



At a Glance

Why We Did This Review

The U.S. Environmental Protection Agency (EPA) Cross-Media Electronic Reporting Regulation (CROMERR) specifies the requirements for states, tribes and local governments that operate delegated programs to accept electronic reporting, including electronic signatures, from regulated facilities under most environmental regulations. Once a system is put in place that satisfies the requirements of CROMERR, regulated facilities can file electronic reports instead of paper reports. This will reduce the amount of paper created and transferred and, thus, reduce the cost of reporting and compliance monitoring. This initiative ultimately helps the EPA strengthen its enforcement of regulations to protect human health and the environment.

This report addresses the following EPA themes:

- *Embracing EPA as a high performing organization.*
- *Working toward a sustainable future.*

For further information, contact our public affairs office at (202) 566-2391.

The full report is at:
www.epa.gov/oig/reports/2014/20140321-14-P-0143.pdf

EPA Needs to Improve Management of the Cross-Media Electronic Reporting Regulation Program in Order to Strengthen Protection of Human Health and the Environment

What We Found

The EPA lacks documented procedures that reflect current operations of the CROMERR program. Such procedures are an integral component of an effective management control program as outlined in Office of Management and Budget Circular A-123. While CROMERR applications require State Attorney General (or the chief administrative official in the case of tribes and local governments) approval, the EPA lacks processes to ensure approvals from designated officials. The EPA has neither implemented monitoring activities to verify a CROMERR system's functionality before and after approval nor implemented processes to ensure CROMERR applications are completed, reviewed and approved within required time frames.

An absence in management controls could lead the EPA to receive electronic documents that are unacceptable in administrative or judicial enforcement proceedings.

The EPA had not made it a priority to keep procedures current for implementing CROMERR business practices. Many of the noted deficiencies could have been averted with management emphasis. We noted that 20 percent of the reviewed CROMERR applications lacked support for State Attorney General determinations. We noted that one state changed its CROMERR process without notifying the EPA and another implemented its CROMERR application differently than what the EPA approved. Without current documented business practices, the EPA increases its risks that CROMERR applications may not be processed according to prescribed requirements and meet the high level of integrity needed for enforcement activities.

Recommendations and Planned Agency Corrective Actions

In addition to updating its current procedures, we recommend that the EPA:

- Create a process to verify a state's compliance with CROMERR and implement a completeness review process consistent with CROMERR.
- Develop internal guidance for staff to use in determining acceptable evidence for designation from the State Attorney General (or the chief administrative official).

The agency concurred with our recommendations and provided a complete corrective action plan. We consider these recommendations resolved.

Noteworthy Achievements

The EPA is developing a new management system which will allow CROMERR stakeholders to monitor their CROMERR applications through the agency review process.