



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

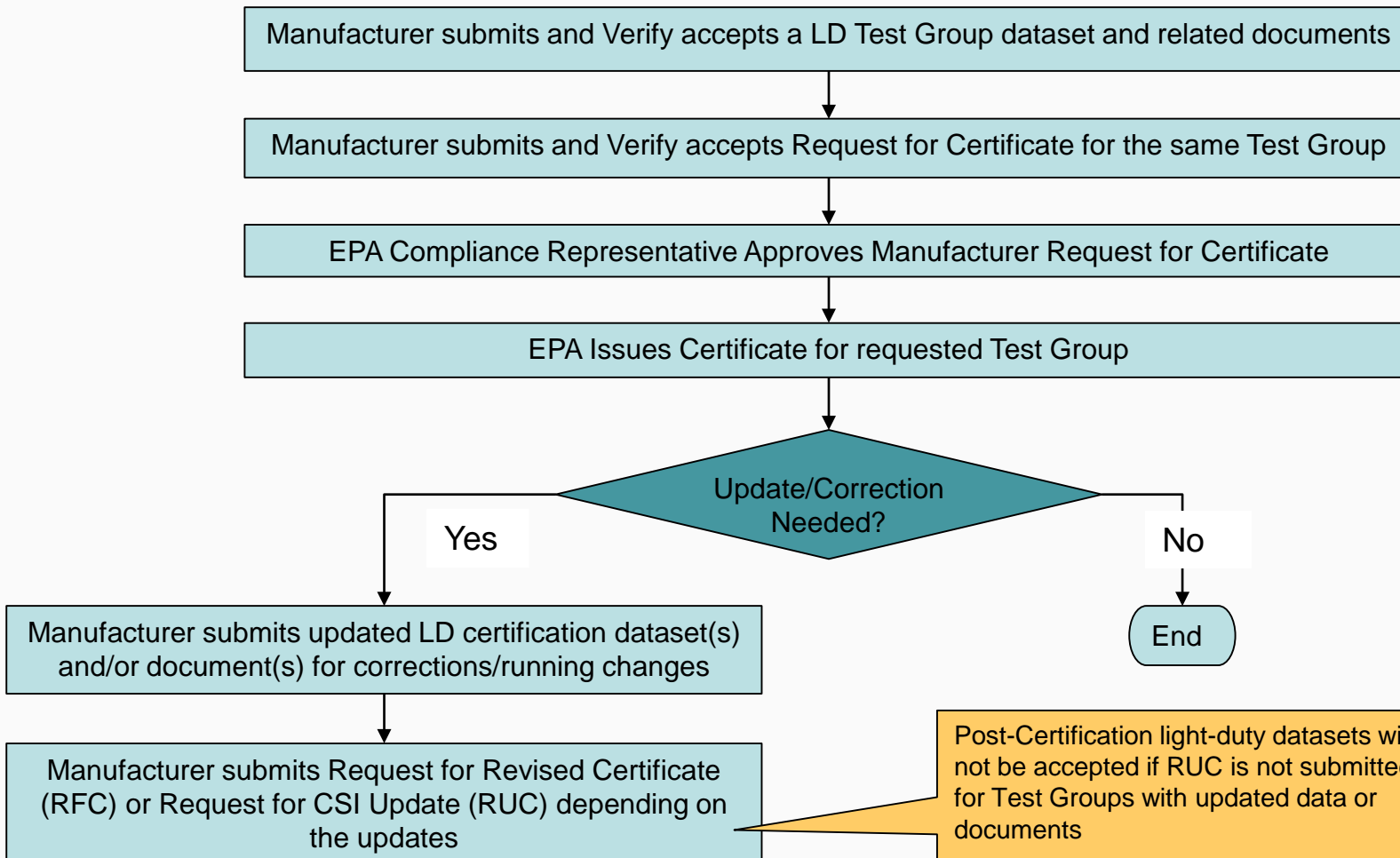
- In order to request a certificate, at least one user will need the CDX CROMERR Signer Role. The CAO will need to:
 1. Create a sponsor letter for the CROMERR Signer
 2. Complete the User Information spreadsheet with the “CROMERR Signer” role selected
 3. Have user(s) complete a CROMERR Electronic Signature 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

CDX Central Data Exchange

MyCDX | [Inbox](#) | [My Profile](#) | [Submission History](#)

Services			Manage
Status	Program Service Name	Role	
	VERIFY: Vehicles and Engines Compliance Information System	Cross Industry Services	
	VERIFY: Vehicles and Engines Compliance Information System	Light-Duty	
	VERIFY: Vehicles and Engines Compliance Information System	Maintain Manufacturer Information	
	VERIFY: Vehicles and Engines Compliance Information System	Upload Compliance Documents	
	Verify-RFC: Request an Engine, Vehicle or Component Certificate of Conformity (CROMERR)	CROMERR Signer	

