Guidelines for Performance Assessment of Submissions by Contaminated Sites Approved Professionals

1. Definitions

The following are the acronyms used in this document:

"AP"	Approved Professional
"BC ENV"	BC Ministry of Environment and Climate Change Strategy
"CSAP, CSAP Society, the Society"	The Society of Contaminated Sites Approved Professionals of British Columbia
"CSR"	Contaminated Sites Regulation
"DAS"	Detailed administrative screening
"DM"	Delegated member of the Performance Assessment Committee
"DSC"	Detailed Screening Coordinator
"FR"	Focused Review
"NRPA"	Non-random performance assessment
"PAC"	Performance Assessment Committee
"PAP"	Performance assessment panel
"PA"	Performance assessment
"PA Coordinator"	CSAP Executive Director
"PAS"	Preliminary administrative screening
"RFQ"	Request for qualifications
"RoFR"	Review of Findings Report
"RPA"	Random performance assessment
"SoSC"	Summary of Site Condition

2. Introduction

The CSAP Society is responsible for confirming that Approved Professional (AP) submissions recommending issuance of Contaminated Sites Regulation (CSR) legal instruments meet BC ENV and quality standards. To do so, CSAP's Board appoints member APs to a Performance Assessment Committee (PAC); the PAC is responsible for undertaking performance assessments (PAs) on AP submissions to determine if they are sufficient or deficient. Once a submission is received by CSAP, it cannot be withdrawn. Extenuating circumstances may be considered. Under such circumstances, the submitting AP(s) must provide detailed rationale for their request to withdraw. A delegated member (DM) of the PAC will review the rationale and provide a recommendation to the CSAP Executive Committee for a decision.

This document provides information on the preliminary administrative and detailed administrative screenings (PAS and DAS, respectively) completed on all submissions, as well as information regarding the type, frequency, and scope of PAs which are completed by a performance assessment panel (PAP) and a DM of the PAC. The PAP members are chosen from a prequalified list of potential PAP members, and the role of the DM is to direct the PA and make the final determination of the outcome of the PA based on recommendations of the PAP.

The PAC may revise requirements and guidance provided in this document from time to time, as necessary.

3. Preliminary Administrative and Detailed Administrative Screening

Every CSAP submission undergoes a PAS and a DAS; a summary of this process is included here, with further details provided in the "Submission Screening Guidelines" available on the CSAP website. The PAS is undertaken by the Administrative Screener and involves reviewing the submission to confirm all the required documents have been included, that the documents have been completed correctly, along with other administrative issues. Potential administrative errors and omissions are recorded and provided to the submitting AP(s) for clarification or correction.

The DAS is undertaken by a Detailed Screener; Detailed Screeners are APs that are on the panel of performance assessors that are pre-qualified by the PAC to conduct DAS (refer to Section 10). In the case where a submission is selected for a PA, the DAS is conducted by the DM for the PA. The DAS involves reviewing the Summary of Site Condition(s) (SoSC), the draft instrument and other required forms and documents for completeness and consistency. The DAS does not include review of any technical information contained in the reports.

Potential issues identified during the DAS are recorded and provided to the submitting AP for clarification or correction; the submitting AP is required to respond in a timely manner that must not exceed two (2) months. If an issue(s) identified during a DAS is not resolved (generally two meetings of questions and responses although this may vary from case to case) and the issue(s) appears to be a major technical error or regulatory omission, a Summary of the Screening Issues is prepared by the Detailed Screener and forwarded to the Detailed Screening Coordinator (DSC). The DSC will review the information, and, as appropriate, references to the regulation, protocols and/or guidance that pertains to the issue(s) identified.

If the DSC agrees that further consideration of an item(s) is warranted, the Summary of the Screening Issues and the Detailed Screening spreadsheet will be sent by the DSC to the PA Coordinator who will assign a DM to conduct a Focused Review (FR) of the submission. The submitting AP(s) will be provided with a copy of the Summary of the Screening Issues and will be informed that their submission has been forwarded to a DM for a FR.

A FR may also be requested by a BC ENV statutory decision maker (SDM) during their review of a submission forwarded by CSAP to BC ENV. In this case, the SDM will contact the PA Coordinator and request that a FR be conducted. The submitting AP(s) will be informed that their submission has been sent for a FR at the request of BC ENV. During the FR, the DM will review the sections of the technical report(s) relevant to the outstanding items requiring clarification. The review process may involve discussion with the Detailed Screener, submitting AP(s) and/or BC ENV.

