CENTRAL FEDERAL LANDS HIGHWAY DIVISION

A/E OVERSIGHT GUIDELINES

FINAL DOCUMENT
AUGUST 2019

LAKEWOOD, COLORADO

A/E OVERSIGHT GUIDELINES

TABLE OF CONTENTS

ABBREVIATIONS

A/E – Architect/Engineer
BC – Branch Chief
BLM – Bureau of Land Management
CFLHD – Central Federal Lands Highway Division
CFT – Cross Functional Team
CM – Construction Modification
CO – Contracting Officer
COR – Contracting Officer's Representative
CPARS – Contractor Performance Assessment Reporting System
FLAP – Federal Lands Access Program
FLH – Federal Lands Highway
FLTP – Federal Lands Transportation Program
FM – Functional Manager
IDIQ – Indefinite Delivery, Indefinite Quantity Contract
IGE – Independent Government Estimate
LOE – Level of Effort
LT – Leadership Team
MB – Management Board
NEPA – National Environmental Policy Act
NPS – National Parks System
PDP – Project Delivery Plan
PM – Project Manager
PNM – Price Negotiation Memo
POP – Period of Performance
PR – Purchase Request
PreNM – Pre Negotiation Memo
PQP – Project Quality Plan
PS&E – Plans, Specifications, and Estimate
PSR – Pre Scoping Report
PST – Project Support Team
QA – Quality Assurance
QC – Quality Control
RA – Reimbursable Agreement
RFP – Request for Proposal
SOW – Statement of Work
TO – Task Order
USACE – US Army Corps of Engineers

REFERENCES

- CFLHD Sharepoint site

SECTION 1 - INTRODUCTION

DOCUMENT PURPOSE

These guidelines provide guidance to Project Teams (Project Manager (PM), Project Support Team (PST), and the Architect/Engineering Firms (A/E's)) on how to effectively and efficiently utilize A/E's under full service contracts to help deliver our program of projects. Understanding the organizational goals and the expectations of the roles and responsibilities will help the entire Project Team optimize the delivery of each project. The key issues that will be addressed are shown below.

Key Issues

- How to provide an appropriate level of oversight of the A/E's based on project complexity and risk while limiting the impact to the overall budget
- How to engage internal staff at strategic points to convey project expectations, institutional experience, and to verify compliance with the task order
- How to define expectations for project deliverables from A/E's

SUMMARY OF CHANGES TO GUIDELINES

To address the research, feedback received, and management expectations, the team proposed the following changes to the 2004 Guidelines as well as other changes to processes and procedures that will occur in parallel to these updates.

Changes to 2004 Guidelines

- Consolidate the guidelines and remove duplicate information and update to use current terms, processes and procedures;
- Clarify management expectations in regards to technical involvement and provide training to staff to clarify and reinforce these expectations;
- Train staff in providing A/E feedback; and
- Identify structured involvement of the PST.

ORGANIZATION OF DOCUMENT

This is a guidance document; many projects are unique and the use of judgment in conjunction with these guidelines will be necessary. These guidelines describe the organizational approach to effectively using A/E's and are not intended to be a step-by-step procedure manual.

The sections of these guidelines are summarized below:

Section Summary

- **Section 1 - Introduction**: Provides the document purpose, background of the 2004 guidelines, the need for these updates, the expectations from management, team objectives, a summary of the research and feedback received, and a summary of the changes from the 2004 guidleines.
- **Section 2 - Project Team Roles and Responsibilities**: Summarizes the framework of the Project Team and the roles and responsibilites of each of the members, process for requesting a PST, and the link between a project's risk assessment and the scaleable involvement and oversight of the PST.
- **Section 3 - Task Order Development and Administration**: Summarizes the overall steps as well as the roles and responsibilites of the Project Team associated with the development of a task order and its administration.
- **Section 4 - Scoping**: Provides an overview of the process for and roles and responsibilites associated with the Scoping process.
- **Section 5 - Preliminary and Final Design**: Provides an overview of the process for and roles and responsibilites associated with Preliminary and Final design.
- **Section 6 - Post Design Services**: Provides an overview of the expectations and roles and responsibilities during the construction phase of a project.
- **Section 7 - Task Order Closeout**: Summarizes the steps necessary as well as roles and responsibilites necessary to close out a task order.

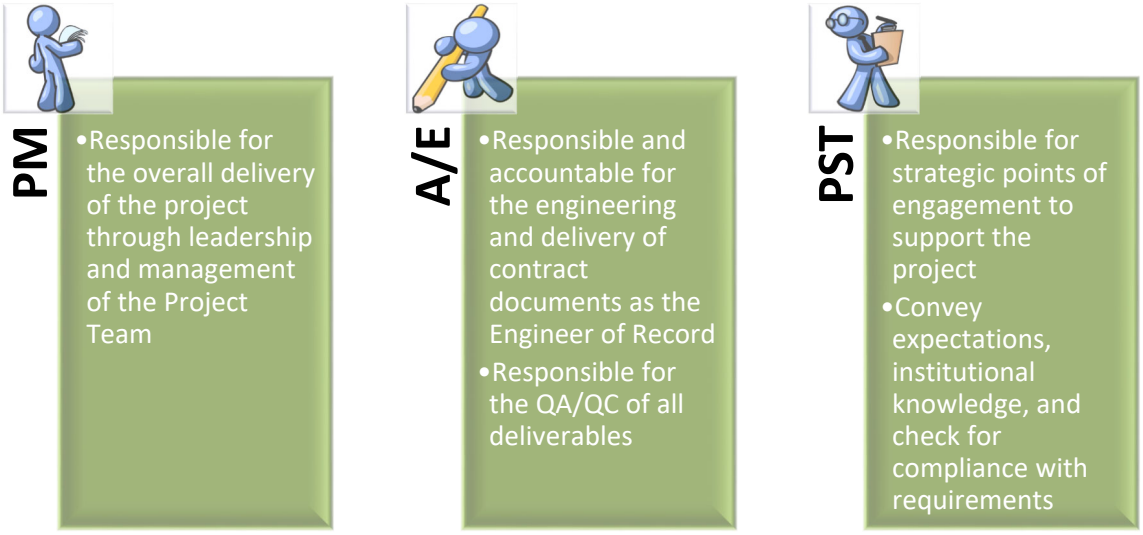
SECTION 2 - PROJECT TEAM ROLES AND RESPONSIBILITIES

OVERVIEW

This section defines the framework and roles and responsibilities of the Project Team.

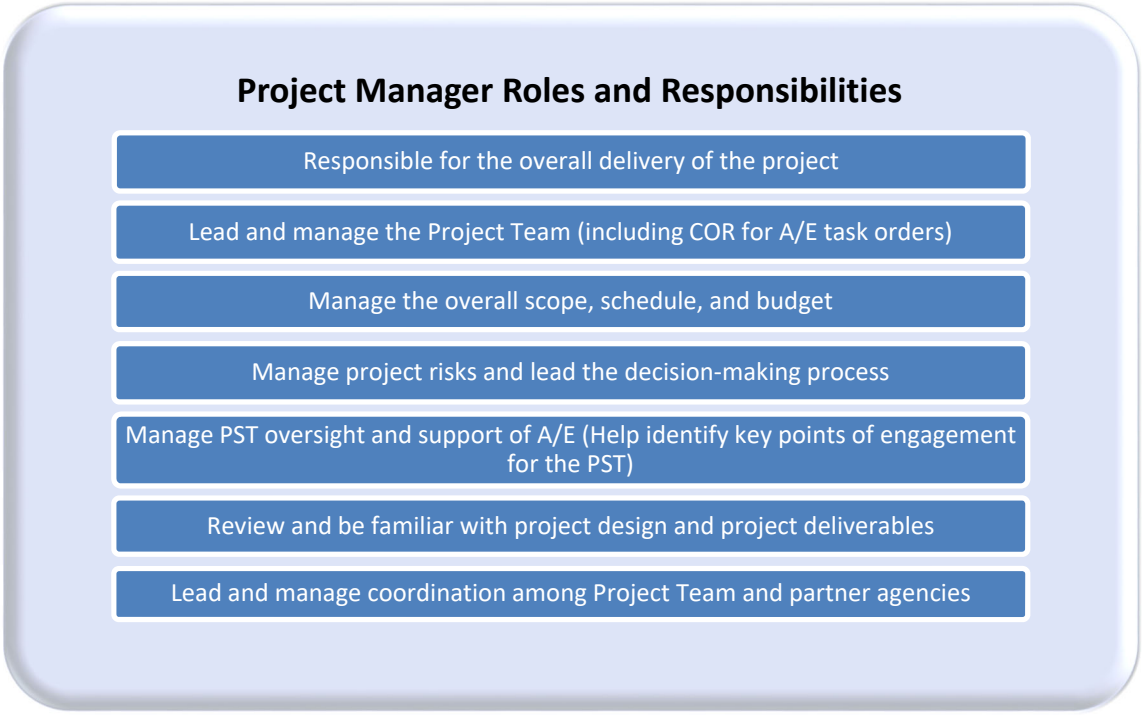
PROJECT TEAM

A Project Team consists of the Project Manager (PM), the A/E Team (A/E), and the Project Support Team (PST).



