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CDX Innovative Cross Media Electronic Reporting Rule (CROMERR) Solutions: Reusable Electronic Signature Agreement (ESA) and 'Real-Time' Identity Proofing

The Office of Information Collection's Information Exchange Technology Branch, responsible for implementing the agency's Central Data Exchange (CDX) is offering two new services: a reusable Electronic Signature Agreement (ESA) and third-party real-time identity proofing. These new solutions meet the CROMERR regulatory requirements and provide a lower cost and faster CROMERR-compliant alternative for EPA programs. CDX manages thousands of data transactions, provides standardized and secure information collection services that simplify reporting, improve data quality and reduce burden for its customers.

Reuse (Consolidated) ESA

Individuals, who report electronically through CDX, often submit reports to EPA using multiple signature agreements. Until now, an individual who wanted to register and report using a signature agreement would have to complete a new ESA for type of every report and have to undergo identity proofing again, creating a burden both for the registrant and EPA. CDX now recognizes when a registrant has an existing ESA, allowing CDX to accept the electronic signature used for all participating program reporting systems. The reusable ESA eliminates the unnecessary burden of identity proofing and the burden of preparing, submitting and processing additional paper ESAs. Furthermore, an individual will be able to submit a report immediately after registering for the new system instead of having to wait until CDX completes identity proofing. The reusable ESA reduces the cost by $24 for each paper ESA registration that is avoided.

Third Party Real-Time Identity Proofing

The paper-based ESA is an effective identity proofing process; however it is burdensome in both time and cost to registrants and EPA. In addition to preparing and submitting an ESA by paper, the registrant also has to wait until EPA processes the ESA before he/she can submit a report. While this approach has worked for

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numerous Agency reports, it can be especially problematic for submitters who report infrequently or only once. In such cases, it is often easier and faster for an individual to submit signed paper reports.

To address these concerns, CDX has developed and is now offering a voluntary method for real-time identity proofing using a 3rd party vendor to validate government ID and additional personal information in compliance with CROMERR and OMB requirements. Using this service, individuals can register with CDX, sign an ESA electronically and receive their credentials in minutes instead of days. The third party process validates both identity and business affiliation at a small fraction of the cost for paper processing and administration, estimated to be $24 per person. By removing a barrier to electronic reporting, this service will yield huge benefits to EPA programs that require one-time or infrequent submissions by making electronic reporting more attractive and reducing the volume of paper reports, and the costs associated with processing them. This service can be used along with the reuse ESA service.

Combined these two services will reduce time, and the OIC estimates that these services will save EPA more than $250,000 per year.