U.S. Environmental Protection Agency National Drinking Water Advisory Council Virtual Public Meeting October 12, 2021 10:30 AM – 2:30 PM (EST)

Meeting Objectives

- Brief the U.S. Environmental Protection Agency's (EPA) National Drinking Water Advisory Council (NDWAC) members on the recommendations and remaining issues under consideration by the NDWAC Consumer Confidence Report Rule Revision (CCR³) Working Group.
- Hear from members of the public who requested to provide oral statements at the meeting.
- Identify any additional questions or considerations that the NDWAC members would like the Working Group to address.

Welcome and Logistics

Elizabeth Corr, Designated Federal Officer for the NDWAC, welcomed all to the meeting. She thanked the CCR³ Working Group, provided a brief overview of the NDWAC as created under the Safe Drinking Water Act (SDWA) and chartered under the Federal Advisory Committee Act, and reminded the public of the opportunity to submit written comments to the Council after the meeting.

Lisa Daniels, NDWAC Chair, welcomed the public, Council members, and the CCR³ Working Group. She thanked the Working Group for their work and asked each member of the NDWAC and the Working Group to introduce themselves. Ms. Daniels also welcomed the NDWAC's liaisons from the Centers for Disease Control.¹

Jennifer McLain, the Director of EPA's Office of Ground Water and Drinking Water (OGWDW), welcomed everyone to the meeting and thanked Ms. Corr, Ms. Daniels, and Jana Littlewood for their coordination and efforts. Dr. McLain noted that many regulations, besides the CCR Rule, would be discussed in future meetings. She highlighted the CCR as a SDWA "right-to-know" provision founded on the principle that consumers have the right to know what is in their drinking water and noted that the American's Water Infrastructure Act (AWIA) set specific goals for CCR revisions, including improving readability and consumer access. She recognized the efforts of the CCR³ Working Group and noted that there will be an additional meeting of the NDWAC in December to discuss finalized recommendations.

Jaime Rooke, the Cadmus facilitator, provided guidance for the meeting's procedures and best practices for using the meeting platform. She also discussed the procedure for submitting written comments, reviewed the agenda, and introduced presenters for the meeting.

Presentations on CCR Rule History and EPA's Charge to the NDWAC

Consumer Confidence Reports and Rule History

Sarah Bradbury and Edward Viveiros with OGWDW's Protection Branch presented on the history of CCRs, the purpose of the CCR Rule, and the CCR Rule's revision history. Details of their presentation can be found in Attachment C.

¹ NDWAC, CDC, and CCR³ Working Group meeting attendees are identified in Attachments A and B.

Mr. Viveiros explained that EPA is seeking advice and recommendations from the NDWAC on targeted issues related to revisions to the CCR Rule, as required by the AWIA of 2018. In particular, EPA seeks advice and recommendations on:

- Addressing accessibility challenges, including translating CCRs and meeting Americans with Disabilities Act (ADA) requirements.
- Advancing environmental justice and supporting underserved communities.
- Improving readability, understandability, clarity, and accuracy of information and risk communication of CCRs.
- CCR delivery manner and methods, including electronic delivery.

Ms. Bradbury and Mr. Viveiros concluded their presentation by thanking the CCR³ Working Group for their efforts in developing recommendations to the NDWAC.

CCR3 Working Group Procedures and Recommendations

Jana Littlewood, Chair of the NDWAC's CCR³ Working Group and a member of the NDWAC, summarized the Working Group's process and described how the Working Group operated during its meetings. For each of EPA's four charges to the NDWAC, she provided an overview of the Working Group's discussions and presented the Working Group's preliminary recommendations to the Council, including recommendations on which Working Group members reached consensus and alternatives where consensus was not reached, with pros and cons for the NDWAC's consideration. Details of Ms. Littlewood's presentation can be found in Attachment C.

Public Comment to the NDWAC

Public Comment #1

Adam Carpenter, Manager of Energy and Environmental Policy at the American Water Works Association (AWWA), provided comments representing AWWA. He noted that AWWA has followed AWIA closely and is pleased to report their recommendations for the CCR Rule revisions. Dr. Carpenter offered several key points to highlight AWWA's response to the recommendations provided by the CCR³ Working Group. Below is a summary of his speaking points:

- 1. Readability indexes are important for language development. CCRs perform poorly on readability assessments because the language is provided as template text. EPA can address the root cause by reviewing and revising text using those indexes.
- Codification should provide for future changes in technology. One-click approaches limit the adaptability of how CCRs can be delivered by systems.
- The requirement for delivery of CCRs biannually should be the same CCR twice per year combined with good faith efforts from water providers to reach more customers.
- The translation requirements should come with support from EPA. They should use existing tools for language development. EPA should offer assistance for translation of common languages.

- There should be reasonable and feasible objectives for the CCRs. CCRs are only one component of a water system's communication strategy.
- The CCR Rule should reinforce the importance of customers being guardians of water quality within their home.

Public Comment #2

Erik Olson, Senior Strategic Director of Health and Food at the Natural Resources Defense Council, provided the second public comment. Mr. Olson stated that CCR information has become complex and said that the NDWAC may want to consider whether people in their communities are aware of the reports and regularly read them. This could potentially help them frame recommendations for EPA. He offered four main points in response to the recommendations provided by the CCR³ Working Group. Below is a summary of his speaking points:

- Experiments with electronic delivery have not been successful so far. In Newark, New Jersey, 73% of the community are renters and do not receive CCRs. There is a high percentage of renters in New York City and Chicago as well. Mr. Olson emphasized that the NDWAC needs to identify a system to ensure that renters and people in homeowners associations and condominium associations are notified about CCRs. He encouraged a broader mailing requirement because underserved communities might not even have access to internet.
- Mr. Olson encouraged the idea of a summary page. Ideally, the CCR would contain an objective grade or report card for the water system.
- On the topic of translation, Mr. Olson added that EPA and primacy agencies should help translate for different languages. Report card and visual cues would be useful, and data visualization templates should be available for easing translation.
- On the topic of units and data understandability, there should not be numbers with many zeroes. Units should be clear and in plain language.

NDWAC Discussion of Preliminary Working Group Recommendations

After the presentations and public comment, NDWAC members had comments, questions, and suggestions relating to different subjects across the four charges. Their comments and discussion with Working Group members are presented by subject area below.

Discussion on Charge One – Addressing Accessibility Challenges, Including Translating CCRs and Meeting Americans with Disabilities Act (ADA) Requirements

Ms. Daniels emphasized the importance of recognizing the CCR as one of several communication tools and requirements—in particular, that the SDWA requires water systems to notify consumers of immediate health threats through the Public Notification (PN) Rule and that the CCR, as a part of the SDWA, is one tool in a suite of consumer information tools to provide information to the public about their drinking water. She emphasized that some tools like PN are more immediate for sharing information of immediate health threats, while the CCR is less immediate. This framed her discussion about how the public should understand how CCRs fit into the wider context of online tools for immediate access to information. She also stated that many of the accessibility recommendations apply to the PN rule and encouraged EPA to consider whether some amendments for CCR should apply to PN as well.

Saeid Kasraei added that urgent information should still be distributed by PN, but Tier 3 PNs could be included in CCRs, if possible and the timing was right. He added that this could replace the need to send multiple notifications out, but only if it makes sense to include it in CCRs, rather than having that be the only method of notification.

Ms. Daniels and Mr. Kasraei expressed interest in developing strategies for providing CCRs to renters and noted that this is an issue that should be resolved in the new CCR Rule revisions. John Brady suggested that it would be simple to add language to encourage landlords to provide CCRs to renters and encouraged EPA to consider language that can create avenues to provide CCRs for people that are not at the billing address. Jeffrey Tiberi suggested that landlord associations could recommend including information about how to access the CCR in leases with their renters.

Ms. Daniels suggested that CCR Rule language should encourage local service agencies to help notify consumers that the CCR is available, adding that public service campaigns could provide further information about CCRs being accessible to consumers in the service area.