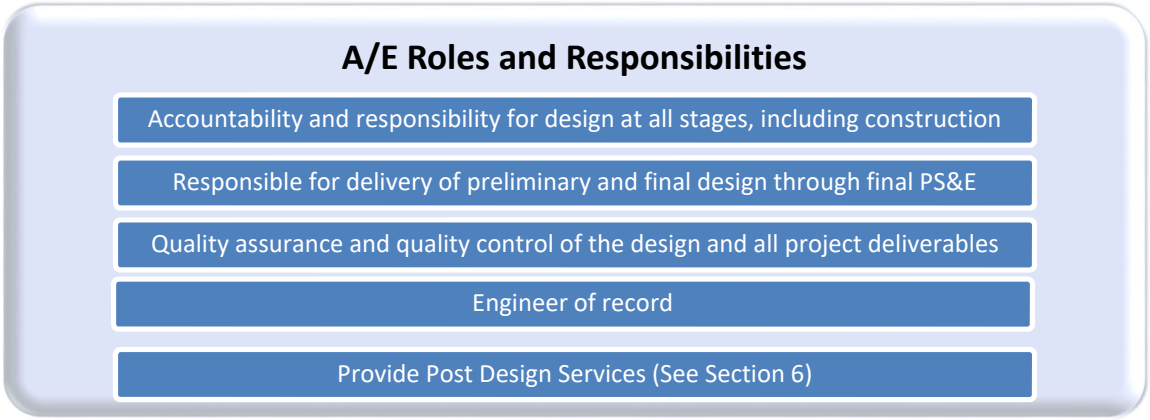
PROJECT MANAGER (PM) ROLES AND RESPONSIBILITIES

The CFLHD PM is the team leader and is ultimately responsible for the delivery of the project. This applies to all projects, regardless of whether the project is delivered by internal or A/E staff. This point is important as the project delivery process should be seamless to our partners and customers. A/E staff should be utilized as a supplement to internal CFLHD staff. The PM should have, at a minimum, a familiarity and understanding of all major issues and risks of the project and lead the decision making process to ensure that all aspects of the project are considered. This includes managing the level of involvement and oversight of the PST to align with the overall project risks. The PM will be the main point of contact for our partner agencies and will lead and manage the coordination and communication between the PST and the A/E.



ARCHITECT/ENGINEERING FIRM (A/E) ROLES AND RESPONSIBILITIES

The A/E performs the engineering and develops the scoping, preliminary and final design deliverables for the project. As the Engineer of Record, the A/E is accountable and has responsibility for the design package. Therefore, the A/E initiates the resolution of issues and is actively engaged in all project decisions affecting the overall design of the project. The A/E performs all quality control and quality assurance on the design and all deliverables. As the Engineer of Record, the A/E should be consulted on all project decisions affecting the A/E design and engineering during construction. The A/E is also responsible for post design services throughout construction of the project (as discussed in Section 6).

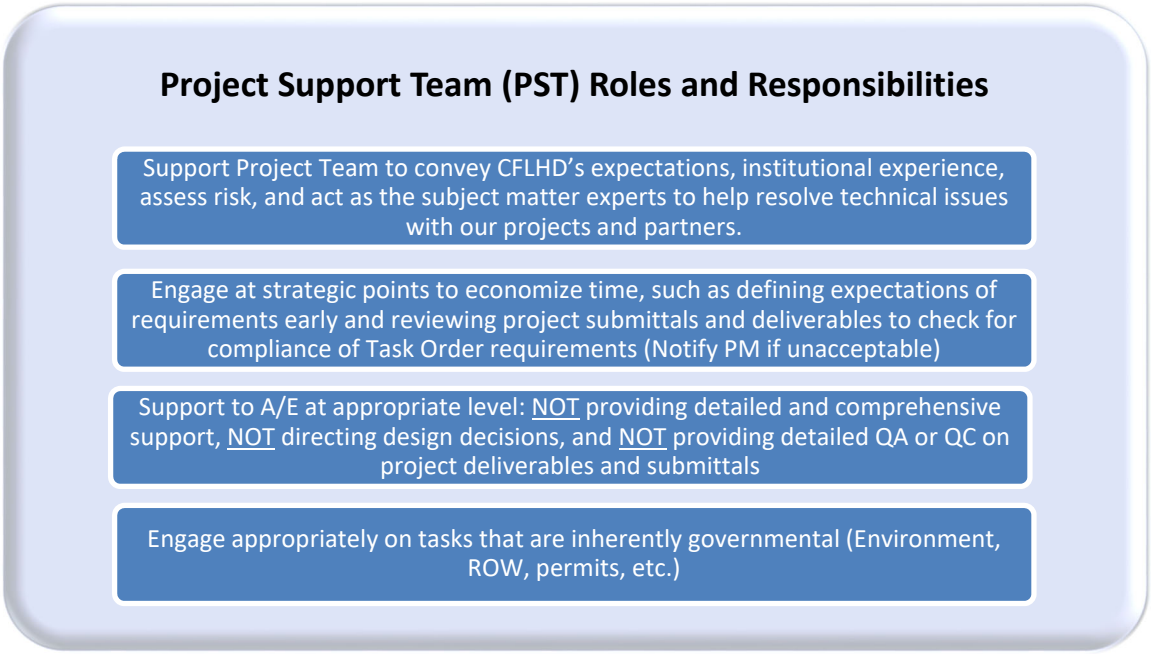


PROJECT SUPPORT TEAM (PST) ROLES AND RESPONSIBILITIES

The PST consists of CFLHD functional staff that provides support to the PM and the A/E during the development of the project. The PST utilizes institutional experience to provide guidance on A/E designs, clarify expectations, assess risk, and provide input to help resolve technical issues. The PM is responsible to manage and communicate the anticipated level of involvement and oversight provided by the PST. This will vary from project to project based on level of complexity, functional risk, and overall project risk. The PST works with the PM to identify key points of engagement during project development and construction to ensure their involvement is optimized and the appropriate level of support and oversight is provided to align with project complexities and risk. The PST does not provide detailed and comprehensive support or Quality Assurance/Quality Control of deliverables, nor direct the design decisions of the A/E. The PST is not responsible for or accountable to the design except when inherently governmental as shown in the text box to the right. The PST performs Independent Assurance of the deliverables to ensure that the A/E has performed QA/QC.

! Things to Watch For !

- The PST role is different for inherently governmental functions, including *NEPA Compliance, Permitting where FHWA will be the applicant, Federal (Letter of Consent) and Non-Federal Right of Way Acquisition, and DOT Highway Easement Deeds.*
- For these activities, CFLHD (FHWA) will have signatory responsibility. See Section 5 for more specific roles and responsibilities relating to these activities.



ESTABLISHMENT AND INVOLVEMENT OF PROJECT SUPPORT TEAM (PST)

CFLHD delivers projects of varying size and complexity with our A/E consultants. Each of these projects has a varying level of risk that is acceptable to the Project Team and partners. The PM should assess the risk on each project to help shape the appropriate PST members and amount of A/E oversight needed, while balancing cost and risk. Many factors could influence the amount of risk that is acceptable and tolerated on a project. In addition to the level of effort (LOE) by the A/E in developing the PS&E, the amount of oversight should be consistent with the acceptable risk. This may mean limited or no involvement of low risk disciplines or heavy involvement of high risk disciplines.