If the DM's review of the relevant sections of the report(s) indicates that the outstanding issue(s) is resolved, then the submission is forwarded to BC ENV. If the DM's review indicates the potential for issues that could impact the conclusions of the reports, the DM will provide the PAC with a summary of their review; and the PAC will review the information and determine if a non-random PA (NRPA) (see below for more information on NRPA) is warranted. If the Detailed Screener is a member of the PAC, the Detailed Screener will excuse themselves from this discussion.

For more information on the Focused Review process and outcomes, refer to the "CSAP Admin and Detailed Screening Guidance".

4. Types of Performance Assessments (PAs)

PA types and frequency are defined in sections 7.4 and 7.5 of the CSAP Bylaws. The following sections expand on and clarify the requirements of the CSAP Bylaws.

4.1. Random PAs (RPAs)

The majority of PAs are conducted on a random basis; these are referred to as random performance assessments (RPAs). The frequency with which RPAs are completed has been set based on experience with the quality of previous AP submissions. The frequency for RPAs for both numerical and risk-based instruments is:

- 1:8 submissions.

Selection of RPAs follows a random number process based on the day/time the submission is received at CSAP's office and logged into its system.

Submissions containing multiple instrument applications are regarded as a single submission for the purpose of a RPA selection, as long as the reports and instruments are for one source site and adjacent affected parcels. Consequently, if selected for an RPA, all instruments and associated investigations and reports will be subject to the RPA.

4.2. Non-Random PAs (NRPAs)

Non-random performance assessments (NRPAs) are conducted when deemed necessary, such as when specified as a remedial measure outcome of a previous PA, where a previous submission for a site was found 'Deficient', if requested by BC ENV or the CSAP's Board, or when an issue identified during a DAS or FR is not resolved, and the PAC determines a NRPA is warranted. CSAP must notify an AP when their submission is the subject of a NRPA.

5. Stages of PAs

Part G of the CSAP Rules outline the PA process and requirements and provide guidance for determining the outcome of PAs. Table 1 of this document provides guidance for when the PA Stage 1 review conclusions indicate that 'Additional Information is Required.'

The DM and the PA Coordinator must attempt to have the PA completed according to the timeline as stated in section 34 of the CSAP Rules. The PA must also be completed according to sections 28 to 32 of the CSAP Rules.

Table 2 summarizes the timeline for a PA and specifies the number of days that the PAP and the DM are allocated to prepare reports. Further details on the PA process and timeline are provided in the following sections. It is noted that the total number of days listed in Table 2 does not include time that the submitting AP may require to prepare additional information requested by the PA Stage 1 Reports, or the time that the BC ENV requires to release an instrument once the submission is transferred to the BC ENV.

Once a submission is selected for PA (RPA or NRPA), the submitting AP and the designated alternate contact person at the firm where the AP works will be notified. It is the responsibility of the AP to notify the site owner or his/her representative that the submission has been selected for a PA.

If following a submission, the submitting AP is no longer retained by the site owner or his/her representative (e.g., due to employment status, illness, or other reasons), there is the opportunity for a second AP to complete the original submission, including addressing Stage 1 Findings, if additional information is required. If a response is not received within two (2) months of the Stage 1 Findings or if an extension is not requested, the submission will be considered 'Deficient'.

5.1. PA Team

The PA team consists of the following members:

- The PA Coordinator is responsible for the administration aspects of the PA. All written correspondence should be addressed to the PA Coordinator and copied to the DM.
- The DM (see note below) is responsible for the technical aspects of the PA, including making the decision on the final outcome of the PA. The outcome would typically be based on the findings and recommendations of the PAP. If the circumstance arises, where the DM disagrees with the PAP, the DM will follow the process outlined in section 5.6 before making a decision on the final outcome.
- The PAP who are assigned by the PA Coordinator on a rotational basis from the list of pre-qualified PAP members, with considerations for potential conflict of interest and other circumstances:
    - Two PAP members are assigned for standards-based submissions.
    - Two additional PAP members are assigned for the risk portion of risk-based submissions.
    - Alternatively, if a PAP member is both a Standards and Risk AP, then this PAP member may be assigned to both the standards and risk portion of the submission.
- For risk-based submissions, two DMs may be assigned to the PA team; one for the standards portion of the submission, the other for the risk portion. Alternatively, one DM who is both a Standards and Risk AP may be assigned.