On the matter of translation thresholds, Mr. Brady and Sridhar Vedachalam discussed the differing points of view that led the CCR³ Working Group to a non-consensus recommendation (in the presentation slides in Attachment C). Ms. Daniels agreed that a national standard is needed for determining whether translation should be provided for a non-English language. She stated that the U.S. Census data may not be granular enough, and lower thresholds based on the demographics of water service areas could be helpful. Mr. Kasraei explained that Maryland is one of 24 states where thresholds cannot be more stringent than EPA standards, and recommended that the language in the recommendation be changed from "more stringent" to "greater flexibility."

James Proctor suggested that EPA should provide accessibility and translation help to water systems that need help with translation services. He believed that it would provide needed support to small systems.

Discussion on Charge Two – Advancing Environmental Justice and Supporting Underserved Communities

Scott Borman explained that water utility budget information is often publicly available or available upon request and does not belong in the CCR.

Nancy Quirk and Ms. Daniels noted concern about online translation tools and expressed interest in ensuring that cultural translations are considered, as word for word translations in online tools may not be appropriate. Dr. Vedachalam noted that online tools may not always be accurate, but the costs of mistranslations can be weighed against the benefit of providing language options to underserved communities. Mr. Brady explained that there could be a verification process with a volunteer or a hired translator provided by the primacy agency to verify CCRs translated using online translation tools. Ms. Daniels added that she liked the idea of a central repository or a telephone line for translation services at the EPA or state level to provide translations in languages requested.

Mr. Kasraei expressed concern for disadvantaged communities within large water systems, stating that members of those communities often do not have access to online tools or are renters. He encouraged EPA to ensure that there is language for providing reassurance to those often-forgotten communities.

Discussion on Charge Three – Improving Readability, Understandability, Clarity, and Accuracy of Information and Risk Communication of CCRs

Mr. Borman expressed interest in including zone information for larger water systems, if it is basic and general, to provide clarity on how larger water systems operate. He noted that water systems may not want to provide specific distribution information for security reasons.

On the topic of corrosion control, Mr. Borman agreed that an explanation of why utilities are not conducting corrosion control could be very technical. He thought that it would be sufficient for utilities to state that they do not conduct corrosion control treatment. He also thought that systems with corrosion control should include language that describes their corrosion control treatment. He also requested that EPA clarify whether CCR requirements, particularly those related to corrosion control, apply to wholesale providers as well as the purchasing system. He suggested that there may need to be different requirements for these types of water providers.

Ms. Daniels noted that challenges can occur when the units of measure presented on the CCR differ from the units provided in state online platforms. Mr. Brady and Mr. Kasraei believed that it was difficult to read numbers with several zeroes after the decimal point, and they expressed that it is easy to overlook or dismiss deviations from the regulatory standard, even when the problem is orders of magnitude. They generally agreed that there needs to be improved language about the consistency of units.

Mr. Tiberi and Dr. Vedachalam explained the importance of finding creative ways to interest consumers in water quality, such as an app that provides water quality data for different water systems. They explained that the closest example is a weather app that has centralized data that individual users can access by entering their zip codes.

Alexandra Campbell-Ferrari expressed interest in developing a system for utilities to gather feedback from customers to find out if the CCRs are effective and reaching the customers. She noted that there was concern about smaller utilities not having the bandwidth to reach their customers, but Working Group members agreed that gathering information and expressing interest in stakeholder engagement could help improve readership.

Ms. Daniels agreed with the recommendation to include a summary page, as it helps the reader find the most important information and prevents violations from being buried in the text. Ms. Daniels also suggested pulling general information (such as definitions) out of the CCR and incorporating this information into a list of instructions that go along with the CCR. She noted that this would help consumers focus on system-specific information.

Ms. Daniels, Mr. Kasraei, and Benjamin Pauli discussed the recommendation that CCRs should clarify that legal standards (Maximum Contaminant Levels or MCLs) are a compromise between what is an acceptable health risk and what is financially or technically feasible. Mr. Kasraei believed that this distinction would open the door to misinformation and that the discussion is outside of the purpose of the CCR. Ms. Daniels said her water systems state in their CCRs whether their water meets standards,

not that it is "safe." She expressed concern about whether MCLs and their benefits, costs, and limitations can be explained succinctly, and she suggested that a link to the EPA webpage on how MCLs and Maximum Contaminant Level Goals (MCLGs) are developed may suffice. She added that this messaging could be provided in a statement that informs consumers about the limits of regulations to show that sometimes regulatory standards are not necessarily the safest due to all of the factors that must be considered.

Ms. Campbell-Ferrari, Taka Wiley, and Dr. Pauli expressed interest in including as much information as possible about water safety and quality to improve transparency. They expressed that effective risk communication and transparency creates trust and allows consumers to make informed decisions about what questions to ask and where to find the information they need. Dr. Pauli expressed that it may be appropriate to inform consumers about the limits of regulation and have them question if their water is safe even if it meets regulatory standards.

Discussion on Charge Four – CCR Delivery Manner and Methods, Including Electronic Delivery

Mr. Borman noted concern that small systems could have problems with a lot of the recommendations, and small systems may not want to produce very long CCRs.

Mr. Borman supported the AWWA public comment suggestion that biannual CCRs should contain the same information and expressed that if consumers want more frequent testing results they can ask the utility to provide that information. Ms. Daniels agreed that the biannual CCRs should contain the same information and added that CCRs are meant to be retrospective, and they will never reflect real-time water quality data. Ms. Quirk expressed concern about producing two unique reports a year, saying that it would be a burden on water systems.

Ms. Quirk also recognized the importance of developing new ways to deliver CCRs and emphasized the use of social media as a tool of communication to provide multiple ways of spreading awareness of CCRs. She also supported AWWA's suggestion of a "multi click" resource that can describe more detail if it is laid out in different resources rather than a "one click" resource containing all information. Mr. Proctor suggested that utilities should make online versions of CCRs more interactive to encourage more effective communication with consumers.

Ms. Daniels expressed concern for hearing and vision impaired customers, and Ms. Littlewood and Mr. Brady explained how they discussed this issue during Working Group meetings. Ms. Littlewood directed the NDWAC members to the recommendation under the fourth charge that encourages utilities to make good faith efforts to convey CCRs to customers with uncommon needs (in the presentation slides in Attachment C).

Wrap-up and Adjourn

Ms. Corr thanked all who joined the call and expressed appreciation to the NDWAC and CCR³ Working Group. Before adjourning the meeting, she provided instructions for filing a written statement and noted that information from this meeting will be taken into consideration by the CCR³ Working Group as they develop their report back to the Council.

ATTACHMENT A

National Drinking Water Advisory Council (NDWAC) Members And Centers for Disease Control (CDC) Liaisons

DW	AC Members
	isa D. Daniels (Chair): Director, Bureau of Safe Drinking Water, Pennsylvania Department of Invironmental Protection
	'olanda Barney: Environmental Program Manager, Navajo Nation, Environmental Protection Agency's Navajo Public Water System Supervision Program
C	D. Scott Borman: General Manager, Benton/Washington Regional Public Water Authority
J	ohn L. Brady: Deputy Director, Operations and Engineering, Central Coast Water Authority
	Alexandra Campbell-Ferrari ¹ : Co-Founder and Executive Director, The Center for Water Security and Cooperation
	hellie R. Chard: Director, Water Quality Division, Oklahoma Department of Environmental Quality
	Ann Marie Chischilly: Executive Director, Institute for Tribal Environmental Professionals, Northern Arizona University
S	aeid Kasraei: Maryland Water Supply Administrator, Maryland Department of the Environment
J	ana Littlewood: Board of Directors, Alaska Representative, National Rural Water Association
J	ennifer L. Peters: National Water Programs Director, Clean Water Action/Clean Water Fund
Ja	ames M. Proctor, II: Senior Vice President and General Counsel, McWane, Inc.
Ν	Nancy A. Quirk: General Manager, Green Bay Water Utility
J	effrey W. Szabo: Chief Executive Officer, Suffolk County Water Authority
J	effrey Tiberi: Montana Association of Conservation Districts Member
Ν	Aacaroy Underwood: Principal Consultant, Raftelis Financial Consultants, Inc.
CDC	Liaisons
	Dr. Arthur S, Chang: Chief Medical Officer, Division of Environmental Health Science and Practice, National Center for Environmental Health
V	Dr. Vincent Hill: Chief, Waterborne Disease Prevention Branch, Division of Foodborne, Naterborne, and Environmental Diseases, National Center for Emerging and Zoonotic Infectious Diseases

NDWAC member Shellie Chard did not attend the October 12, 2021 NDWAC meeting. All others listed above attended.

