



RCRAInfo Change Management Process

Final Document

Prepared by:

**RCRAInfo Change Management Process Workgroup
for distribution to the National RCRA Program Community**

Approved by:

WIN/INFORMED Executive Steering Committee July 28, 2005

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BACKGROUND

The Waste Information Needs/Information Needs for Making Environmental Decisions (WIN/INFORMED) initiative originated in 1994 as a partnership between EPA and the States when the EPA's Office of Solid Waste (OSW) included an information management objective as part of its five-year Strategic Plan for the RCRA Subtitle C (RCRA C) program. The objective noted that the RCRA C program should be "information driven," and there should be a close connection between strategic goals for the RCRA C program and information available in the national data system, RCRAInfo. The overall vision for the WIN/INFORMED initiative was to integrate information management as a regular part of program development, program implementation, and program evaluation, while making reporting and using hazardous waste information as easy as possible.

The goal of WIN/INFORMED was to analyze the RCRA C information needs and then design the data system to provide the required information. WIN/INFORMED laid out a logical 5-stage process for defining RCRA C information needs and implementing changes to the data system: 1) planning, 2) analysis, 3) design, 4) construction, and 5) ongoing maintenance. The last stage, the ongoing maintenance phase, is as vital as the first four. Ongoing maintenance of the data system, including required system upgrades and enhancements, will need to continually take place to ensure RCRAInfo keeps pace with the changing information needs of the RCRA C program.

The WIN/INFORMED program analyses will end the Summer of 2005 and then ongoing maintenance of the RCRAInfo data system and related data collections is required to address the changing information needs for the RCRA C program. The last Program Area Analysis Report (permitting and corrective action) is completed and work is underway to re-design that system as required by the recommendations.

WORKGROUP SCOPE

The RCRAInfo Change Management Process (CMP) Workgroup was formed by the WIN/INFORMED Executive Steering Committee (ESC) to develop the process by which future changes to RCRAInfo will be determined, following the implementation of system changes required by the recommendations of all WIN/INFORMED Program Area Analyses (PAAs).

The CMP Workgroup was tasked with developing a streamlined change process which will allow all stakeholders to have an opportunity to submit change requests and suggestions, while also allowing all stakeholders a voice in deciding which system changes are implemented with the resources available to HQ OSW.

The workgroup was responsible for defining the issues, analyzing solutions, and proposing a process to the stakeholders for consideration. Issues discussed by the Workgroup included the:

- need for timely implementation of changes in the data system;
- level of effort and resources required to implement an ongoing change management process into our daily routines;
- requirement to report and track ALL future change requests using the new (to be released in RCRAInfo V3) RCRAInfo User Support Issue Tracking System (USITS); and

- need for RCRA C program and information management staff to continue to overcome “culture change” issues by improving communication and coordination for emerging RCRA C program changes that will impact information use and the data system.

ACKNOWLEDGMENTS

The RCRAInfo Change Management Process Workgroup is comprised of representatives from all major stakeholders in the process. This proposed RCRAInfo Change Management Process was developed by all members of the Change Management Process Workgroup:

- **Dan Bakk, US EPA Region 5 (Workgroup Co-lead)**
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- **Linda Prockish, Kansas**
- **Dina Villari, US EPA OSW (Workgroup Co-lead)**

INTRODUCTION

This report presents the proposed RCRAInfo Change Management Process (CMP) to provide timely controlled changes to RCRAInfo. These recommendations will facilitate and promote a more responsive and committed effort toward maintaining high quality information to support RCRA C program activities. Like the WIN/INFORMED initiative, the proposed CMP continues the partnership between EPA and the States. **For successful implementation of this new process, it is critical that all members of the RCRA C Community recognize the CMP as the only mechanism for reporting and evaluating the need and resources available to implement changes to the RCRAInfo data system.**

Since the new CMP must include the process for managing new or changing information needs of the RCRA C program, the CMP was designed to meet the needs of both the RCRA **information management** community and the RCRA **program management** community. These distinct, but often over-lapping, entities could also be called “**system users**” and “**data users**”. **System users** are those users who **both “input information”** into the RCRAInfo system and “**extract information**” they require from the RCRAInfo system. They maintain the data system and work with data, but generally do not apply data for a specific purpose. In general, **system users** often perform activities such as: entering data, deleting data, reorganizing data, receiving data from the RCRA C regulated community, transmitting data, extracting data, reporting system problems or “bugs”, running standard national or implementer-defined reports, and developing custom reports to meet their organization’s reporting requirements. “**Data users**” primarily “**extract information**” they require from the RCRAInfo system, and are users who run standard and customized reports to work with the data and apply it to setting goals, answering questions, solving problems, quantifying accomplishments, prioritizing workload, making decisions, and monitoring progress.

Data users in the States and EPA Regional offices often use the data to: provide RCRA site descriptions and activities related to regulated wastes; identify which sites and facilities to inspect; prioritize a permitting workload; evaluate performance of States regarding implementation of the RCRA C program; examine waste quantities and waste flow; understand the history of a particular facility; provide facility specific information to the public; track the effectiveness of legal instruments; monitor progress of a specific facility or State toward GPRA goals; prioritize facility workload; respond to information requests; show programmatic efforts to the public, state legislature and/or executive bodies and summarize and validate accomplishments.

Data users in EPA Headquarters will usually perform activities such as: proposing information requirements to implement voluntary or regulatory efforts; providing RCRA site descriptions and activities related to regulated wastes; estimating regulated universes for regulatory development and Information Collection Requests (ICRs); responding to public inquiries/FOIAs; investigating reductions in reporting/record keeping burdens; recommending data quality improvements; finding analytical uses for and limitations with the data; developing GPRA goals; designing GPRA measurement processes; planning for the Resource Conservation Challenge (RCC) initiative; providing RCRA C strategic planning analyses; and targeting constituents and facilities for waste minimization.

