CROMERR & Verify's New Request for Certificate (RFC) Module

Motorcycle/ATV Manufacturer Webinar December 2016



Agenda

- Important Motorcycle/ATV Dates
- CROMERR and the User Registration Process
- CROMERR and Certification
 - Overview of Process
 - MyCDX
 - Maintain Manufacturer Information
 - Uploading Certification Documents
 - Request for Certificate Process
- Demo of CROMERR Request for Certificate Process
- Questions
- Appendix: CROMERR Requirements
- Appendix: Sample CDX CRK Letters



MC/ATV Implementation Dates

- Submit MC/ATV CROMERR documentation by 02/10/2017 to increase likelihood that the CROMERR signer role will be added to the user's Verify account in order to be able to request certificates
- EPA must complete or "deny" all pending MC/ATV certificate requests on 02/23/2017 in preparation for deployment of new RFC module
 - Any MC/ATV certificate requests denied by EPA must be resubmitted by the manufacturer using the new RFC module beginning on Monday, 02/27/2017
- Beginning Monday 02/27/2017 all MC/ATV certificate requests (New, Revised, CSI Updates) can only be submitted using the new RFC Module by the CROMERR signer
 - IMPORTANT- Only CROMERR Signers who have completed the Verify registration process will be able to see and access the new RFC module



CROMERR AND THE USER REGISTRATION PROCESS



Cross-Media Electronic Reporting Rule (CROMERR)

- CROMERR (40 CFR part 3) provides the framework for electronic reporting for all of the EPA's environmental regulations
- CROMERR establishes standards for information systems that receive reports and other documents electronically
- The CROMERR program ensures the enforceability of regulatory information collected electronically by EPA and EPA's state, tribal and local government partners.
- Under CROMERR, electronic reporting directly to EPA requires submission through EPA's Central Data Exchange (CDX)



System Roles for Each Company

Functional Roles	Description
Company Authorizing Official (CAO)	Identifies, vouches for, and manages the "Verify Submitters" and "CROMERR Signers"
CROMERR Signer	Takes legal responsibility for all of the information used as the basis for a request for certificate
Verify Submitter	Submits certification and compliance information to Verify (not including certificate requests)
Additional Roles	Description
Maintain Manufacturer Information	Provide updates to industries, addresses, contacts, test labs and other manufacturer information
Upload Compliance Documents	Submit non-certification compliance documents 6



Company Authorizing Official

- To establish a CAO you must submit:
 - Sponsor letter to establish CAO(s) for the company
 - Signed by a senior company manager to identify CAOs
 - Electronic Signature Agreement (ESA) signed by CAO
 - Verify User Registration Information spreadsheet

https://www.epa.gov/vehicle-and-engine-certification/checklist-verify-registration-package

Sponsor Letter for the Verify CAO CAO - use these templates to Print letter on company letterhead establish CAO(s) for your company List name(s) of CAO(s) Include the Date Sign the letter in ink (wet ink signature) by Senior Manager blank Verify CROMERR Company ESA for the CAO Authorizing Official (CAO) For each CAO listed in the sponsor letter Sponsor Letter (Word) Complete ESA blank Verify CROMERR Company Signed in ink (wet ink signature) by CAO & proper witness Authorizing Official (CAO) **Electronic Signature Agreement** Information Spreadsheet for Verify User Registration For each CAO listed in the sponsor letter (ESA) (Word) Fill in Manufacturer Code and Date blank Verify User Registration Fill in the contact information Information (XLS) ** Select CAO



CROMERR Signer(s)

- To establish CROMERR Signer(s) you must submit:
 - Sponsor letter signed by the CAO
 - Used only to identify Verify Submitters and CROMERR Signers
 - ESA for the CROMERR Signer
 - Verify User Registration Information spreadsheet

https://www.epa.gov/vehicle-and-engine-certification/checklist-verify-registration-package

Sponsor Letter for Verify Submitter and CROMERR Signer CROMERR Signer - use Print letter on Company Letterhead these templates to establish ☐ List name(s) of CROMERR Signer(s) CROMERR Signers(s) for your ☐ List names(s) of Verify Submitters company ☐ Include the Date ☐ Sign the letter in ink (wet ink signature) by a CAO blank Verify CROMERR User **ESA for the CROMERR Signer** For each CROMERR Signer listed in the sponsor letter Sponsor Letter (Word) * ☐ Complete ESA blank Verify CROMERR Signer ☐ Sign the ESA in ink (wet ink signature by the CROMERR **Electronic Signature Agreement** Signer) (ESA) (Word) Information Spreadsheet for Verify User Registration blank Verify User Registration For each CROMERR Signer listed in the sponsor letter Information (XLS) ** Fill in Manufacturer Code and Date Fill in the contact information ☐ CROMERR Signer selected



Verify Submitter(s)

- To establish Verify Submitter(s) you must submit:
 - Sponsor letter signed by the CAO to establish Verify Submitter(s)
 - Used only to identify Verify Submitters and CROMERR Signers
 - Verify User Registration Information spreadsheet

https://www.epa.gov/vehicle-and-engine-certification/checklist-verify-registration-package