5.2. PA Stage 1 Process

The following is an outline of the process for Stage 1 of the PA:

- The DM undertakes the DAS and provides the findings to the PAP members.
- Each PAP member is provided a copy of the submission.
- Each PAP member conducts a preliminary review of the submission (or the documents relevant to their review) and summarizes their cursory findings to the DM during the PA initiating conference call. Where required or determined to be beneficial, the DM will clarify BC ENV policy or technical issues for the PAP.
- As part of the Stage 1 review, the PAP will evaluate whether the submission qualifies as a Protocol 6 submission. Based on their review and discussions with the other PAP members, as well as the DM, each PAP member writes a PA Stage 1 Report. The PAP members do not need to raise the same issues, but both should agree that the issues raised are appropriate.
- There are two possible findings of the PA Stage 1 Report: 'Sufficient' or 'Additional Information is Required'.
- **Table 1** of this document provides guidance used by the PAP in determining if 'Additional Information is Required'. When 'Additional Information is Required', the information should only be requested to clarify and/or support conclusions, and not to address major investigation and/or remediation issues (e.g., failure to investigate APECs/PCOCs; lack of delineation, etc.).
- The PAP has no direct contact with the submitting AP through the PA. All communication with the submitting AP is via the PA Coordinator or the DM.
- The DM reviews each PA Stage 1 Report provided by each of the PAP member and makes the final decision on the PA Stage 1 outcome, which is communicated in a PA Stage 1 Findings letter. This

letter, along with copies of PA Stage 1 Reports prepared by the PAP, is forwarded to the submitting AP by the PA Coordinator.

- If the PAP concludes in their PA Stage 1 Reports that the submission is 'Sufficient' and the DM after reviewing these reports agrees, then the DM prepares a PA Final Findings letter, and this letter is forwarded to the submitting AP by the PA Coordinator.
- If the PAP's PA Stage 1 Reports indicate that 'Additional Information is Required' and the DM after reviewing these reports agrees, then the DM prepares a letter requesting the additional information required, and this letter is forwarded to the submitting AP by the PA Coordinator. The PA then proceeds to Stage 2 as described in the following section.
- The DM can also, at their discretion, not accept the findings of the PAP regarding the need for additional information and can conclude that the submission is 'Sufficient' at the PA Stage 1 Findings.

5.3. PA Stage 2 Process

When the PA Stage 1 Findings determine that 'Additional Information is Required', the PA progresses to Stage 2. This involves the PAP reviewing the additional information provided by the submitting AP, in the form of a single final addendum to the submission (Addendum), to determine whether the submission is 'Sufficient' or 'Deficient'.

The submitting AP has two (2) months from the date they receive the Stage 1 Findings to submit the Addendum to the submission. If more time is required, the submitting AP must submit a request for an extension to the PA Coordinator and provide rationale for the request. Typically, only one (1) two-month extension is granted, but under extenuating circumstances, and at the discretion of the PA Coordinator, a maximum of two (2), two-month extensions may be granted.

If the submitting AP has questions regarding issues, gaps or other information that is identified in the PA Stage 1 Reports, it is recommended that the submitting AP contact the PA DM as soon as possible for clarification before responding in writing to the PA Stage 1 Reports. A meeting with the submitting AP may be requested by the DM and the PAP to discuss the findings in the PA Stage 1 Reports. The PA Coordinator will request a meeting within one (1) week of the date of the Stage 1 Findings letter to schedule said meeting, if necessary.

The submitting AP may also request a meeting to discuss and clarify the findings in the PA Stage 1 Reports and explain their rationale to the PAP and DM prior to finalizing their Addendum. The submitting AP must notify the PA Coordinator within one (1) month (30 days) of the date of the Stage 1 Findings letter if they would like to request a meeting with the PAP and DM.

The meeting is only intended for the participants in the PA, and no other attendees will be allowed (e.g., Project Manager, report authors). If requested, a meeting, either in-person or by conference/video call, will be scheduled.

The draft Addendum must be provided at the time of the meeting request to allow the PAP sufficient time to review the document(s). There is an opportunity to revise the draft Addendum and submit the final Addendum after the meeting. To maintain the two-month timeline, the final Addendum is required to be submitted within one (1) month of the meeting. Only a single final Addendum is permitted, and once the final Addendum is submitted, no subsequent information can be submitted under the PA.