ATTACHMENT B

National Drinking Water Advisory Council (NDWAC) Consumer Confidence Report Rule Revision (CCR³) Working Group Members

The CCR³ Working Group includes members of the NDWAC and EPA's National Environmental Justice Advisory Council (NEJAC) and Childrens' Health Protection Advisory Committee (CHPAC) as indicated.

Jana Littlewood (CCR ³ Working Group Chair): Board of Directors, Alaska Representative, National Rural Water Association (<i>NDWAC member</i>)
Yolanda Barney: Environmental Program Manager, Navajo Nation, Environmental Protection Agency's Navajo Public Water System Supervision Program (NDWAC member)
John L. Brady: Deputy Director, Operations and Engineering, Central Coast Water Authority (NDWAC member)
Alexandra Campbell-Ferrari: Co-Founder and Executive Director, The Center for Water Security and Cooperation (<i>NDWAC member</i>)
Shellie R. Chard: Director, Water Quality Division, Oklahoma Department of Environmental Quality (<i>NDWAC member</i>)
Michael Hansen, PhD: Senior Scientist, Consumer Reports
Olga Naidenko, PhD: Vice President for Science Investigations, Environmental Working Group (CHPAC member)
Benjamin Pauli, PhD: Assistant Professor of Social Science, Kettering University (NEJAC member)
Jennifer L. Peters: National Water Programs Director, Clean Water Action/Clean Water Fund (NDWAC member)
Jeffrey W. Szabo: Chief Executive Officer, Suffolk County Water Authority (NDWAC member)
Sridhar Vedachalam, PhD: Director of Water, Environmental Policy Innovation Center
Taka Wiley: Health Communication Specialist, Centers for Disease Control and Prevention's National Center for Environmental Health and the Agency for Toxic Substances and Disease Registry

CCR³ Working Group members Shellie Chard and Olga Naidenko did not attend the October 12, 2021 NDWAC meeting. All others listed above attended.

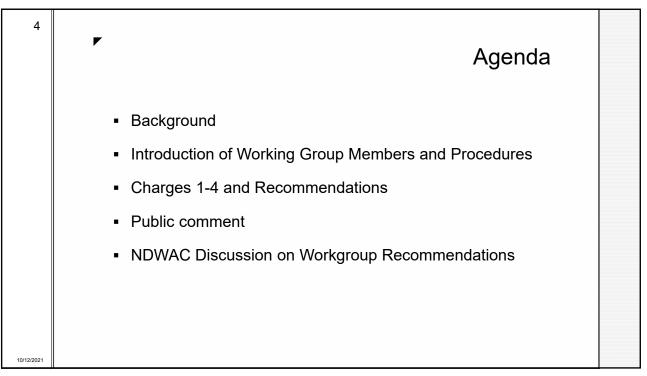
ATTACHMENT C

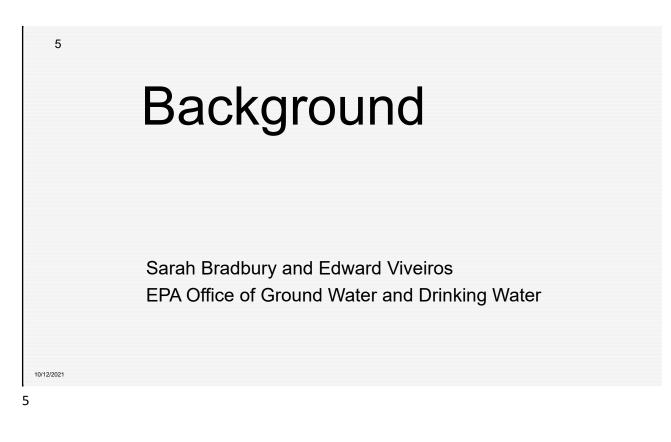
National Drinking Water Advisory Council (NDWAC) October 12, 2021 Meeting Presentation Slides

1	
	NDWAC CCR
	Rule Revision
	Working Group
	Preliminary Working Group Recommendations for the Council
	October 12, 2021 Jana Littlewood, Working Group Chair
10/12/2021	

2		
	Teams Meeting Information	
	 When the meeting starts, we ask that you please keep your webcam enabled as much as possible and please remain muted when not speaking. 	
	 If you would like to speak during the meeting, please use the raise hand feature (<i>click</i> the "face/hand" icon, then <i>click</i> the "hand" icon, or Alt+Y) and wait for the facilitator to call on you. After speaking, we ask that you please ensure your hand is lowered (<i>click</i> the "face/hand" icon again, then <i>click</i> the "hand" icon again). 	
	Please note that the Teams chat feature is disabled for this meeting.	
	 If you experience any technical issues, please email: <u>CadmusCCR3Support@cadmusgroup.com</u> 	
10/12/2021		

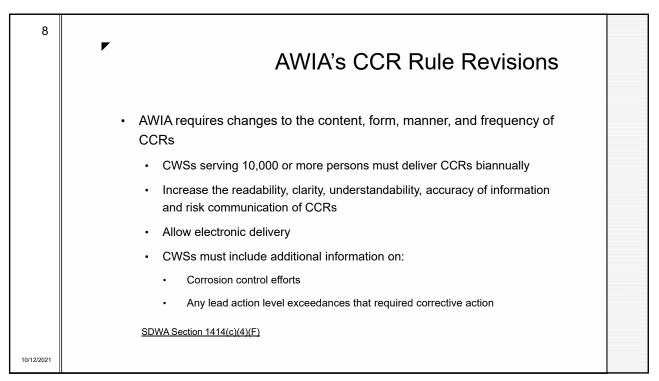
3	Written Comments
	 Any person who wishes to file a written statement can do so by sending them to <u>OGWDWCCRrevisions@epa.gov</u>. Any statements received will become part of the permanent file and will be forwarded to the CCR³ WG members for their information. Written comments received within the 30-day window after today's Council meeting will be shared with the Council and Working Group members.
10/12/2021	 Members of the public wishing to submit written comments should refer to the procedures outlined in the public meeting notice published on 9/22 in the Federal Register [86 FR 52672].