Sponsor Letter for Verify Submitter and CROMERR Signer Verify Submitters – use these Print letter on Company Letterhead templates to establish Verify List name(s) of Verify Submitter (s) Submitters(s) for your company Include the Date Sign the letter in ink (wet ink signature) by a CAO Information Spreadsheet for Verify User Registration blank Verify CROMERR User For each Verify Submitter listed in the sponsor letter Sponsor Letter (Word) * Fill in Manufacturer Code and Date blank Verify User Registration Fill in the contact information Information (XLS) ** Select Industry Roles



Contact Info for EPA Registration

Mail complete hard-copy CROMERR documentation to:

Verify Team c/o CGI Federal, Inc. 12601 Fair Lakes Circle Fairfax, VA 22033

 Questions regarding registration can be sent to:

verifydpc@epacdx.net



Verify User Registration & CROMERR Process

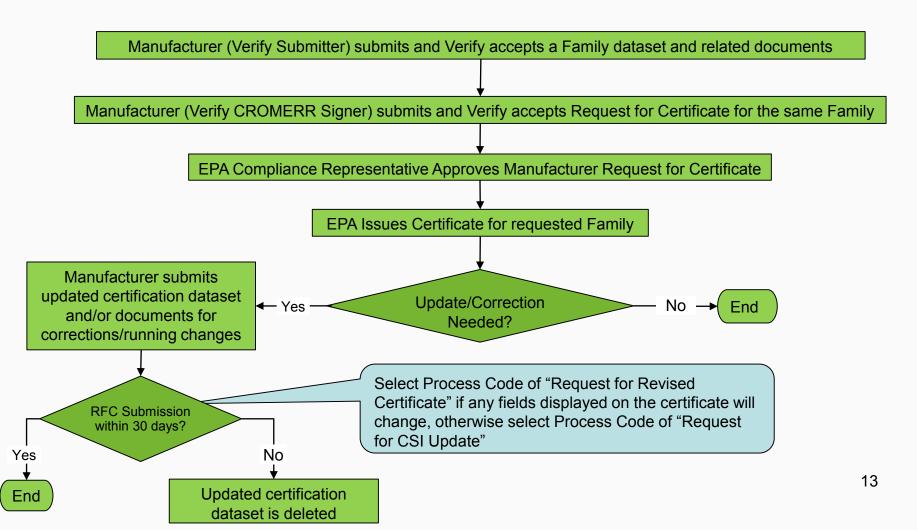
- Once approved, each user will receive an email with instructions for finalizing their registration and a link to access their CDX accounts.
- Existing Verify users getting the new CROMERR Signer Role:
 - Upon first log in after the new CROMERR signer role has been added, the user will be required to establish security questions/answers that will be needed during the certificate request process
- To ensure that these notifications aren't filtered as spam/junk mail, please add <u>helpdesk@epacdx.net</u> to your address book/contact list



CROMERR and Certification



Verify Certification Process Overview





"My CDX" Verify Roles

CDX Central Data Exchange

MyCDX Inbox My Profile Submission History

_	Services	Manage
<u>Status</u>	<u>Program Service Name</u>	Role
8	VERIFY: Vehicles and Engines Compliance Information System	Certification Module: Electric-MC, Portable Fuel Containers, Snowmobile, HD-Evap, HD-Engine CFF
8	VERIFY: Vehicles and Engines Compliance Information System	Cross Industry Services
8	VERIFY: Vehicles and Engines Compliance Information System	Maintain Manufacturer Information
8	VERIFY: Vehicles and Engines Compliance Information System	MC/ATV
8	VERIFY: Vehicles and Engines Compliance Information System	Upload Compliance Documents
8	VERIFY: Vehicles and Engines Compliance Information System or Engine Compliance	View Manufacturer Information
8	Verify-RFC: Request an Engine, Vehicle or Component Certificate of Conformity (CROMERR)	CROMERR Signer

Click on "Maintain Manufacturer Information" to update industries, addresses, contacts, etc.

Click on the applicable industry to submit the required certification datasets and documents

Click on "Upload Compliance Documents" to submit non-certification compliance documents

Click on "CROMERR Signer" to request a certificate.



Maintain Manufacturer Information



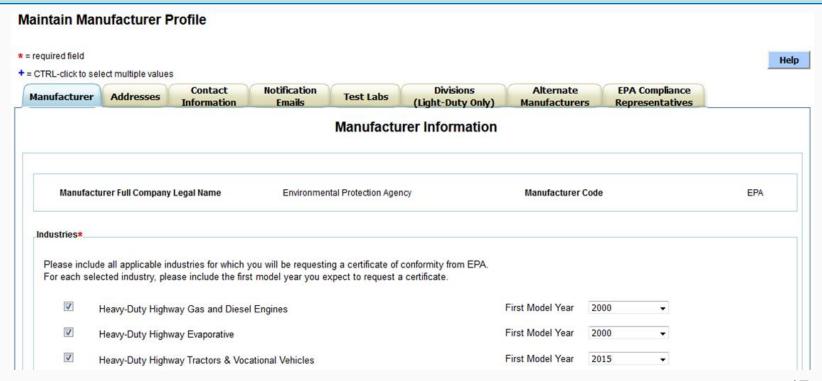
Maintain Manufacturer Information

- Each company is responsible for keeping all of the information in Verify's "Maintain Manufacturer Information" module complete and up-to-date
 - Add any new or missing industries, addresses, contacts, test labs, notification emails, etc
 - Inactivate any obsolete addresses, contacts, test labs, etc
- EPA certification engineers rely on this information
- A special Verify role is needed for "Maintain Manufacturer Information", otherwise users will only have access to "View Manufacturer Information" for their Manufacturer Code



