

Very Small Drinking Water and Wastewater System Resilience Continuing Education Unit (CEU) Program - Standard Operating Procedure

Program Overview

The U.S. Environmental Protection Agency (EPA) Water Infrastructure and Cyber Resilience Division ([WICRD](#)), the National Rural Water Association ([NRWA](#)), and the Rural Community Assistance Partnership ([RCAP](#)) will provide signed certificates for up to three personnel at community drinking water systems (CWSs) that serve less than 3,301, non-CWSs, and wastewater systems who create risk and resilience assessments (RRAs) and emergency response plans (ERPs). The certificates can be submitted to state or tribal operator certification programs to receive continuing education unit (CEU) credit hours towards the operator's license renewal, if allowed by the state or tribal operator certification program.

This CEU program will serve as an incentive for water and wastewater systems who do not have to comply with America's Water Infrastructure Act (AWIA) Section 2013/Safe Drinking Water Act (SDWA) Section 1433 to prepare for disasters by developing RRAs and ERPs. AWIA Section 2013/SDWA Section 1433 requires that CWSs serving populations more than 3,300 conduct and certify completion of a RRA and ERP to EPA. CWSs that serve less than 3,301, non-CWSs, and wastewater systems are not required to certify completion of a RRA or ERP to EPA. However, natural disasters and malevolent acts also occur at these facilities, therefore EPA, RCAP, and NRWA encourage these systems to plan for disasters that could disrupt system operations by conducting RRAs and developing ERPs.

EPA has applied for CEU pre-approval with all 50 states, the Intertribal Council of Arizona (ITCA), and the United South and Eastern Tribes (USET). To qualify to receive a signed certificate, public drinking water and wastewater system personnel need to reach out to set up a meeting with either a NRWA or RCAP technical assistance provider. The technical assistance provider will help walk the water or wastewater system through the process of completing a RRA using EPA's [AWIA Small System Risk and Resilience Assessment Checklist](#) and ERP using EPA's [Emergency Response Plan Template and Guidance](#) or other EPA approved templates. Other EPA approved templates include:

- [RCAP & AWWA's Small Systems Risk and Resilience Assessment Worksheet](#)
- [New York Rural Water Association's 2022 Vulnerability Assessment and Emergency Response Plan Templates](#)
- [The Alliance of Indiana Rural Water's Emergency Response Plan Template](#)
- SEMS Software Suite Vulnerability Assessment (submitted for consideration by the New Jersey Rural Water Association)

If a partnering technical assistance provider wants to use a template that is not on this list, they should email dwresilience@epa.gov a copy of the template for EPA's review and approval BEFORE beginning work with the water or wastewater system. Once approved, EPA will add the template to the list of approved templates that can be used for this program. Once approved, EPA will add the template to this list of approved templates.

After the RRA and ERP are complete, the technical assistance provider will present the water or wastewater system with a certificate signed by themselves, as well as a representative from EPA's WICRD (the technical assistance provider should email dwresilience@epa.gov for assistance filling out the certification and to obtain a signature from an EPA representative). The signed certificate will contain the name(s) of the individual(s) who worked on the RRA and ERP, as well as how many hours

they spent working on the documents up to a maximum of ten hours per person. System operators and technical assistance providers must then follow the pre-established method used by their operator certification program to apply for CEU credit hours.

Role of EPA WICRD

- Apply for CEU pre-approval of this program with all state, federal, and tribal primacy agencies for water and wastewater systems. Maintain a list of state and tribal operator certification programs that participate in this CEU program on EPA's website: <https://www.epa.gov/waterresilience/awia-section-2013#under3301>
- Provide RCAP and NRWA with a copy of the RRA and ERP Primer for Very Small Drinking Water and Wastewater Systems to use to advertise the benefits of creating RRAs and ERPs and promote the CEU Program.
- Provide RRA and ERP certificate of completion template to NRWA and RCAP for technical assistance providers to sign and award to water and wastewater system personnel once RRA and ERP have been completed. The regional partners and state associations will also be given an option to add their own state/local logos to the certificate of completion if desired.
- Monitor dwwresilience@epa.gov for certificates of completion sent by TAPs to assist them in filling out the certificate and sign the document.
- Host information sessions, either in person or virtual, with NRWA and RCAP technical assistance providers to describe the program and the role of the technical assistance provider. Create record information sessions, upon request, for RCAP and NRWA to share with their new technical assistance provider during their regularly scheduled trainings.
- Lead a series of workshops throughout 2023 and 2024 to teach water systems how to develop RRAs and ERPs and explain the opportunity available to CWSs that serve less than 3,301, non-CWSs, and wastewater systems to potentially earn CEU credits towards maintaining their operator's license.
- Provide training materials to state and regional rural water associations and RCAP Regional Partners for ongoing trainings on RRA and ERP development.
- Promote the program through EPA communication networks to advertise its existence to water and wastewater systems and at annual meetings and conferences held by NRWA, RCAP, the Association of State Drinking Water Administrators (ASDWA), and other organizations, as appropriate. This includes posting and distribution of a 2-page primer on the program.
- Coordinate with EPA's National Operator Certification Program and Drinking Water Capacity and Compliance Assistance Division to ensure that the CEU program is an activity that NRWA and RCAP technical assistance provider can do under EPA's technical assistance grant program. Allow technical assistance providers and water system operators to begin the program in March 2023.

Role of Local/State/Regional Rural Water Association or RCAP Regional Partner

- Maintain a list of water and wastewater systems who were issued a certificate under this program. Report numbers to NRWA, RCAP, and EPA twice a year for internal tracking purposes. RCAP communicated that they plan to use their existing DCS tracking system to pull this information using pre-existing RRA and ERP tasks.
- Conduct ongoing training for technical assistance providers on RRA and ERP development. EPA will share materials and PowerPoint slides that associations can use to host trainings for their technical assistance providers on RRA and ERP development.

Role of Technical Assistance Provider

- Ensure that the water or wastewater system is eligible (only CWSs that serve less than 3,301, non-CWSs, and wastewater systems are eligible) before beginning the program. Email the US EPA at dwresilience@epa.gov for assistance determining eligibility.
- Meet with the water or wastewater system at least once to explain what they must do to receive a RRA and ERP certificate of completion signed by the technical assistance provider and EPA WICRD representative.
- Use EPA's [AWIA Small System Risk and Resilience Assessment Checklist](#) and [Emergency Response Plan Template and Guidance](#) methodology or another EPA approved RRA/EPA template (listed above in the Program Overview section of this document) when working with water or wastewater systems to create or update RRAs and ERPs.
- Review the RRA and ERP with the water or wastewater system to verify completion and adherence to AWIA Section 2013/SDWA Section 1433 requirements before issuing a certificate of completion.
- Protect the potentially sensitive information in RRAs and ERPs by using proper security precautions (password protected files, avoid emailing information with sensitive information, etc.) to prevent a leak of RRA or ERP documents to a malicious actor.
- Provide no more than three certificates of completion within a 5-year period to each water system that participates in the program. Record the number of hours worked by each individual on RRA and ERP development on the certificate, up to a maximum of 10 hours per individual. Record the date that the certificate is provided to the water system.
- Add logo of state/local rural water association or RCAP regional partner next to the US EPA logo (if desired), complete the specified text for the technical assistance provider, and sign the certificate. Email the completed certification to the US EPA at dwresilience@epa.gov for a signature from an EPA representative.

Please email dwresilience@epa.gov if you have any questions on the standard operating procedures outlined in this document.