

# Shared CROMERR Services and Components Integrated Project Team (IPT) Charter

Adopted September 27, 2012

*This Charter defines the objectives, leadership, and membership of an Integrated Project Team (IPT) that will guide the requirements definition for Shared Cross-Media Electronic Reporting Regulation (CROMERR) Services and Components that can be leveraged by Exchange Network partners and other 3<sup>rd</sup> party implementers.*

## **Background on Integrated Project Teams**

Integrated Project Teams (IPTs) are used to achieve successful solutions to complex problems that involve multiple organizations. An IPT is a multi-disciplinary, cross-functional team brought together to implement the processes necessary to deliver a defined product or set of products. IPTs are multi-disciplinary in order to bring together all the business and technology skills required to construct a successful product. IPTs are cross-functional in the sense that they include representation from the various organizations that have different functional roles with respect to the product.

## **Shared CROMERR Services and Components Background**

EPA's Cross-Media Electronic Reporting Regulation (CROMERR) sets performance-based, technology-neutral security and performance standards for systems that states, tribes, and local governments use to receive electronic reports or other documents from facilities they regulate under EPA-authorized programs. CROMERR also addresses electronic reporting directly to EPA. CROMERR applies to: (a) regulated entities that submit reports and other documents to EPA under Title 40 of the Code of Federal Regulations, and (b) states, tribes, and local governments that are authorized to administer EPA programs under Title 40. CROMERR establishes standards for information systems that receive reports and other documents electronically (including email, but excluding disks, CD's, and other magnetic and optical media) that are submitted to satisfy requirements of a program that a state, tribe, or local government is authorized to administer under Title 40. These standards cover a variety of system functions, such as electronic signature validation. The standards are designed to provide electronic submittals with the same level of legal dependability as the corresponding paper submittals.

To date, states, tribes, and local governments who have addressed CROMERR requirements for electronic reporting have done so by implementing system functions within each of their respective electronic reporting systems, resulting in duplicative investment of resources across this set of stakeholders in order to meet a shared set of business requirements. Budget shortfalls, staff turnover, and changes in technology and program requirements can pose challenges to organizations that need to meet or continue to support CROMERR requirements.

The maturation of cloud-based technologies and the creation of a robust EPA Central Data Exchange (CDX) CROMERR solution may offer a path to cheaper and more efficient ways of allowing implementers to achieve CROMERR compliance for their electronic reporting systems. CDX has already implemented a series of CROMERR services for EPA program offices and this work will help accelerate the CROMERR IPT. EPA has committed to making available a set of shared CROMERR Services and Components and specifications that can be utilized by states, tribes and local governments by Q2 FY2013.

## **Objectives and Anticipated Work of the IPT**

The objective of the Shared CROMERR Services and Components IPT is to 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.

In developing these requirements and policy implications, the IPT will:

- Identify target audience for Shared CROMERR Services and Components;
- Identify their key needs and barriers to achieving CROMERR compliance;
- Identify requirements for a set of individual, compatible CROMERR services that could be made available to interested parties and easily integrated into their local systems;
- Document the key set of approaches, agreements, and implications of those agreements for Exchange Network partners implementing these components;
- Define the set of proposed services (and possible future services), and their development, roll out, and implementation paths, as agreed to by the IPT; and
- Provide recommendations to the Exchange Network governance on the applicability, timing, governance, and implementation considerations for the defined set of Shared CROMERR Services and Components.

Shared CROMERR services may be just one component of a complete electronic reporting solution. The scope of this IPT's discussions will be limited to shared services that support compliance with CROMERR. This IPT will *not* be discussing other workflows such as the submission of reported data to EPA National Systems.

If the IPT encounters issues or questions related to CROMERR policy, the IPT co-chairs should elevate them to the co-chairs of the Exchange Network Leadership Council for discussion and resolution.

## **Deliverables**

The Shared CROMERR Services and Components IPT will produce the following set of deliverables that will be made available to the Exchange Network community.

- Project Plan: The IPT Plan will define the set of key activities that will be undertaken by the team in order to explore the policy implications and provide definition for a shared set of CROMERR Services and Components.