Factors that Could Affect Risk

- Budget constraints
- Schedule constraints
- Project controversy
- Project complexity
- Environmental sensitivities
- Partner expectations

Through the PST Request Form, the PM formally requests participation on the PST of specific Functional Managers (FM's). FM's then assign PST members from their staff based on availability, understanding of the scope of the project, as well as the anticipated functional risk level. The PM will develop the PST Request Form including:

- *Project Name*
- *PS&E Delivery Year*
- *Delivery Method*
- *Program Year*
- *Type of project*
- *Preliminary Engineer's Estimate*
- *Disciplines they are requesting PST members for*
- *Brief scope description*

With the PST Request, the PM also provides the Pre-Scoping Report (PSR) and any other project information that will help the FM's assign team members. It may be useful for the PM to develop a draft Risk Assessment Form (see Section 4) based on information known at the time to assist in preparing the PST Request Form and developing anticipated involvement by staff. The PM distributes the PST request form to the FM's indicating which staff is needed. The Branch Chiefs (BC's) and all other FM's are included on the request to maintain open communication on all new projects.

Tips and Tricks

- The PM should document in the Pre-Scoping Report and the PST Request Form any special skills required or budget restrictions that could impact team assignments.

Once a PST is established, only those disciplines requested should expect, and plan for, involvement in the project. The PM communicates the anticipated LOE by the PST based on the risk assessment of the project. No single template will effectively characterize the expected LOE of a specific project. The PM is responsible for making an initial determination of the expected LOE with input from the Project Team. Functional representatives should proactively identify strategic engagement points that will effectively utilize their time. During

! Things to Watch For !

- Adding PST members in the middle of a project is generally more difficult, less effective, and less efficient than if they are included early in the process. PMs are highly encouraged to discuss potential involvement with FMs for disciplines in question. It may be best to include those disciplines during the initial scoping phase to clarify if participation will be needed.

the development of the Project Delivery Plan, the anticipated responsibilities and LOE will be discussed with the Project Team and finalized by the PM. The final LOE will be reflected in the PST SOW, resources, hours and budgets provided with the PDP.

For some projects, ad-hoc support that is not anticipated may be necessary and all disciplines should be receptive to these requests when made. When a PM requests ad-hoc support from a discipline not included in the PST, the PM and Project Team will need to brief the new PST member on the project status and to allow for appropriate time to complete the request.

QUALITY OF A/E DELIVERABLES

The A/E is responsible to provide QA/QC for their design and deliverables. Each A/E generally has an overarching Quality Plan that they follow on each project as well as a project specific Project Quality Plan (PQP) that references the overall general plan. In the case that any member of the PST feels it is evident that QA/QC was not performed in alignment with their PQP and/or project risk assessment and a submittal (a technical report, the PS&E, an environmental document, etc.) is not complete enough to provide an adequate review, the PST member should notify the PM immediately. The PM should return the deliverable with feedback for the A/E to correct and resubmit prior to any further review by the PM and PST. The PM should determine if the entire submittal should be resubmitted or only the deliverable in question. The Contracting Officer (CO) for the IDIQ should be notified of all unacceptable deliverables, in particular if it is reoccurring.

SECTION 3 – TASK ORDER DEVELOPMENT AND ADMINISTRATION

OVERVIEW

This section describes the roles and responsibilities of the Project Team in the process of executing an A/E task order (TO) and administering the contract. This section is NOT the step-by-step process necessary to execute a task order.

TASK ORDER PHASING

TO's are developed for each phase of a project. The number of phases is typically determined by the PM, in consultation with the A/E, during scoping based on the number of milestones required, project assumptions, unknowns, and the acceptable level of project risk. A separate task order is prepared for Post Design Services.

PE Task Order Phasing Examples

- For smaller, lower risk projects (such as resurfacing, overlay, culvert replacements, etc), there are often only two phases; Scoping and Prelim/Final Design. In these cases with low risk, all of Preliminary and Final Design could be tasked in a single TO.
- A large 4R project that requires a high level of environmental field work and compliance that may have impacts on the design would typically be split into three phases; Scoping, Preliminary Design/NEPA Compliance, and Final Design. This allows the team to shape the SOW at each phase based on current information.

TASK ORDER ROLES AND RESPONSIBILITIES

The PM is typically the Contracting Officer's Representatives (COR) for all TO's and therefore leads the TO development and administration. The level to which the A/E and PST will be involved in the development of the TO depends on the project phase, complexities, and risk. Scoping SOWs and IGEs are generally developed by the PM as the scope and the task order period of performance are more concise. These SOWs and IGEs are usually generic in scope (meetings, site visit, project delivery plan) and therefore, input from the A/E or the PST is not always necessary. Preliminary and Final Design SOWs and IGEs are more complex and need to be customized so the PM will typically obtain input from the A/E and PST. This will allow the A/E (who is performing the work) to help shape the SOW and the PST to be more engaged in the project through identification of appropriate scope, elimination of unnecessary scope, and assistance in preparation of the IGE.

STATEMENT OF WORK

The COR, generally the PM, leads the development of the SOW with appropriate input from the A/E and PST. The PM will typically obtain input from the A/E and PST on preliminary and final design TO's to allow the PST to be engaged in the project and help to ensure that all members of the Project Team are in alignment with the proposed SOW. Alternatively, the A/E consultant can also develop the draft SOW that is then edited by the PM and PST. The PST should provide input during the development of the Project Delivery Plan (PDP) regarding any opportunities to reduce cost during design as well as any recommendations for items that should be included in the SOW (field investigations, design requirements, special permit requirements/timelines, environmental study timeframes, etc.). The SOW template lists typical activities that are needed for projects. It is important to document assumptions in the SOW and to hold discussions to ensure a common understanding of the SOW and LOE. The goal is to reduce ambiguities in the contract and to clarify the expectations

Tips and Tricks

- Assumptions should be detailed in each SOW to provide consistency while developing the IGE and negotiating the A/E Fee Proposal, as well as to document the basis for each TO to help determine if modifications are required at a later stage.

! Things to Watch For !

- Always start with the current SOW Template. The template is constantly being updated and improved, copying old SOWs may be excluding new edits
- Every functional section of the SOW should be customized to individual projects and phases
- Customization includes adding, deleting, and/or modifying activities and steps within the TO to clearly document the work to be completed, as well as stating assumptions

INDEPENDENT GOVERNMENT ESTIMATE (IGE)

Similar to SOWs, the PM typically develops the IGE for the scoping TO, but should typically obtain input from the PST for preliminary and final design TO's. Allowing the PST to review each IGE will promote consistency across projects and consultants, as well as resulting in realistic IGE's.

Once the IGE is developed, the PM needs to verify that there are enough funds approved for the TO. If not, an additional budget request for funds should be submitted through FundsMap.

Utilize the COR Notebooks (located on the CFLHD SharePoint site) for the A/E delivering the project to ensure appropriate direct charges, subconsultant mark-ups, and staff classifications are used.

Tips and Tricks

- To obtain more information and improve accuracy , the PM should discuss with the A/E the possible staff and staff classifications anticipated to work on the proj ect prior to developing the IGE.

! Things to Watch For !

- The PM and/or PST should not accept fee proposals from A/E's until an IGE has been developed and a formal RFP has been sent to the A/E by Acquisitions.

TASK ORDER PACKAGE AND RFP

The PM/COR enters all necessary data for the development of the Purchase Request (PR) and for the obligation document Form PR-1240 into FundsMap and follow the process for the preparation of PR's in PRISM and obtaining signatures for Form PR-1240 (process may differ slightly by branch).

The PM/COR then submits the Task Order package to the Acquisitions Team including the following:

- PR (through PRISM) and Form PR-1240
- COR Nomination
- SOW
- IGE

Once the Acquisitions team has the Task Order package they will prepare and send the Request for Proposal (RFP) to the A/E.

NEGOTIATIONS

Negotiations are led by the PM who is typically the COR. The PM will determine if it would be helpful to include any PST members in the negotiations. Once a fee proposal has been received from the A/E, the PM should review it and identify any significant differences that need to be negotiated. The PM will develop pre-negotiation objectives in a Pre Negotiation Memorandum (PreNM). The PreNM needs to be routed to Acquisitions for CO approval prior to holding negotiations. The Acquisitions CO does not need to be in the room during negotiations, except for actions over $300,000. The Acquisitions CO can attend if the CO feels necessary or at the request of the COR.

Tips and Tricks

- The type and formality of the negotiation process is dependent on the amount and risk of the task order, as well as the differences between the IGE and the fee proposal.
- Negotiations could range from a simple phone conversation with the COR and A/E to a face-to-face meeting with the COR and members of the PST, A/E, and subconsultants.

