

PART 1, CHAPTER 15

PROJECT FILE AND RECORDS MANAGEMENT

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PART 1, CHAPTER 15

PROJECT FILE AND RECORDS MANAGEMENT

15.1 OVERVIEW

Pursuant to **23 United States Code (U.S.C.) § 327** and the implementing Memorandum of Understanding (MOU) executed on May 26, 2022, the Florida Department of Transportation (FDOT) has assumed and Federal Highway Administration (FHWA) has assigned its responsibilities under the **National Environmental Policy Act (NEPA)** for highway projects on the State Highway System (SHS) and Local Agency Program (LAP) projects off the SHS (**NEPA** Assignment). In general, FDOT's assumption includes all highway projects in Florida which source of federal funding comes from FHWA or which constitute a federal action through FHWA. **NEPA** Assignment includes responsibility for environmental review, interagency consultation and other activities pertaining to the review or approval of **NEPA** actions. Consistent with law and the MOU, FDOT will be the Lead Federal Agency for highway projects with approval authority resting in the Office of Environmental Management (OEM).

FDOT maintains its Project Development and Environment (PD&E) files in accordance with FDOT's [Procedure No. 050-020-025, Records Management](#). For documents pertaining to FDOT's assumption of responsibilities under the **NEPA** Assignment Program, FDOT complies with the requirements of **FHWA Records Disposition Manual (Field Offices) Chapter 4** and **FHWA Order No. 1324.1B, issued July 29, 2013**, and retains appropriate files mapped to the Department of State **Retention and Disposal Schedule GS1-SL(167)**.

FDOT's Electronic Document Management System (EDMS), as defined in FDOT's [Information Technology Resource User's Manual, Topic No. 325-000-002](#) (Chapter 13) serves as the environmental file of record for **NEPA** actions, including those under the **NEPA** Assignment Program. The EDMS stores and archives files, provides backup and disaster recovery while maintaining document access and managing records to appropriate retention and disposal schedules. When the files are imported into the EDMS, they are reviewed, published to the archive, and made available to other FDOT computer applications.

To support PD&E record-keeping and retention responsibilities, the StateWide Environmental Project Tracker (SWEPT) application is used in conjunction with EDMS. SWEPT is an interactive web site that supports activities during FDOT's Document Review Process. SWEPT provides an interface to the EDMS that is integrated with the document review workflow. This gives easy access to the environmental project record throughout the environmental review process. When files are uploaded to SWEPT, they are attributed according to EDMS standards, placed in the appropriate group and type and associated with the required retention and disposal schedule. When an

Environmental Document is approved in SWEPT, it is imported into the EDMS with associated supporting documentation.

15.2 PROCEDURE

15.2.1 Project File

In preparing a PD&E Study, FDOT determines how to manage its project files, as long as the procedures satisfy FDOT record-keeping and retention requirements and meets or exceeds FHWA record-keeping and retention requirements for federal projects. FDOT project files are also available consistent with Florida and federal public records laws.

A project file refers to the files maintained by the project team to support development of the PD&E Study and resulting **NEPA** decision or approval. Documents maintained in the project file for each PD&E project include, but are not limited to, letters, technical reports, correspondence, emails, comments, responses, meeting minutes, studies, computer modeling reports. The project file should include information FDOT considered or presented which was reasonably available during the process, including documentation of contrary opinions or conflicting data and resolution of issues or concerns raised and any resolution made in response.

15.2.2 Administrative Record

The Administrative Record (AR) is FDOT's official record of the **NEPA** decision making process and refers to documents from the project file that are submitted to the court during **NEPA** litigation. The AR is established when a lawsuit is filed, and the court requests the records. The AR includes documents and materials directly or indirectly considered or relied upon by FDOT when making decisions in the environmental review process. This includes decision documents, as well as documents generated or received by FDOT during the environmental review.

The AR for PD&E projects is created from the project files, which are uploaded and stored in SWEPT. When files are initially uploaded in SWEPT, they are categorized as: AR, project file only, or attorney work product (considered privileged). When an AR is required, the Project Manager uses the Administrative Record tool on SWEPT to identify and confirm which documents comprise the AR. The Project Manager also uses the Administrative Record tool to request approval from the Office of General Counsel (OGC) to create and distribute the record.

For more information on ARs, please see the ***American Association of State Highway Transportation Officials (AASHTO) Practitioner's Handbook, Maintaining a Project File and Preparing an Administrative Record for A NEPA Study.***

15.2.3 Records Management

The project file shall be maintained electronically within SWEPT. The PD&E Project Manager is responsible for maintaining an accurate and up-to-date project file in SWEPT. The PD&E project team members may assist by uploading files and managing files. It is recommended that documents be placed within the applicable folder in SWEPT according to FDOT's [SWEPT Project File Organization Guidance](#). When files are uploaded to SWEPT, they are attributed according to EDMS standards, mapped to the appropriate group and type and retention and disposal schedule ([Section 15.2.4](#)).

Environmental Documents and their supporting files are imported into the EDMS with associated project file records upon final document approval. When the files are imported into EDMS, they are reviewed by OEM Technology Resources Coordinator and made available through EDMS according to the Environmental EDMS protocols established in the *EDMS QA/QC Process for the Office of Environmental Management*.