5.4. PA Final Findings

Once received, the final Addendum will be reviewed by the DM and PAP and the PAP members will prepare their PA Final Findings Reports. The DM considers the recommendations made by PAP in their PA Final Findings Reports to determine whether the submission is 'Sufficient' or 'Deficient'. The DM then prepares a PA Final Findings Letter, which is issued to the submitting AP.

The Addendum is evaluated in accordance with Table 1 to determine whether it is 'Sufficient' or 'Deficient'. Table 1 specifies the types of errors, field work or clarifications that are considered acceptable as part of an Addendum versus the level of additional work that exceeds what is acceptable in an Addendum.

If it is determined the information provided in the Addendum supports the original conclusions and does not exceed the level of additional work that is defined in Table 1 as being acceptable, the submission will be determined to be 'Sufficient'.

If the Addendum reveals that there was insufficient information available at the time of the original submission to support the submitting AP's recommendation for issuance of an instrument; and/or the additional work is substantial in nature (e.g., new investigation of a previously unexplored APEC), the submission will be determined to be 'Deficient'. In this case, the new information provided in the Addendum will not be reviewed and commented on as part of the PA. Instead, the information provided in the Addendum will be reviewed when a resubmission is made.

Once a site has been the subject of a 'Deficient' PA finding, the outcome and site details are recorded by CSAP. Any resubmission or future submission for all or a portion of such a site will be subject to a NRPA, regardless of which AP or applicant makes the submission.

5.5. Resubmissions following a Deficient Final Findings

Following a 'Deficient' PA finding for a site, resubmission fees will apply, and review of the Addendum and any revised documents will be undertaken by the same DM and PAP (if possible) as the initial PA if resubmission for the legal instrument is applied for within six (6) months of the previous PA finding.

In the case of a resubmission for a site that was previously found 'Deficient', where more than six (6) months has passed, the submission is considered a 'new' submission and a complete submission package, along with applicable fees, must be submitted to CSAP. The submission will be subject to a NRPA, regardless of which AP or applicant makes the submission.

5.6. Additional Guidance

Although different issues may be raised by the PAP in their PA Stage 1 Reports, there must be consensus between the PAP members and the DM that the issues raised have the potential to affect the conclusions of the submission. If a consensus cannot be reached, the DM has several options to reconcile the PAP members' differences of opinion. The DM can either:

a) Retain an additional PAP member(s) to request that these individuals review the submission; or,
b) Choose to accept one PAP member's report conclusion over the other, in which case it is at the discretion of the DM whether to provide the submitting AP with one or both PAP members' reports. The DM can also, at their discretion, not accept the findings of the PAP members

regarding the need for additional information. If so, the DM will review the relevant section(s) and specify items requiring clarification in the PA Stage 1 Findings letter.

Where the PAP members cannot reach a consensus on a recommendation (Sufficient or Deficient) or a PAP member is unable to complete their review, the DM may undertake the PA, including the detailed review of the submission. In such a case, the DM will review the submission and determine whether the submission is 'Sufficient' or 'Deficient' in consultation with the PAC.

6. Final PA Outcomes

Sections 30, 31, and 32 of the CSAP Rules describe the PA process and possible outcomes. Table 1 provides guidance for assessing if submissions are 'Sufficient' or 'Deficient'. Table 1 guidance is not exhaustive; case-specific variations will be warranted for some submissions.

6.1. Sufficient Submissions

Once a submission is found to be 'Sufficient', no further information is required from the submitting AP and the submission would be forwarded to the BC ENV. If a PA is found to be 'Sufficient' following the Stage 1 review, the Stage 1 Report Findings are considered the PA Final Findings by the DM.

6.2. Deficient Submissions

If a submission has been found to be 'Deficient', it is not mandatory that the applicant or AP make a resubmission. However, any future submissions for the site will be subject to a NRPA.

Further guidance regarding what may constitute a 'Deficient' submission is provided in Table 1, with the potential steps/outcomes following a 'Deficient' finding presented in a flow chart in **Table 3**.

6.3. Incomplete Performance Assessment

In rare circumstances, such as when a landowner decides they no longer need a legal instrument, or when an AP is not paid for their services during a PA, a PA may be categorized as incomplete. If during the PA process such circumstances are encountered, the submitting AP is required to provide, in writing to the PA Coordinator, a request for the PAC to review the circumstances and assess eligibility for an incomplete PA. Documentation should include communications and or documents providing evidence of the circumstances leading to the request. The PA Coordinator will respond to the request within one (1) month.