Negotiations should first focus on a common understanding of the SOW. Detailed discussions concerning individual functional efforts, plan contents, and risk areas after scoping and prior to SOW development can improve common understanding. Once both the A/E and government have a common understanding of SOW, the LOE for each task (Project Management, Design, Hydraulics, etc.) should be discussed with the A/E. This could lead to further clarifications/revisions of the SOW as well as additional documentation of assumptions within the SOW.

The goal of all negotiations is to have a clear and common understanding of the SOW and to come to agreement on level of effort/fair and reasonable price. Disagreements on level of effort for individual cost elements many times indicate different interpretations of the deliverables or level of work anticipated in the

! Things to Watch For !

- Negotiations should be held for all proposals, even if the proposed price is similar to or lower than the IGE.
- These negotiations should focus on common understanding of individual activities.

SOW between the government and the A/E. In these situations, the level of effort can be documented through revisions to the SOW. Listing assumptions in the SOW will minimize misinterpretations.

Once a fair and reasonable price has been agreed to, the PM will document the negotiation summary in the Price Negotiation Memorandum (PNM). The negotiation summary PNM should contain all specifics of the negotiations including, but not limited to, participants, date, location, summarization of IGE and fee proposal, changes to the SOW, and detailed discussion of each item (or group of items) and the final agreed to cost. The PNM should describe the basis for determining the final price is fair and reasonable.

Once the PNM is approved by the CO and the PR is revised to reflect the fixed price, the Acquisitions Team will award the task order and provide a Notice to Proceed to the A/E. Once the Notice to Proceed is provided, work may begin.

Definition

- Firm-fixed price contract provides for a price that is not subject to any adjustment on the basis of the contractor's cost experience in performing the contract.

TASK ORDER MODIFICATIONS

The PM, in cooperation with the A/E, is responsible for monitoring the need for scope modifications to the task order. Task orders are modified for a number of reasons including SOW changes, administrative changes (e.g. appointing a new COR) and Period of Performance (POP) extensions. POP extensions and administrative changes require minimal coordination with Acquisitions staff and usually no involvement from the PST.

It is important to document assumptions in the original SOW and all subsequent modifications and to hold discussions to ensure a common understanding of the SOW and LOE. The goal is to reduce ambiguities in the contract and to clarify the expectations.

Once the need for a modification is identified, prepare an IGE, then enter a Planned PR into FundsMap and submit budget requests as soon as modifications are anticipated. Once a budget has been requested and approved, follow the steps above for a new task order (SOW, IGE, and PR) to modify the task order.

PST involvement will vary based on the involvement of each function in the change. The PM will request involvement on an as-needed basis. The final TO Modification (SOW and negotiated fee) should be routed to the entire PST for informational purposes to keep the team engaged in the project.

Tips and Tricks

- The original Task Order SOW (or most recent if previous modifications have already been processed) should be used to develop the SOW for the current modification
- Modified sections should be indicated with red text or red strikethrough for deletions.
- Form PR-1240 is **NOT** required for modifications

ADMINISTRATION, INVOICING, AND PROGRESS REPORTS

Acquisitions will forward the monthly invoice and progress report through Delphi Markview to the COR. The COR is responsible to review all items of the progress report as well as to

! Things to Watch For !

- For all task orders with multiple accounts (especially match accounts), the COR should verify the invoice amounts are being charged to the appropriate accounts in Delphi Markview.

ensure the appropriate account codes are used. Typical items included in each Progress Report include:

- Work Accomplished
- Anticipated Progress Next Period
- Budget Status
- Issues of Concern/Problems Encountered

SECTION 4 – SCOPING

OVERVIEW

This section will describe the scoping process as well as the Project Team's roles and responsibilities as it relates to scoping and the development of a Project Delivery Plan.

SCOPING ROLES AND RESPONSIBILITIES OVERVIEW

During Scoping the Project Team defines and describes the project elements that need to be completed to deliver a quality project that is in alignment with the partner and organizational goals. The project elements include the scope, cost, schedule, and risks (see Project Risk Assessment section below). The project elements are documented through the completion of a Project Delivery Plan (PDP). It is important that adequate effort is spent during scoping to define the project. Without proper scoping it is difficult to execute the delivery of the project.

SCOPING TASK ORDER

The scoping task order typically includes tasks for a kick-off meeting, scoping site visit, and the development of a Project Delivery Plan.

! Things to Watch For !

- For most projects delivered in the Access Program, you must have a scoping Reimbursable Agreement (RA) for matching funds in place, with the funds in hand or reimbursable authority before issuing a PR for the TO.

KICK-OFF MEETING

The PM coordinates a kick-off meeting with the A/E and PST members. It is best at this stage to invite all PST members so that everyone has the same understanding and information on the project.

Tips and Tricks

- PM's should structure the meeting to discuss disciplines with minor roles in the project first (typically after introduction) so that those PST members can be excused from the majority of the meeting. This is an efficient use of their time and reduces A/E oversight time and costs.

Main agenda items should include:

- Scope (Summarize project goals and discuss scope of each discipline)
- Schedule and budget
- Scoping trip goals and logistics (critical information to gather and who will attend)

Typically, PST members will not need to attend the Scoping Site Visit but may be necessary in certain situations where it is critical to meet with partners/stakeholders for environmental concerns, ROW, etc. and/or where there is an inherently governmental function or high risk areas.

SCOPING SITE VISIT

The site visit is the major information gathering activity for this task order. Information gathered and discussions with project partners and stakeholders will shape the project and scope for all future task orders.

The A/E is responsible to document all meetings and discussions, field work, and other pertinent information that will be helpful in finalizing the scope and the development of future task orders. The PM will use the Scoping Checklist for the procedure to follow when scoping a project. The Scoping Report will be used to document decisions, project scope and design criteria as well as key issues and risks identified during the initial research and information collecting and the scoping trip. The scoping report will be developed using the Scoping Report Template on SharePoint and the CFL Website. The purpose of the initial research and the scoping site visit is to identify the scope of the project, as well as all of the anticipated key issues.

POST-SCOPING SITE VISIT MEETING

The PM holds a post site visit meeting to summarize the information gathered at the scoping site visit and to verify scope with the entire Project Team. A draft scoping report should be completed by the A/E prior to and reviewed during this meeting. The scoping report can be in the form of a trip report on simple projects, but is typically documented using the standard scoping report template.

Tips and Tricks

- It is important to ensure that the PM, A/E and PST are on the same page for the SOW. Specific details on tasks in the SOW should be discussed if there is any question as to the overall intent.

The A/E documents the Post-scoping meeting in meeting notes to provide to the project team and to PST members not in attendance. The meeting minutes should be a supplement to other project documents and summarize items discussed and decisions made at the meeting.

PROJECT RISK ASSESSMENT

Once the project scope has been finalized after the scoping site visit and post-scoping visit meeting, the A/E develops the Risk Assessment Form for the project with input from the PM and PST. As described in Section 2, assessing the project risk tolerance will help shape the PST involvement and oversight (establishment and Involvement of the PST).

Example

- High risk projects may require certain disciplines of the PST to be heavily involved with decision making and attending field reivews
- Low risk projects may not require any involvement from disciplines of the PST even if there are elements in the design related to that discipline

Risk levels may vary between functions based on the likelihood and impact that risk associated with each function could have on the project. The Risk Assessment Form provides the Project Team with a way to document what risks are acceptable and what risks the PST can help mitigate with oversight on the project. Items that the team must assign risk level to include construction costs, schedule and budget limitations, scope complexities, and risks associated with the partner agencies. Combining these into an

overall project risk level will document and provide the Project Team with some guidance on how to best utilize PST oversight on the project.

DRAFT PROJECT DELIVERY PLAN

The A/E will be responsible for the development of the Project Delivery Plan (PDP) in accordance with their SOW. At a minimum, the PDP that the A/E develops should contain the Scoping Report, Preliminary/Final Design SOW, Schedule, Budget, Preliminary EE, Draft Project Agreement, and Risk and Opportunity Management Plan.

! Things to Watch For !

- The PM should verify understanding of each section **of the SOW** with the A/E to ensure appropriate level of effort is applied to each.

The PM will develop the A/E Oversight SOW and Budget. The PM will evaluate the LOE estimates provided in the oversight templates and will adjust the hours based on anticipated PST involvement considering the project scope and risks. The PM will send the draft A/E Oversight budget and SOW to the PST for review, comment, and concurrence.

Supplemental sections for the PDP should be developed as needed for complex or unique projects (Communications Plan, Acquisitions Plan, Funding Plan, Closeout Plan, etc.).

