
EPA Classification No.: CIO 2133-p-4 (formerly 2128.0-P-04) Approval Date: 06/28/07

CIO Transmittal No.: 07-002

Review Date: 06/2010

*Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19, dated 07/07/2005*

REQUESTING DATA STANDARDS CONFORMANCE WAIVER

1. PURPOSE

These procedures establish the key steps to follow for requesting a data standard conformance waiver from EPA data standards.

2. SCOPE AND APPLICABILITY

These procedures apply to all EPA organizations and their contractors engaged in the design, development, operation, or maintenance of Agency information systems or applications.

3. AUDIENCE

The audience for these procedures includes all EPA programs, regions, laboratories, offices, and contractors/grantees developing and maintaining systems for the Agency.

4. BACKGROUND

Data standards are documented agreements on the format and definition of common data. Consistent use of data standards across the enterprise and with our information exchange partners promotes the efficient sharing of information. Employing common terminology and common data element definitions enables the integration of databases, and promotes environmental assessment and analysis of data from disparate sources, improves data integrity, and maximizes the use of shared resources.

As stated in the Data Standards Policy, EPA shall develop, implement, maintain and oversee two types of data standards:

1. Data exchange within an EPA Program Office, by two or more EPA offices, between EPA and federal agencies, or between EPA and international partners. These data standards are developed, approved, and promulgated by EPA according to the Chief Information Officer (CIO) mandated approval process.

2. Data exchange with partners across the Exchange Network. These standards are developed, approved, and promulgated through the Exchange Network in collaboration with Network partners and promulgated by EPA using the CIO mandated approval process. EPA shall use Exchange Network Data standards in Exchange Network data exchange flows and tools. Development and maintenance of Exchange Network standards is governed under the policies and procedures of the Exchange Network and not by these procedures.

5. AUTHORITY

a. Capital Planning and Investment Control (CPIC) Policy, Directive 2100.2a

Procedure: Obtaining a Waiver from an EPA IT Requirement
(<http://www.epa.gov/irmpoli8/policies.htm>)

c. US EPA Data Standards Policy (<http://www.epa.gov/irmpoli8/policies.htm>)

6. PROCEDURES

a. Types of Waivers.

1. Temporary Waiver: **Waivers with a CIO designated expiration date. A temporary waiver enables the system managers to wait until an appropriate time in the systems life cycle (e.g., modernization) to incorporate a new data standard.**
2. Permanent Waiver: **Waivers granted for the life of the system.**

b. Determination of Need.

1. **The program office's Information Management Official (IMO) or the regional Information Resource Management Branch Chief (IRM BC), in consultation with the system/application owner, determines whether they will have problems conforming to a relevant data standard.**
2. **Both DSB and the Data Standard Steward are consulted for conformance review and/or assistance. Every effort shall be made to achieve conformance.**
3. **Systems shall conform to the latest version of the data standard by its required implementation date. A waiver is required if the system is in conformance with a version that has reached its retirement date, but is not in compliance with the new version by the required implementation date.**
4. **A waiver is data standard specific. A separate waiver must be issued for each data standard relevant to the system/application to which the system/application does not comply.**

c. Submission of a Waiver Request.

1. **The IMO or IRM BC submits the waiver request in writing to the CIO. Copies must be sent to the DSB Branch Chief and the Co-chairs of the QIC Steering Committee.**
2. **Waivers for CPIC investments must include a signed concurrence by the System Owner and the Senior Information Official (SIO).**
3. **Waiver submissions are made on EPA letterhead in memorandum format with supporting documentation attached. An official e-mail record is required for electronic submissions.**

d. Disposition of Waiver Request.

1. **In consultation with the data standard steward, the system owners and the QIC Steering Committee (if it is appropriate or there is a dispute), DSB evaluates applications and makes advisory recommendations to the CIO.**
 2. **Waiver evaluation criteria include, but are not limited to, life cycle of the system/application, applicability of data standard, burden on the regulated community and/or information trading partners, use of the data for secondary purposes.**
 3. **THE CIO notifies the IMO or IRM BC applicant in writing of the disposition of the application within 60 days of receipt.**
-

e. Posting of Waiver Information.