The overall vision for the WIN/INFORMED initiative was to more fully integrate the RCRA C program to facilitate communication between the information management system and the RCRA C program, and to integrate information management as a regular part of program development, program implementation, and program evaluation. To successfully implement this vision, requires continued efforts to enforce a “culture change” in the RCRA C Community to establish better coordination/communication regarding new or changing RCRA C program issues. In other words, all types of “**system users**” and “**data users**” must communicate with each other on a regular basis to ensure the data system can continue to capture the information required to support and implement the RCRA C program. From the analysis conducted by the CMP Workgroup, this “culture change” is required in all organizations- EPA Headquarters, EPA Regions and in the States. To support and facilitate this culture change, the following process recommendations were developed.

PROCESS RECOMMENDATIONS

The RCRAInfo CMP was developed by the Workgroup to:

- 1) identify required or desired changes to the nationally maintained RCRAInfo data and software;
- 2) facilitate consideration of the requested change by the national user community;
- 3) facilitate communication between program and information management staff; and
- 4) track all RCRAInfo change requests from receipt through resolution.

Version 3 of RCRAInfo will include a new component of RCRAInfo, the User Support Issue Tracking System (USITS), to facilitate the new CMP. **USITS is the tool that will be used by the entire RCRA C Community to initiate a request for change and will be instrumental to the success of the new RCRAInfo Change Management Process.** USITS was designed and developed by OSW's RCRAInfo Programmers to allow the RCRA C Community to enter and track the status of all issues, change requests, and system bugs that are identified by the Community. USITS will be accessible through RCRAInfo and designed to allow all RCRAInfo Users to comment on all CMP requests before they are approved or denied. As the RCRA C Community submits requests for change through the CMP, these changes will be reviewed by the USITS System Administrator (SA) and categorized into the appropriate change management types identified below:

The CMP Workgroup identified 4 major types of changes:

Operations and Maintenance of the National System and National Database: changes required to fix current programming errors/bugs; adapting the existing system to meet current and upcoming technological requirements; and updating system and/or user documentation.

Streamlining: short-term, low-cost, low level-of-effort changes to the national data system and/or database that result in minimum changes to our daily routines to incorporate the changes. (Examples: Adding or deleting event codes, field sorts, screen views, button placements, Denial of obviously superfluous, impractical requests, and changes to HQ Management Reports.)

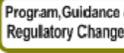
Program, Guidance and Regulatory: proposals requesting changes to RCRAInfo to address new or changing information needs for the RCRA C program.

Major Enhancements: proposals requesting changes to the national data system and/or database, however, the suggested change **does not** meet the criteria to be classified as “**Streamlining**”.

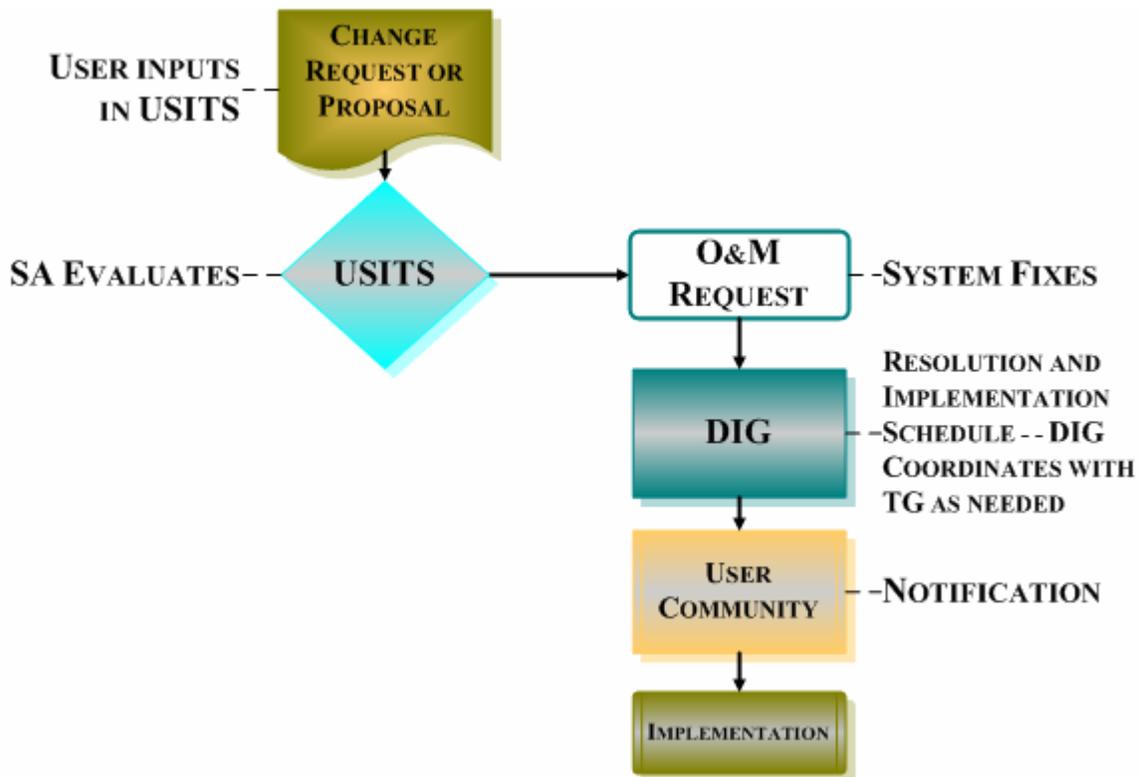
The anticipated timeframes to reach final recommendation for each type of request is in Appendix B with Streamline and O&M requests taking 2 ½ months and Program, Guidance, Regulatory, and Major Enhancements taking 6 months.

The CMP flow chart on the following page illustrates the CMP Workgroup’s proposed flow of change issues through the process. Immediately following the chart, you will find the recommended steps that each change type will follow to assist you in reading and understanding the chart.

