Shared CROMERR Services
IPT Meeting
September 27, 2012
101 Recap – CROMERR Context

- 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
CROMERR System Process Groups

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

<table>
<thead>
<tr>
<th>Type of integration</th>
<th>State/Tribe hosted applications using full suite of EPA Shared Services</th>
<th>State/Tribe hosted integration using subset of EPA Shared Services</th>
<th>Identity focused integration (Single Identity Proofing, ESA Reuse)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reg/Identity Mgmt</td>
<td>EPA Identity Store</td>
<td>State (or other) Identity Store</td>
<td>EPA Identity Store</td>
</tr>
<tr>
<td>Ceremony</td>
<td>EPA Signature Services</td>
<td>EPA Signature Services</td>
<td>State Signature Services</td>
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<td>COR receipt</td>
<td>State and EPA Receives COR</td>
<td>State and EPA Receives COR</td>
<td>State Receives COR</td>
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<tr>
<td>COR storage / access</td>
<td>EPA Stores COR for access</td>
<td>EPA Stores COR for access</td>
<td>State Stores COR for access</td>
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Example Workflow of Shared Service Adoption (Illustrative)