



## Cross-Media Electronic Reporting Rule

The EPA Cross-Media Electronic Reporting Rule (CROMERR), published in the Federal Register under 40 CFR, Part 3 on October 13, 2005, provides the legal framework for electronic reporting from regulated entities to the EPA and to states, tribes, and local governments that are authorized to administer EPA programs. CROMERR seeks to maintain the level of corporate and individual responsibility and accountability during the transition from a paper-based to an electronic reporting environment.

### What Does CROMERR Do?

CROMERR ensures that regulatory reports collected under the EPA's environmental programs are enforceable by setting performance-based, technology-neutral system standards:

- Criteria 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

### Where Does CROMERR Fit in the Electronic Reporting Process?

When EPA or EPA-delegated programs want to collect electronic reports from regulated entities, the systems and related business processes for collecting the regulated data must comply with CROMERR. The CROMERR program reviews and approves "applications"—plans describing how the electronic reporting approach meets CROMERR standards. CROMERR approval does not indicate the availability of electronic reporting, it is one element in the implementation of electronic reporting.

### Different Electronic Reporting Approaches

How an applicant chooses to approach electronic reporting is determined by factors unique to each case, but ultimately falls in one of two categories of solutions: custom-developed or off-the-shelf (OTS). OTS solutions are compliant solutions provided by EPA or commercial vendors. Applicants pursuing OTS solutions benefit from an abbreviated time to approval, approximately 1-3 months. The applicant is required to provide limited to no technical documentation on how the proposed electronic reporting approach meets CROMERR standards.

Applicants pursuing fully custom-developed solutions can expect a longer timeframe for approval, approximately 1 year. The applicant is required to provide extensive technical documentation describing how the proposed electronic reporting approach meets *all* CROMERR standards. All aspects of the approach are reviewed.



## Central Data Exchange and CROMERR

EPA's Central Data Exchange (CDX) provides technical solutions to the criteria set in the regulation. CDX provides two services related to CROMERR:

- A CROMERR-compliant electronic reporting platform for direct reporting to EPA programs.
- Shared CROMERR Services—a suite of electronic reporting components for system integration by delegated programs.

## CROMERR Streamlining and Process Improvement

The CROMERR program has completed a comprehensive effort to improve operations by:

- **Automating and standardizing processes** using a Salesforce-based program tracking system.
- **Embracing new, off-the-shelf approaches**—working collaboratively with CDX and commercial vendors.
- Implementing **streamlined review and approval processes** for applicants using OTS approaches.
- Allowing for **maximum flexibility under CROMERR** in the processing of applications.
- Approving legacy applicants—**developing additional guidance for applicants pursuing custom-developed systems.**

### For More Information

Visit our CROMERR [website](#) to find more information and tools.

- [CROMERR 101 training](#)
- [Application Resources](#)
- [Program Progress](#)
- [Shared CROMERR Services](#)

### Contact

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These improvements allow the CROMERR program to approve 3 times more applications per year with the same budget and staffing it had 5 years ago.

## CROMERR Program Commitment to Customer Service

The CROMERR Program strives to be a valued partner to EPA programs and co-regulators seeking electronic reporting expertise. We deliver on this commitment by:

- Serving as a one-stop resource
- Offering practical information and sharing lessons learned by providing convenient tools and accessible guidance
- Working collaboratively with applicants
- Strengthening relationships with applicants

## CROMERR Program Success

To date, the CROMERR Program has approved more than 110 of the delegated program applications received, 30% of these received in the last 2 years. The CROMERR program has also approved approximately 50% of state environmental agencies for “enterprise approaches”—a single electronic reporting solution designed to provide compliant reporting for all a state’s 40 CFR programs. An additional 5-10 are planning for an enterprise approach or are already in the review and approval process.