The flow chart is interactive with the document. Each flowchart links to descriptions of the steps in the process. The definitions of the symbols are:

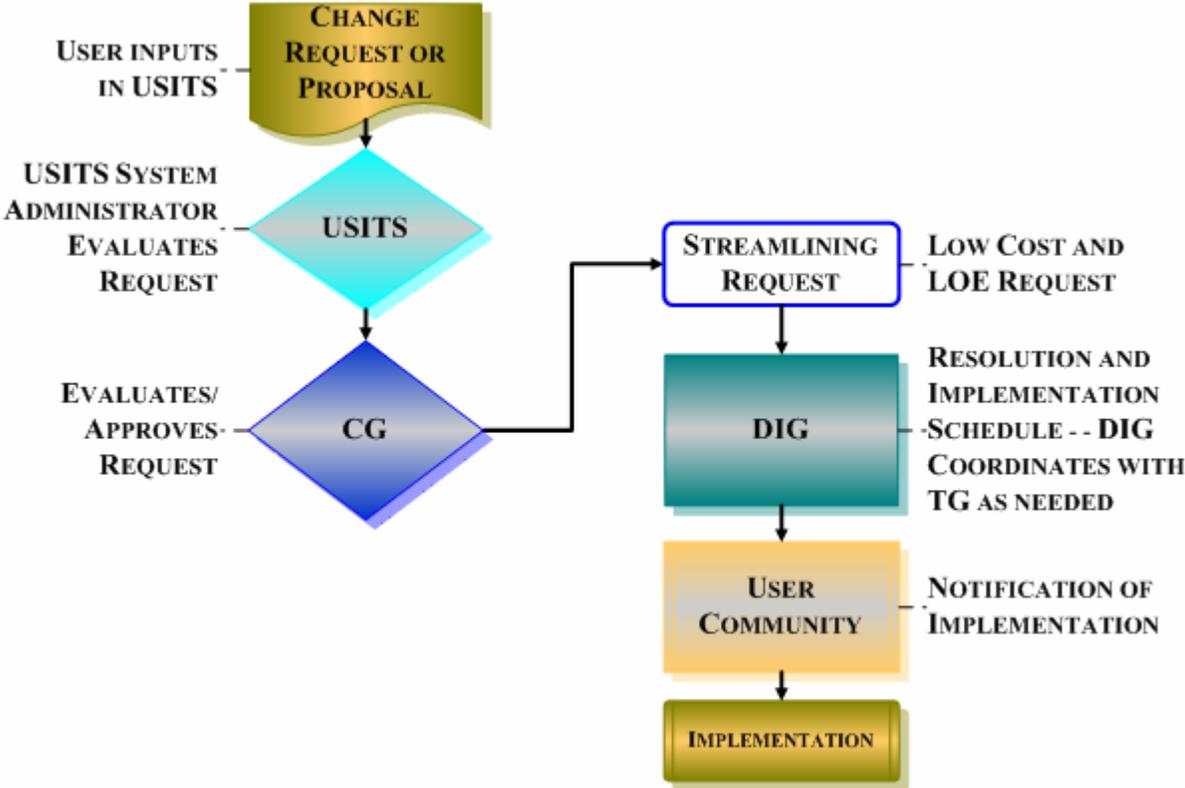
Symbol	Click on this symbol for a description of group's role in CMP:	Symbol	Click on this symbol for a description of group's role in CMP:
	User Support Issue Tracking System (USITS)	   	Any one of four major types of changes identified by the CMP Workgroup.
	Coordination Group (CG)		
	Program Groups (PGs)		Translation Group (TG)
	Design and Implementation Group (DIG)		Management Board (MB)

Flowchart Process for an Operation & Maintenance Request Figure 1



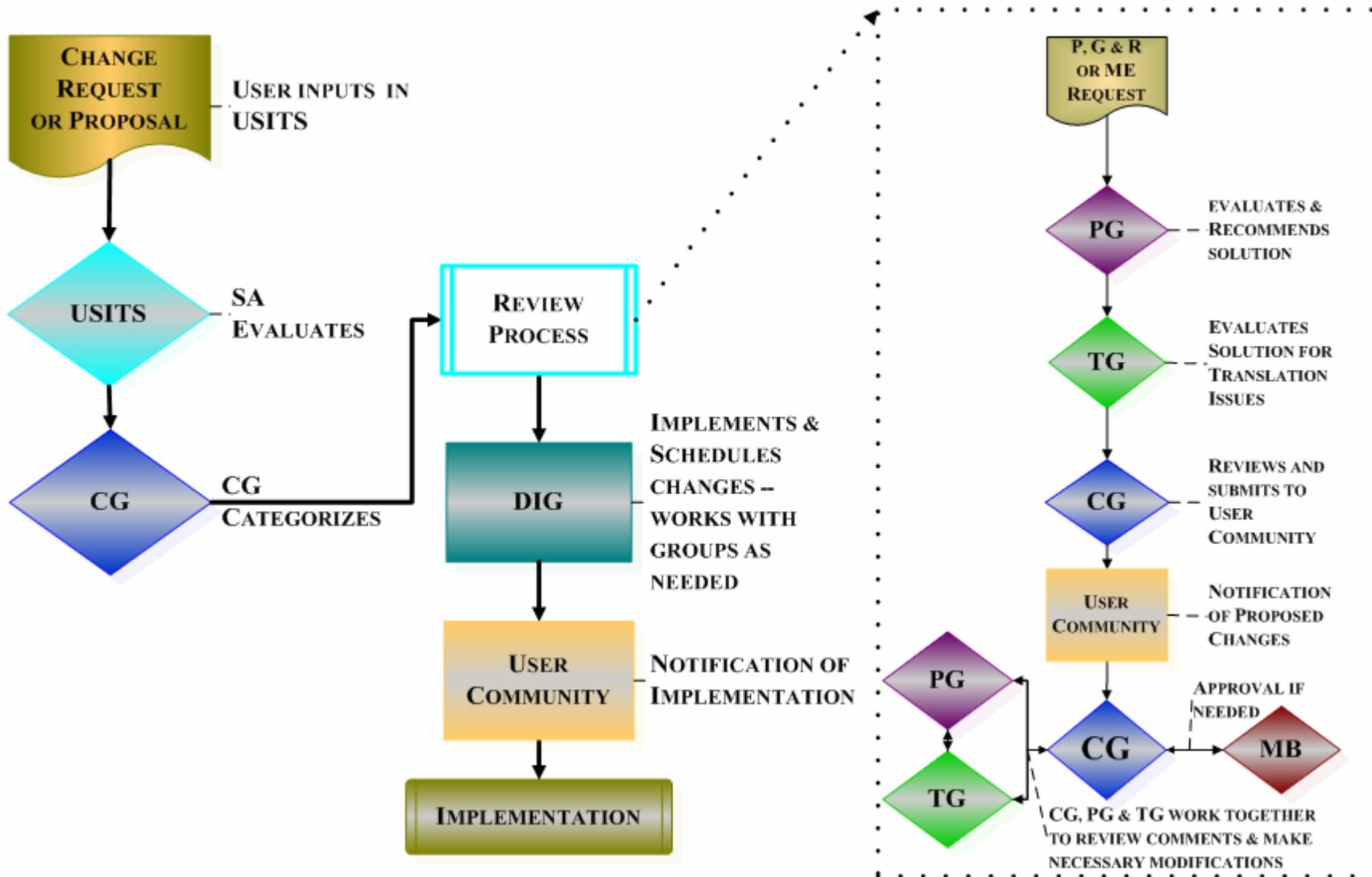
Flowchart Process for a Streamlining Request