Manufacturer Information

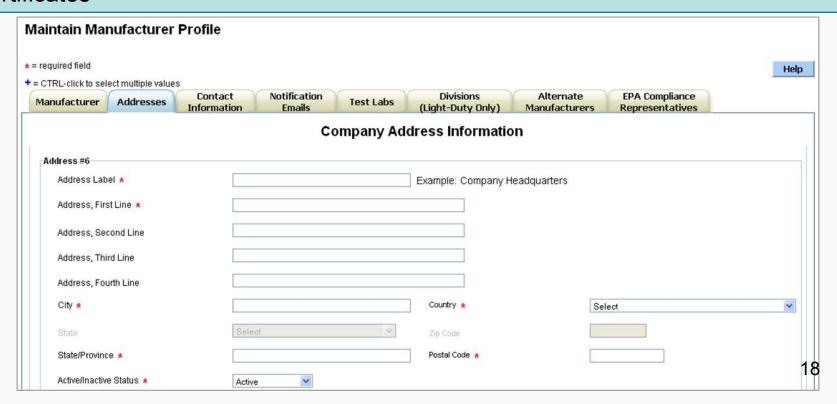
The appropriate industry sector(s)* must be selected as "industries" on this tab in order to submit requests for certificates





Addresses

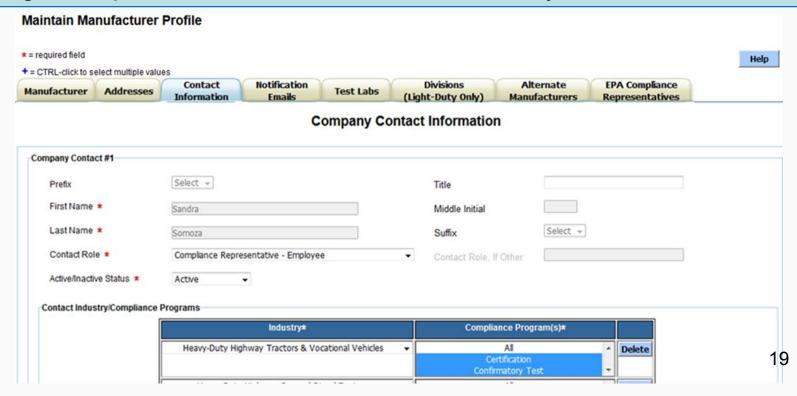
All company addresses must be entered on this tab in order to submit requests for certificates





Contact Information

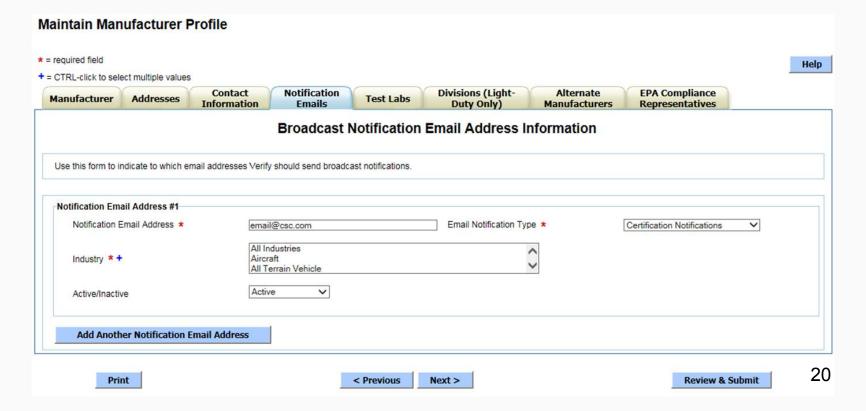
- All company contacts must be entered (or inactivated) on this tab with the applicable industries selected for each contact.
- An industry will not appear in the RFC pull-down unless the CROMERR Signer is specified as a contact here for that industry.