REVIEW OF DRAFT PROJECT DELIVERY PLAN AND FINALIZE

The PM should review the entire PDP to ensure consistency among all disciplines; that the overall intent of the project is met with appropriate scope, schedule, and budget; positively contributes to organizational goals and measures; and innovation is incorporated. PST members should review the PDP to ensure the appropriate amount of investigation and design is included for their disciplines.

Tips and Tricks

- The PM should review and compile all comments from the PST prior to delivering to the A/E to ensure that there are no conflicts between PST comments or what was discussed and agreed to in previous team meetings and site visits.

The A/E will be responsible to update and revise the PDP based on comments provided by the PM and the PST. The final PDP should then be compiled for submission to the PM.

ENDORSEMENT OF FINAL PROJECT DELIVERY PLAN

Once the final PDP has been developed, the PST needs to endorse it, certifying that they have been involved with the decision making process. In the Technical Services Branch, the Team Leads will also review PDPs prior to the PST endorsement.

The PM must submit the Final PDP to the MB for concurrence. The MB will review the PDP to ensure alignment with organization and program goals and to keep informed of all projects within the organization. Once endorsed, the project will be baselined and the project may proceed.

SECTION 5 – PRELIMINARY AND FINAL DESIGN

OVERVIEW

This section describes the Project Team roles and responsibilities as it relates to preliminary and final design.

PRELIMINARY AND FINAL DESIGN ROLES AND RESPONSIBILITIES OVERVIEW

The PM is responsible for delivery of the project and for verifying that the A/E work products are in conformance with the contract SOW. They may request PST support as issues arise during the TO performance period.

The A/E is accountable for analysis, development, and advancement of the project except for inherently governmental work. They utilize their depth of technical expertise and skills to deliver quality products.

As described in Section 2, the PST utilizes institutional experience to provide guidance to the A/E to clarify expectations, assess risk, and provide input to help resolve technical issues. The PST does not provide detailed/comprehensive support. Defining strategic points of engagement and LOE for the PST as well as additional responsibility and accountability on the A/E will result in a reduction of oversight resource hours, while maintaining quality deliverables. In addition, the success of this process will increase available time for CFLHD staff to deliver projects internally, and participate in other efforts to enhance personal and agency capabilities.

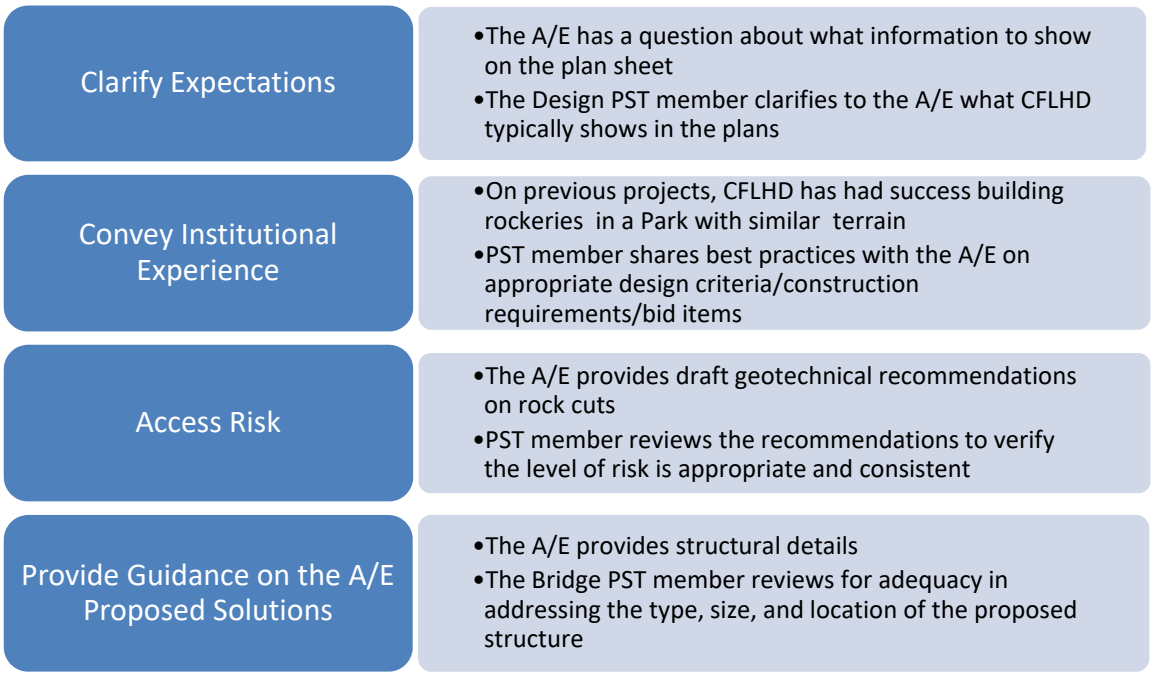


Figure 5-1: Examples of Oversight Provided by PST Members

The PST provides technical support, but does not direct the A/E. The A/E has been hired for their technical expertise, and CFLHD is relying on the A/E to maintain accountability for the technical decisions on the project (except for inherently governmental decisions as described later on in this section). If the PST directs the work of the A/E by providing detailed or comprehensive support or direction, the A/E does not maintain a level of responsibility commensurate with being the Engineer of Record. The following example further explains this concept.

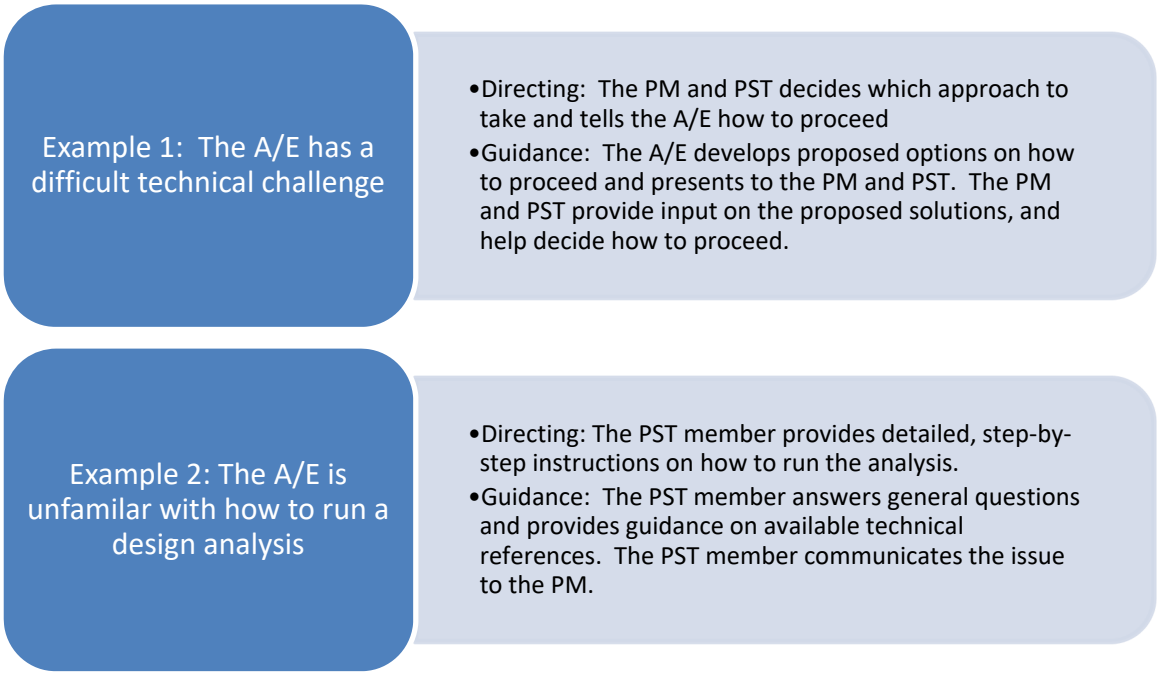


Figure 5-2: Example of Directing vs. Providing Guidance

STRUCTURED INVOLVEMENT OF THE PST

To better define roles and expectations, the PST member level of involvement is described in the A/E Oversight SOW. This SOW describes the structured involvement of staff, and defines specific points of engagement during the project development process. The LOE is customized for each project and each discipline.

As the preliminary and final design SOW is developed, input from PST members typically will be necessary to ensure that tasks, work effort, and issues are clearly and completely stated. PST members are expected to provide comments on general oversight processes and suggestions on "best practice."

The LOE for A/E oversight ranges according to the project type and risk: for simple, low-risk projects with limited scope and budget, the LOE for most PST members is minimal, while more technically-complex and high-risk projects may need more input from the PST members.