Figure 2



Process for Program, Guidance & Regulatory or Major Enhancement Request

Figure 3



Step by Step Process, the following outlines each specific step a change request will take when “flowing” through the CMP: [Return to Fig 1, Fig 2, Fig 3](#)

Step 1 Change Issue/Request/Proposal (**Request**) entered by requesting User into RCRAInfo User Support Issue Tracking System (USITS). USITS System Administrator (SA) reviews and categorizes all **Requests** and clarifies as needed.

If **Request** is categorized as Operation and Maintenance (O&M):

1a-O&M Requests submitted directly to the Design and Implementation Group (DIG) for resolution. DIG will review and provide the RCRA C Community with an implementation schedule based on current resources available to implement changes. The Translation Group (TG) will review all O&M Recommendations.

1b-ALL Other Requests submitted to the Coordination Group (CG) for further review.

Step 2 CG will:

2a-Review and Categorize Request into one of the following categories. (Historic Requests will be available for reference to aid CG.)

1. Streamlining
2. Program, Guidance & Regulation (P, G & Reg)
3. Major Enhancements

2b-If Streamlining, CG will evaluate and approve/deny **Request** and notify requesting User and User Community. If CG approves, **Request** submitted to the Translation Group for review and comment, then to the DIG for scheduling and implementation.

2c-If P, G & Reg Request or Major Enhancement **Request**, CG will designate the applicable Program Group (PG) and forward **Request** to one of five PGs listed below. If necessary, more than one PG will be assigned the **Request**.

1. Corrective Action Group (CAG)
2. Permit/Closure Group (PCG)
3. Site Identification Group (SIG)
4. Waste Activity Group (WAG)
5. Compliance/Enforcement (CEG)

Step 3 Applicable PG will review, analyze and recommend how to proceed with **Request** (i.e., the CAG will review **Request** pertaining to RCRA Corrective Action, the PCG will review **Request** pertaining to RCRA Permitting/Closure). If necessary, more than one PG will review **Request**.

PG(s) forwards **Request** and PG Recommendation to Translation Group (TG) for review.

Step 4 TG reviews **Request** and PG recommendations and makes recommendations regarding translation issues. TG forwards **Request** and recommendation(s) to the CG for review.

[Return to Fig 1, Fig 2, Fig 3](#)

- Step 5** CG reviews PG and TG recommendations and prepares Recommendation for national review.
- Step 6** CG submits Recommendation to user community for national review.
- Step 7** National review and comment period.
- Step 8** CG, TG and applicable PG will review any comments received. Unless Management Board (MB) approval required, CG approves or denies Request based on feedback from national review. CG, TG and applicable PG will work together to revise Request and Recommendation if necessary.
- Step 9**
- A** CG approved Request and Recommendations not requiring Management Board (MB) approval will be submitted to Design and Implementation Group (DIG). CG, TG and PGs will work with DIG as needed.
 - B** Request and Recommendations which require Management Board (MB) approval will be submitted to the MB. MB approval may be necessary when Request requires significant resources to implement system changes.
- Step 10** Approved Requests and Recommendations go to DIG for implementation. CG, TG and PGs will work with DIG as needed. DIG prepares an implementation schedule.
- Step 11** Final Recommendation regarding Request distributed to User Community by CG with proposed implementation schedule.
- Step 12** Request implemented as scheduled. [Return to Fig 1, Fig 2, Fig 3](#)

PROCESS IMPLEMENTATION

The CMP Workgroup recommends establishing the following CMP Groups to implement the CMP and provide ongoing reviews of the RCRA C information needs identified by the RCRA C Community. Each of the CMP Groups should be made up of data and system users. To limit the resources required to implement the CMP (e.g., travel costs), the CMP Groups will primarily meet via Conference Calls on a monthly, or as needed, basis. An occasional face-to-face meeting of a CMP Group may be scheduled, and future RCRAInfo National Users Conferences will be used to conduct face-to-face CMP meetings with state funding provided by ASTSWMO.

The proposed roles and responsibilities of the CMP Group members identified below are defined in the **Roles and Responsibilities** section of this document. CMP Workgroup recommendations regarding how members of the CMP Groups will initially be populated is discussed in the **CMP Group Member Selection Process** section of this document.

Coordination Group (CG): This group will be the main body of the Change Management Process (CMP) and will be comprised of ten EPA HQ, EPA Regional, and State members (4 States, 2 Regions, 2 HQ/OSW and 2 HQ/OECA). One of the State representatives could be the Chair of the ASTSWMO Hazardous Waste Information Management Task Force (HWIMTF). **The CG will also serve as the decision making body for most of the issues moving through the CMP, with only those issues that require extensive resources or major changes in RCRA C program direction having to go forward to the Management Board (MB) for decision/approvals.** A good example of a request where the decision could stay at the CG level would be the recent request to change the Full Enforcement Universe with additional OP/LEG status codes. Decisions re: Streamlining requests will also be made at the CG level.