7. Remedial or Disciplinary Measures Associated with Deficient Submissions

Pursuant to section 33 of the CSAP Rules, the Discipline Committee may impose remedial measures to the submitting AP. The PAC will inform the Discipline Committee when a submission is found to be 'Deficient'. The DM of the PA will summarize the rationale for the 'Deficient' finding in a letter to the chair of the Discipline Committee.

The Discipline Committee will consider the reason(s) for the 'Deficient' finding, as well as the submitting AP's PA history and remedial measures assigned for recent and similar 'Deficient' findings, when determining remedial measures for the submitting AP.

Depending on the issue(s) for which a submission is found to be 'Deficient', either the Standards AP, the Risk AP, or both, may be subject to remedial measures.

The PAs carried out by the PAC, and the potential remedial measures determined by the Discipline Committee, will be undertaken in good faith, and in a fair and courteous manner.

The PAC may notify the Discipline Committee if there is evidence that the submitting AP had deliberately attempted to circumvent regulations or requirements (whether fraudulent or not) or in other ways had deliberately provided misleading statements.

8. PA Final Findings Appeal Timing

An AP who wishes to appeal the PA Final Findings and/or remedial measures imposed must state their intention to do so within seven (7) days of receiving the document(s) in accordance with section 35 of the CSAP Rules. A rationale for launching an appeal must be received within 20 working days of the appeal notification.

9. Scope of PAs

A PA will largely be based on PA guidance provided in the "CSAP Practice Guidelines" (Practice Guidelines). However, the Practice Guidelines specify that it is the responsibility of the submitting AP to look beyond the Practice Guidelines when appropriate. Similarly, the PAP members shall use their professional judgment to determine whether an AP submission subject to a PA generally conforms with the Practice Guidelines.

As part of the AP submission, the submitting AP is encouraged to identify, either as part of the supporting reports or as a separate document, the rationale for professional judgement exercised to make a recommendation that is, or could be, interpreted to be inconsistent with the Practice Guidelines. It is recommended that the following principles guide the DM and PAP members during the PA:

- The protection of human health and the environment is paramount.
- If in doubt regarding a regulatory or other issue that warrants guidance, the DM will request that the BC ENV provide the necessary guidance/clarification in writing. If the question is complex and requires substantial description of site conditions, then the DM will request that the submitting AP prepare the request for guidance/clarification to be forwarded to BC ENV by the DM and copied to the submitting AP and PA Coordinator. The DM will confirm that the BC ENV and the submitting AP are both included in any written correspondence originating from the PAC.
- The Practice Guidelines should guide the PA. It is encouraged that the Practice Guidelines checklists be used by PAP members to guide their review.
- Where atypical methods or interpretations have been employed, all assumptions and uncertainties associated with conclusions and recommendations must be properly documented.
- The use of reasonable and practical professional judgment by the AP is acceptable if defensible and properly documented; and if due consideration of site-specific conditions and limitations were considered.

- The submitting AP is not required to 'look behind' the data except as circumstances warrant, and they may rely on the data provided such as chemical analyses, borehole and test pit logs, etc. included in reports provided the data meet typical quality assurance and quality control (QA/QC) requirements.

- The PA focuses on major issues with the potential to affect the identified conclusions and recommendations, and if an instrument should be issued. Minor issues should not be commented on.

- The DM should seek clarification from the submitting AP regarding critical information such that the submitting AP is provided reasonable opportunity to address potential deficiencies or issues. A submission is not 'Deficient' if clarification satisfactory to the PAP is provided by the submitting AP.

- The PAP is expected to review all submission documents but is not expected to 'look behind' the information presented in the documents. Review efforts should be focused on issues which have the potential to impact the conclusions of the report or the site's eligibility for the instrument being applied for.

- Submissions are 'Deficient' if significant supplemental information (such as additional field investigations beyond verification of the results of existing investigations) is required; or if any additional remediation is required to support the recommendation (refer to Table 1 for details).

- The submitting AP is encouraged to prepare a Review of Findings Report (RoFR) documenting their review and considerations or use the Practice Guidelines to record their review findings. The RoFR or completed Practice Guidelines would be utilized to help expedite the PA process but will not be considered part of the submission package. CSAP recommends the RoFR or the Practice Guidelines be retained in the submitting AP's files and only forwarded to CSAP if selected for a PA.