6	Purpose of the CCR	
	Consumer Confidence Reports (CCRs) help to:	
	Raise consumer awareness of where their water comes from	
	 Start a dialogue between consumers and their community water systems (CWSs) and increase consumer participation in decisions affecting their drinking water 	
	 Inform consumer decision making (especially for those with special health needs) regarding their drinking water 	
	 Educate consumers on the importance of water safety measures (e.g., source water protection) 	
10/12/2021	<u>Federal Register, Volume 63 Issue 160 (August 19, 1998) (govinfo.gov)</u>	

7	CCR Revision History	
	History and Background	
	 1996 Safe Drinking Water Act (SDWA) amendments created "Right-to-Know" rules to increase the availability of information to those served by CWSs 	
	 The CCR is one of the "Right-to-Know" rules stemming from the 1996 SDWA amendments 	
	 The CCR was promulgated in 1998 and founded on the principle that consumers have a "right to know what is in their drinking water and where it comes from" 	
	 In 2013, EPA issued the delivery options memorandum following a Retrospective Review of the CCR 	
	 America's Water Infrastructure Act (AWIA), signed into law in 2018, amended portions of the SDWA directly related to the CCR 	
	1996 – SDWA Amended 1998 – CCR Promulgated 2018 – AWIA Amends SDWA	
10/12/2021		

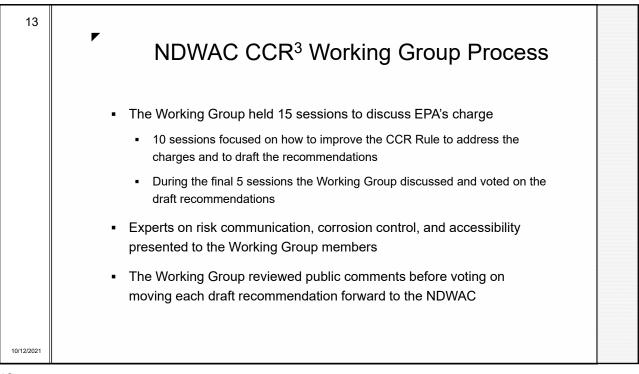


9	NDWAC Charge	
	EPA is seeking advice and recommendations from the National Drinking Water Advisory Council (NDWAC) on targeted issues related to revisions to the CCR Rule, as required by the AWIA of 2018	
	In particular, EPA seeks advice and recommendations on:	
	1) Addressing accessibility challenges	
	2) Advancing environmental justice and supporting underserved communities	
	 Improving readability, understandability, clarity, and accuracy of information and risk communication of CCRs 	
	4) CCR delivery manner and methods, including electronic delivery	
10/12/2021		

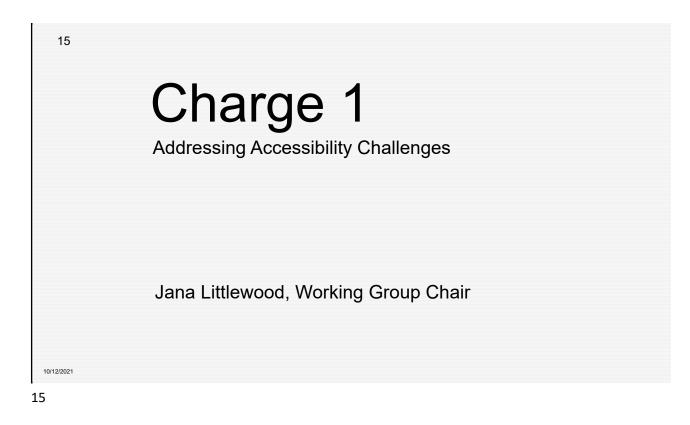


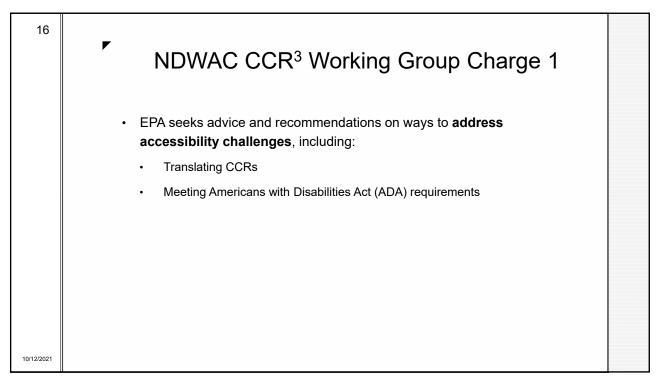
Working Group Members
 Jana Littlewood (CCR³ Working Group Chair, NDWAC Member): Board of Directors—Alaska Representative, National Rural Water Association
 Yolanda Barney (NDWAC Member): Environmental Program Manager, Navajo Nation Environmental Protection Agency's Navajo Public Water System Supervision Program
 John Brady (NDWAC Member): Deputy Director, Operations & Engineering, Central Coast Water Authority
 Alexandra Campbell-Ferrari (NDWAC Member): Co-Founder and Executive Director, The Center for Water Security and Cooperation
 Shellie Chard (NDWAC Member): Director, Water Quality Division, Oklahoma Department of Environmental Quality
 Olga Naidenko, PhD: Vice President for Science Investigations, Environmental Working Group and Member of EPA's Children's Health Protection Advisory Committee
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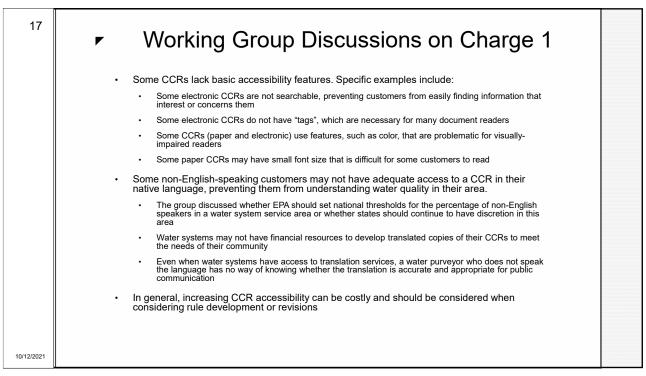
	Working Group Members (Cont'd)	
	 Benjamin Pauli, PhD: Assistant Professor of Social Science, Kettering University; Member of EPA's National Environmental Justice Advisory Committee 	
	 Jennifer Peters (NDWAC Member): National Water Programs Director, Clean Water Action/Clean Water Fund 	
	 Jeffrey Szabo (NDWAC Member): Chief Executive Officer, Suffolk County Water Authority 	
	 Sridhar Vedachalam, PhD: Director of Water, Environmental Policy Innovation Center 	
	 Taka Wiley: Health Communication Specialist, Centers for Disease Control and Prevention's (CDC's) National Center for Environmental Health (NCEH) and the Agency for Toxic Substances and Disease Registry (ATSDR) 	
10/12/2021		



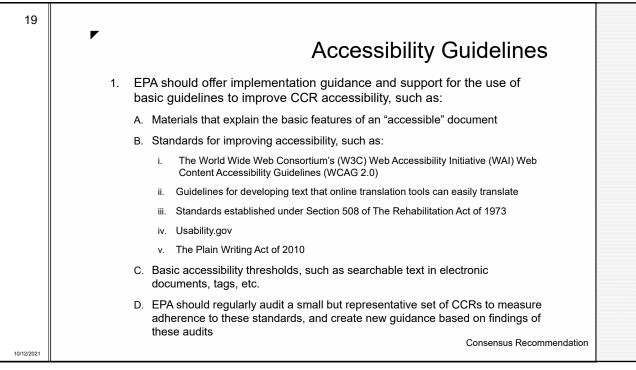
14	NDWAC CCR ³ Working Group	
	Recommendations to the NDWAC	
	The Working Group developed recommendations for NDWAC consideration under each of the four charges	
	 The Working Group reached consensus on recommendations when the members "could live with" the recommendation 	
	 When consensus on a particular topic was not reached, the Working Group developed options that reflect the differing viewpoints, with pros and cons for NDWAC consideration 	
	 This presentation separates recommendations where consensus was reached from alternatives where consensus was not reached 	
10/12/2021		