Program Groups (PGs): The CMP Workgroup proposes five different Program Groups to handle the various RCRA C program-specific issues received by the User Community that are considered Program/Guidance/Regulatory type requests. **Each of the PGs** will be comprised of an equal number of State and EPA members, a total of 6 (3 States, 1 Region, 2 HQ) that represent both RCRA C Program and Information Management staff from these organizations. OECA will have 2 members on Compliance/Enforcement Group and OSW will have 2 members on Waste Activity Group. These 5 groups will provide in-depth analysis of change requests within their specific program area. A request to track something new within the RCRA C program would be considered a Program/Guidance/Regulatory request and would be referred to one of these groups. The CMP Workgroup recommends establishing these Program Groups as ‘standing’ groups rather than having the groups ‘assigned’ as needed, which will delay evaluation of the change request. A good example of a request that would be forwarded by the CG to the appropriate PG would be the recent request to add a new environmental indicator code to the RCRAInfo Corrective Action Module. The proposed **Program Groups** are as follows:

- **Corrective Action Group (CAG)** - This group will handle any of the programmatic Corrective Action issues that are forwarded through the CMP.
- **Permit/Closure Group (PCG)** - This group will handle any of the programmatic Permitting or Closure issues that are forwarded through the CMP.
- **Site Identification Group (SIG)** - This group will handle any of the specific site issues such as Notification or Part A collection information that are forwarded through the CMP.
- **Waste Activity Group (WAG)** - This group will handle any issues related to the collection of hazardous waste activity such as that information found on the Biennial RCRA Hazardous Waste Report.
- **Compliance/Enforcement Group (CEG)** - This group will handle any of the programmatic Compliance, Monitoring, or Enforcement related issues that are forwarded through the CMP.

Design and Implementation Group (DIG): This group will support the CMP by implementing the changes to RCRAInfo that are identified and approved by the CG or MB. This group will primarily consist of HQ/OSW Information Management Branch’s (IMB) RCRAInfo staff, however, this Group will consult with the CG and the appropriate Program Group(s) as requests for Streamlining, Program/Guidance/Regulatory, and Major Enhancement changes are approved and forwarded for design and implementation. Consultation with the Program Groups will allow State and Regional input into the design process. This Group will make the necessary changes to correct software ‘bugs’ identified by the RCRA C Community and will address other Operations and Maintenance issues as they arise.

Translation Group (TG): The group will have 6 members (3 States, 1 Region, 1 HQ/OSW, and 1 HQ/OEI/CDX), and will be comprised of current or planned State translators and an EPA Region with translator states. This group could develop guidelines for translation as well as ensure that everyone is kept informed of when new edits are added to the system. All recommendations will be reviewed by the TG to see if any translator issues apply. There are many states that have become Translators of some type of RCRA C program information that needs to be loaded into RCRAInfo. This Group would be responsible for commenting on any request/issue that will require a change to any of the translator systems. They will also ensure that system enhancements are only made once during a calendar year and that the User Community is notified in writing with the specifications six months prior to the release of this information.

Management Board (MB): This group will be comprised of six members (3 States, 1 Region, 1 HQ/OSW and 1 HQ/OECA); all key Senior RCRA C Managers within their organizations. HQ/OSW and HQ/OECA members will be at the Division Director or Associate Division Director level, while the Regional representative will be the equivalent-level Senior Manager in the Region currently responsible for leading all RCRA C program activities. The State representatives will be the Senior Manager currently serving as the Chair of the ASTSWMO Hazardous Waste Subcommittee, the Vice-Chair of the Subcommittee and a State Senior Manager designated by the Subcommittee Chair. This group will generally only be called upon to evaluate and approve a change request if the CG is unable to reach consensus with regards to implementation of a critical Program, Guidance or Regulatory change, or a Major Enhancement change will require significant resources at all levels (EPA HQ, Regions and States) to implement. (Example: adding a module to RCRAInfo). The group will also support the CG's implementation of the CMP and will discuss with the RCRA C Community changes in information flows to state management through the PPA, ERP or other guidance, policies and agreements.

ROLES AND RESPONSIBILITIES

The following outlines the Roles and Responsibilities of the RCRA C Community in implementing the RCRAInfo Change Management Process.

General Roles and Responsibilities for the RCRA C Community

- The entire RCRA C Community will be required to submit change requests or suggestions for operational, maintenance, structural, report development, data calculation or information collection changes to RCRAInfo through the formal CMP for review and potential implementation. The RCRAInfo USITS tracking system will be the single source of information available to the RCRA C Community regarding specific RCRAInfo change requests, comments, suggestions, and reported problems.
- All users are strongly encouraged to participate in the change management process. USITS will be designed to allow discussion and questions on all requests before they are approved or denied.
- All state and regional users are encouraged to contact their specific state or regional RCRAInfo lead to discuss RCRAInfo questions or problems before submitting change requests through the CMP.

General Roles and Responsibilities for RCRA Program Managers

- All RCRA Program Managers, regardless of location (EPA HQ, EPA Regions or State agencies), need to be active users of RCRAInfo data and users of RCRAInfo data quality tools and reports. An effective change management process will be dependent upon the ongoing use and maintenance of RCRAInfo data by RCRA Program Managers and staff in all agencies.
- RCRA Program Managers are encouraged to use the RCRAInfo CMP to request adjustments and enhancements in programmatic activity tracking and the ongoing reporting of GPRA accomplishments. Data records stored in RCRAInfo need to present a comprehensive picture of RCRA C program activities and accomplishments.