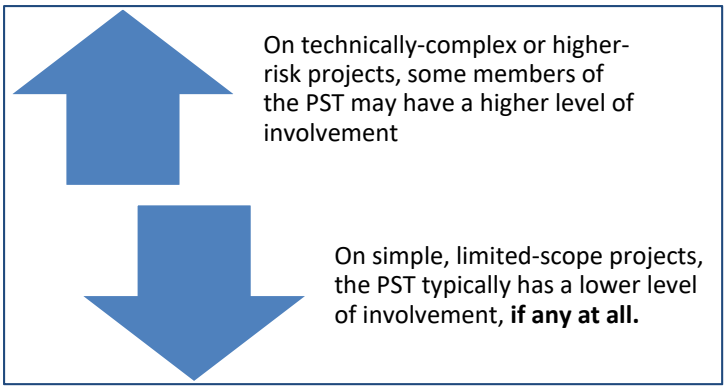


Figure 5-3: Anticipated PST Level of Involvement in A/E Oversight

Below are examples of varying level of involvement for a PST member based on project scope.

Project Scope: Place gravel on 20 miles of various rural roads

- No Hydraulics PST member involvement.
- The A/E Oversight SOW and budget show no Hydraulics PST member work is anticipated on the project.

Project Scope: Pulverize and overlay 5 miles of roadway, staying on the existing bench. Some existing culverts, including two 60" culverts, are in poor condition.

- Hydraulics PST member will provide guidance on the framework or boundaries to evaluate existing culverts (replace vs. rehabilitate or repair vs. leave in-place) and will review milestone submittals.
- The A/E Oversight SOW and budget document the anticpated engagement of the Hydraulics PST member: (1) initial discussion on the approach to existing culverts (2) milestone reviews and (3) ad-hoc support of the PM and A/E.
- Hydraulics is kept apprised of the project status through communication from the PM.

Project Scope: Reconstruct 4 miles of rdwy, improving horizontal and vertical alignments. Existing bridge location has environmental and ROW constraints that will not allow the new structure to accommodate the design flow.

- The Hydraulics PST member reviews the A/E proposed solution at the bridge, and provides input on the risks associated with each option. The Hydraulics PST member provides guidance on the hydraulic analysis and design of the bridge.
- The A/E Oversight SOW and budget document the anticpated engagement of the Hydraulics PST member: (1) Initial discussion on the design approach to the bridge hydraulics (2) milestone reviews and (3) ad-hoc support of the PM and A/E.
- Hydraulics is kept apprised of the project status through communication from the PM.

Figure 5-4: Examples of Structured Engagement of the Hydraulics PST Member on Various Projects

Managing risk in technical designs is an important role of the PM and PST. Through the structured involvement of staff, the PM, A/E and PST work together to define an appropriate level of risk within the budget and schedule constraints of each project. The risk is understood and documented clearly.

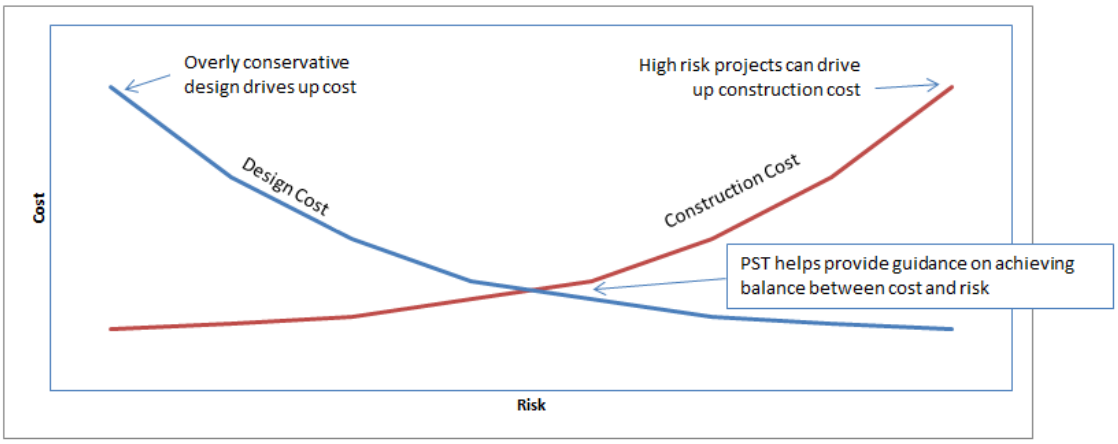
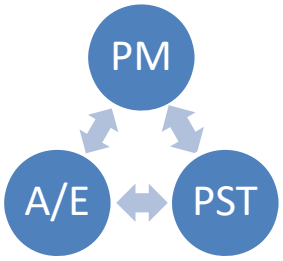


Figure 5-5: Role of PST in Managing Risk

PROJECT TEAM COMMUNICATION



The PM will typically have weekly or biweekly communications with the A/E to discuss progress. Involvement in these communications by the PST is not anticipated and will only be required when an issue is raised that requires the assistance of the PST, or as part of early engagement to determine best paths forward. The PM provides updates to the PST to keep the team engaged and aware of project progress. This communication may be through face-to-face communications, e-mails, or status/progress meeting minutes. The PST should request status or updates as necessary if more information is needed.

Direct communication between the PST and A/E technical staff may also be necessary. The PM may request the A/E contact the PST members directly to expedite the process. The PM will notify the PST and A/E of this request for assistance as early as possible to ensure that PST members can plan their schedule accordingly and minimize disruption to other project work. For all communications, and in particular for any decisions that could impact the project scope, schedule, or budget, the A/E should promptly document the discussions with PST members through an email to the PM and PST.

Progress meetings are another way the Project Team communicates project status and resolves issues and concerns. The PM schedules progress meetings intermittently between milestone meetings and field reviews. The timing of meetings will depend on the phase of the project, issues and concerns, risks, etc. The A/E and PST members should recommend progress meetings to the PM's as well when they feel they are necessary. Progress

Tips and Tricks

- Progress meetings help the PST stay engaged with the project issues and concerns, leading to more timely input and support from the PST.

meetings should focus on unresolved issues and the status of high risk items. PST members need only attend at the request of the PM for those meetings when their discipline has unresolved issues or high risk items. The PM leads these meetings overall, but the A/E leads the majority of discussions on each discipline. The A/E documents status, discussions, decisions, etc., for all progress meetings and distributes them to the entire Project Team.

REVIEW OF A/E SUBMITTALS (PS&E PACKAGES, REPORTS, ETC.)

The PM distributes all CFL internal submittals. The PM distributes the external submittals as well. In some situations, it may be desirable to have a pre-submittal or internal review prior to the external distribution. This pre-submittal review may be helpful on complex projects or projects with unique constraints.

Quality Definitions

- Quality Control (QC)- Review work to identify errors and defects; the independent checking of work and use of control points (approvals) to ensure a high level of confidence that each product will meet expectations
- Quality Assurance (QA) - Review of the policies, procedures, and systematic actions established to prevent defects or make improvements to ensure quality

During the development of the A/E Oversight SOW, the PM coordinates with the PST to determine the appropriate LOE and points of engagement. The PM also coordinates with the team and determines which disciplines review the submittals and the LOE needed for each review based on project scope and the risk assessment.

As shown in the definitions above, quality control (QC) is an independent detailed review of work to prevent errors and defects so that the final product meets the expectations of the project team. Quality assurance (QA) is simply the review of the policies, procedures, and processes that are in place to ensure that QC has been done on each individual work item and the overall QC plan and process are adequate to ensure expectations are met. Each A/E has its own overarching QA/QC plan and each project should have a specific Project Quality Plan, and therefore perform their own QA and QC on all work and deliverables.

Each PST member designated to review a submittal has the responsibility of completing an appropriate level of review of the documents. This review should be a high level review that should focus less on format or spelling errors and more on content and technical issues. The purpose is to understand the product and to impart CFL institutional experience with similar projects, customers, project features, and potential construction contractors. CFL review is to evaluate the level of risk taken by the government and to evaluate if that level of risk is consistent with the intent of the project. It is not the responsibility of the PST to perform QA/QC on the documents. The PST performs Independent Assurance to verify that the A/E performed QA/QC.

Comments should be within the area of technical review and substantial enough to require changes. Minor details such as drawing or spelling errors should not be listed in the formal comments as they are not appropriate within this context. Example focus areas of PST reviews are shown in Figure 5-6.