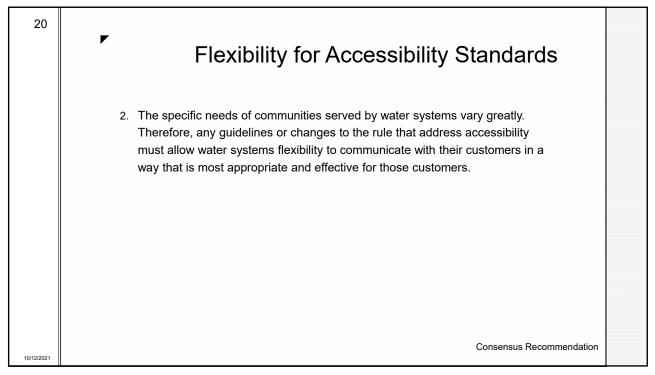




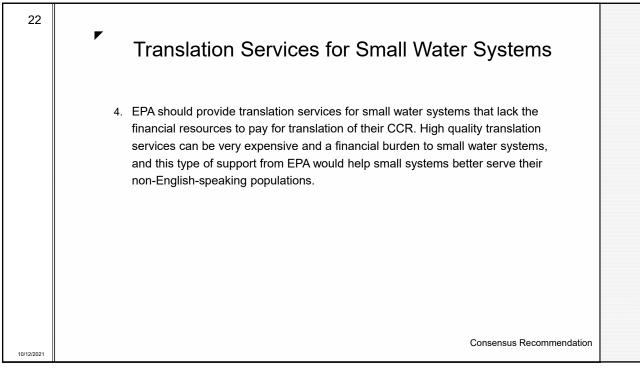


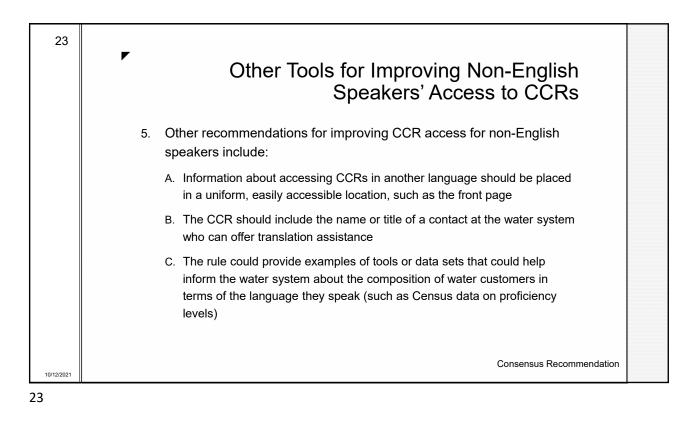




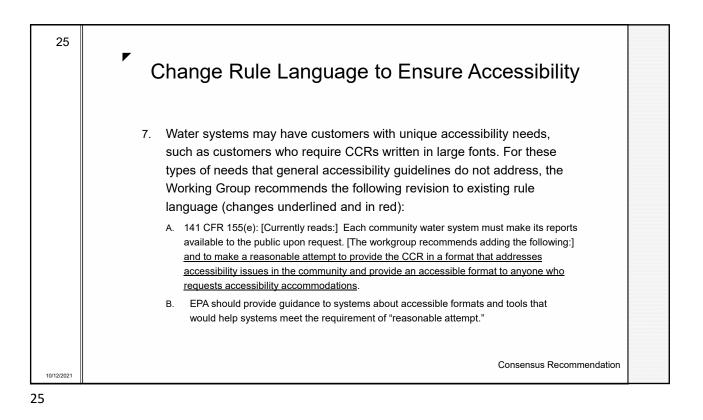


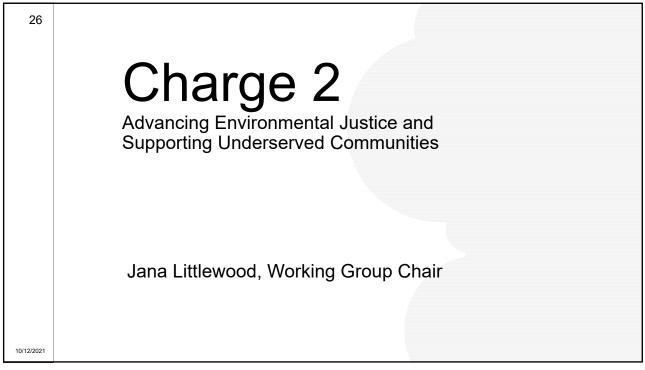
Translation Thresholds
3. The Working Group recommends that for water systems serving 100,000 or more people, the rule should define "large portion of non-English speaking residents" as a minimum threshold (to be established by EPA) of the population served by the water system speaking the same non-English language. The rule should also give primacy agencies the authority to establish a more stringent (lower) threshold or identify other situations in which a translated copy of the CCR is needed. Any group speaking a non-English language that meets the threshold should have a high-quality translated copy of the report available to them. The reasons for this approach include:
a. A national threshold would provide consistency across the country.
 Limiting any additional translation requirements to large water systems would avoid potential burdens to small water systems.
Allowing primacy agencies to set a lower threshold would allow for flexibility to meet the specific needs of communities in cases when the threshold should be lower.
Consensus Recommendation

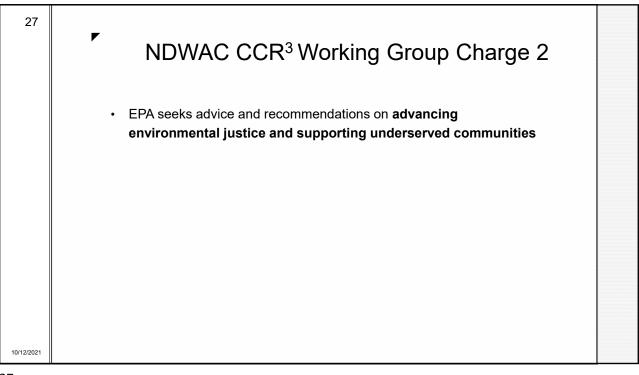


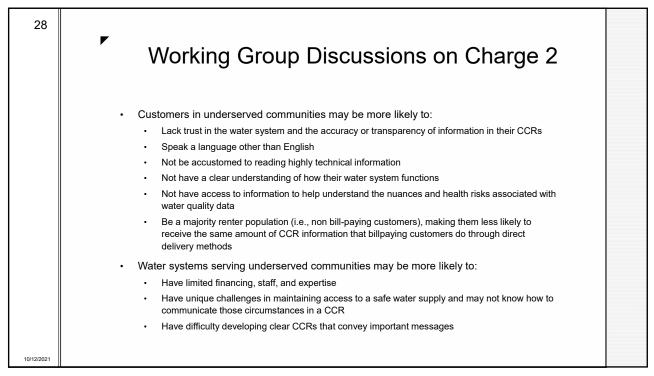


Methods of Translating CCRs
6. Whenever possible, water systems should enlist a certified translator to develop translated copies of the CCR or evaluate a CCR translated using an online translation tool, when a translated copy is needed.
A. Water systems should develop online versions of CCRs in a format that can be translated using online tools. When it is not possible to use a certified translator to translate the CCR, the systems and customers can use online translators.
B. Water systems should use online guides to develop CCRs in a way that improves accuracy of translation tools that may be used on CCRs.
C. Water systems could provide directions to customers on how to use online translation tools. These directions can be provided on the water system's website along with a phone number of a water system contact who could assist with this process.
Consensus Recommendation





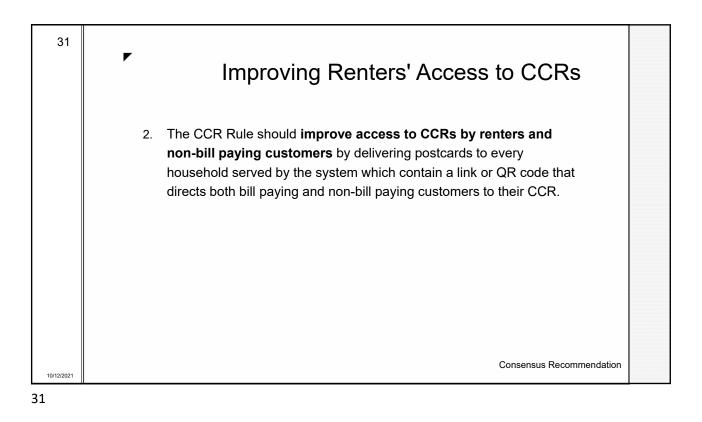








30	Improving Engagement by Primacy Agencies
	 The CCR Rule should encourage Primacy Agencies to be more engaged in the CCR process to help systems serving underserved communities, specifically: A. Help ensure accuracy and completeness of CCR information B. Provide technical assistance to help systems develop and understand CCRs C. Serve as an alternative resource to systems to answer customer questions D. Develop guidance materials E. Ensure underserved communities know who makes decisions regarding drinking water
	 Changes to the CCR Rule to address these concerns should: A. Be flexible B. Recommend that Primacy Agencies coordinate with the system when responding to requests from the public C. Be accompanied by funding if EPA imposes specific mandates on Primacy Agencies to support those mandates
10/12/2021	Consensus Recommendation