General Roles and Responsibilities of State and Regional RCRAInfo Leads

- Regional RCRAInfo leads are responsible for coordinating and consulting with their state RCRAInfo leads. The CMP Workgroup recommends establishing **one** lead coordinator in each State and Region who will be given the responsibility of establishing and maintaining regular communication. An example of a desired communication channel is the dissemination of national RCRAInfo conference call summaries by regional leads to their states following each monthly RCRAInfo data call.
- Regional and State RCRAInfo leads are also responsible for consulting with their RCRA C program offices on specific programmatic data needs and advising them of potential or approved RCRAInfo changes affecting specific data records or flows.
- Regional and State RCRAInfo leads are expected to attend all RCRAInfo National User Conferences, where EPA HQ staff will provide RCRAInfo-related training.
- Regional and State RCRAInfo leads should provide ongoing orientation and training to their organization's program and information management staff to encourage continued use and understanding of the data system by the entire RCRA C Community.
- Regional and State RCRAInfo leads are considered one of the primary **communications specialists** for the RCRAInfo CMP, and are responsible for training and assisting RCRAInfo users in their organization with using USITS to submit and track change requests.
- Routinely monitor USITS requests and give appropriate feedback or inform others in their organization of potential changes as appropriate.

Roles and Responsibilities of the USITS System Administrator (SA)

- The USITS SA will serve on the CG and will also be responsible for coordinating all CMP issues regarding USITS operations with the DIG .
- The USITS SA will review all issues submitted into USITS, ensure issues are clearly stated, and will forward O&M issues directly to DIG and TG for resolution and implementation.

- The USITS SA will have the lead responsibility for posting RCRAInfo alerts in USITS and other information related to all immediate or emergency RCRAInfo fixes and their planned implementation schedule.
- The USITS SA is considered one of the primary **communications specialists** for the RCRAInfo CMP, and is responsible for training and assisting RCRAInfo users in EPA HQ with using USITS to submit and track change requests.

Roles and Responsibilities of Coordination Group (CG) Members

- Members will attend CG conference calls, and as required, attend face-to-face meetings to discuss CMP issues and change requests.
- Members will develop a communication strategy for the CG to facilitate an ongoing flow of information about RCRAInfo change management topics. This includes how and to whom notification of changes are sent (Ex. RCRAInfo and Program Area Leads, weekly emails, and RCRAInfo news alerts).
- Members will select a lead and co-lead person for scheduling group meetings and calls.
- Members will distribute Quarterly status updates on the status of CMP activities.
- Members will establish criteria for prioritizing and evaluating change requests, and requestors will have to provide the necessary information to the CG in their proposals. This will assist CMP Groups with determining the level of resources required to make the change. The CG will distribute the general criteria for prioritizing change requests to the RCRAInfo user community for review and comment soon after the group is formed.
- Members will review all change requests forwarded by the USITS SA and participate in decisions regarding the categorization of those Requests which the CG feels require further programmatic review by one of the 5 PGs.
- Members will review, forward to PG, and/or respond to questions submitted by the RCRAInfo User Community through USITS.
- **Members will be the decision makers/approvers regarding all RCRAInfo change requests/recommendations.** The CG will use historic change decisions documented by the WIN/INFORMED process as guidance in reviewing future overlapping change requests. Only those issues where consensus can not be reached amongst the CG, or where implementation of an issue will require significant resources or a significant change in RCRA C program direction, will require further approval by the Management Board (MB).
- CG will develop a CMP Group Replacement Strategy to ensure ongoing fair participation by those interested in joining one of the CMP Groups. The CG will need to consider a staggered replacement approach to ensure that there is always a person knowledgeable of the Group responsibilities.
- The CG will continuously monitor and evaluate the RCRAInfo Change Management Process and implement adjustments to the process when necessary. Major changes will be implemented through annual RCRAInfo version releases on a schedule to be developed by the CG. All approved USITS requests will be distributed to the RCRA C Community for notification prior to implementation.

National Review distribution for program, guidance, regulatory changes and major enhancements will be through email to the OSW RCRAInfo User Community list.

- The goal in decision making for each Group is consensus. If consensus is not possible, majority vote will prevail.

Roles and Responsibilities for the Members of each Program Group

- Each Program Group will be responsible for choosing a Group Lead and Co-lead that will lead and facilitate each of the 5 RCRA C Program Groups established to provide expert in-depth analysis on change requests related to the following RCRA C program areas: Corrective Action, Permit/Closure, Site Identification, Waste Activity, and Compliance/Enforcement.
- These 5 Program Groups will act as the **change specialists and recommenders** for the CG on change requests directed to them for further review and analysis. Their preliminary written recommendations for change implementation will be distributed by the CG to the entire RCRAInfo C Community for comments and feedback, and final recommendations for implementation will incorporate the comments received during these national reviews.
- The Programs Groups will use the WIN/Informed PPA Reports as guidance and reference documents in review and analysis of requests.
- Each of these 5 Program Groups will review Headquarters and Implementer-defined RCRAInfo Lookup Table values **annually** for their specific program area to ensure consistent use of defined codes by all Implementers. As needed, they should create or re-emphasize data quality guidelines for users and should specify exceptions/QC reports to add to RCRAInfo
- The goal in decision making for each Group is consensus. If consensus is not possible, majority vote will prevail.
- Each of these 5 Program Groups will assist the DIG on the design phase of implementing approved changes to RCRAInfo.
- Each of these 5 Program Groups will also be responsible for coordinating the development and presentation of future RCRAInfo training sessions focusing on their specific RCRA C program area, including: RCRA C program orientation training, national RCRA C program management conferences and the RCRAInfo National Users Conferences. Specific training responsibilities can be delegated to other groups or persons under appropriate circumstances.

Roles and Responsibilities for Design and Implementation Group (DIG) Members

- EPA HQ OSW IMB staff will be the core members of the DIG and will have the responsibility of being the **change coordinators and implementers** for all CG and/or MB approved RCRAInfo changes. This includes coordination of testing of all implemented requests with all applicable groups to verify that the changes are working in accordance with the recommendations.
- The DIG will have lead responsibilities for implementing RCRAInfo O&M change requests submitted by the RCRA C Community via USITS.

- For Streamline and O&M requests the DIG will ensure that RCRAInfo relaxes edits for translators until the yearly annual scheduled enhancement that is allowed to affect Translator systems is done.
- The DIG will be responsible for consulting with the CG and the appropriate PG(s) as requests for Streamlining, Program/Guidance/Regulatory, and Major Enhancement changes are approved and forwarded for design and implementation.
- DIG members will be responsible for maintaining and updating RCRAInfo on-line system and user documentation.