  RoFRs or the completed Practice Guidelines must not include information that has not been included in the reports that comprise the submission (e.g., new search results, calculations).

10. Selection of PAP Members

The CSAP Board, at the recommendation of the PAC, appoints PAP members that meet specific qualifications (as outlined in a Request for Qualifications). PAP members are then contracted to undertake PAs and are compensated for their work by CSAP. Potential PAP members and DMs must consider the potential for an actual or perceived conflict of interest to exist prior to agreeing to become a PAP member for a particular PA. If such a conflict is identified, the issue must be identified to, and discussed with, the PA Coordinator. Such conflicts could include PAP members, or their firm, who worked on the project, provided a proposal for a project, who worked on adjacent properties or who have a standing contract with corporations who may be involved with either the project or projects on adjacent properties.

Table 1: Performance Assessment Process Clarification Chart

<table>
<tr><th colspan="2">Stage 1 Findings: Additional Information Required</th></tr>
<tr><td colspan="2">A submission may be found to require additional information if:
A report contains documentation errors or mandatory information is missing (i.e.: text, calculations, table, figures or appendices);
A conclusion is not clearly supported by the data and/or the rationale presented;
The level of site investigation and/or remediation/risk management appears to be insufficient; or,
A conclusion that has the potential to affect the recommendation for issuance of the instrument appears to be incorrect.</td></tr>
<tr><td colspan="2">The following type of additional information may be provided as an Addendum to the AP submission in response to Stage 1 findings:
Correction to, or provision of missing text, calculations, tables, figures and appendices;
Presentation of additional data/details which were already available but had not been adequately presented; or,
Collection of additional field data for confirmation of conclusions drawn as further defined below under Final Findings, ‘Sufficient’.</td></tr>
<tr><th colspan="2">Final Findings</th></tr>
<tr><th>Sufficient</th><th>Deficient</th></tr>
<tr><td>A submission is considered Sufficient if the information provided in the Addendum indicates that:
The correction to, or the provision of missing text, calculations, tables, figures and appendices completes the reporting requirements.
Data that was previously omitted (but available at the time of the submission) or inadequately discussed was found to support the conclusions.
Additional confirmatory field data substantiates the conclusions drawn; this does not include new investigations of any unidentified or not previously investigated APEC/PCOC or medium.
The scope of the additional confirmatory sampling is limited compared to the original sampling scope.</td><td>A submission is considered Deficient if the information provided in the Addendum indicates that:
The response to the ‘Additional Information Required’ is submitted more than two (2) months after the date the Stage 1 Findings were provided to the AP, unless a request for extension has been granted by the PAC Coordinator.
The AP fails to adequately correct or provide missing text, calculations, tables, figures or appendices.
Data that was previously omitted or inadequately discussed does not support the original conclusions.
An unidentified or not previously investigated APEC/PCOC or medium required investigation.
Additional confirmatory field data do not support previously drawn conclusions.
The submission was ineligible for Protocol 6, or the incorrect instrument was applied for.
The scope of the additional confirmatory sampling was not limited compared to the original scope.</td></tr>
</table>

