CROss-Media Electronic Reporting Rule (CROMERR)

Open Call: Regulatory Reform Opportunities and Shared Services

Executive Order 13777
"Enforcing the Regulatory Reform Agenda"

May 11, 2017

Introduction and Agenda

- Introductions

- CROMERR Overview

- CROMERR Shared Services Overview

- Stakeholder Feedback on CROMERR

- Closing Remarks

Moderator Process Notes

- EPA is recording and will subsequently transcribe this conference call. The transcription will be made available in the agency-wide docket at EPA-HQ-OA-2017-0190.

- All participant lines are muted until the public comment period begins at 2:20 pm Eastern.

- If individuals have technical questions about the Shared CROMERR Services please email: sharedcromerrservices [at] epacdx.net

- If individuals have general questions about CROMERR please visit: https://www.epa.gov/cromerr

- If participants want to provide written feedback about CROMERR those comments should be submitted to the agency-wide docket EPA-HQ-OA-2017-0190 on www.regulations.gov by 11:59 Eastern on Monday, May 15th.

CROMERR Overview

Karen Seeh
U.S. Environmental Protection Agency
202-566-1175
seeh.karen@epa.gov

U.S. Environmental Protection Agency

What is CROMERR?

- **Cross-Media Electronic Reporting Rule**
  - Promulgated October 15, 2005. Codified under 40 CFR part 3.
  - Performance-based system standards; both technology and process neutral.
  - Focus is on EPA programs and state, local, and tribal government partners administering EPA programs.
    - Applies to electronic reporting of regulatory information under EPA programs.
  - Industry is not subject; generally a beneficiary of what CROMERR addresses.

- **More Information:** epa.gov/cromerr

U.S. Environmental Protection Agency

Key Benefits of CROMERR

- Ensures that EPA regulatory data collected electronically maintains the same legal integrity as paper submittals by providing common EPA standards for:
  - Establishing a copy of record
  - Integrity of electronic document
  - Opportunity to review and repudiate copy of record
  - Validity of electronic signature
  - Identity management and electronic signature authority

- Reduces barriers to electronic reporting by providing one-stop technical, administrative, and legal advisory services for EPA and EPA-authorized programs implementing e-reporting systems.

Electronic Reporting Process

- Regulated entities report directly to EPA and/or to EPA -delegated programs run by state, tribal and/or local agencies.

- **CROMERR does not require electronic reporting**
  - EPA and delegated programs may choose to collect some or all EPA regulatory data electronically.
  - EPA and delegated programs design the specifics of their electronic reporting approaches.
  - However, these approaches, both systems and related business processes, must comply with CROMERR technology and process neutral standards.
  - CROMERR is one of many elements in the implementation of electronic reporting.

- **EPA CROMERR Program reviews and approves "applications":**
  - Applications are plans on paper describing how the electronic reporting approach meets CROMERR standards.

CROMERR Implementation

- **EPA CROMERR program strives to be a valued partner to EPA programs and co-regulators**
  - Stresses customer service.
  - Provides electronic reporting expertise to minimize approval time and save resources.

- **A 2013-2016 initiative to improve CROMERR implementation**
  - <u>Most applicants are now "automatically" approved with a simple request for EPA action under CROMERR.</u>
  - Expanded technical guidance available to those applicants still pursuing custom-developed solutions.

- **As technology has changed, so has program implementation**
  - 80 percent of current CROMERR applicants pursue off-the-shelf and shared-service solutions.
  - Many use the EPA Central Data Exchange (CDX) shared services.

CROMERR Shared Services Overview

Greg Mitchell
U.S. Environmental Protection Agency
919-541-4823
mitchell.greg@epa.gov

U.S. Environmental Protection Agency

Background on CROMERR Shared Services

- Integrated Project Team of 20 States, EPA and ECOS

- **Objective:** "Define the requirements and policy implications for a shared set of CROMERR Services and Components that could be leveraged by states, tribes, and local governments to achieve CROMERR compliance."

- Four Categories of CROMERR Requirements:

  1) Registration and Account Management
  2) Identity Management
  3) Signature Device
  4) Signature Ceremony/Copy of Record

CROMERR Shared Services Benefits

- Provides streamlined functionality to automate manual tasks (e.g., identity proofing).

- Level of integration is determined by the implementer – states can use one, many, or all CROMERR services.

- Provides a consistent, standardized approach to CROMERR-compliant electronic reporting to regulated industry.

