

INTEGRATED COMPLIANCE INFORMATION SYSTEM (ICIS) MODERNIZATION

Internal deliberative pre-decisional - FOR USE BY 2024 PRESIDENT-ELECT TRANSITION TEAM MEMBERS ONLY

ISSUE SUMMARY:

EPA evaluates the success of its mission to protect human health and the environment through the collection and analysis of regulatory compliance data. The Integrated Compliance Information System (ICIS)—EPA’s and the states’ principal compliance and enforcement data system—is used to gather, assess, and disseminate compliance assurance data for the Clean Air Act and Clean Water Act programs, and enforcement data associated with all Agency regulatory programs. ICIS is a legacy system that is extremely difficult and costly to operate, maintain, and update.

EPA is in the process of replacing ICIS with a modernized system to meet current IT standards and state needs; improve data completeness, accuracy, and accessibility; and reduce system operations, maintenance, and modernization costs. EPA received seed funding under the Inflation Reduction Act for this OECA-led, Agency-wide effort (\$18M for ICIS modernization, \$3M for states to modernize their systems, and \$4M for the continued development of inspection tools for inspectors).

KEY POINTS:

- ICIS cannot be sustained in the long-term due to increasing costs for development of necessary enhancements and maintenance of the current system. ICIS is over 20 years old; siloed; outdated; reliant on proprietary, custom databases and applications developed iteratively over many years and in a variety of programming languages; and hosted onsite—all resulting in a fragile, difficult to manage, and costly system.
- ICIS’s antiquated computer code is impossible to shift to the automated, cloud-based environment used today by most IT systems.
- Additionally, the business requirements that ICIS supports have changed significantly. ICIS was originally designed as a “case docket”-type system for EPA to internally manage information about its enforcement cases and activities. Now, ICIS must manage facility-specific information for hundreds of thousands of regulated facilities required to submit compliance reports.
- EPA is updating ICIS to position the Agency and our coregulators to manage, and inform the public about, critical enforcement and compliance data.

ONGOING/UPCOMING REVIEWS FOR FY2024:

This project is co-sponsored by the Environmental Council of the States. The EPA has established an ICIS Modernization Board, with a state co-chair and representatives from state and local coregulating agencies. The Board meets monthly to provide feedback on the proposed direction of the future system.

In FY2024, the EPA and its coregulator partners began the requirements development phase of the modernization.

KEY EXTERNAL STAKEHOLDERS:

☐ Congress ☒ Industry ☒ States ☒ Tribes ☐ Media ☒ Other Federal Agency
☒ NGO ☒ Local Governments ☒ Public

MOVING FORWARD:

The tentative schedule for the modernization is:

Phase	Tentative Timing	Duration	Lead Office
Requirement Development Phase	Spring 2024 – Spring 2025	12 months	OECA
Analysis of Alternatives	Summer 2025 – Winter 2026	6 months	OMS

Design & Procurement	Winter 2026 – Winter 2027	12 months	OMS
Development	Beginning in Winter 2027	To be determined	OMS

The EPA and its coregulator partners will develop requirements for the ICIS Air, ICIS NPDES, and ICIS Federal Enforcement and Compliance (FE&C) replacement system by the summer of 2025. The Office of Mission Support (OMS) will then conduct an analysis of alternatives, design, procurement, and development, with support from OECA. Finally, OECA will migrate data into and operate the new system and decommission the legacy system.

OMS and OECA have jointly requested additional funding for modernizing ICIS in FY25 & FY26. Similar projects have cost upwards of \$80 million, so additional funding requests will be needed through at least FY2028.