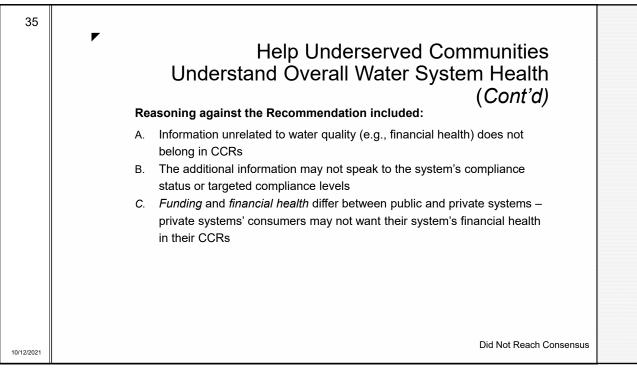


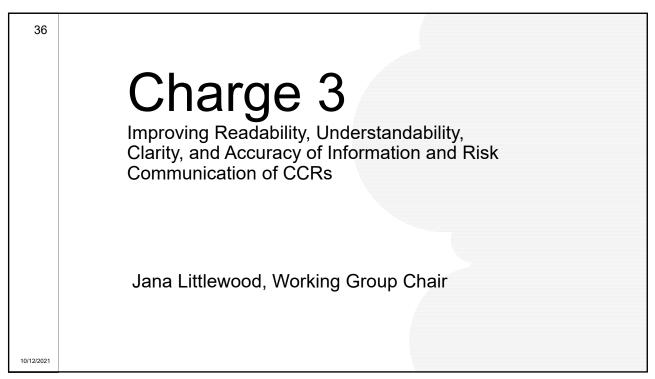
32	Encouraging States to Adopt Templates
	 3. The CCR Rule should encourage states to adopt templates to reduce the burden of CCR development. Many underserved communities with limited staffing and financial resources use templates (e.g., CCR iWriter) to create CCRs. A. Templates should be improved (e.g., CCR iWriter) by providing suggested content for systems that meet certain conditions (e.g.,
	geographically isolated, experiencing drought, or experiencing source water problems)
	B. Create a guide or toolkit to supplement templates that help systems include the proper information in CCRs and ensure the effectiveness of relaying information to their underserved communities
10/12/2021	Consensus Recommendation

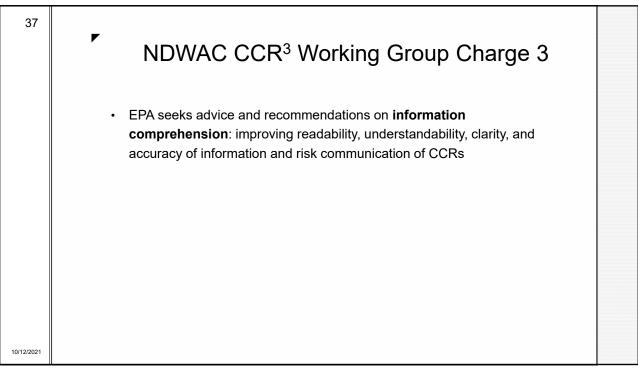


34	Help Underserved Communities Understand Overall Water System Health
	 Recommendation: The CCR Rule should encourage water systems to include more information about the overall health of their water system in their CCRs. For example, factors driving the system's financial health.
	Reasoning in favor were as follows:
	A. Gives context to customers for why particular decisions are made
	B. Informs customers about their system's water quality challenges and what they can do at the household level
	C. Helps customers advocate for themselves and understand the drivers behind water quality decisions
	D. Increases transparency
0/12/2021	Continued on next slide Did Not Reach Consensus