Notification Emails

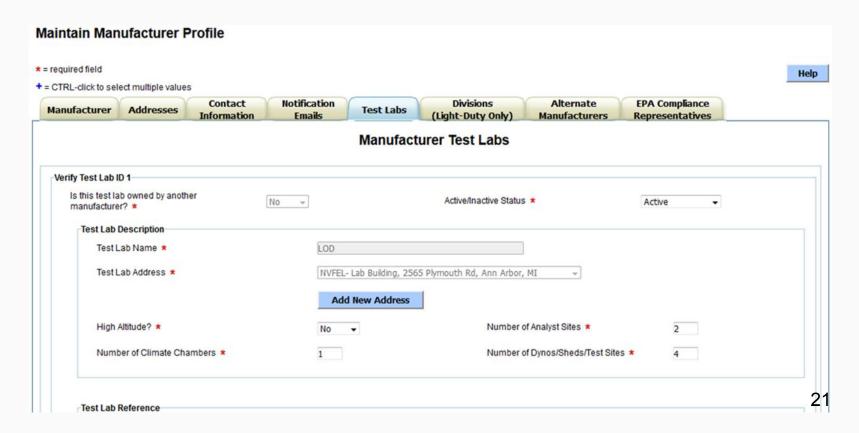
All company contacts must be entered (or inactivated) on this tab in order to submit requests for certificates





Test Labs

Test lab information only applicable if performing or contracting tire or aerodynamic testing





Uploading Certification Documents



Uploading Family Datasets & Certification Documents

- The "Request for Certificate" link has been removed from each industry home screen and is instead on the MyCDX page (for CROMERR Signers only)
- The "Upload Compliance Documents" link has been renamed to "Upload Certification Documents"



About CDX
MyCDX
Inbox
Change Password
Frequently Asked
Questions
Help & Support
CDX Home
Terms & Conditions
Logout

Verify: Engine and Vehicle Compliance System

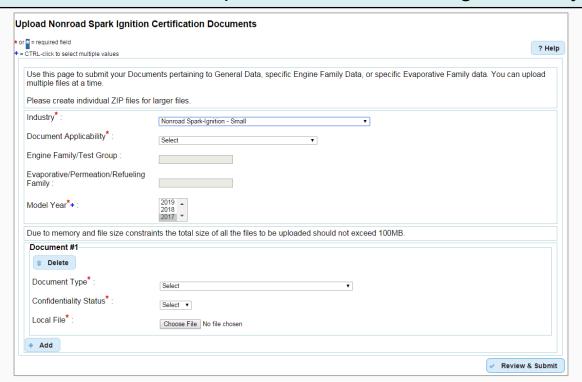
MyCDX > Nonroad Spark Ignition

- Upload Nonroad SI Certification Documents
- Nonroad SI Evaporative Components/Equipment
- Small SI Engine Family
- Large SI Engine Family
- Marine SI Engine Family



Uploading Certification Documents

- The Document Type pull-down list on this screen will only include certification document types for the applicable industry (upload non-certification documents from the Upload Compliance Documents link on the MyCDX page)
- All certification documents for a family must be uploaded before the RFC can be submitted (but do not have to be uploaded before the Engine Family dataset)





MC/ATV Certification Documents

Required documents are indicated in bold and with an asterisk (*).
 The other documents are either optional or conditionally required (see the MC/ATV Data Requirements and Business Rule documents for details).

Document Type	Required?
AECD (Auxiliary Emissions Control Device) Supplemental Information	Optional
Application for Certification (CBI)*	Required
Application for Certification (FOIA)*	Required
CARB Executive Order	Optional
Certification Preview Meeting Information	Optional
Pre-Model Year Averaging Plan	Required if the field "Does it participate in ABT?" from CSI.1 equals "Yes"



CROMERR Request for Certificate Process



Prerequisites

- The full amount of the certification fee is paid for the Family
- The Family Dataset for the Family being certified must have been accepted by the system
- All of the required documents must have been accepted by the system
- Pass/Fail determination must equal "Pass" for all test results
- User submitting the Request for Certificate must have the "CROMERR Signer" Role in Verify

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CROMERR Signer Role in Request for Certificate Module

The CROMERR Signer

Request

Makes the Request for Certificate or CSI Update

Review

- Reviews the application and related documents that have been submitted through Verify
- Determines completeness

Attest

Attests that the submission is true and accurate

Sign

Electronically signs the request for certificate



Request for Certificate – CROMERR Package

- The CROMERR package is compiled and stored in the CROMERR Archive when a Request for Certificate (or Revised Certificate) is completed and includes:
 - Formatted Certificate Summary Information (CSI) PDF report
 - Supporting certification documents
 - RFC Compliance Statement Answers
 - Encrypted electronic signature information
- A link to the CROMERR package will be sent to the CROMERR signer's CDX in-box



Request for New Certificate

Request a certificate for a Family that has not been previously certified

Request for Revised Certificate

 Request a revised certificate for a certified Family if any fields displayed on the certificate have changed

Request for CSI Update

Request a Certificate Summary Information (CSI) update for a certified Family where updates have been made to the Family dataset and/or certification documents but no changes to any fields displayed on the certificate

Delete Request for Certificate

 Delete a request for a certificate (only for a Family that has not been acted upon by EPA)



Post-Certification Updates

- Any updates to either the family dataset or supporting certification documents must be completed by submitting a Request for CSI Update or Request for Revised Certificate as applicable
 - CDX in-box notifications will remind the CROMERR Signer who submitted the original request for certificate to complete the required update
 - If a Request for Revised Certificate or Request for CSI Update are not completed by the required date, the family updates will be deleted
 - Submitting the applicable request recompiles the CROMERR package with the updated information