- Meeting Summaries: Meeting summaries will be produced by the IPT following each team meeting. These meetings will include periodic status meetings in addition to detailed technical/business discussions focused on specific topics.
- CROMERR IPT Questionnaire and Response Summary: In order to direct activities of the team to the appropriate priority areas, the IPT members will respond to a questionnaire that will be designed to provide feedback that will guide the team's analysis. The group will produce a summary of the feedback after it has been analyzed.
- Shared CROMERR Services and Components Guidance and Recommendation Document: Through a series of focused sessions, the IPT will explore a number of technical, functional and business related areas. These discussions will be used to provide definition for a shared set of CROMERR Services and Components as well as define and document policy and governance implications. Some of the topic areas that may be covered in this document include:
  - Target Audience and Use Cases: Define target audience and types of use cases;
  - Governance: Types of governance models that would be needed in order to effectively implement, manage, and maintain? Shared CROMERR Services and Components;
  - Shared CROMERR Services and Components Definition: Implementation options and service definitions for various CROMERR functions that are required in order to achieve CROMERR compliance. For example:
    - Registration and Identity Management
    - Signature Process Components
    - Copy of Record Management

## **Constraints**

The primary constraint on this IPT is the timing of the release of the Exchange Network Grant Program Solicitation Notice and the due date for Exchange Network Grants. The draft Solicitation Notice identifies implementation of Shared CROMERR Services and Components as a Type I activity and the due date for grant applicants is in November. While the Shared CROMERR Services and Components Guidance and Recommendations Document (to be finalized in January of 2013) will ultimately detail the specifics about these services, the EPA has asked that this IPT develop an interim product based on early progress, which can be used to inform the EN community in support of grant applicants and the application deadline. The form and type of necessary documentation and dissemination will be determined by the IPT co-chairs by the end of October 2012.

## Schedule and Structure of the IPT

The kick-off conference call will be on Thursday, September 27<sup>th</sup>, 2012 from 1-3p Eastern Time. The next call will be on Thursday Oct 18<sup>th</sup>, from 1-2:30p and the IPT will meet every other Thursday from 1-2:30p. The call schedule, anticipated topics, and interim milestones are listed below, but are subject to change:

Date and Time (Eastern Time)	Call Topic	Milestone
<b>THURSDAY:</b> September 27 - 1:00-3:00 ET	Charter Review, data collection process	Charter Adopted
<b>THURSDAY:</b> October 18 - 1:00-2:30 ET	Review of data collection results, and discussion of straw set of candidate EPA CROMERR services	Participants complete data collection in advance of call
<b>WEDNESDAY:</b> Oct. 31st 1 - 1:00-2:30 ET	Topic drill down (TBD)	
<b>WEDNESDAY:</b> November 14 - 1:00-2:30 ET	Topic drill down (TBD)	Communication to EN community in support of EN grant applicants
<b>WEDNESDAY:</b> November 28 - 1:00-2:30 ET	Topic drill down (TBD)	
<b>WEDNESDAY</b> December 12 - 1:00-2:30 ET	Topic drill down (TBD)	
<b>WEDNESDAY</b> January 2 - 1:00-2:30 ET	Rough Draft Review	Draft #1 Scope Document
<b>WEDNESDAY</b> January 16 - 1:00-2:30 ET	Rough Draft Feedback	
<b>WEDNESDAY</b> January 30 - 1:00-2:30 ET	Final Draft Review	Final Draft Scope Document
<b>WEDNESDAY</b> February 13 - 1:00-2:30 ET	Final Scope Document	Final Scope Document

## Roles, Responsibilities, and Time Commitments

**All members are expected to attend every call or ensure participation by an alternate if unavailable.** The amount of work between calls will vary, however, the biggest time commitments will likely be during the requirements gathering process and conference call participation (90 minutes, bi-weekly). The total amount of work will average 5-10 hours a month for workgroup members and 10-12 hours a month for co-chairs. Individuals interested in piloting or participating in a proof of concept will likely have additional time considerations.

**State and Tribal representatives** are expected to broker input from other representatives within their organizations for topics outside their expertise. The IPT will identify the topics for each call with as much lead time as possible if States or Tribes are interested in having other representatives join the call.

**EPA representatives** are expected to provide technical resources and expertise as necessary. EPA has also indicated a willingness to share their experiences in building similar services for internal customers. Chuck Freeman will be the EPA Co-Chair.

EPA is providing **CGI and Ross Strategic** as contractor support to produce the deliverables and

to manage the IPT. CGI will be responsible for leading technical discussions and be the primary lead on the Guidance and Recommendation Document. Ross Strategic will manage the day-to-day operations of the IPT including meeting agenda, call scheduling, meeting summaries, and other support roles.

## Membership

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