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

Verify: Engine and Vehicle Compliance System

[MyCDX](#) > [Light-Duty Vehicle & Truck](#) > [Cert Home](#)

Certification

- **Carline**
 - [Start New Dataset](#)
 - [Open Existing Dataset](#)
 - [Submit Batch Dataset](#)
 - [Request Dataset Report](#)
- **Evaporative/Refueling Family**
 - [Start New Dataset](#)
 - [Open Existing Dataset](#)
 - [Submit Batch Dataset](#)
 - [Request Dataset Report](#)
- **Test Group**
 - [Start New Dataset](#)
 - [Open Existing Dataset](#)
 - [Submit Batch Dataset](#)
 - [Request Dataset Report](#)
 - [Request CSI Report](#)
- [Upload Certification Documents](#)

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

Verify: Engine and Vehicle Compliance System

MyCDX > [Light-Duty Vehicle & Truck](#) > Upload Light-Duty Vehicle & Truck Certification Documents

Manufacturer: EPA - EPA ([Logout](#))

Upload Light-Duty Vehicle & Truck Certification Documents

* or = required field

+ = CTRL-click to select multiple values

[? Help](#)

Use this page to submit certification documents pertaining to a specific family/group or with general applicability to many families/groups. You can include multiple files in one submission.

Please create individual ZIP files for larger files.

Document Applicability*	<input type="text" value="One Engine Family/Test Group"/>
Engine Family/Test Group*	<input type="text"/>
Evaporative/Permeation/Refueling Family :	<input type="text"/>
Model Year*+ :	<input type="text" value="2018"/> <input type="text" value="2017"/> <input type="text" value="2016"/>

Due to memory and file size constraints the total size of all the files to be uploaded should not exceed 100MB.

Document #1

[Delete](#)

Document Type*	<input type="text" value="Application for Certification (FOIA)"/>
Document Topic*	<input type="text" value="Select"/>
Confidentiality Status*	<input type="text" value="FOI"/>
Local File* :	<input type="button" value="Choose File"/> No file chosen

[+ Add](#)

[Review & Submit](#)

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

Select
ABT - Averaging, Banking and Trading Credit Projection Report
Application for Certification (CBI)
Application for Certification (FOIA)
Auxiliary Emissions Control Device Information
CARB Executive Order
Certification Preview Meeting Information
Delegated Assembly Instructions
Durability Approval
Durability Procedure Carry-Over Notification
Durability Process Application
Hardship Relief Request
Hardship Relief Request Approval
HD-GHG 2b/3 Pre-Model Year Report
Installation Instructions
IRAF Information
LD-GHG Pre-Model Year Report
OBD - CARB On-Board Diagnostics Approval
OBD - EPA On-Board Diagnostics Approval
OBD - On-Board Diagnostics Information
ORVR Information
Secondary Manufacturer Information
Special/Alternate Test Procedure
Vehicle Emission Control Information

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)