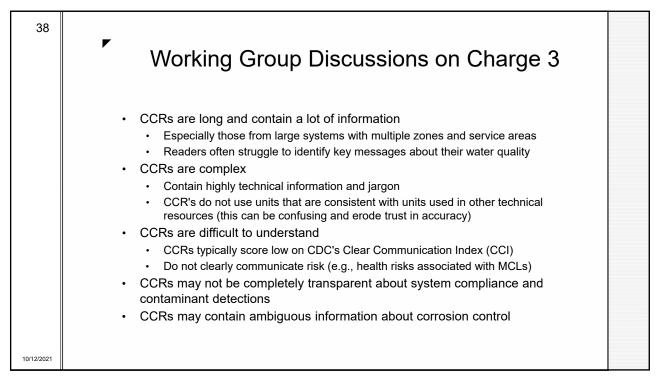






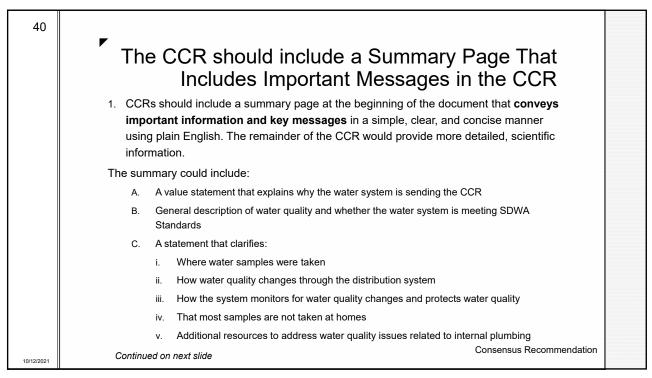




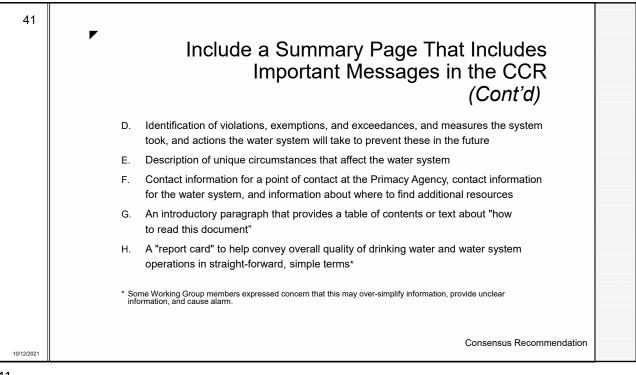




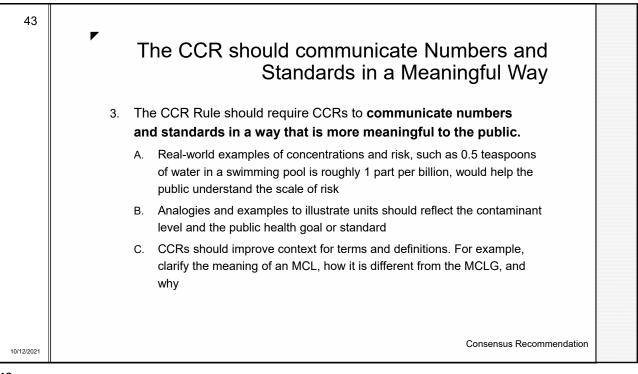


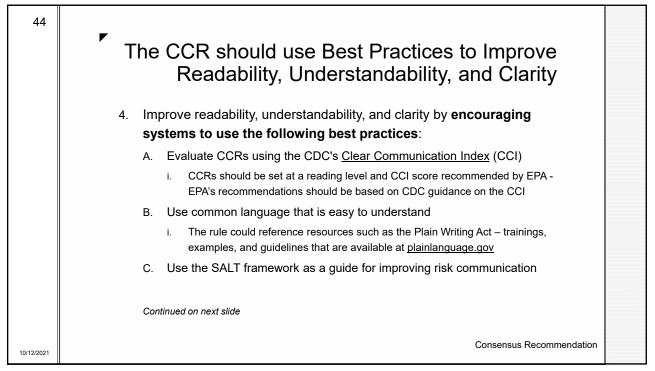


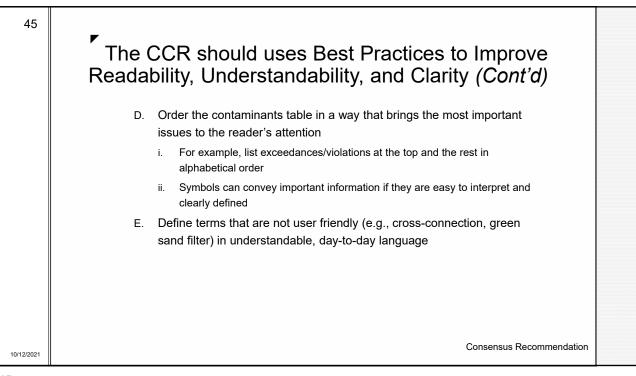


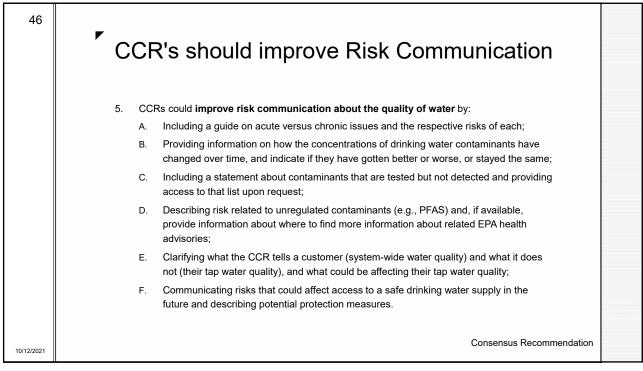


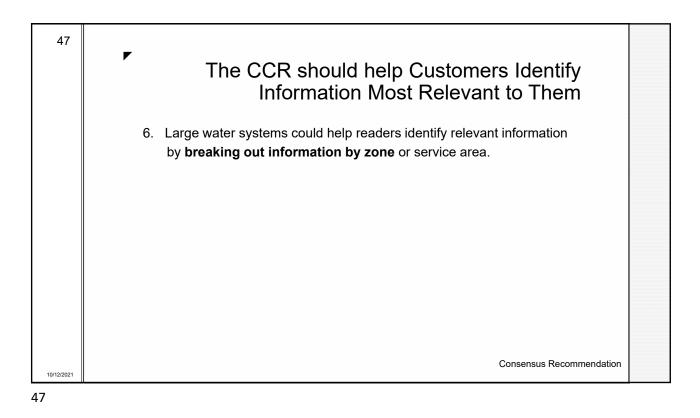
42	Improving the Clarity and Simplicity of Messaging
	2. The CCR Rule should encourage systems to develop clear and simple messaging to streamline the document by guiding readers through a "story", avoiding overloading readers with too much information.
	 If readers are interested in learning more, CCRs could link to additional technical information that can be found in resources such as CDC's <u>Agency For Toxic Substances and Disease Registry (ATSDR)</u> <u>ToxFAQs</u> and additional information provided by the Primacy Agency.
10/12/2021	Consensus Recommendation