15.2.4 File Naming Convention

All documents uploaded into SWEPT and imported into the EDMS follow an established naming convention. The document name is formed by concatenating project and document information, as follows:

- a. FM#-COA-District-Document Type Abbreviation-Document subtype Abbreviation-Date;

Example: 43257425201-CE1-D4-Approved_Type_1_Categorical_Exclusion_Checklist-2016-0802.pdf

or

- b. FM#-COA-District-Document name-Date

Example: 43257425201-CE1-D4-USFWSSection7InformalConsultationLetter-2015-0619.pdf

Naming convention specifications are:

- a. FM# = The full Financial Management Number (FM#) (at least item number and item segment, and phase type, phase group and sequence number if provided, with dashes removed.)
- b. COA = Abbreviated Class of Action:
 - CE1 = Type 1 Categorical Exclusion
 - CE2 = Type 2 Categorical Exclusion
 - EA = Environmental Assessment

- EIS = Environmental Impact Statement
 - NMSA = Non-Major State Action
 - SEIR = State Environmental Impact Report
- c. District = Abbreviated District number or FTE for Turnpike: D1, D2,...FTE
- d. Document Type (and subtype) = can relate to higher level group of information to support a project. For instance, a **Natural Resources Evaluation (NRE)** is a technical report to support a particular COA. And a subtype of that report could be data, correspondence, concurrence request, concurrence.
- e. Document_Name = The original file name, minus extension (apply this before the date), with spaces replaced by underscores
- f. Date = Date the document was created or represents (or in the case of correspondence, the date when it was sent), formatted as YYYY-MMDD. If the document being uploaded was published or made available on March 10, 2016, but not uploaded until May 15, 2016, the March 10, 2016 date is the correct date to represent the document in SWEPT naming convention. SWEPT provides a date picker to select that date on upload.

15.2.5 Retention

For documents pertaining to FDOT's assumption of responsibilities under the **NEPA** Assignment Program, records are retained in accordance with [Procedure No. 050-020-025, Records Management](#) and **Retention and Disposal Schedule GS1-SL(167)**. For Significant Transportation Projects, as defined in **FHWA Order No. 1324B**, records will be stored permanently. For other projects, records are retained in SWEPT and EDMS for at least five fiscal years following completion of construction of the last project segment or last project action if the project stops before construction. Project completion is tracked and the records archived as follows:

- a. Work Program tracks completion through a "Closed Financial Projects" report.
- b. Financial Project Identification (FPID) Status 100 indicates the books have been reconciled between parties and the financial project is closed.

FPID or FM# is a unique 11-digit number assigned to track funding, schedule, and activities on a project. These 11 digits are defined as follows:

Item (6) Segment(1)Phase Group(1)-Phase Type(1)-Sequence(2)

Example: 407085-1-32-04

- c. Work program tracks PD&E projects (parent record) with subordinate FPIDs (other item segment FMs for design or construction phases) through a “Related Items” report. SWEPT obtains this information from the Work Program through a web service.
- d. SWEPT maintains list of PD&E FM#s and related FM#s (through users and/or through the related items report provided by Work Program).
- e. Once all associated FMs (related items) have reached status 100, based on the related items report provided by Work Program, SWEPT begins a 5-year countdown to meet data management requirements (projects identified as Significant Highway Projects will be retained permanently).
- f. After 5 years of related FMs reaching status 100, SWEPT provides notification to the SWEPT helpdesk that records have reached their retention schedule and updates EDMS export records to purge the project records.
- g. SWEPT sends information to EDMS marking the documents obsolete and indicating records are to be purged.
- h. EDMS sends a confirmation email to the SWEPT helpdesk that the identified records have been updated to obsolete.

Information associated with draft Environmental Documents (not approved) shall be retained until obsolete, superseded, or administrative value is lost as determined by the FDOT Project Manager, in consultation with the OGC.

15.3 REFERENCES

AASHTO. 2016. Maintaining a Project File and Preparing an Administrative Record for A NEPA Study. <https://environment.transportation.org/resources/practitioners-handbooks/maintaining-a-project-file-and-preparing-an-administrative-record-for-a-nepa-study/>

FHWA. 2013. FHWA Records Disposition Manual (Field Offices) Chapter 4. <http://www.fhwa.dot.gov/legregs/directives/orders/envi-reg.cfm>

FHWA. 2013. FHWA Order No. 1324.1B, issued July 29, 2013. <https://www.fhwa.dot.gov/legregs/directives/orders/13241b.cfm>

First Renewal of the Memorandum of Understanding Between FHWA and FDOT Concerning the State of Florida’s Participation in the Surface Transportation Project Delivery Program Pursuant to 23 U.S.C. § 327, May 26, 2022. https://fdotwww.blob.core.windows.net/sitefinity/docs/default-source/environment/pubs/nepa_assign/fdot-327-first-renewal-mou-for-comment.pdf?sfvrsn=202c70b4_2

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FDOT. Records Management, Procedure No. 050-020-025. <https://pdl.fdot.gov/>

FDOT. 2016. EEDMS QA/QC Process Office of Environmental Management

FDOT. 2020. StateWide Environmental Project Tracking website. <https://www.fl-etat.org/est/swept/>

National Environmental Policy Act (NEPA) of 1969

15.4 HISTORY

6/14/2017: NEPA Assignment, 1/14/2019, 7/1/2020