**Shared CROMERR Services – Executive Summary**

**March 15, 2013**

**Background**

EPA’s Cross Media Electronic Reporting Regulation (CROMERR) sets technology-neutral and performance based standards for systems used by states, tribes, and local governments to receive electronic reports and documents from entities regulated under EPA-authorized programs. These standards cover a variety of system functions (e.g., security, user identification, etc.) designed to make electronic reports as legally defensible as paper submittals.

States and tribes have typically addressed CROMERR requirements by implementing system functions within their respective electronic reporting systems resulting in some duplicative investment of resources. Budget shortfalls, staff turnover, changing technology and complex program requirements pose challenges to organizations required to implement CROMERR and continue this duplicative investment.

In an effort to ease these challenges, the Exchange Network Leadership Council established the Shared CROMERR Services Integrated Project Team (IPT), comprised of EPA management and staff and 17 state representatives, in the fall of 2012. The IPT discussed and investigated opportunities for the adoption of information technology services that EPA maintains and co-regulators could use to meet CROMERR requirements. This Executive Summary broadly reviews the recommendations from the IPT.

**Shared CROMERR Services**

EPA’s Central Data Exchange (CDX) serves as the gateway through which environmental data enters the Agency and the designated system for meeting CROMERR requirements. The IPT recommends making EPA CROMERR services reusable and managed in a centralized way, co-regulators can leverage the CDX CROMERR services for their own reporting programs in a more cost effective and efficient manner. EPA will offer states and tribes a set of CDX services for CROMERR functions; states and tribes will be able to select the desired services and implement them to meet their organizational and system needs.

At a summary level, the services can be broken down into the following three categories:

* **Registration and Identity Management:**
	+ Services for creating, validating and maintaining accounts of reporting entities.
	+ Over 90 percent of IPT participants are interested in implementing a shared solution to help with Identity Proofing components within the Registration process.
* **Electronic Signature:**
	+ Services for authenticating credentials, verifying user intent, and electronically signing submissions from regulated entities that is as legally defensible as the traditional pen and paper approach.
	+ Over 80 percent of the IPT participants are interested in implementing a shared solution to help with the signature ceremony aspects of CROMERR.
* **Copy of Record (COR) Management:**
	+ Services for storing, maintaining, and retrieving data submissions at the level of legal integrity required by CROMERR.
	+ Nearly 70 percent of IPT participants are interested in implementing a shared solution that would help with COR management.

**Anticipated Benefits**

The following benefits are anticipated as a result of providing Shared CROMERR Services to states and tribes:

* **Reduced barriers for compliance –**The initial upfront and ongoing investment to meet CROMERR requirements will be reduced.
* **Improved CROMERR Compliance Assistance –** Adoption of Shared CROMERR Services will facilitate better responses to CROMERR compliance auditing activities.
* **Realization of Cost Savings –** There is great potential for States and tribes will realize costs savings by integrating shared CROMERR services as opposed to building and maintaining independent systems.
* **Common Support Model** – States and tribes will be able to leverage a common pool of resources, services and lessons learned to assist with implementation approaches and integration work.
* **User Friendly Experience to Regulated Communities**– States and tribes will be able to provide consistent and simplified registration and electronic signature processes to the regulated community.
* **Consistent Audit and Enforcement Practices** – Shared CROMERR services should provide a stronger legal foundation and more consistent practices in civil and criminal enforcement proceedings.

**Next Steps**

EPA is working with volunteer states to implement a set of pilot services that will be made available for testing by Q2 FY2013. EPA is planning to implement CROMERR services based on the results of the pilot and the level of state participation and interest. Following this initial release, EPA will plan a subsequent round of refinements and explore opportunities for expansion with additional rollouts to states and tribes. EPA is also seeking IPT support to develop a tool kit to make implementation easier for new co-regulators in the future, as well as providing communication channels and forums to share experiences with the Exchange Network Partners.