Responsibilities for Translation Group (TG) Members

- Members of this Group must be familiar with RCRAInfo translation operations and will be responsible for reviewing translator issues and discussing all change requests.
- This Group will act as the **change specialists and recommenders** for translator issues for the CG and DIG. They will provide consultation to all CMP Groups for specific change requests proposed for implementation that necessitate changes in translation routines. Their preliminary recommendations for change implementation will be distributed by the CG to the entire RCRAInfo C Community for comments and feedback, and final recommendations for implementation will incorporate the comments received during these national reviews.
- This Group is responsible for providing the DIG with updated translator guidance for approved RCRAInfo changes that necessitate changes in translation routines, and the DIG will ensure the appropriate change are implemented in the RCRAInfo on-line system and user documentation. This Group will work with the DIG on identification and testing of relaxed edits.
- This Group is responsible for obtaining input from current RCRAInfo Translator States, as well as coordinating discussions and interactions with EPA HQ/OEI/CDX operations group on potential translation changes that will impact Network Exchange activities.
- **Translator States will not be required to modify their systems to accommodate RCRAInfo changes more than once each year.** All translation guidance changes developed by the TG will be available to Translator States approximately six months prior to implementation in RCRAInfo, to allow sufficient time to implement the changes to the State's translation routines. Critical bugs are the only exception to the yearly update and six-month notice.
- The goal in decision making for the Group is consensus. If consensus is not possible, majority vote will prevail.

Responsibilities for Management Board (MB) Members

- This Group will be asked to evaluate and approve a change request if the CG is unable to reach consensus with regards to implementation of a critical Program, Guidance or Regulatory change, or a Major Enhancement change will require significant resources at all levels (EPA HQ, Regions and States) to implement.

- The Management Board will also work to facilitate better communication between the information management and the RCRA C program management staff, and will enforce a “culture change” in the RCRA C Community to begin better coordination/communication regarding new or changing RCRA C program issues.
- The group is responsible for supporting the CG’s implementation of the CMP and will ensure the RCRA C Community within their organizations follow the procedures outlined in the CMP.

CMP GROUP MEMBER SELECTION PROCESS

The following outlines the strategy developed by the CMP Workgroup to populate the CMP Groups:

- The initial population of the CMP Groups will be conducted through use of Response Forms submitted during our initial review of the draft CMP document in June and July 2005, and from additional volunteer responses received by December 9, 2005, using the attached revised Volunteer Response Form. There is no need to submit duplicate responses to volunteer. All June and July 2005 response forms have been saved and will also be used to populate the CMP groups. **Those interested in participating on a CMP Group must obtain approval from their supervisor prior to submitting your name for consideration by the CMP Workgroup.**
- During the month of December 2005 the CMP Workgroup members will select from the list of interested State, EPA Regional and EPA HQ/OSW and HQ/OECA volunteers and populate each CMP Group with the appropriate number of members representing each organization. **All initial CMP group members will be notified in early January 2006 of their selection.** Identification and selection of state representatives should be made in close consultation with the ASTSWMO Hazardous Waste Information Management Task Force. As an on-going function, the ASTSWMO HWIMTF should be responsible for recruiting/identifying state representatives. This will also serve to maintain and strengthen the necessary linkage between ASTSWMO (HW Subcommittee and IMTF) and EPA regarding information and data management.
- The various groups should be filled with a mix of programmatic, data, and management personnel from the various organizations to ensure that the process is not inappropriately slanted to one perspective.
- Once the CMP Coordination Group (CG) is formed and implementation of the CMP begins, the CG will develop an ongoing CMP “Group Replacement Strategy” that will address the length of time each Group member will serve and the method in which they will be replaced (i.e., voting vs selection). The CG will be responsible for distributing the “Group Replacement Strategy” to the RCRA C Community for national review and comment, and will communicate the approved “Group Replacement Strategy” once it is final.
- Each State or Region should have no more than one representative on each CMP Group. HQ offices will have more than one representative on some CMP Groups because of the need to represent different organization's views (e.g., OSW vs OECA).

CONCLUSIONS

The overall vision for the WIN/INFORMED initiative was to integrate information management as a regular part of program development, program implementation, and program evaluation, while making reporting and using hazardous waste information as easy as possible. WIN/INFORMED program analyses will end the Summer of 2005 once the last Program Area Analysis Report (permitting and corrective action) is approved and work is underway to re-design that system component to address the recommendations. Although the WIN/INFORMED Initiation will be completed, ongoing maintenance of the RCRAInfo data system is required for the changing information needs for the RCRA C program.

To successfully implement the WIN/INFORMED vision to more fully integrate the RCRA C program to facilitate communication between the information management system and the RCRA C program, requires continued efforts to enforce a “culture change” in the RCRA C Community to begin better coordination/communication regarding new or changing RCRA C program issues. In other words, all types of “**system users**” and “**data users**” must communicate with each other on a regular basis to ensure the data system can continue to capture the information required to support and implement the RCRA C program. From the analysis conducted by the CMP Workgroup, this “culture change” is required in all organizations- EPA Headquarters, EPA Regions and in the States.

The CMP Workgroup was tasked with developing a streamlined change process which will allow all stakeholders to have an opportunity to submit change requests/suggestions, while also allowing all stakeholders a voice in making the decisions as to which system changes are implemented with the resources available to HQ OSW for future system changes. This document presents the CMP Workgroup’s recommendations for the RCRAInfo Change Management Process (CMP) that will provide timely controlled changes to RCRAInfo and we feel these recommendations will facilitate and promote a more responsive and committed effort toward maintaining high quality information to support RCRA C program activities.

The CMP Workgroup expects initial resistance from some members of the RCRA C Community to following a structured process for requesting and implementing changes to RCRAInfo. **For successful implementation of the RCRAInfo CMP, it is critical that all members of the RCRA C Community recognize the CMP as the only mechanism for reporting and evaluating the need and resources available to implement changes to the RCRAInfo data system.**

APPENDIX A

ACRONYMS and ABBREVIATIONS

The following is an alphabetical compilation of acronyms and abbreviations used throughout this document.