- Streamlines the CROMERR application and system documentation process.

- Reduces development and implementation costs and timeframes for co-regulators.

Shared CROMERR Services

CROss-Media Electronic Reporting Rule (CROMERR)

Technology neutral standards for electronic reporting

Shared CROMERR Services

- Web Services – CROMERR Input/Output functions for any system/platform
- Source Code – Systems & Web computer software using Web Services
- Advanced Services – Complete Website Capabilities
- Help Desk support
- Documentation and procedures / Pre-approved CROMERR Checklists

Shared Services Advancements

IPT Charter	Standard Web Services	Support Services	Advanced Services	Website Tools & Reports
Sep '12				
2013	2014	2015	2016	2017

Web Services

Charter

DEMO TOOL

sharedcromerrservices@epacdx.net

Service Desk

CROMERR Toolkit
- Access Authority
- Baseline CROMERR Checklist & Attachments
- Contractual and Project Planning Package
- Development Toolkit
- Example Shared CROMERR Demo Application

Streamlined Documentation

*First Production Partners

Website Services

LexisNexis Identity Proofing

Advanced Provisioning Services
- RetrieveRoles
- RetrieveRolesForDataflowAndPartner

Advanced User Information Services
- Authenticate
- AuthenticateUser
- RetrieveUser

Advanced Organization Services
- RetrieveOrganizationsByDataflow
- CreatePartnerOrganization
- UpdatePartnerOrganization
- RetrievePartnerOrganization
- RetrievePartnerOrganizationByExternalId

Web Services

*First Advance Partners

Advanced Submit

Admin Tools
- Alert Publishing
- Create User Account
- CROMERR Administration
- Advanced SCS Lexis Nexis Report
- Lexis Nexis Partner Summary Report
- Lexis Nexis User Detail Report
- Organization Management
- Pending Requests
- Pre-Registration
- Themes
- User Management

Administration & Reports

Alerts

Alert Tools

Shared Services Adoption
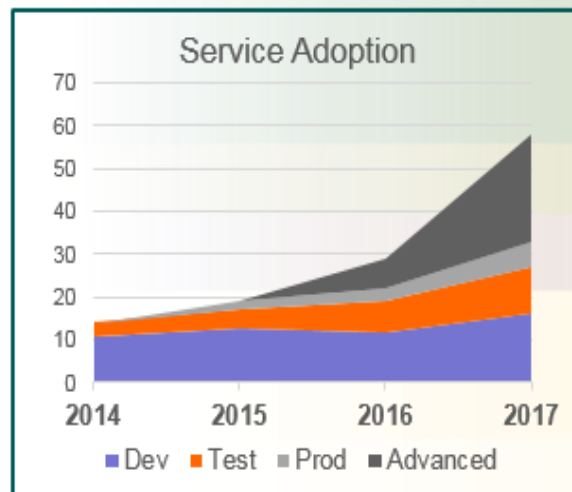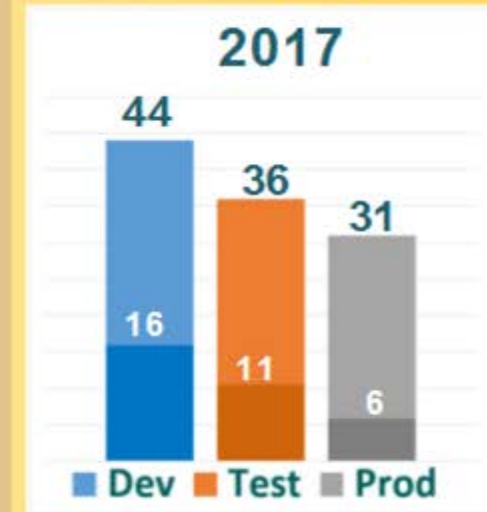
Recent Service Adoption Successes

- Oklahoma Department of Environmental Quality
09/15/2016

- Iowa Department of Natural Resources
01/05/2017

- Ohio Environmental Protection Agency
02/03/2017

Providing Comments

- EPA is ready to listen and will not be responding to any individual comments.

- Please mute your line to eliminate background noise (*6) or mute locally on your phone. If you are not muted and your line is interrupting the call, your line may be disconnected by an operator.

- Commenters will not but cued. Please be prepared to speak once the moderator calls for the "next commenter, please."

- Speakers are asked to:
  - Identify yourself and who you are representing
  - Limit your comment to two minutes. After two minutes we may interrupt you and move on to the next commenter.

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