



Shared CROMERR Services IPT Meeting

September 27, 2012

- CROMERR 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.
- Intent: Maintain the same level of corporate and individual responsibility/accountability that exists in the paper environment when reporting is done electronically.

CROMERR: Looking Ahead



- Shared business requirement
- Minimize implementation, maintenance costs for regulatory agencies
- Opportunity for shared services
- Example constraints:
 - Different IT environment complexity across stakeholders
 - State/Tribal specific IT standards
 - “Single Window” concepts
 - Resource constraints



CROMERR: Looking Ahead



- Reduce burden on industry users
- Burden:
 - Duplicate registration required for multiple Exchange Network partners and EPA submittals
 - Steps required for registration
 - Processes for identity proofing
 - Ease of use for signature process
 - Ease of access to Copy of Record



EPA as a provider of CROMERR Services for Exchange Network Partners



- EPA has an existing set of CROMERR services that could potentially be leveraged
- Need to identify key drivers, constraints and business process requirements to drive options
- Need to identify governance models to manage
- Integrated Project team effort is critical to defining services that will be used and adopted



- High level components of CROMERR
 - Registration and Identity Management
 - Submission Process
 - Signature Ceremony and Validation
 - Copy of Record Management and Access
- Additional implementation considerations
 - Governance model
 - Operational support
 - Training: End users; State/Tribal staff

Each CROMERR process group has detailed, shared requirements for achieving compliance. Some examples:

Registration

- Create Account
- Identity Proof, ESA
- Authorized to Submit
- Registration Approvals
- Update Account Data

Signature Ceremony

- View Human Readable Copy
- Retrieve Info for Ceremony
- Validate Info during Ceremony
- Create/Apply Signature

Copy of Record

- Create/Store COR
- Distribute/Archive COR
- Notifications
- Find Previous COR
- View Previous COR
- Validate Previous COR
- Repudiation Support
- Enforcement Support

EPA CROMERR Services Inventory



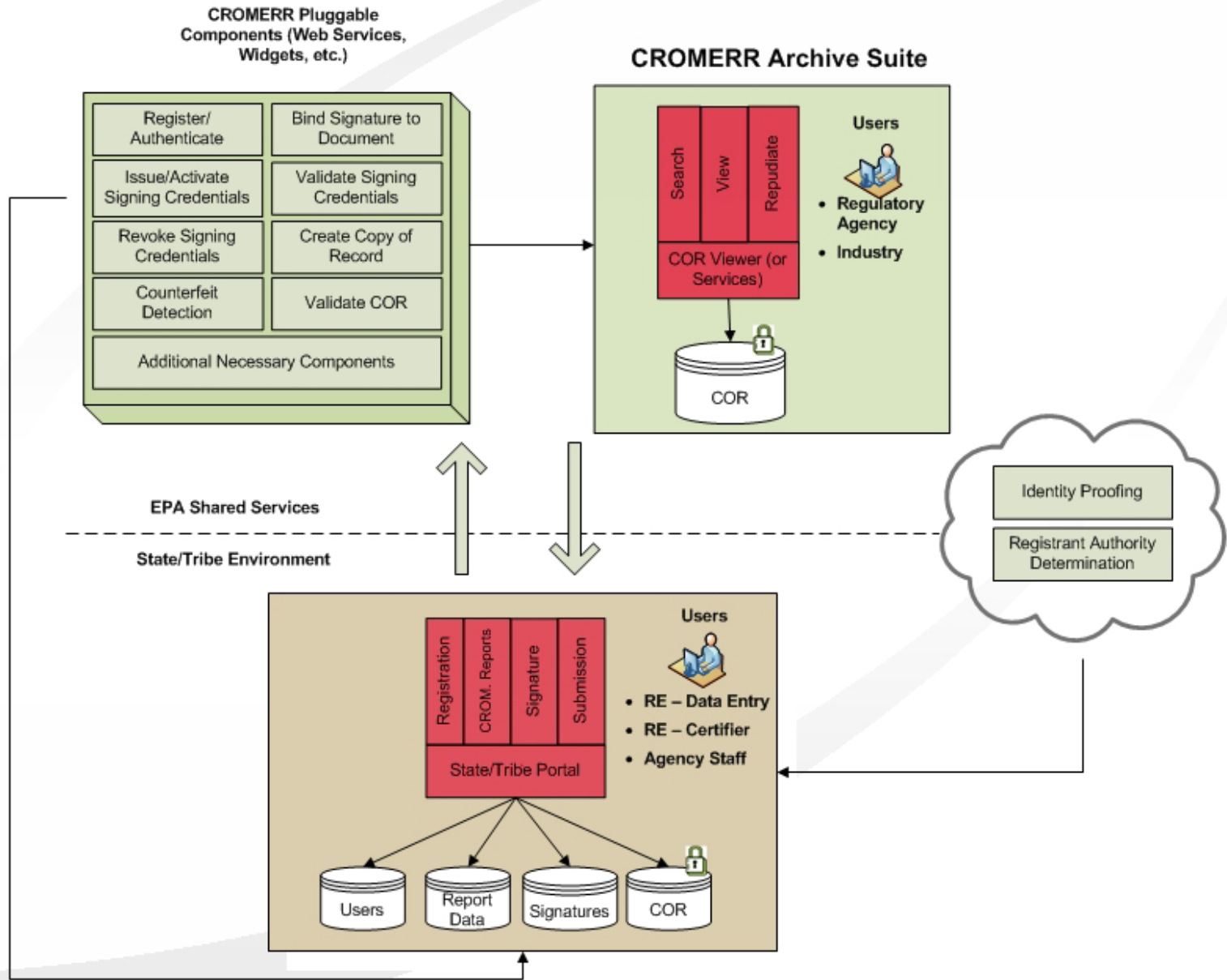
EPA has been evaluating some possible scenarios for State/Tribal integration of EPA service. Some examples:

Type of integration	State/Tribe hosted applications using full suite of EPA Shared Services	State/Tribe hosted integration using subset of EPA Shared Services	Identity focused integration (Single Identity Proofing, ESA Reuse)
Reg/Identity Mgmt	EPA Identity Store	State (or other) Identity Store	EPA Identity Store
Ceremony	EPA Signature Services	EPA Signature Services	State Signature Services
COR receipt	State and EPA Receives COR	State and EPA Receives COR	State Receives COR
COR storage / access	EPA Stores COR for access	EPA Stores COR for access	State Stores COR for access

Example Architecture Option

Adapted from EN2012 State Working Group

Copy of Record



CROMERR Services
Model #1

Example Workflow of Shared Service Adoption (Illustrative)