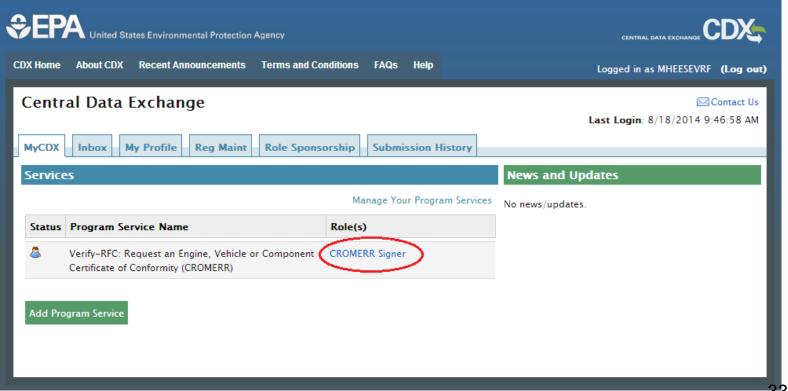
31



CROMERR Request for Certificate Screenshots



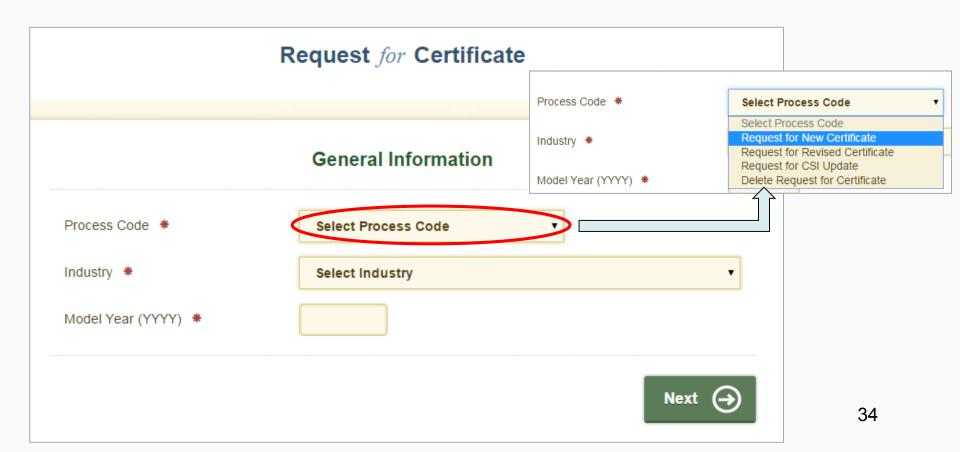
 Only Verify users with the CROMERR Signer role will have the link to the Request for Certificate module on their MyCDX page



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Select the applicable Process Code for this submission



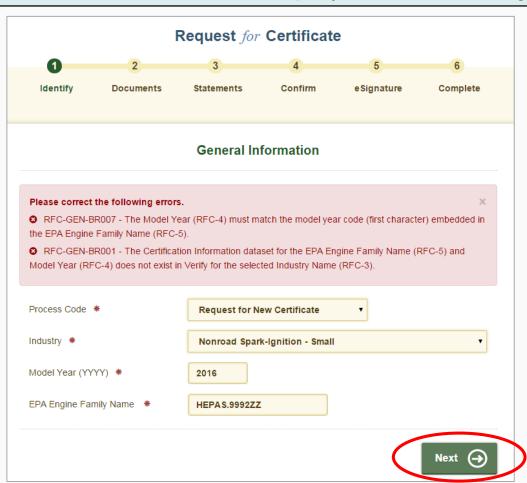


 When Process Code and Industry are selected, the Request for Certificate progress status bar will appear and the fields displayed on the screen will change as applicable

0	2	3	4	5	6
Identify	Documents	Statements	Confirm	e Signature	Complete
		General In	formation		
Process Code	*	Request for N	ew Certificate	•	
Industry *		Nonroad Spar	k-Ignition - Small	•	
Model Year (YY	YY) *				
EPA Engine Fa	mily Name *				



Applicable validation errors will be displayed after clicking on "Next"



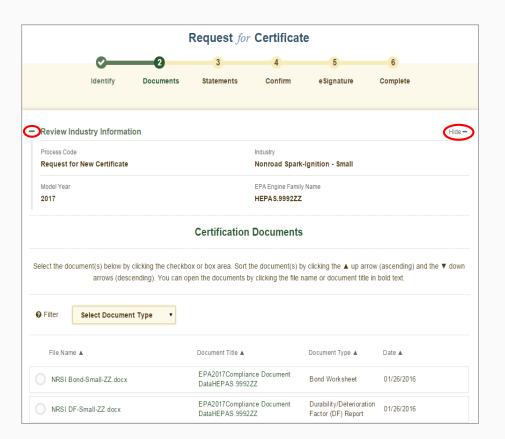


Click "Next" again after addressing any errors on the screen

0	2	3	4	5	6
Identify	Documents	Statements	Confirm	eSignature	Complete
		General In	formation		
rocess Code	*	Request for N	ew Certificate	٧	
ndustry *		Nonroad Spar	k-Ignition - Small	•	
lodel Year (YY	YY) *	2017			
PA Engine Fai	mily Name *	HEPAS.9992ZZ			



 Click the minus sign ("-") to hide the fields from previous screens. Click the plus sign ("+") to display the information again



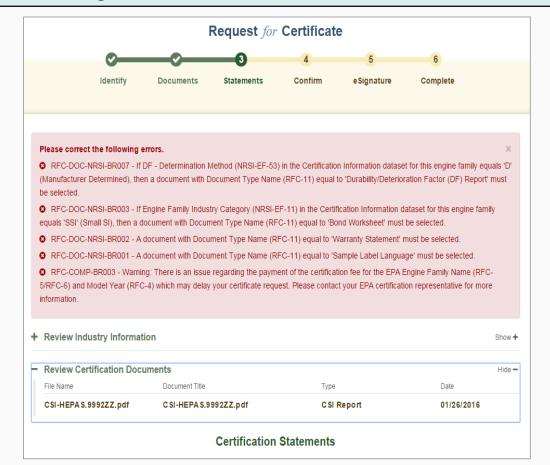


 All certification documents submitted for the family name entered on the previous screen as well as "General Applicability" documents for the same industry and model year will be displayed on this screen. Select all applicable documents for this family and click "Next".

Select the document(s) below by clicking the checkbox or box area. Sort the document(s) by clicking the ▲ up arrow (ascending) and the ▼ down arrows (descending). You can open the documents by clicking the file name or document title in bold text.							
3 Filter	Select Document Type	,					
File Nar	me 🛦	Document Title ▲	Document Type ▲	Date ▲			
NRSI E	3 ond-Small-ZZ.docx	EPA2017Compliance Document DataHEPAS.9992ZZ	Bond Worksheet	01/26/2016			
) IRSI [DF-Small-ZZ.docx	EPA2017Compliance Document DataHEPAS.9992ZZ	Durability/Deterioration Factor (DF) Report	01/26/2016			
IRSIN	Warranty.docx	EPA General Applicability Compliance Document Data	Warranty Statement	01/21/2016			
NRSI	Sample Label-NRS1.docx	Sample Label General Applic ability	Sample Label Language	01/25/2016			
CSI-HE	EPAS.9992ZZ.pdf	CSI-HEPAS.9992ZZ.pdf	CSI Report	01/26/2016			



 Any document errors will be displayed on the Certification Statements screen after clicking on "Review".



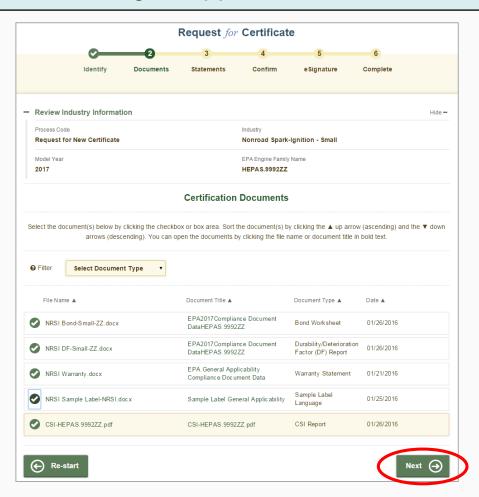


- To return to the Document Selection screen, either click the "Back" button or the check mark (♥) above "Documents"
- If expected document(s) are not appearing on the Document Selection screen, the missing document(s) must be uploaded from the Upload Certification Document link on the industry's Certification page.



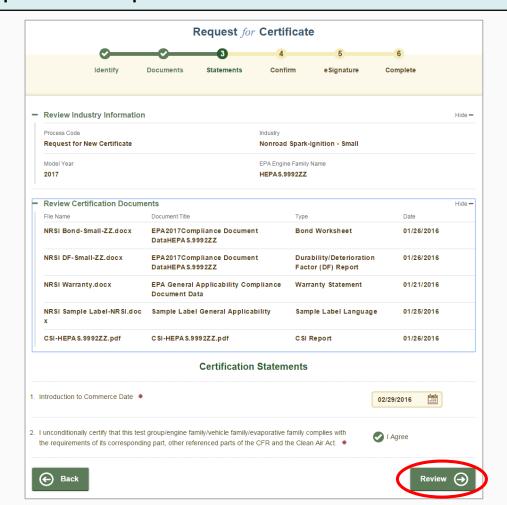


Click "Next" after selecting all applicable documents for this family



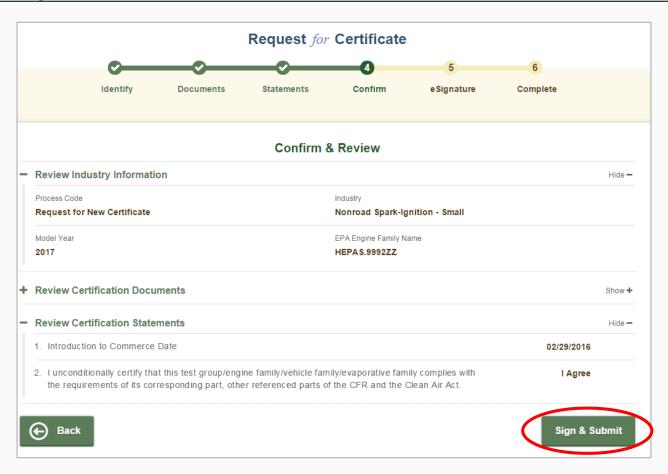


Answer all required Compliance Statements and click "Review"



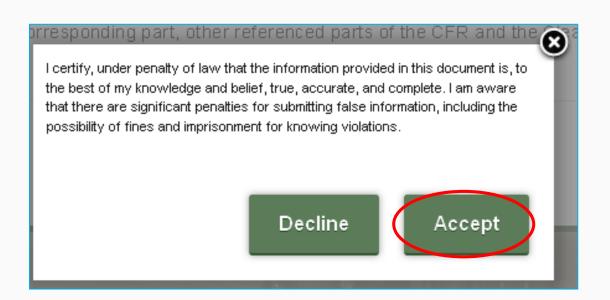


 Review the information you provided and click "Sign & Submit" if everything is correct





Read the CROMERR Electronic Signature message and click "Accept"



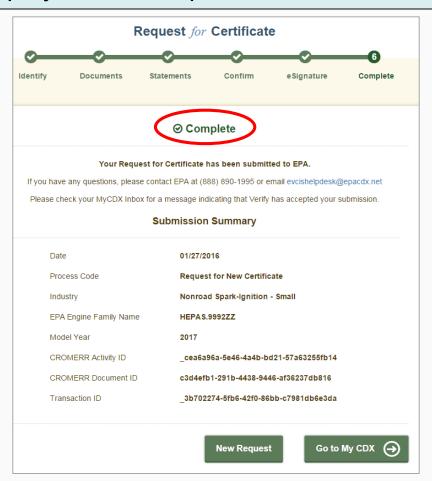


 Provide your CDX password and answer your secret question to electronically sign your Certification package. Click "Sign".





 Your Request for Certificate package has been submitted to EPA when "Complete" is displayed at the top of the confirmation screen.





 The CROMERR Signer will receive a confirmation message in their CDX In-box for success Request for Certificate submissions. Click on the link to view the CROMERR package.

MyCDX	Inbox	My Profile	Submission History	

Request for Certificate for HEPAS.9992ZZ Received

From Verify Administrator

Date 1/27/2016 2:15:43 PM

The Nonroad Spark-Ignition - Small Request for Certificate for EPA Engine Family Name HEPAS.9992ZZ has been successfully signed and submitted to EPA. You can view the signed Request for Certificate package through the Submission History link on your MyCDX page or by using the link below. Contact your EPA compliance representative for additional information.

https://test.epacdx.net/SilentHandoff?URL=https://testngn.epacdxnode.net/cromerr-review/action/submitter/details/details/ c4469f5a-7fd4-43e1-8899-4c2d10750f19

Transaction Identifier: _877822f6-26d1-4b1a-b852-e988c40136f3

Click here to view the status history.

Thank you for submitting your request to Verify via CDX.

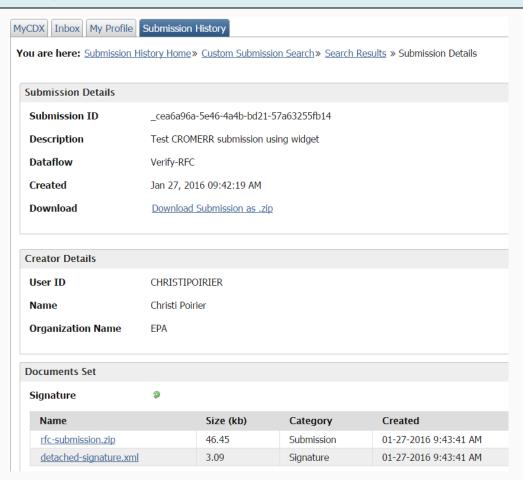






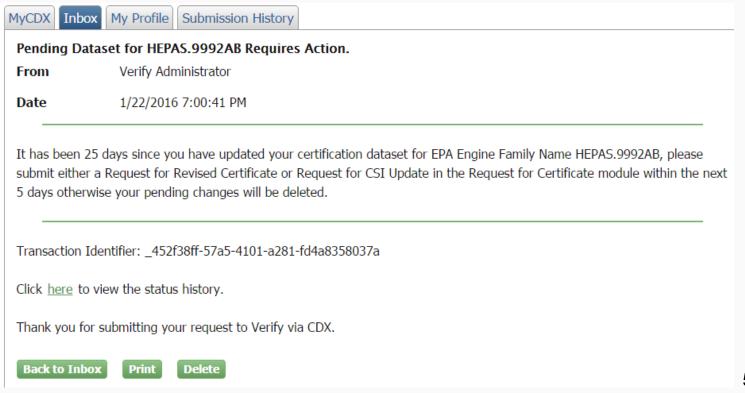


 The Request for Certificate CROMERR Package can be viewed by clicking on the .zip file below



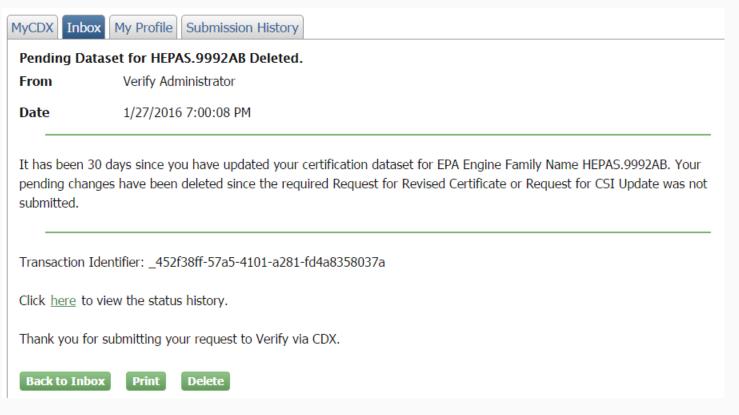


 CDX Inbox warning message for any updates/corrections made to certified families that have not been finalized with a Request for Certificate (or Request for CSI Update).





 CDX Inbox message for any updates/corrections made to certified families that were not finalized within 30 days with a Request for Certificate (or Request for CSI Update) and were therefore deleted.





Additional Verify Information Sources

- Verify Website (On-Highway): https://www.epa.gov/vehicle-and-engine-certification/certification-non-electric-motorcycles
- Verify Website (ATV/Dirt Bike): https://www.epa.gov/vehicle-and-engine-certification/certification-all-terrain-vehicles-atvs-and-dirt-bikes
- Listserver: https://lists.epa.gov/read/all_forums/subscribe?name=verify
- Manufacturer Guidance letters: <u>www.epa.gov/dis</u>
- For CROMERR and User Registration questions, please contact verifydpc@epacdx.net
- For Verify Request for Certificate questions, please contact: <u>evcishelpdesk@epacdx.net</u>



QUESTIONS



APPENDIX – CROMERR REQUIREMENTS



Cross-Media Electronic Reporting Rule (CROMERR)

- What is CROMERR?
 - CROMERR (40 CFR Part 3) provides the framework for electronic reporting for all of the Environmental Protection Agency's (EPA) environmental regulations
 - CROMERR establishes standards for information systems that receive reports and other documents electronically
- Whom does it affect?
 - Regulated entities that submit reports and other documents to EPA under Title 40 of the Code of Federal Regulations
 - States, tribes, and local governments that are authorized to administer EPA programs under Title 40



Cross-Media Electronic Reporting Rule (CROMERR)

- How does Verify implement CROMERR?
 - Verify implements CROMERR through its Request for Certificate Module
 - Applications are deemed final when a manufacturer submits a Request For Certificate (RFC)
 - An authorized "CROMERR Signer" must electronically sign that submission
 - Electronic signatures will have the same legal force as the handwritten signature
 - The CROMERR Signer is an individual who is authorized to sign the document by virtue of his or her legal status or his or her relationship to the entity on whose behalf the signature is executed



APPENDIX – SAMPLE CDX CRK EMAILS



CRK Email – U.S. Template

Hello [Persons name here],

A Pre-registration Customer Retrieval Key (CRK) has been created for you to utilize the VERIFY application via the Central Data Exchange (CDX) using the Manufacture Code of [insert MFR here] with a Role of "Submitter" and an ID Type of:

Certification Module: [Industry]

Please contact the CDX Helpdesk at (888)890-1995 or (970) 494-5500 where you will need to refer to this ticket [enter ticket number here] to obtain your CRK VERIFY CRK notification for [enter MFR here]

Once you have received your CRK, please access the CDX website using the following link:

https://cdx.epa.gov/SSL/CDX/preregistration.asp

If you already have a CDX account, you will be asked to provide the password for it.

If you have more than one CDX account, you will be asked to select the one you wish the CRK to be applied to and then provide the password for it.

If you don't currently have a CDX account, you will be asked to create an account with a user ID of your choice.

If you have any questions or require assistance, please contact us by utilizing one of the two contact numbers above or by emailing us at Helpdesk@epacdx.net



CRK Email – International Template

Hello [Persons name here],

A Pre-registration Customer Retrieval Key (CRK) has been created for you to utilize the VERIFY application via the Central Data Exchange (CDX) using the Manufacture Code of [insert MFR here] with a Role of "Submitter" and an ID Type of:

Certification Module: [Industry]

Please contact the CDX Helpdesk at (888)890-1995, 970-494-5500 internationally or by email, Helpdesk@epacdx.net where you will need to refer to this ticket [enter ticket number here] to obtain your CRK VERIFY CRK notification for [enter MFR here]

Once you have received your CRK, please access the CDX website using the following link:

https://cdx.epa.gov/SSL/CDX/preregistration.asp

If you already have a CDX account, you will be asked to provide the password for it.

If you have more than one CDX account, you will be asked to select the one you wish the CRK to be applied to and then provide the password for it.

If you don't currently have a CDX account, you will be asked to create an account with a user ID of your choice.

If you have any questions or require assistance, please contact us by utilizing any of the contact methods as listed above.