ASTSWMO - Association of State and Territorial Solid Waste Management Officials

CA - Corrective Action

CAG - Corrective Action Group

CDX - Central Data Exchange

CEG - Compliance/Enforcement Group

CG - Coordination Group

CMP - Change Management Process

CMPG - Change Management Program Groups

DIG - Design and Implementation Group

EC - Environmental Controls

EPA - Environmental Protection Agency

ESC - Executive Steering Committee

FOIA - Freedom of Information Act

GPRA - Government Performance and Results Act

HQ - Headquarters

HWIMTF - Hazardous Waste Information Task Force

ICR - Information Collection Requests

IMB - Information Management Branch

INFORMED - Information Needs For Making Environmental Decisions

MB - Management Board

O&M - Operations and Maintenance

OECA - Office of Enforcement and Compliance Assurance

OEI - Office of Environmental Information

OP/LEG - Operating and Legal Status

OSW - Office of Solid Waste

PAA - Program Area Analysis

PCG - Permit/Closure Group

PG - Program Groups

RCC - Resource Conservation Challenge

RCRA - Resource Conservation and Recovery Act

RCRA C - Resource Conservation and Recovery Act Subtitle C

RCRAInfo - Resource Conservation and Recovery Act Information System

SA - System Administrator

SIG - Site Identification Group

TG - Translation Group

USITS - User Support Issue Tracking System

WAG - Waste Activity Group

WIN - Waste Information Needs

Appendix B

Estimated Timeframes for Implementing Change Requests

Estimated Timeframes for Streamlining and O&M Requests							
Streamlining: short-term, low-cost, low level-of-effort changes to the national data system and/or database that result in minimum changes to our daily routines to incorporate the changes.							
Operations and Maintenance: changes required to fix current programming errors/bugs; adapting the existing system to meet current and upcoming technological requirements; and updating system and/or user documentation.							
ID	Task Name	Start	Finish	Duration	Q1 06		
					Jan	Feb	Mar
1	USITS System Administrator (SA) reviews and categorizes all Requests. If O&M, Request goes to DIG If Streamlining, Request goes to CG	01/02/2006	01/06/2006	1w	■		
2							
3	If Streamlining, CG will evaluate and approve/deny Request. CG will forward to Translator Group for comment and DIG for implementation schedule.	01/13/2006	02/09/2006	4w	■■■■		
4	If Streamlining, TG reviews Request and recommendations. DIG determines implementation schedule.	02/09/2006	02/22/2006	2w		■■	
5	If Streamlining, CG reviews Dig and TG recommendations and submits final Recommendation to User Community with Implementation Schedule.	02/22/2006	03/07/2006	2w			■■
6							
7	If O&M Request, DIG will review, analyze and recommend how to proceed with Request. Forward to Translator Group (TG) for Comment.	01/13/2006	02/09/2006	4w	■■■■		
8	If O&M Request, TG comments on recommendations. Forward to DIG.	02/09/2006	02/22/2006	2w		■■	
9	If O&M Request, DIG reviews TG recommendations and approves or denies recommendations and includes implementation schedule.	02/22/2006	03/07/2006	2w			■■
10	If O&M Request, CG submits final Recommendation to User Community with Implementation Schedule.	03/07/2006	03/13/2006	1w			■
11							

Appendix B-1

Estimated Timeframes for Program, Guidance, & Regulatory Changes and Major Enhancement Change Requests

Program, Guidance and Regulatory: proposals requesting changes to RCRAInfo to address new or changing information needs for the RCRA C program.

Major Enhancements: proposals requesting changes to the national data system and/or database, however, the suggested change does not meet the criteria to be classified as “Streamlining”.

ID	Task Name	Start	Finish	Duration	Q1 06			Q2 06			
					Jan	Feb	Mar	Apr	May	Jun	
1	USITS System Administrator (SA) reviews and categorizes all Requests	01/02/2006	01/04/2006	.6w	█						
2	If P, G & Reg Request or Major Enhancement Request, CG will designate the applicable Program Group (PG) and forward Request	01/04/2006	01/06/2006	.6w	█						
3	Applicable PG will review, analyze and recommend how to proceed with Request	01/06/2006	03/02/2006	8w	█	█					
4	TG reviews Request and PG recommendations	03/02/2006	03/15/2006	2w			█				
5	CG reviews PG and TG recommendations and prepares Recommendation for national review	03/15/2006	04/04/2006	3w			█				
6	National review and comment period	04/04/2006	05/01/2006	4w				█			
7	CG, TG and applicable PG will review any comments received	05/01/2006	05/19/2006	3w					█		
8	CG approves or denies Request based on feedback from national review.	05/19/2006	05/25/2006	1w						█	
9	Recommendations which require Management Board (MB) approval will be submitted to the MB	05/19/2006	06/08/2006	3w						█	
10	Approved Requests and Recommendations go to DIG for implementation schedule.	06/08/2006	06/21/2006	2w							█
11	Final Recommendation regarding Request distributed to User Community by CG with proposed implementation schedule.	06/21/2006	06/27/2006	1w							█
12											

**RCRAInfo Change Management Process
Volunteer Response Form
November 14, 2005**

If you would like to volunteer to be part of a Change Management Process Group, please complete and return the following form via email to Lynn Hanifan, Region 1, hanifan.lynn@epa.gov or Dan Bakk, Region 5, bakk.daniel@epa.gov **no later than COB, Friday, December 9, 2005.**

Name: _____

State/Region or HQ Office: _____

I am volunteering to be a Member of the following RCRAInfo Change Management Process Group. I have read and understand the Roles & Responsibilities of the Members of this Group:

_____ **Coordination Group**

_____ **Program Groups (please specify the group below):**

_____ **Corrective Action Group**

_____ **Permit/Closure Group**

_____ **Site Identification Group**

_____ **Waste Activity Group**

_____ **Compliance/Enforcement Group**

_____ **Translation Group**

The following outlines my relevant experiences with the issues the above-noted Change Management Group will be responsible for when implementing the CMP:

I would like to provide the following additional comments regarding my experiences with the WIN/INFORMED process for determining the information needs of the RCRA C Program: