CROMERR and Verify Light-Duty Request for Certificate Process

Light-Duty Manufacturer Webinar
November 4, 2015

Agenda

- Introduction
- CROMERR Requirements
- CROMERR and Light-Duty Certification
  - Uploading Certification Documents
  - Request for Certificate Process
  - Update Introduction To Commerce Date
- Deployment Information & Next Steps
- Questions
- Appendix: CROMERR

Verify/CROMERR User Roles

Functional Roles	Description
Company Authorizing Official (CAO)	Individual(s) responsible for identifying, vouching for, and managing the "Verify Submitters" and "CROMERR Signers". Also referred to as the "Company Approving Official"
Verify Submitter	Submitters of application information to Verify's Light-Duty module
CROMERR Signer	Individual(s) taking legal responsibility for that final submission and/or requesting a certificate through the Request for Certificate module (Could be the same person as the Verify submitter)

Reminder: What Your Company Needs to Do by November 20, 2015

- For Company Authorizing Official(s) (CAO), all manufacturers must:
  1. Have a Senior Manager identify the CAO(s) through a signed sponsor letter
  2. Have the CAO(s) complete the latest versions of the CAO Electronic Signature Agreement(s) (ESA) and the User Information spreadsheet with the “Company Authorizing Official (CAO)” role selected
  3. Mail the signed CAO Sponsor Letter, the CAO Electronic Signature Agreement(s) and the User Registration Information spreadsheet to the Verify Team

Reminder: What Your Company Needs to Do by November 20, 2015

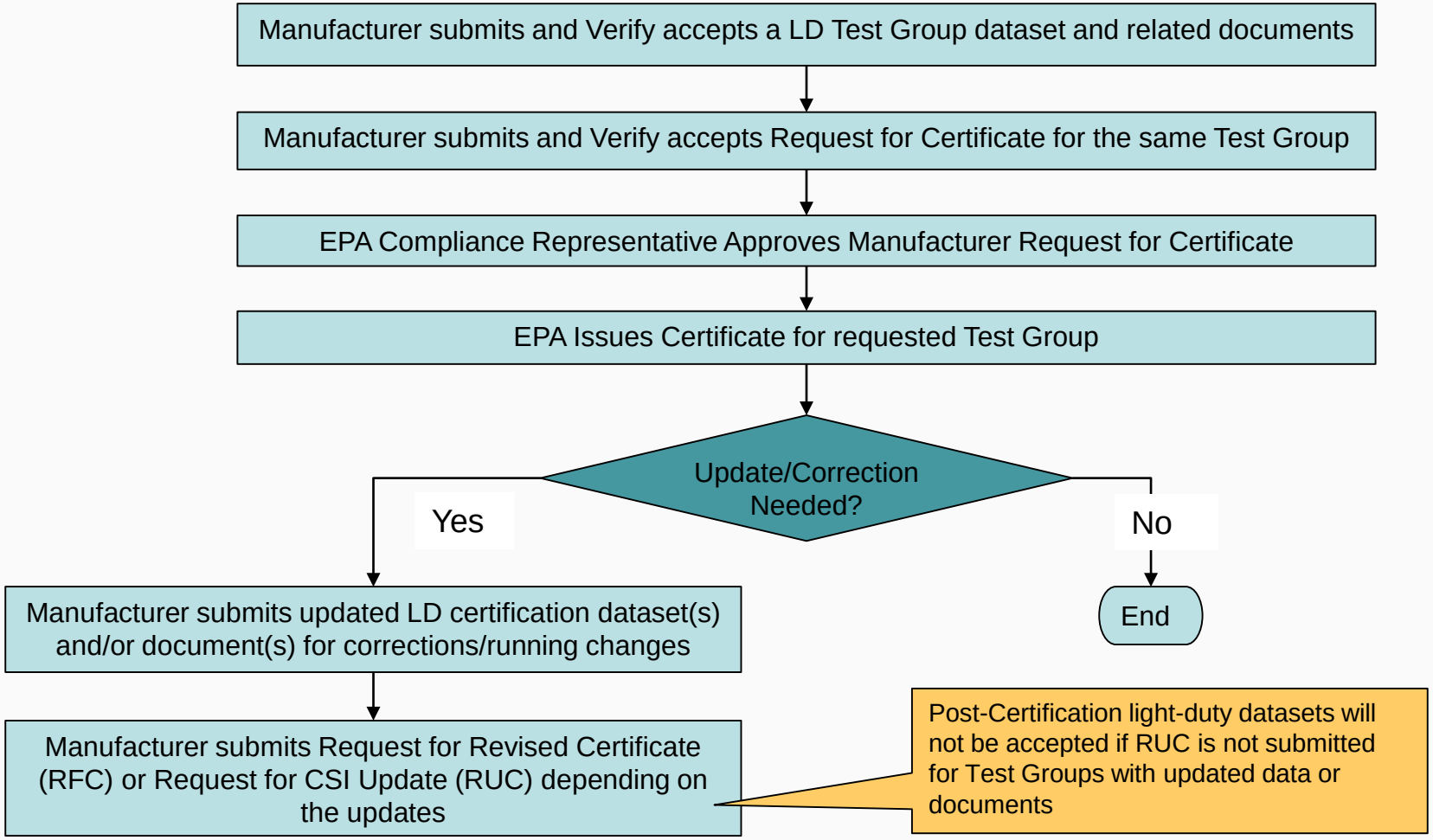
- For new Verify Submitter(s) only, the CAO will need to:
  1. Create a sponsor letter for the Verify Submitter
  2. Complete the User Information spreadsheet with the "Light-Duty" role selected
     - No Electronic Signature Agreement required for Verify Submitters
  3. Mail the signed Sponsor Letter and the User Information spreadsheet to the Verify Team
- No action needed for current LD Verify submitters

Reminder: What Your Company Needs to Do by November 20, 2015

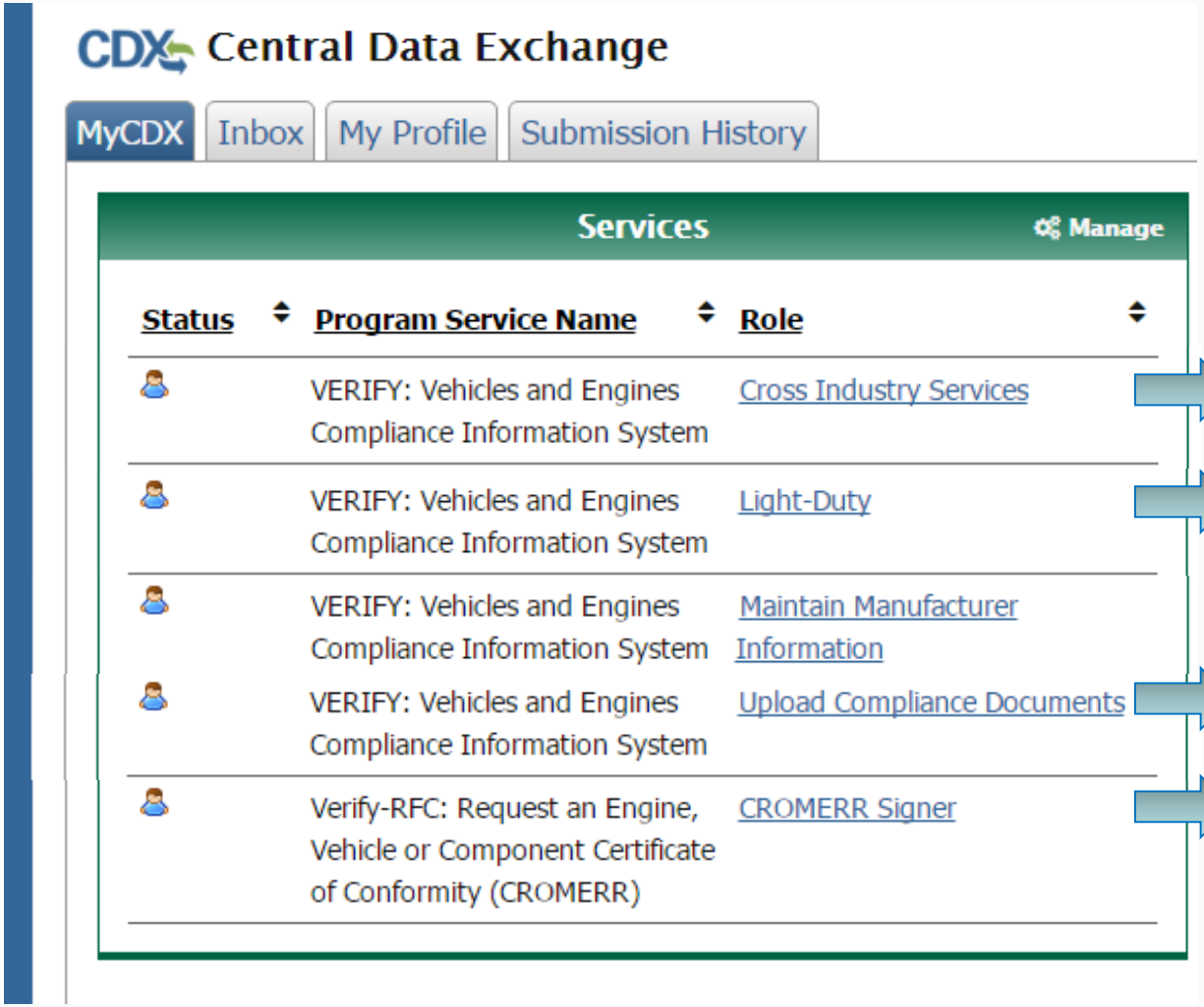
- In order to request a certificate, at least one user will need the CDX CROMERR Signer Role. The CAO will need to:
  1. Create a sponsor letter for the CROMERR Signer
  2. Complete the User Information spreadsheet with the "CROMERR Signer" role selected
  3. Have user(s) complete a CROMERR Electronic Signature Agreement(s) (ESA)
  4. Mail the signed Sponsor Letter, the CROMERR Signer Electronic Signature Agreement(s) and the User Information spreadsheet to the Verify Team
- No action needed for current CROMERR Signers

CROMERR and Light-Duty Certification

LD Certification Process Overview



My CDX



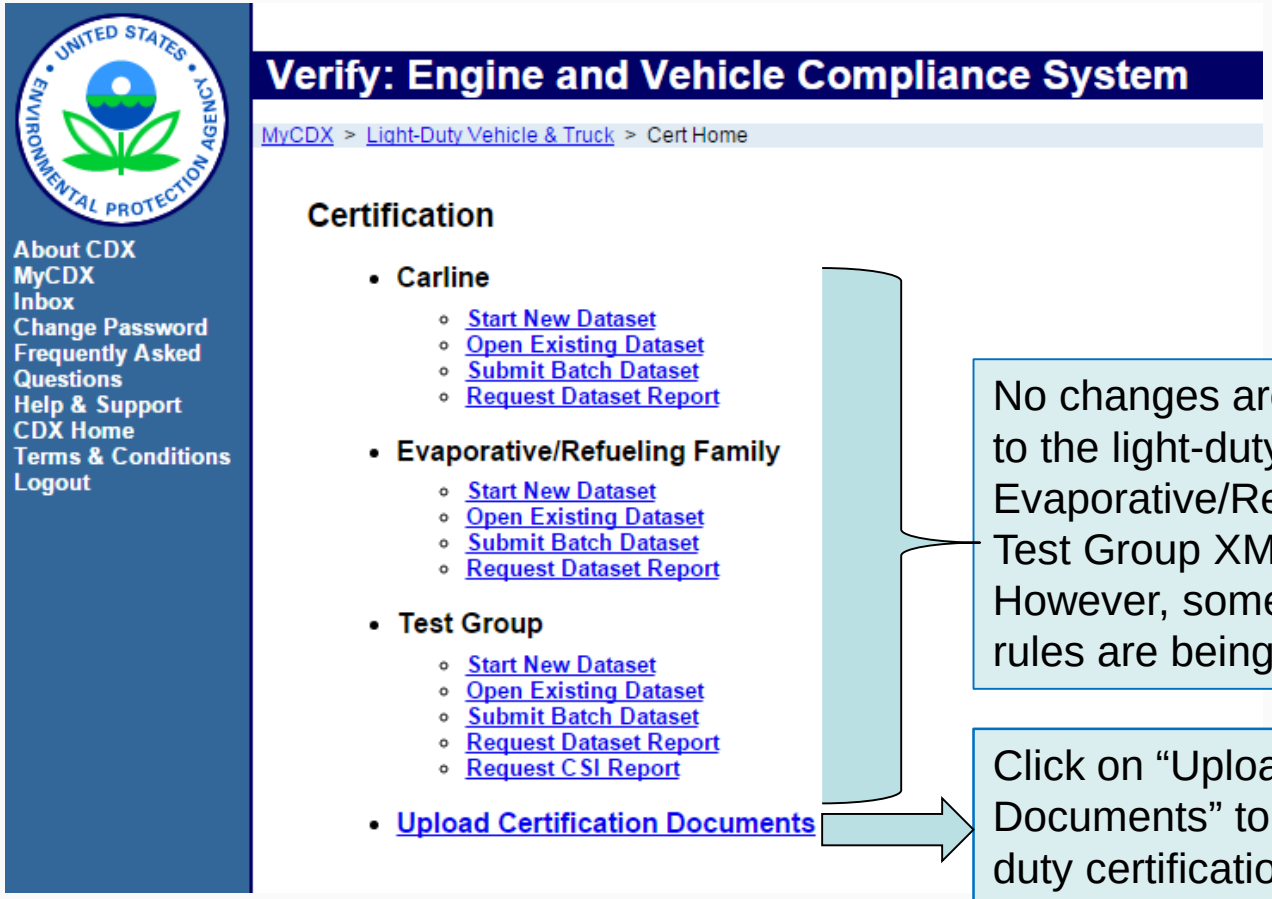
Click on “Cross Industry Services” to change the Introduction Into Commerce Date for a certified Engine Family/Test Group. This is a new CDX Role for all industries.

Click on “Light-Duty” to enter the required light-duty certification datasets and documents

Click on “Upload Compliance Documents” to submit compliance documents (non-certification)

Click on “CROMERR Signer” to request a certificate or CSI Update for all industries. This requires a different CDX Role than used to submit light-duty certification information

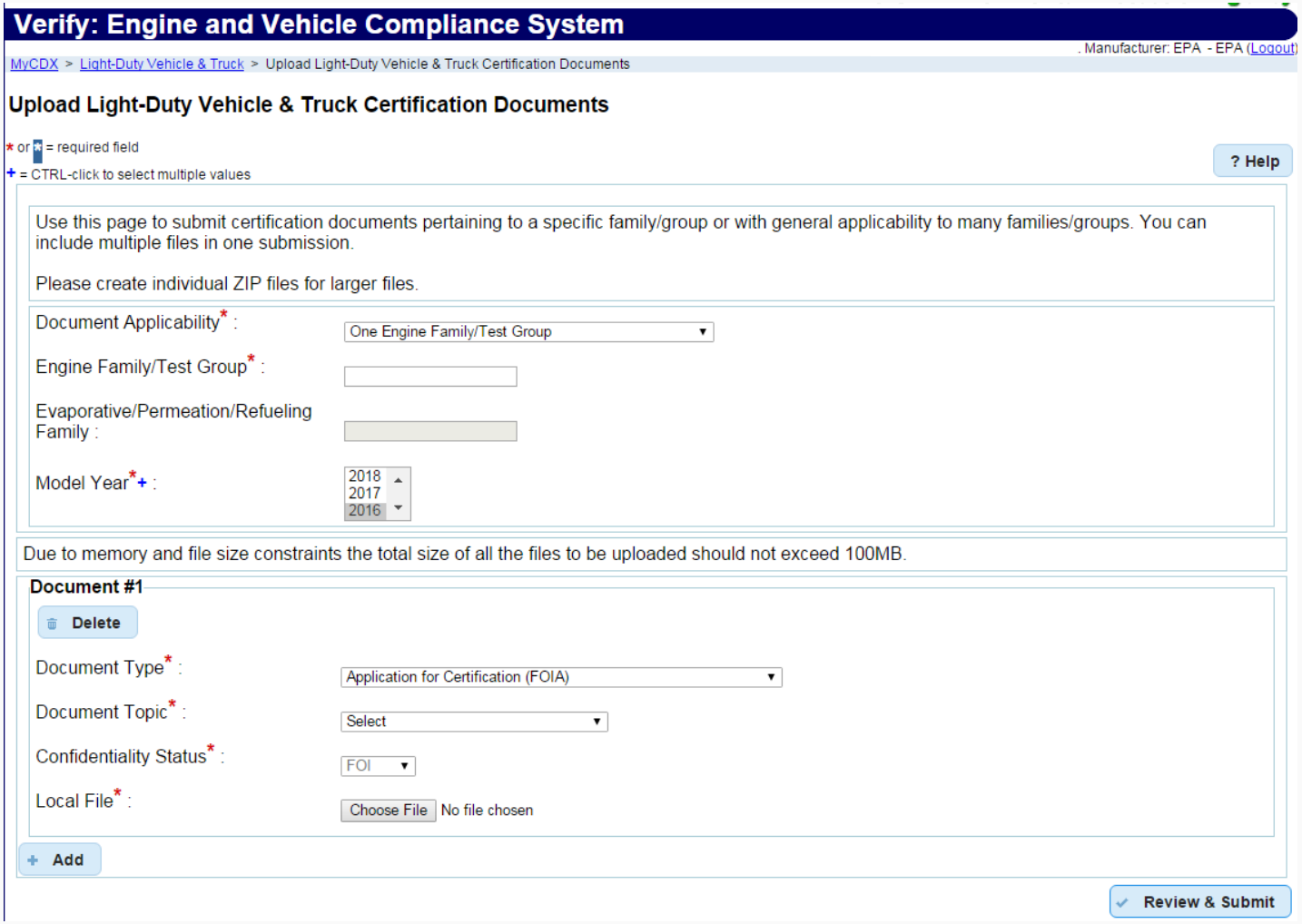
Light-Duty Certification Home Page



No changes are being made to the light-duty Carline, Evaporative/Refueling or Test Group XML schemas. However, some business rules are being updated

Click on “Upload Certification Documents” to submit light-duty certification documents (not compliance documents)

Uploading Certification Documents

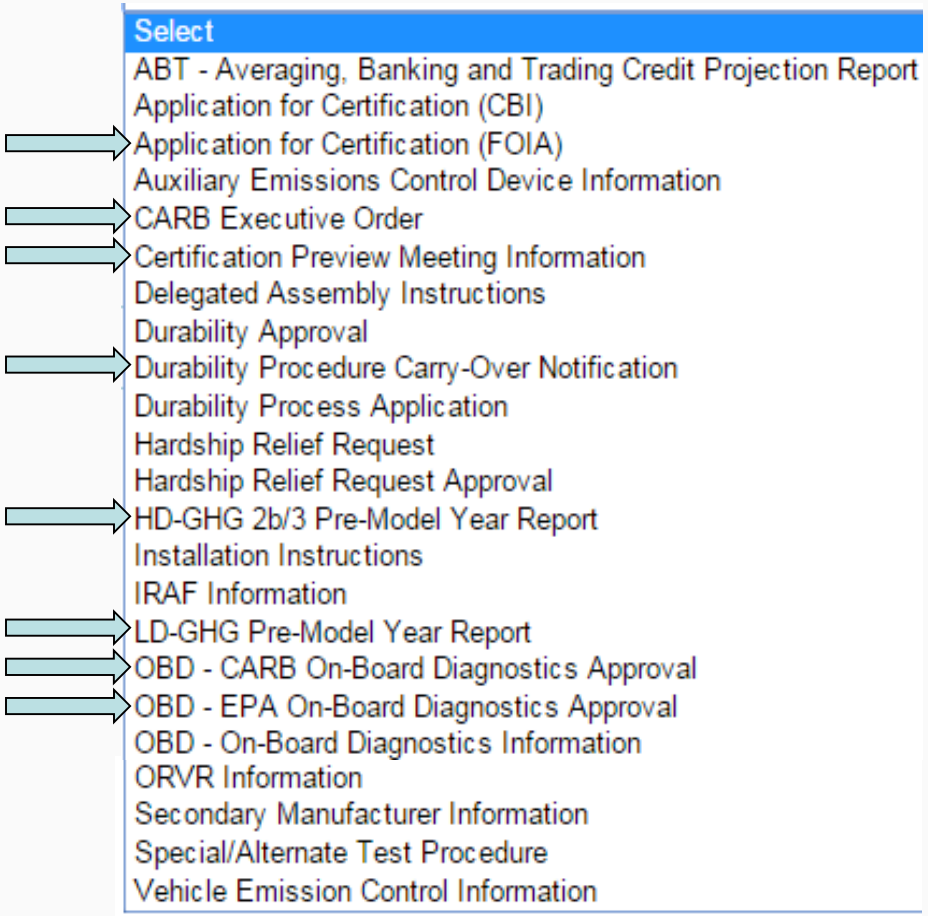


The Document Type pull-down list on this new screen will only include light-duty certification document types

Multiple documents can be submitted in one submission. A different CDX In-Box message will be received for each document

Compliance documents will still be submitted via the “Compliance Document Upload” option on the MyCDX page

Light-Duty Certification Documents



Other documents may need to be submitted as applicable

Either EPA or CARB OBD Approval is required

Either LD or HD GHG Pre-Model Year Report is required

Required document types

Request for Certificate Process

- Prerequisites
  - The Test Group Dataset for the Test Group being certified must have been accepted by the system
  - All of the required documents must have been accepted by the system
  - Pass/Fail determination must equal “Pass” for all test results
  - Required fee payment must have been processed by EPA
  - User submitting the Request for Certificate must have the CDX “CROMERR Signer” Role

Request for Certificate Process Codes

Request for New Certificate	• Request a certificate for a Test Group that has not been previously certified
Request for Revised Certificate	• Request a revised certificate for a certified Test Group where the information on the certificate has changed
Request for CSI Update	• Request a Certificate Summary Information (CSI) update for a certified Test Group where updates have been made to any LD dataset and/or certification documents
Delete Request for Certificate	• Delete a request for a certificate for a Test Group that has not been acted upon by EPA

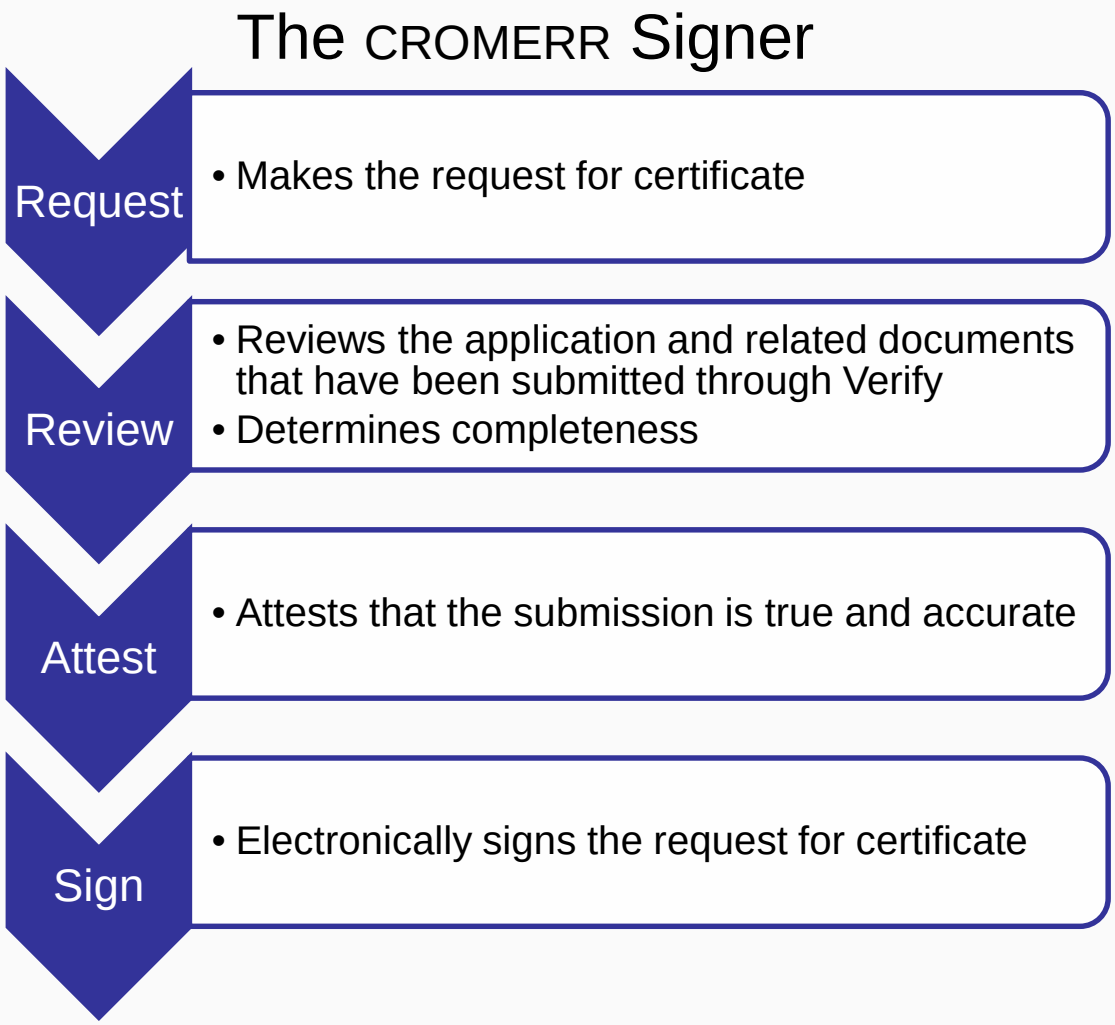
Request for Certificate

- The CROMERR package is compiled when a request for certificate (or Revised Certificate) is made and includes:
  - Formatted CSI PDF report
  - Supporting certification documents
  - RFC Answers
  - Encrypted password hash
- There will be business rules, in the post-certification datasets (FE Label, Roadload, CAFE, IUVP), that check to see that all updates are completed (Request for Revised Certificate or Request for CSI Update)

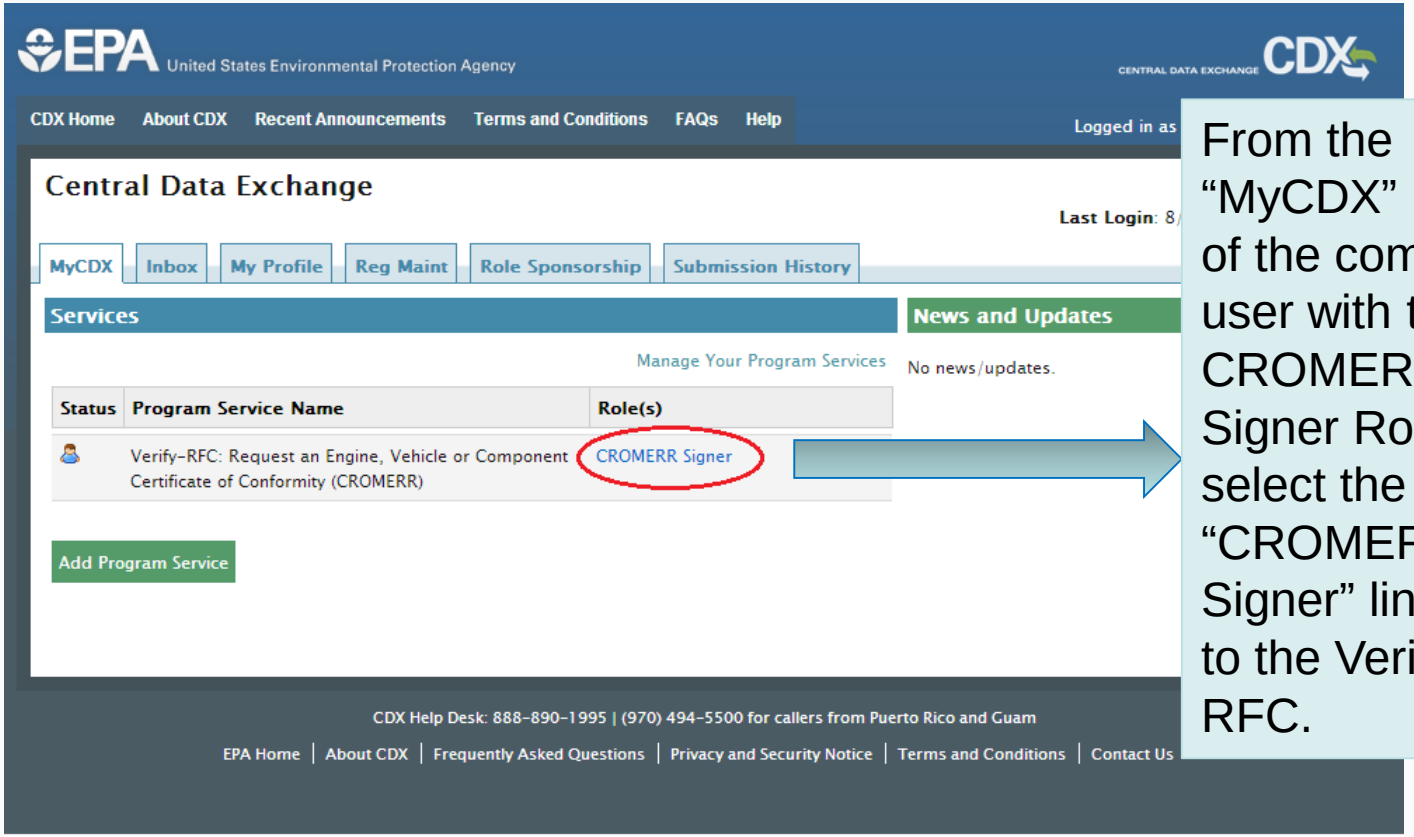
Request for CSI Update

- A Request for CSI Update:
  - Is required when changes are made to any of the following after a certificate has been issued:
    - LD Certification Datasets
    - Supporting certification documents
  - Replaces the current lock/unlock process
  - Should only be selected when nothing on the certificate has changed (otherwise use “Request for Revised Certificate”)
  - Recompiles the CROMERR package with the updated information
- There will be business rules, in the post-certification datasets (FE Label, Roadload, CAFE, IUVP), that check to see that all updates are completed (Request for Revised Certificate or Request for CSI Update)

CROMERR Signer Role in Request for Certificate Module

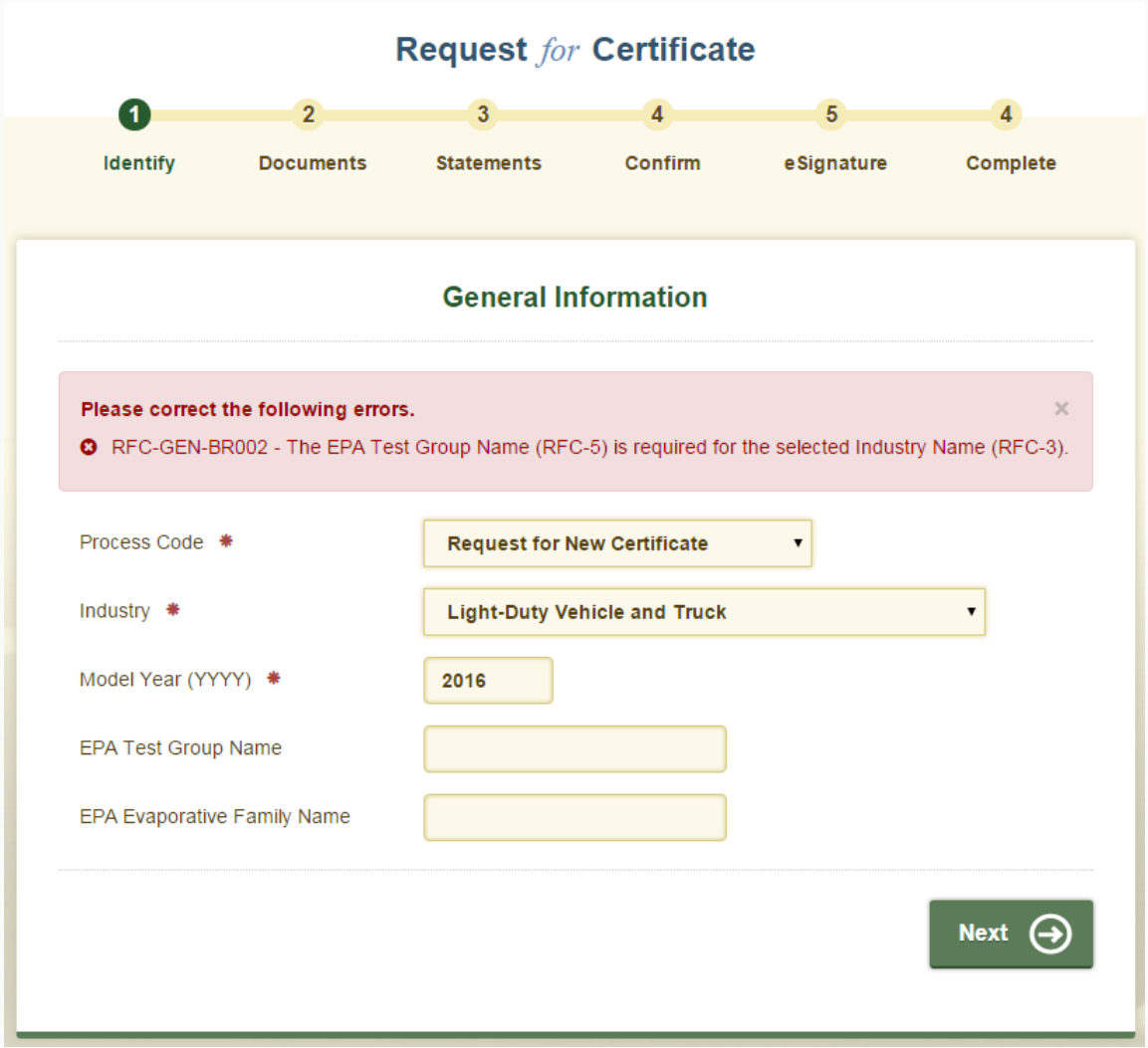


Request for Certificate Process



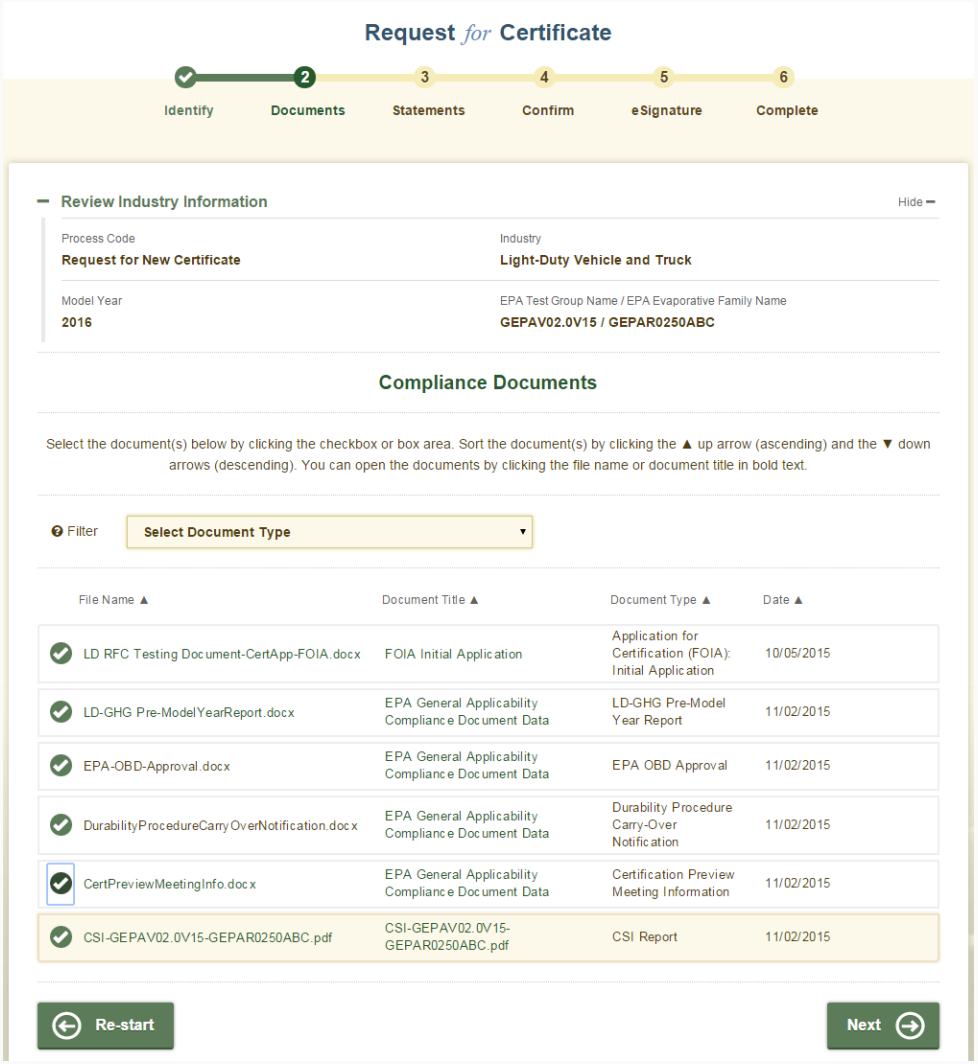
From the "MyCDX" page of the company user with the CROMERR Signer Role, select the "CROMERR Signer" link next to the Verify-RFC.

Request for Certificate Process



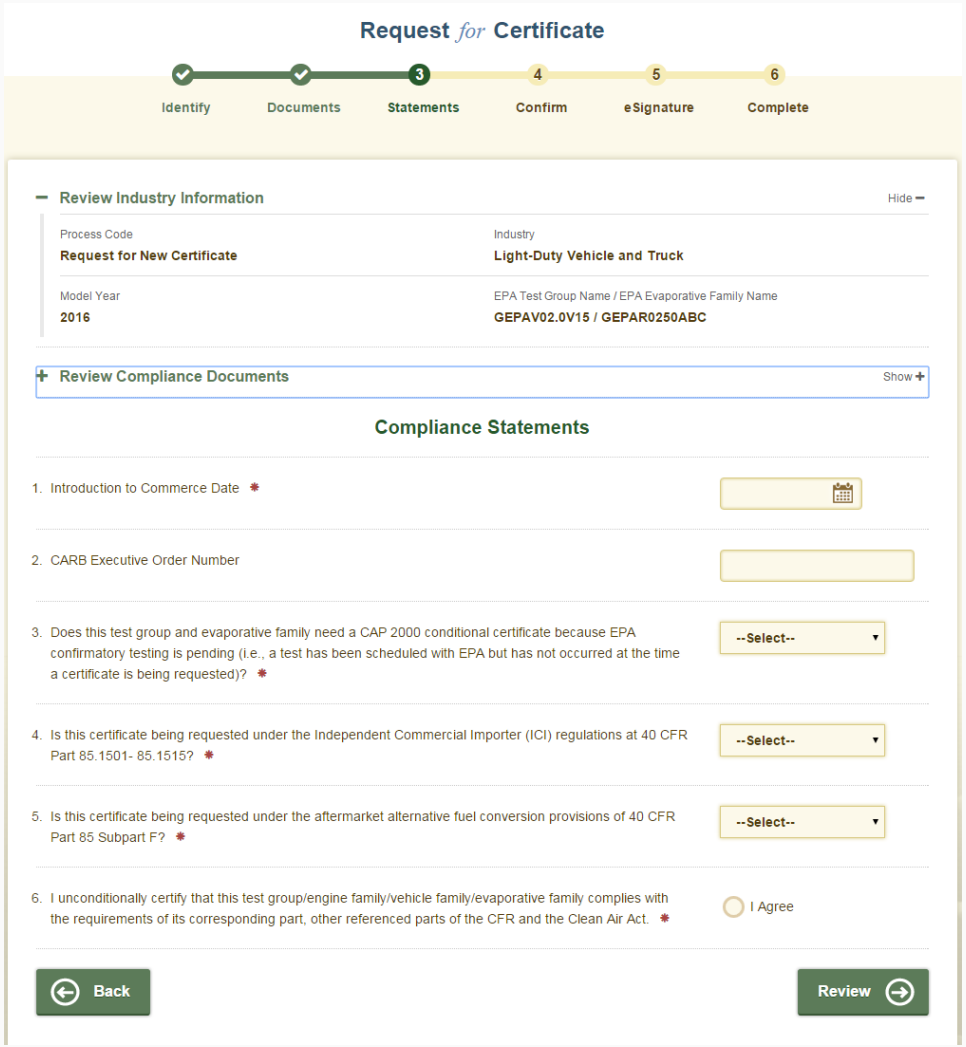
Any validation errors will be displayed at the top of each screen.

Request for Certificate Process



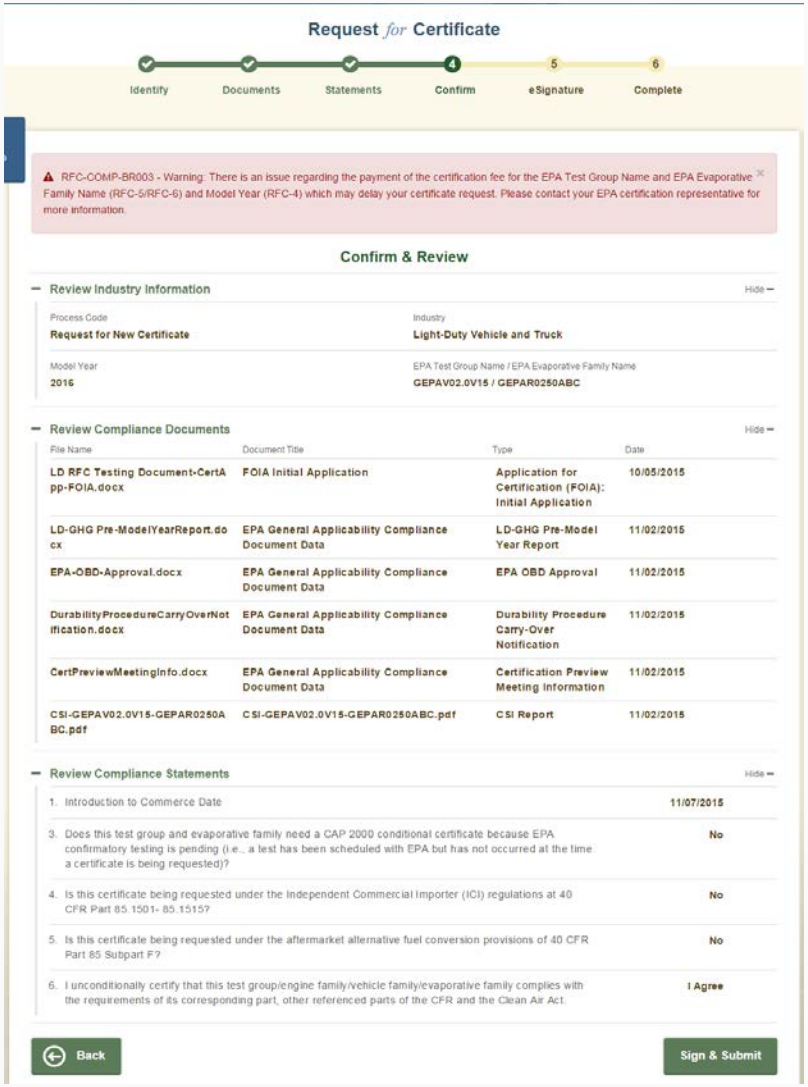
Select all applicable certification documents and click “Next”.

Request for Certificate Process



Provide the Introduction to Commerce Date, CARB Executive Order Number (if applicable) and answer the compliance statements and click “Review”.

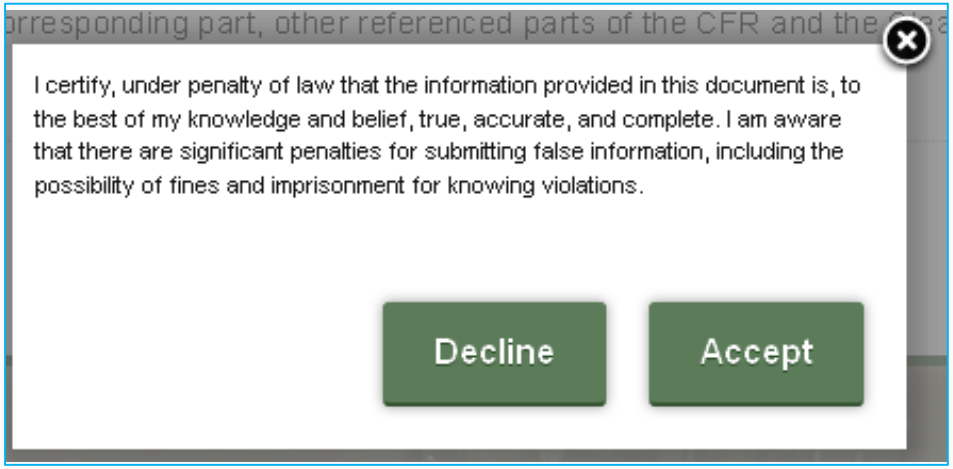
Request for Certificate Process



Review the information you provided and click “Sign & Submit” if everything is correct.