Example Focus Areas for PST Reviews

Highway Design Standards

The selected design controls and criteria used on a project could have an effect on the overall project scope. The Roadway Design PST member verifies during early stages of project development that the appropriate design criteria have been selected and that the appropriate level of risk is documented in the Highway Design Standards form.

Environmental Commitments Summary

The A/E generates an environmental commitments form identifying the environmental commitments agreed to in the NEPA document and identifies how/where those commitments are addressed in the PS&E package. The Environment PST member reviews the summary and verifies the commitments are appropriate.

Bid Items

The A/E is responsible for selecting appropriate pay items for use in the construction contract. During the milestone review, the discipline PST members review the pay items shown in the plans, and verify that the A/E has selected pay items that are appropriate to the project, minimize measurement and payment efforts in the field, and drive appropriate contractor behavior. Examples include 301 vs 308 aggregates, miles vs square yards, and lump sum.

Figure 5-6: Role of PST in Managing Risk

The PM is responsible to coordinate and reconcile all PST review comments for milestone PS&E reviews, as well as discipline specific reports/study reviews, and provide them back to the A/E. Comment review meetings are typically held for each milestone review scheduled by the PM, and PST members may be asked to participate to clarify their review comments. Not all PST members need to attend the comment review meetings (for example, if the PST review member comments are minimal or self-explanatory, the PST member may send comments to the PM and decline going to the meeting confirm with them if attendance is required based on the comments). The A/E will send comment responses back to the PM. The PM will then distribute the responses to the PST.

If a submittal is not complete enough to provide an adequate review or does not meet the contract requirements for quality, the PST members are to immediately advise the PM. The submittal will be returned to the A/E with feedback to document why the submittal was deemed unacceptable. The PM is responsible to ensure that the A/E has fulfilled their responsibilities and is in compliance with their PQP.

Tips and Tricks

- It is not necessary to review the entire submittal if it is immediately apparent that the submittal is inadequate.

FIELD REVIEWS

The PM's role is to control the direction of the review to ensure that significant topics (i.e. goals, objectives, standards, guidelines, compliance, land use, and stewardship) are discussed and acknowledged. This may involve consensus building or delegation of responsibility for future actions necessary to further the project. The PM and/or functional PST member(s) will also impart CFLHD institutional experience with the site or similar sites, partner agency expectations, project features, and oversee the A/E's work efforts.

The A/E's role is to gather information, present the conceptual design alternatives, discuss design decisions, and solicit comments from partner agencies. The A/E will lead the design portion of the field review, including presentation of their design, solicitation of comments, future design efforts, rationale for decisions, etc. The A/E will customarily provide the technical expertise for on-site support in the particular functional areas, as defined in the SOW. The A/E will organize the review (prepare the distribution letter for signature by the PM and prepare the agenda); and the PM will contact participants to schedule review dates and provide oversight of the A/E to ensure that the review and participation is coordinated fully. The PM is responsible for dissemination of all field review materials provided by the A/E to the Project Team and relevant partner agency personnel.

Functional support during the field review comes from the A/E and therefore PST staff will rarely be involved, with the exception of Environment and/or ROW who may attend in an oversight role to aid in the understanding, conveyance, and steering of inherently government issues as described below. The involvement of PST members will be determined by the PM based on the complexity and needs of the project. When it is necessary for PST functional staff to attend, they will function in an oversight role to evaluate that processes, procedures, and level of risk taken are consistent with other CFLHD projects.

Documentation of the field review will be the responsibility of the A/E. The PST members that attended the review will be provided the opportunity to review the field review documentation and provide comments prior to final distribution. The PM distributes the field review documentation to the entire Project Team to keep them informed and engaged.

INHERENTLY GOVERNMENTAL FUNCTIONS

There are some roles during project development that are considered inherently governmental and are performed by CFLHD staff. Regulations require that FHWA maintain authority as the lead agency on all project environmental decisions and consultation activities. Regulations also require that FHWA lead all right-of-way (ROW) acquisitions.

Environment

By regulation, when acting as the lead federal agency for NEPA, CFLHD maintains the coordination, contact, and signature authorities. These regulatory requirements necessitate the involvement of the Environmental PST at various stages of document development. The A/E Contractor will be responsible for performing environmental tasks under the direct oversight of FHWA personnel. FHWA will be engaged in all elements of NEPA compliance including planning of required studies and level of effort, review and acceptance of reports, and final approval of

the NEPA action. FHWA maintains authority as lead agency on all project environmental decisions and consultation activities.

The ability of CFLHD to approve a document and make a NEPA decision requires an understanding of the environmental issues and depth of the preparation of the document. In order for this to be an efficient process, the A/E develops the documents describing environmental issues with the oversight of the CFLHD PM and Environmental PST Member.

The SOW will document the roles and responsibilities between the A/E and the government, being explicit that inherently governmental activities such as agency coordination, tribal consultation and determinations of effect are done by CFL. Examples of this dynamic are: the A/E may draft consultation letters, but CFL performs the consultation; the A/E analyzes effects and makes a recommendation, CFL makes determinations of effect.

The A/E will be heavily involved as a presenter or preparer/presenter at public meetings and hearings. The A/E will be responsible for ensuring that all pre-, during-, and post-meeting scheduling, documentation, etc., are completed. The PM will attend public meetings and hearings. Environment PST attendance at an AEOS public meeting/hearing is dependent on project risk and should be agreed upon in coordination with the PM. Other PST members will typically not be involved in public meetings or hearings. The PM will be the media contact person on environmental issues should the media be in attendance at the meeting or if the media calls prior to or following the meeting. The PM will follow all FHWA media relations policies and procedures.

Prior to forwarding decision-making documents for signature, the Environmental PST will conduct an independent review of the documents. The PM will present the final document for signature with clearly delineated concurrence from the PST and legal counsel, when required, that the document and process meets CFLHD requirements. The PM will be responsible for reviewing the environmental document to ensure that the commitments detailed in the document are achievable during design and construction. The PM, Environment PST, and CFL management review and sign off as appropriate.

Right-of-Way

CFLHD oversees all right-of-way acquisition processes particularly for acquiring letters of consent from Federal Land Management Agencies and executing Highway Easement Deeds to the maintaining agency, to ensure compliance with federal acquisition regulations. The A/E typically prepares all of the right-of-way plans, descriptions, etc. needed for the acquisition process. The ROW PST member will be engaged at the appropriate stage of the project development to provide guidance on right of way document preparation and the need for specialized documents to facilitate the right of way acquisition process.

It is expected that the ROW PST member will participate in an initial meeting with the A/E and acquiring agency to provide guidance and develop strategies for how to prepare ROW documents in advance of the acquisition process. The right of way documents will be reviewed by the ROW PST member. Then the ROW PST member will submit the ROW documents to the acquiring agency with a request for a ROW certification. The ROW PST member may also request a utility certification with the request.

PS&E Approval and Hand-Off to Acquisitions

Just as our external partners should have a seamless experience whether a project is internally delivered or delivered using an A/E, the approval and advertisement process should be seamless as well from the perspective of Acquisitions. Acquisitions should receive the same documentation and approvals as they do for internally delivered projects.

On A/E delivered projects, the PM will prepare the PS&E checklist and supporting documentation. The PM will arrange for final PS&E approval from external partners and obtain the approval signature on the PS&E cover sheet.

The A/E will stamp the plans and provide them to the PM. The A/E will also provide all electronic files to the PM. The PM will place the electronic files on the N: drive in case future access is required by the PST.

Amendments During Project Advertisement

The CFL Acquisition's Representative will be the initial point of contact for bidders' questions. Technical questions are forwarded to the PM, who will engage the A/E (and PST if necessary) when assistance in answering the questions is required.

Identification of the need for amendments to the PS&E during advertisement usually originates with questions from prospective contractors, wage rate changes, or errors and/or omissions identified by the PST or the Acquisitions Section. Acquisitions will initiate discussions with the PM to determine the necessity of generating an amendment. Acquisitions will generally prepare the amendment contract documents with technical assistance from the A/E and PM. The amendment may be discussed with other PST members to determine the best approach.

SECTION 6 – POST DESIGN SERVICES

OVERVIEW

This section defines the roles and responsibilities of the Project Team during Post Design Services (construction and post-construction mitigation monitoring).

ROLES AND RESPONSIBILITIES OVERVIEW

The PM continues to lead the project through construction and post construction.