1. **The IMO or IRM BC must record the waiver information in READ and in all relevant system life cycle management and Solutions Architecture documentation.**
-

7. RELATED DOCUMENTS

None

8. ROLES AND RESPONSIBILITIES

- a. Chief Information Officer (CIO), or designee shall
 1. **monitor and encourage adherence to data standards;**
 2. **arbitrate conflicts and issues related to data standards conformance;**
 3. **issue waivers to data standard conformance (see Data Standard Implementation Procedures); and,**
 4. **notify the applying office in writing of the disposition of the waiver application.**

 - b. Senior Information Officials shall
 1. **monitor and encourage adherence to data standards, and;**
 2. **submit a signed concurrence on any waiver requests for systems/applications applying for a waiver that are regulated under the CPIC process. All other waiver applications will be handled by the IMOs.**

 - c. Data Standards Branch (DSB) shall
 1. **provide conformance assistance, measurement and review;**
 2. **evaluate waiver applications and make advisory recommendations to CIO;**
 3. **consult with data stewards and the QIC Steering Committee as needed;**
 4. **report any conformance conflicts to the CIO and resolve those conflicts based on the CIO's guidance; and,**
 5. **monitor the status of waivers through READ.**

 - d. Information Management Officers (IMOs) and Information Resources Management Branch Chiefs (IRM BCs) shall
 1. **make every effort to ensure all systems conform to relevant data standards;**
 2. **prepare applications for waivers, except those for CPIC systems (see SIO),**
 3. **and submit them to the CIO; and,**
 4. **ensure that all waivers that have been granted are accurately recorded in READ and any applicable system life cycle and solutions architecture documentation.**

 - e. **QIC Steering Committee. Will confer with the DSB representative and the waiver applicant to develop a recommendation to the CIO on contentious waiver applications.**

 - e. System Owners shall
 1. **submit a signed concurrence with the SIO on any systems/applications applying for**
-

a waiver that are a part of the CPIC process.

9. DEFINITIONS

- a. Chief Information Officer (CIO): **The Assistant Administrator for Environmental Information, responsible for establishing an innovative center of excellence that advances the creation, management and use of information as a strategic resource at EPA.**
 - b. Conformance Assistance: **Lending technical expertise to assist a party to accurately implement a data standard according to the rules agreed upon in the implementation guidance document.**
 - c. Conformance Measurement: **The degree to which a system/application accurately uses a data standard according to the specifications of the data standard and the guidance implementation document.**
 - d. Conformance Review: **An assessment of the accuracy and completeness of an implementation of a data standard according to data standard specifications and the guidance implementation document (also called compliance).**
 - e. Data Standard: **documented consensus-based agreement on the format and definition of common data.**
 - f. Data Standards Branch (DSB): **organization that manages EPA's data standards program to promote efficient sharing of environmental information among EPA, states, tribes and other information partners through the cooperative development of data standards. DSB is located in the Office of Environmental Information, Office of Information Collection.**
 - g. Data Standard Steward: **A subject matter or data standards expert responsible for the quality, accuracy and revision of a data standard.**
 - h. Exchange Network: **A partnership of states, tribal entities, and US EPA for the purpose of creating a network for the exchange of environmental information. The governance of the network is shared by US EPA and the states.**
 - i. Information Management Official (IMO): **Management official responsible for the oversight of the information resources management in the program or administrative office.**
 - j. Information Resources Management Branch Chief (IRM BC): **Management official responsible for the oversight of the information resources management in an EPA region.**
 - k. Quality Information Council (QIC): **EPA senior level managers that advise and assist the CIO with formulation of policies on major cross-cutting quality and information issues.**
 - l. Required Implementation Date: **The date, stated in the data standard, by which the data standard must be incorporated into all applicable agency systems (directly or by mapping system/application data elements to the standardized data elements).**
 - m. Retirement Date: **The date upon which a version of a data standard has been superseded by a new version. The old version should no longer be used unless a waiver is obtained and recorded.**
 - n. Senior Information Official (SIO): **The SIO in each Headquarters and Regional Office will be the primary, central point of accountability for the effective oversight, coordination and management of information, information technology, and related issues.**
 - o. Solution Architecture: **The Solution Architecture describes how an individual information management system or information acquisition will comply with the requirements of EPA's Target Architecture.**
 - p. System Lifecycle Documentation: **A compilation of managerial documents, usually called the System Management Plan (SMP), in the life of an information system required by the System Lifecycle Management Policy. The required documentation varies by the classification of the system and changes over the life of system as it moves through the phases.**
-

EPA Classification No.: 2128.0-P-04.0

CIO Approval Date: 06/28/07

CIO Transmittal No.: 07-002

Review Date: 06/2010

-
- q. Waiver: An official approval issued by the CIO which exempts a system from the requirement to conform to a data standard.
-

10. WAIVERS

N/A

11. RELATED POLICIES, STANDARDS AND GUIDANCE

Procedures for Data Standards Development
Procedures for Data Standards Implementation
Procedures for Data Standards Maintenance

12. MATERIAL SUPERSEDED

13. ADDITIONAL INFORMATION

For further information, please contact the Office of Environmental Information, Office of Information Collection, Data Standards Branch.



*Molly A. O'Neill, Assistant Administrator
and Chief Information Officer
Office of Environmental Information*