The fee payment warning will only appear if Verify doesn’t have a record of the required fee payment for this test group and will not prevent the submission.

Request for Certificate Process

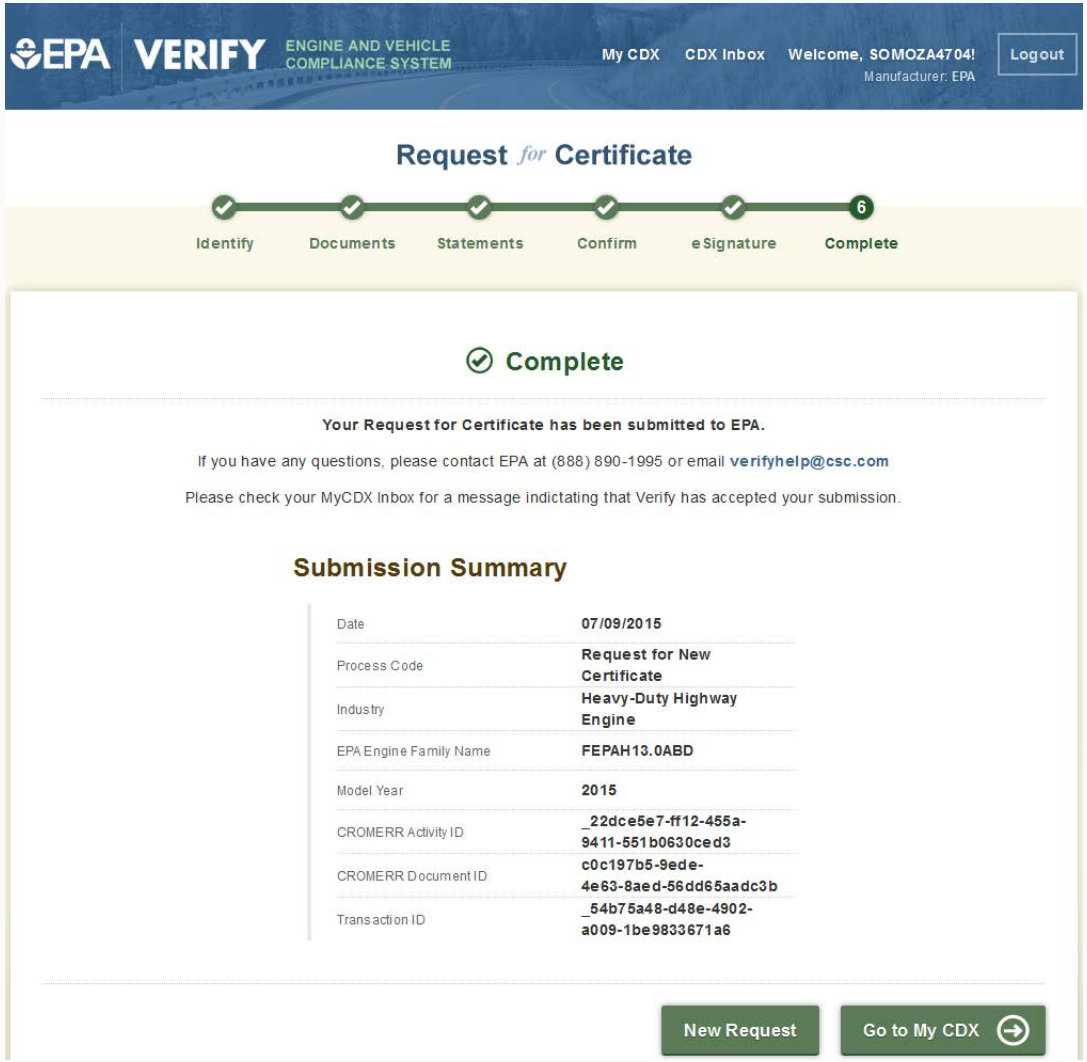


Read the CROMERR Electronic Signature message and click “Accept” to continue.

Request for Certificate Process

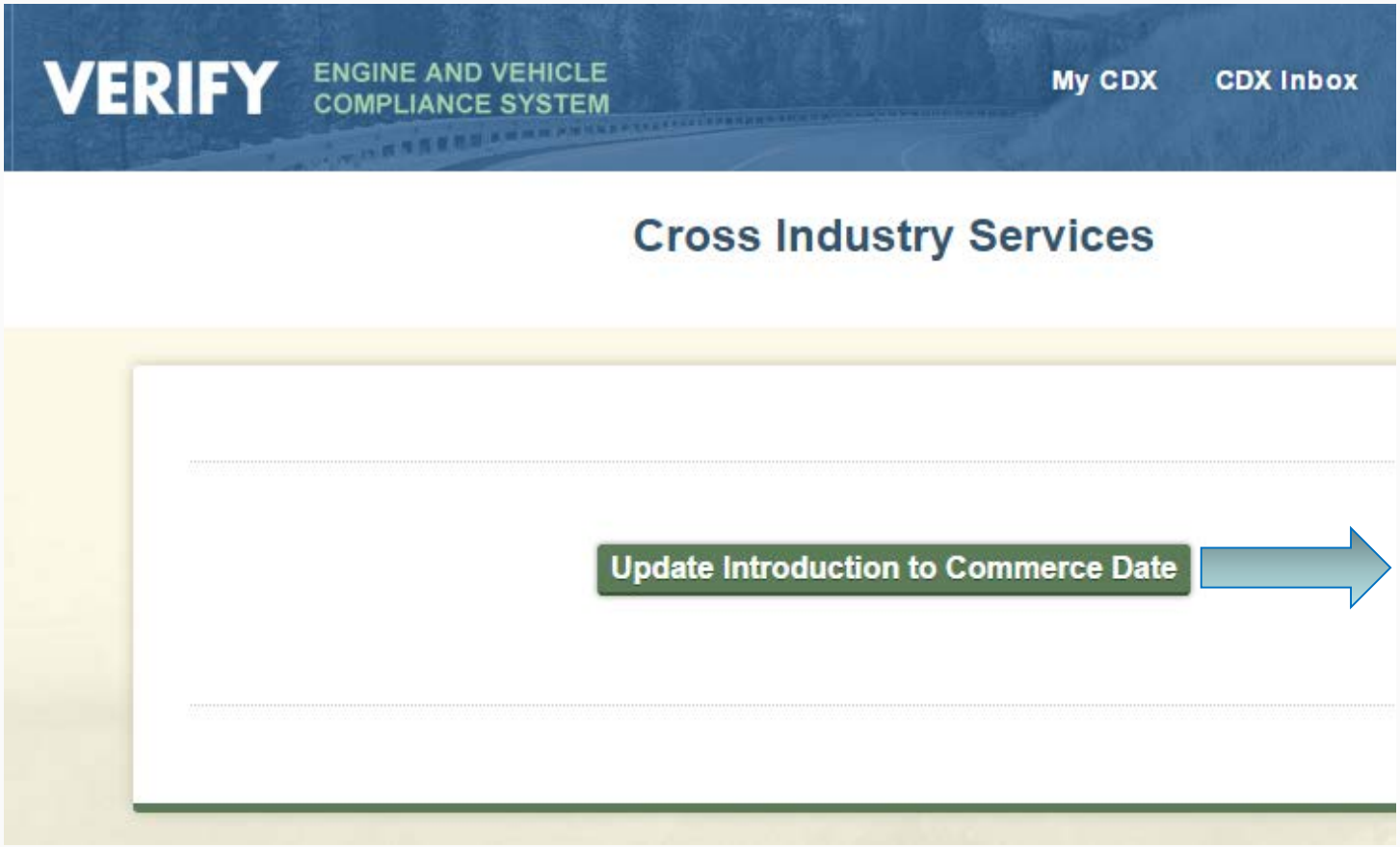
You will need to provide your CDX password and answer one of your secret questions to sign your Certification package. Click “Sign”.