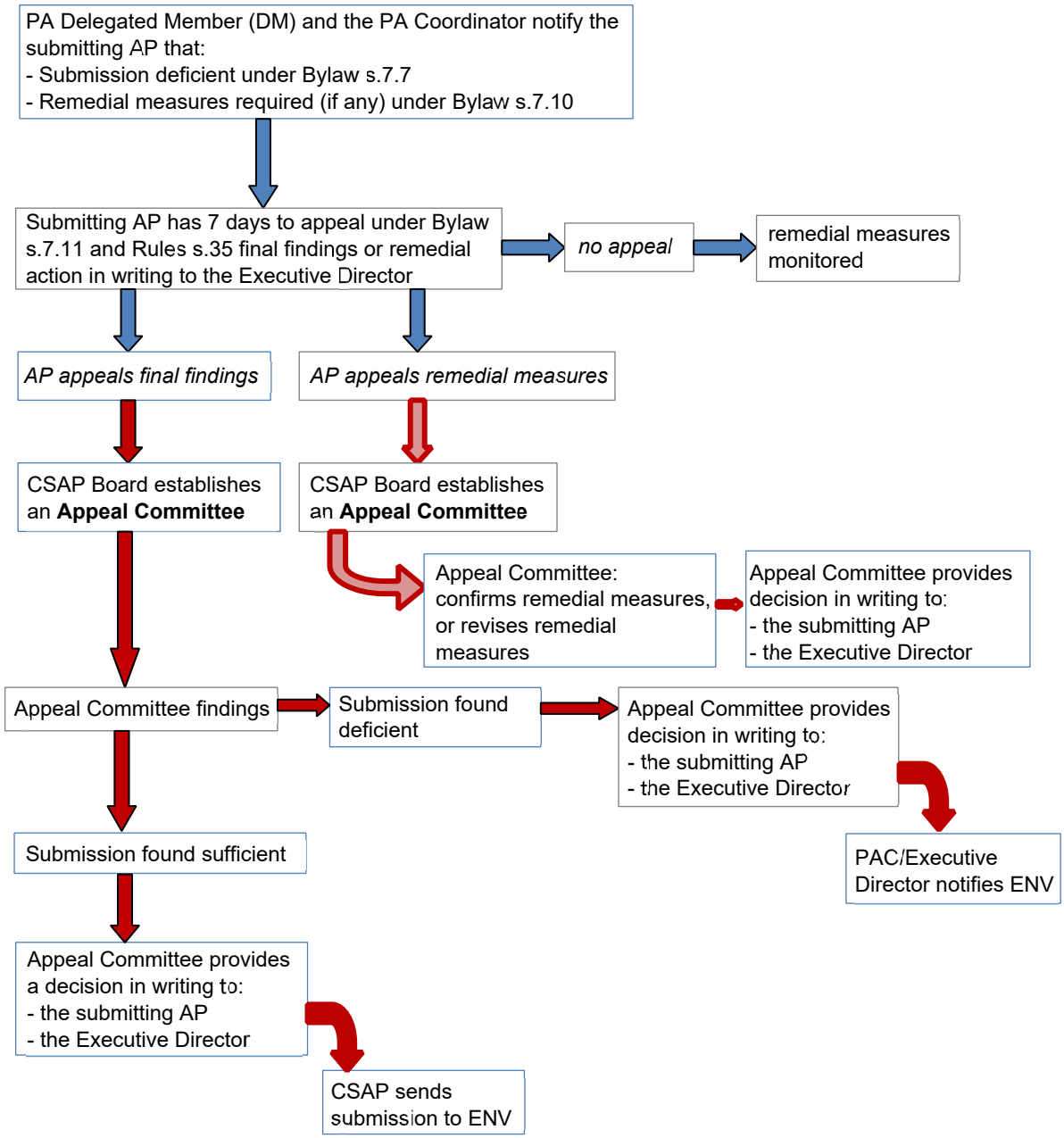
	• A conclusion that would affect the recommendation for issuance of the instrument was incorrect. • The risk management measures proposed are not adequate to address the risk or are overly conservative. • The scope of the additional receptors, exposure pathways and chemicals of potential concern was not limited compared to the original scope. • The technical content of the original reports requires revision.

Note: The guidance may not cover all possibilities, and case specific variations may be warranted.

Table 2: Typical Performance Assessment Timeline

Action	Stage 1 Findings (Sufficient) (Working Days)	Final Findings (Working Days)	Total (Working Days)
Initial and selection of a submission by the PA Coordinator for PA.	5		
Stage 1 Report prepared by PA Panel (PAP) members and submitted to Delegated Member (DM). **Note:** PAP Members have 10 days from the time they receive a copy of the submission.	10		
For RA Performance Assessments additional time is required for review and preparation of the Stage 1 Report.	5		
Review of Stage 1 Report by DM and approval for forwarding to submitted AP by CSAP.	5		Std – 20 Risk – 25
If the Stage 1 Report indicates that 'Additional Information Required': • The submitting AP has up to two (2) months to prepare an addendum to the submission providing the requested additional information. • During this 2-month period, the submitting AP may request a meeting with the PAP, DM and PA Coordinator to the review the Stage 1 Reports and their DRAFT additional information addendum.			
PAP members review the additional information addendum(s) provided by the submitting AP and issue Final Findings Report to DM.		10	
Review of the Final Findings Reports by DM and preparation of the Final Performance Assessment Findings letter by the DM and forwarding to submitting AP by CSAP.		5 10	Std – 35 Risk – 45

Table 3: CSAP Deficient Performance Assessment Flow Chart



Note: In the case of a 'Deficient' submission, the BC ENV will be notified of the Site ID/PID.