instances when the Corps must go outside for an independent review of project details and associated documents. Two levels of such reviews are possible, according to Corps requirements.

**The first level of external review** (called the "Agency Technical Review") occurs when the originating Corps office sends documents to USACE personnel outside the originating office. Such reviews are conducted to "ensure the quality and credibility of the government's scientific information." These reviews also cover reviews of any necessary NEPA documents. From my experience all federal agencies review major NEPA documents at regional or the Washington level. These internal senior management reviews function as external reviews when a NEPA document originates at a field office or local district level.

**The second level of external review** is a fully independent external peer review. In such cases, a review is conducted by independent review panels, made up of independent experts (not government employees). These fully independent external reviews are conducted when "there are public safety concerns, significant controversy, a high level of complexity, or significant economic, environmental and social effects to the nation" (p. 9 of EC1165-2-209).

An external review is important when an organization judges that the risks of going forward with a project are substantial. But as USACE EC 1165-2-209 explains on pp. 14-15, a Federal agency must comply with the Federal Advisory Committee Act, even the Corps when it is directed to use panels of expert external reviewers.

In a parallel situation, NEPA practitioners recognize that routine NEPA procedures, beginning with early scoping and continuing when disclosure documents are issued, are a form of external review. Such reviews potentially include any and all interested and affected parties. If they have any questions or objections to the proposed agency action, the agency is responsible for tracking and addressing all such comments.

Review comments under NEPA processes are not as formal or well-managed as the proposed Corps method of using identified panels of external experts. But the NEPA process does have the virtue of being well established. Remember, also, that in cases where an agency issues an Environmental Impact Statement, the Draft EIS goes out to all interested and affected parties. These parties include all federal agencies and other affected governmental units, who are

then invited to comment on the agency's technical approach and any other details related to its proposed project actions. The Final EIS also goes out to the same mailing list.

So both the public circulation of the Draft EIS and then the publication of the Final EIS are a form of external peer review, although not as formal as the USACE review process.

### **A Final Lesson about Reviews**

Some years ago, a NEPA team leader asked a Shipley consultant to help with managerial review comments on her internal DEIS. About a dozen regional specialists had been assigned to provide comments on the DEIS, using spread sheets.

Their efforts produced 12 separate spread sheet files, with comments organized by section and page, as keyed to the DEIS. Total comments numbered nearly 2500 and covered everything from minor comments about word choice to questions about NEPA compliance. No one at the regional office attempted to review the 2500 comments for critical points (often called NEPA fatal flaws). The only guidance to the DEIS team leader was to fix the unacceptable DEIS.

At least the regional folks had attempted a review! But in their effort to provide a useful review of the internal DEIS, they stumbled on a number of problems:

- No clear priorities for their review. Major NEPA compliance questions should have been the topic in early conceptual reviews. Later reviewers should focus on writing problems that remain and any minor editing and proofreading suggestions.
- No one responsible for separating mandated changes from stylistic suggestions (often not real errors, but personal writing preferences of a single reviewer). Duplicate comments from different reviewers not eliminated.
- Comments were rarely explained, and remedies were often missing or unclear to the DEIS team.

Lessons such as these are why a written review plan needs to be done before a complex planning project and its documentation begin. *And this review plan needs its own review!*