Request for Certificate Process



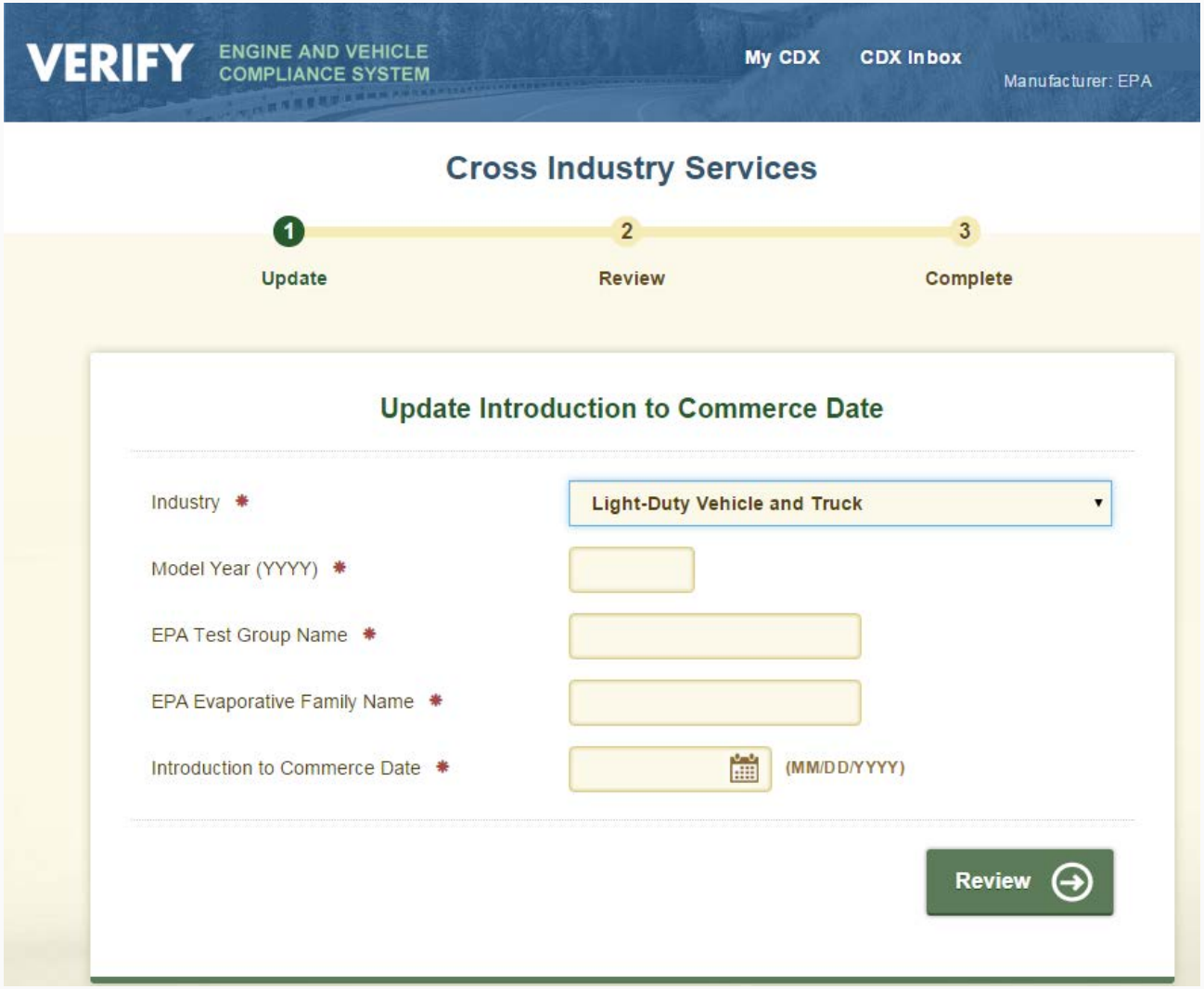
Cross Industry Services-
Update Introduction to Commerce Date

Cross Industry Services



Click on "Update Introduction to Commerce Date" to change the date for a certified test group.

Update Introduction to Commerce Date



Deployment Information & Next Steps

Deployment Information

- The new “Certification Document Upload” and Light-Duty “Request for Certificate” modules will be deployed to production on Friday, December 4, 2015
- All light-duty Request for Certificate submissions (including requests for revised certificates) will need to be submitted via this new module beginning on Monday, December 7, 2015
- In preparation for this deployment, EPA must complete or deny all certificate requests by 3 PM EST on Thursday, December 3, 2015

Deployment Information

- To increase the likelihood that your certificate requests are completed by December 3, 2015, submit them before Tuesday, November 24, 2015
  - However, even if a certificate request is submitted prior to November 24, 2015, EPA cannot guarantee that it will be completed prior to the deadline
- Any “denied” requests must then be resubmitted by the manufacturer after the new “Request for Certificate” module is deployed on Monday, December 7, 2015
  - To reiterate, if a new certificate request is required, no other datasets need to be resubmitted

Next Steps

- By no later than November 20, 2015 submit required CROMERR documentation for your company:
  - All required documents can be found on our website at: http://www3.epa.gov/otaq/verify/setup.htm
- Mail complete documentation to:
  - Verify Team
    OAR/OTAQ/CD
    US EPA, NVFEL
    2000 Traverwood Drive
    Ann Arbor, MI 48105

Information Sources

- Verify Website: www.epa.gov/otaq/verify
- Verify Listserver: https://lists.epa.gov/read/all_forums/subscribe?name=verify
- Manufacturer Guidance letters: www.epa.gov/dis
- For CROMERR and User Registration questions, please contact helpdesk@epacdx.net
- For Verify Request for Certificate questions, please contact: EVCISHelpDesk@epacdx.net

QUESTIONS

APPENDIX: CROMERR & THE USER REGISTRATION PROCESS

Cross-Media Electronic Reporting Rule (CROMERR)

- What is CROMERR?
  - CROMERR (40 CFR Part 3) provides the framework for electronic reporting for all of the Environmental Protection Agency's (EPA) environmental regulations
  - CROMERR establishes standards for information systems that receive reports and other documents electronically
- Whom does it affect?
  - Regulated entities that submit reports and other documents to EPA under Title 40 of the Code of Federal Regulations
  - States, tribes, and local governments that are authorized to administer EPA programs under Title 40
- How does Verify implement CROMERR?
  - Verify implements CROMERR through its Request for Certificate Module
  - Applications are deemed final when a manufacturer submits a Request For Certificate (RFC)
  - An authorized “CROMERR Signer” must electronically sign that submission

CROMERR and Regulated Entities Reporting Directly to EPA

- Under CROMERR, electronic reporting directly to EPA requires submission through EPA's Central Data Exchange (CDX)
- Submissions must include valid electronic signatures in those cases where handwritten signatures would have been required for the paper-based submissions

CROMERR and Regulated Entities Reporting Directly to EPA

- Valid Electronic Signature: An electronic signature on an electronic document that has been created with an electronic signature device
  - Electronic signatures will have the same legal force as the handwritten signature
- Signatory - An individual who is authorized to sign the document by virtue of his or her legal status or his or her relationship to the entity on whose behalf the signature is executed.
  - The signatory in Verify is called the CROMERR Signer