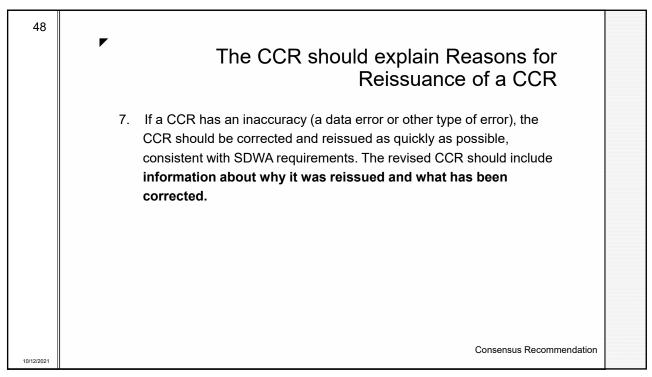


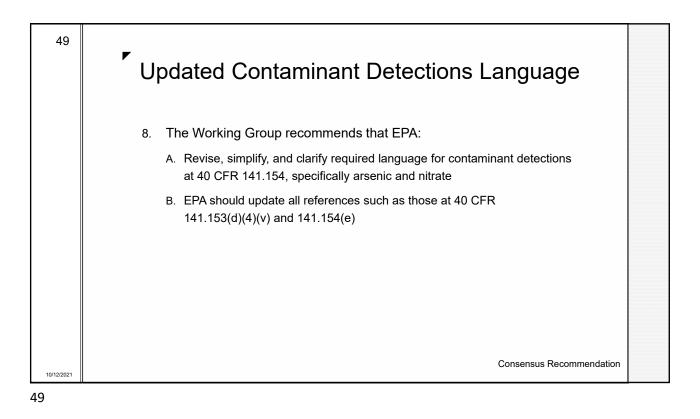


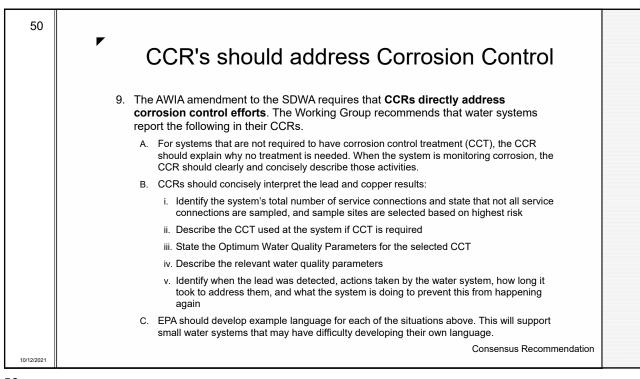




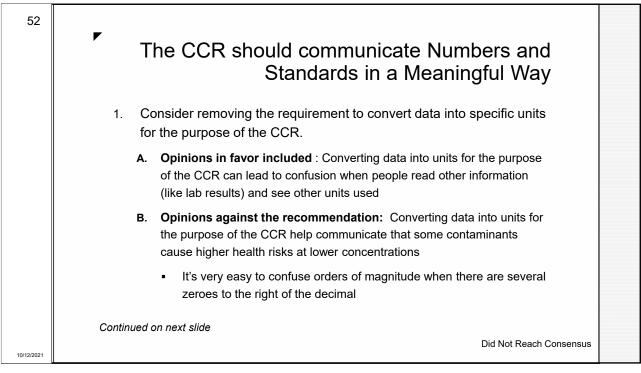


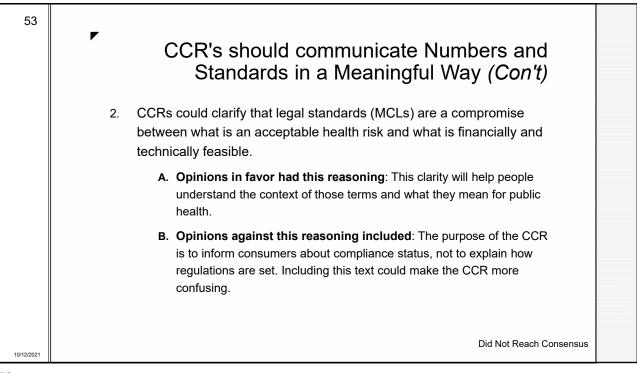


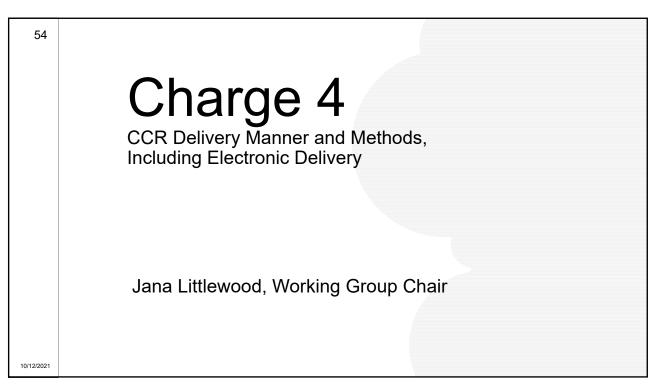


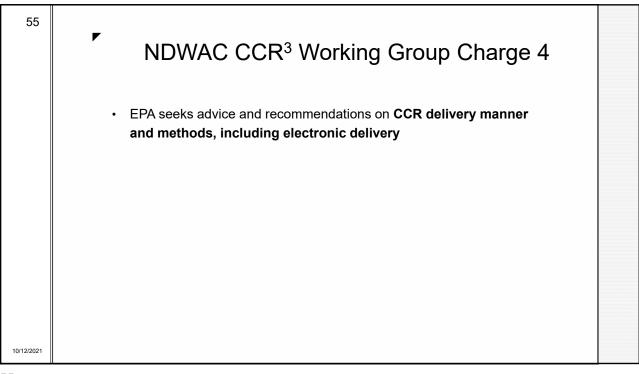


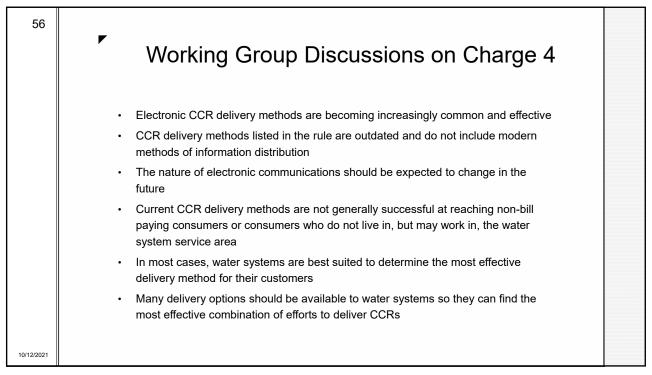






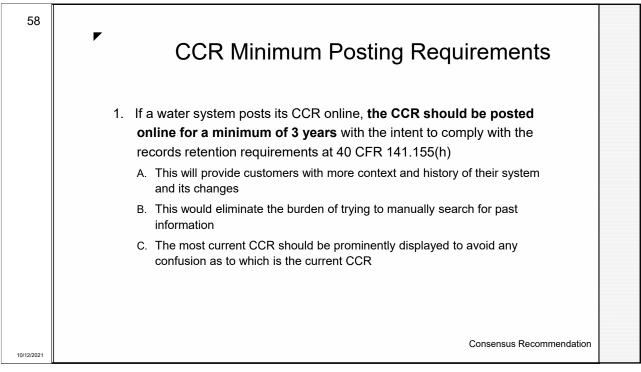


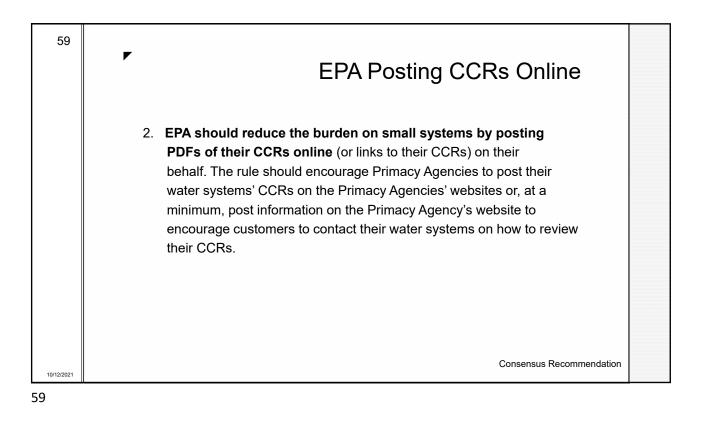


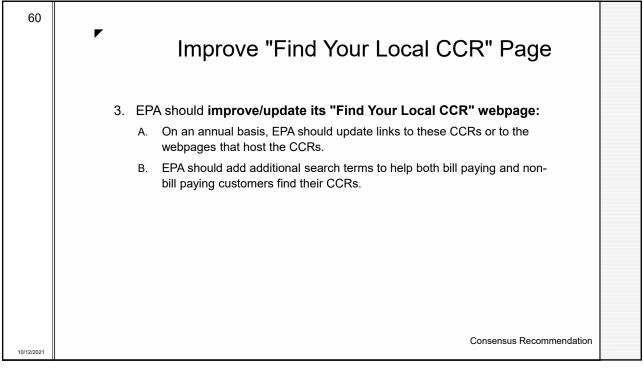


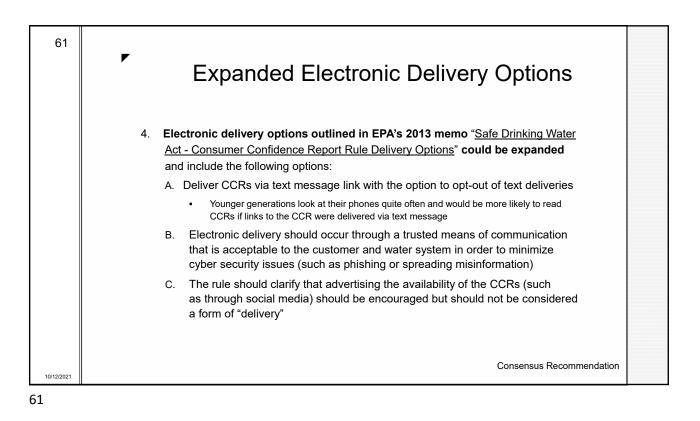


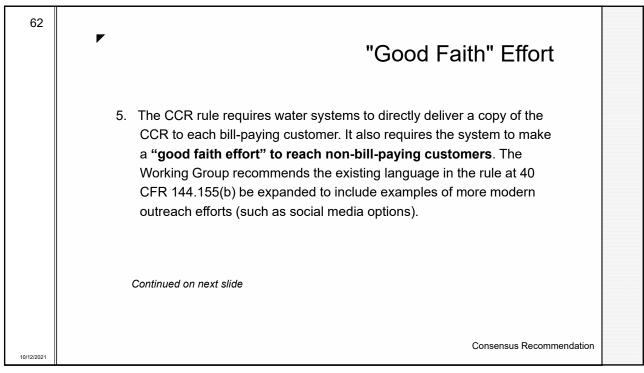












"Good Faith" Effort (Cont'd)
The Working Group recommends that EPA modify 40 CFR 141.155(b) to include the following delivery methods:
40 CFR 141.155(b) : "A good faith effort to reach consumers would include a mix of methods appropriate to the particular system such as:"
 A. Including mailing postcards or CCRs directly to the service address (in addition to the billing address, as required under the direct delivery requirement)
B. Posting in public places a QR code that links directly to the CCR
 Advertising the availability of the report in the news media and through direct texts to residents
D. Providing a direct link to CCRs on water bills
E. Holding public forums
Consensus Recommendation

65	Gathering Input From Customers
	6. Water systems could improve their CCRs by gathering input from customers.
	A. This could be achieved by providing customers with contact information (such as a phone number) to let them directly contact their system with feedback regarding the format, readability, accessibility, etc. of the CCR they received.
	B. The water system can incorporate input at its discretion.
	C. Water systems can include a link or QR code at the bottom of the CCR to solicit feedback from customers. Examples of ways to solicit feedback include:
	i. A survey that asks the customers questions to understand whether they think the CCR is clear and accessible.
	 A quiz or game that would ask questions about the content of the CCR to give the utility a sense as to how much the customer understood the CCR, and therefore whether it is clear and accessible.
10/12/2021	Consensus Recommendation