The A/E is responsible for supporting the PM through construction of the project. This support may be limited to answering technical questions and providing interpretation of the PS&E documents or for providing additional drawings or specifications for a contract modification. The A/E is typically also responsible for all mitigation designs and post-construction monitoring that is required by permit. As the Engineer of Record, it is critical that the A/E maintain ownership and accountability throughout construction.

PST responsibilities may include consultation with the Project Engineer and A/E during construction activities; the PST does not provide detailed/comprehensive support except as noted below for inherently governmental work.

POST DESIGN SERVICES TASK ORDERS

Post design services task orders are set up using a not-to-exceed amount with the issuance of work orders for specific work that needs to be done (on an as-needed basis). These work orders will be issued by the COR or CO on a firm-fixed price basis. Since all work is issued by work order, the COR (PM) is the only one that should be directing the A/E to perform work under the work order.

INHERENTLY GOVERNMENTAL WORK

During construction, CFLHD Pavements/Materials staff will be involved with the Independent Assurance of all projects' mix design approvals, material testing, etc. due to the processes and procedures involved with testing at the CFLHD Material Testing Facilities. A/E pavement and material engineers should be involved if there are any changes to the proposed pavement design, but otherwise the pavements and materials testing for an A/E delivered project will be the same as that for an internally delivered project.

Tips and Tricks

- Field staff should contact the PM/COE for all issues and not the PST members. The PM will direct the issue as appropriate to the A/E.

CFLHD Environmental PST staff will also be involved as the lead agency for NEPA (as described in Section 5) if any NEPA issues arise during construction and/or with the mitigation and mitigation monitoring that is required by the project.

TECHNICAL ASSISTANCE AND SITE VISITS

The A/E may need to answer technical questions, interpret drawings, notes or specifications, or provide their rationale to the PM and CFLHD Field Staff during construction. To provide feedback or resolve issues the PM may request that the A/E perform a site visit to review construction progress and/or participate in project issue discussions.

Tips and Tricks

- The feedback process is strongly encouraged by management.

The PM will initiate communication with the A/E to discuss any issue or questions that arises to ensure that any work requested is under the issuance of a work order.

It is anticipated that there will be little involvement by the PST except when an issue is raised that requires the assistance of the PST or work that is inherently governmental. The PM provides updates to the entire Project Team (including the PST) to keep the team engaged and aware of project issues, as necessary.

REVIEW AND APPROVAL OF CONTRACTOR SUBMITTALS

Tips and Tricks

- Submittals may include, but are not limited to shop drawings, diagrams, layouts, schematics, schedules, test data, etc.

Except as noted above for pavements/materials, the A/E reviews each submittal checking for compliance with the plans and specifications of the construction contract. The A/E recommends the approval or rejection of the submittals to the PM.

In some cases, the PM may request the PST also review the contractor submittals or to validate the A/E recommendation. The LOE expected for this work is expected to be limited and on an as-needed basis.

CONSTRUCTION MODIFICATIONS

The need for construction modifications (CM's) occurs due to a multitude of factors. Although there are CM's that are strictly related to issues in the field, the PM and Field Staff should keep the Project Team engaged through discussions, e-mails, and the distribution of final CM's. For those CM's that do require engagement from the Project Team it is important to engage the A/E first on all issues of their design. The PST may need to be involved as well at the discretion of the PM.

ERRORS AND OMISSIONS

Definitions

- Errors - Design features or details that are incorrect, conflicting, insufficient, or ambiguous.
- Omissions - Instances in which design documents are silent on an issue that should otherwise have been addressed.

Payment will not be made for work performed to correct errors and/or omissions. Errors and/or omissions may be discovered at any time during the execution of the construction contract, including during the efforts related to post design services. The A/E and the PM must work together to separate the work related to errors and/or omissions from the Post Design Services work.

SECTION 7 – TASK ORDER CLOSEOUT

OVERVIEW

Following the final acceptance of work, acquisitions will close out the task order file. The closeout process involves the CO, COR, Finance Manager, A/E, and when applicable, the PST. Only informal input is generally expected from the PST and external agencies in completing evaluations unless there are specific discipline heavy project elements.

The PM plays an important role in determining whether the A/E consultant has satisfactorily performed the required work and has met contractual obligations. The task order is complete when the A/E consultant has completed the required services and the Government has inspected and accepted the deliverables. A primary objective of the closeout is to identify and resolve any outstanding obligations or pending liabilities of either the Government or the A/E consultant.

Following the COR's completion of the performance evaluation in the Contractor Performance Assessment Reporting System (CPARS), contract completion statement and approval of the final invoice, individuals acting on behalf of the CO begin administration of the closeout. This information becomes part of the official record and serves as the basis for evaluating the contractor's past performance in future source selections. The consultant is involved in the evaluation process and has an opportunity to comment on the Assessing Officials' CPARS evaluation.

CLOSEOUT DOCUMENTS

Acquisitions will initiate administrative closeout of task orders after issuance of the final payment and release of claims signed by the A/E contractor. Acquisitions uses the Closeout Checklist to confirm completion of all activities necessary to close out the task order, including a critical check from Finance to ensure zero funds remain. This checklist indicates all activities accomplished from the beginning through completion of a task order, including modifications, and contains dates and dollar amounts of specified activities.

The COR must complete the A/E Performance Evaluation (addressed in the following section) and the Contract Completion Statement (or "k-form") before Finance completes their final check and the CO can sign-off on completed closeout files. Contract files are kept for 6 years after final payment (per FAR 4.805) and are archived at a National Archives and Records Administration (NARA) facility.

FEEDBACK LOOP

The COR will hold a meeting or a conference call to provide feedback to the A/E at the end of the Task Order. This meeting may include the Project Engineer, the PST, the Land Management Agency and/or partner agencies.

PERFORMANCE EVALUATION

The COR and Contract Specialist will conduct the performance evaluation of the A/E consultant, with input from the PST, as necessary. The COR is responsible for contacting the appropriate PST disciplines for input on the A/E evaluation. Generally, these performance evaluations are conducted at the following times:

- At least annually.
- When the task order is completed (included with the closeout package).
- When interim evaluations are needed on task orders lasting more than a year.
- When poor performance is identified.

The COR and Contract Specialist consider all the circumstances of the project when rating the performance of an A/E consultant, including the complexity of the project, the external agency coordination necessary, the Government's performance (for example, reviews and comments) and other project-related factors.

Contractor Performance Assessment Reporting System (CPARS) is used to evaluate contractors. CPARS is a web-based system used to input data on contractor performance for each contract of $35,000 or more (per FAR 36.604).

When a task order is initiated, information is input into CPARS regarding the Assessing Official Representative and contractor in preparation of this final evaluation process. CPARS automatically generates email notifications following the end of the Task Order Period of Performance (POP) or annually for the Assessing Official Representative to initiate an evaluation. The Assessing Official Representative must input contractor ratings and a narrative, and then releases the evaluation to the Assessing Official who reviews and signs the evaluation. The evaluation is then released to the contractor for comment.

Below are the evaluation ratings and their definitions. There are five categories.

- Exceptional
- Very Good
- Satisfactory
- Marginal
- Unsatisfactory

Rating	Contract Requirements	Problems	Corrective Actions
Exceptional	Exceeds Many -Gov't Benefit	Few Minor	Highly Effective
Very Good	Exceeds Some -Gov't Benefit	Some Minor	Effective
Satisfactory	Meets All	Some Minor	Satisfactory
Marginal	Does Not Meet Some - Gov't Impact	Serious: Recovery Still Possible	Marginally Effective; Not Fully Implemented
Unsatisfactory	Does Not Meet Most - Gov't Impact	Serious: Recovery Not Likely	Ineffective

When PST input is required for the evaluation, the COR will request information from the PST on the overall satisfaction of the A/E's work for their functional area. The PST will provide a rating and comments based on their knowledge of the scope and level of involvement of the tasks. Then the Assessing Official Representative will compile the ratings provided by the team in CPARS.

Tips and Tricks

- The evaluation should include more than just checkmarks in the applicable boxes. It should tell the "story" of the project. The Assessing Official Representative should always include a summary narrative in the last box.

The Contractor will respond to or concur with the assessment. The CO will provide comments and close the assessment.

This information becomes part of the official record and will be available Government-wide to serves as the basis for evaluating the contractor's past performance in future source selections and determine the contractor's responsibility on our (and other Government) contracts.

! Things to Watch For !

- Written notification must be provided of unsatisfactory reports and the basis for them. The CO should be involved in the process of resolving any discrepancies between the Assessing Official Representative and the A/E.