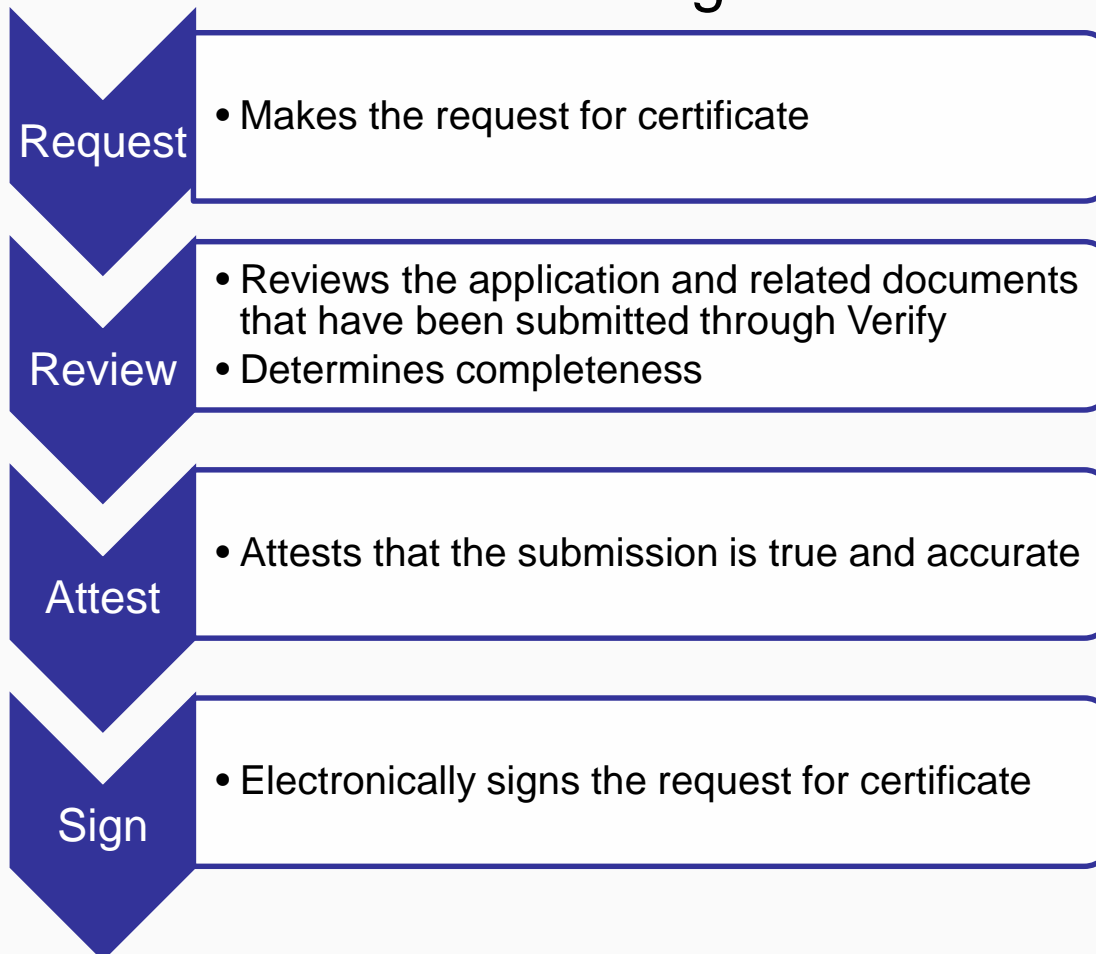
Request for CSI Update

- 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

The CROMERR Signer





Request for Certificate Process

The screenshot shows the EPA CDX MyCDX interface. At the top, there is the EPA logo and the text 'United States Environmental Protection Agency'. To the right, it says 'CENTRAL DATA EXCHANGE CDX'. Below this is a navigation bar with links: 'CDX Home', 'About CDX', 'Recent Announcements', 'Terms and Conditions', 'FAQs', and 'Help'. On the right side of the navigation bar, it says 'Logged in as' and 'Last Login: 8/...'. The main content area is titled 'Central Data Exchange' and has several tabs: 'MyCDX', 'Inbox', 'My Profile', 'Reg Maint', 'Role Sponsorship', and 'Submission History'. Below the tabs, there are two sections: 'Services' and 'News and Updates'. The 'Services' section has a link 'Manage Your Program Services' and a table with the following data:

Status	Program Service Name	Role(s)
	Verify-RFC: Request an Engine, Vehicle or Component Certificate of Conformity (CROMERR)	CROMERR Signer

Below the table is a green button labeled 'Add Program Service'. The 'News and Updates' section has a green header and the text 'No news/updates.' At the bottom of the page, there is a footer with the text 'CDX Help Desk: 888-890-1995 | (970) 494-5500 for callers from Puerto Rico and Guam' and a navigation bar with links: 'EPA Home', 'About CDX', 'Frequently Asked Questions', 'Privacy and Security Notice', 'Terms and Conditions', and 'Contact Us'.

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

Request for Certificate

1 Identify 2 Documents 3 Statements 4 Confirm 5 eSignature 4 Complete

General Information

Please correct the following errors. ×

- ✖ RFC-GEN-BR002 - The EPA Test Group Name (RFC-5) is required for the selected Industry Name (RFC-3).

Process Code * Request for New Certificate ▼

Industry * Light-Duty Vehicle and Truck ▼

Model Year (YYYY) * 2016

EPA Test Group Name

EPA Evaporative Family Name

Next ➔

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



Request for Certificate Process

Request for Certificate

1 Identify 2 Documents 3 Statements 4 Confirm 5 eSignature 6 Complete

Review Industry Information Hide

Process Code Request for New Certificate	Industry Light-Duty Vehicle and Truck
Model Year 2016	EPA Test Group Name / EPA Evaporative Family Name GEPAV02.0V15 / GEPAR0250ABC

Compliance Documents

Select the document(s) below by clicking the checkbox or box area. Sort the document(s) by clicking the ▲ up arrow (ascending) and the ▼ down arrows (descending). You can open the documents by clicking the file name or document title in bold text.

Filter: Select Document Type ▼

File Name ▲	Document Title ▲	Document Type ▲	Date ▲
<input checked="" type="checkbox"/> LD RFC Testing Document-CertApp-FOIA.docx	FOIA Initial Application	Application for Certification (FOIA): Initial Application	10/05/2015
<input checked="" type="checkbox"/> LD-GHG Pre-ModelYearReport.docx	EPA General Applicability Compliance Document Data	LD-GHG Pre-Model Year Report	11/02/2015
<input checked="" type="checkbox"/> EPA-OBD-Approval.docx	EPA General Applicability Compliance Document Data	EPA OBD Approval	11/02/2015
<input checked="" type="checkbox"/> DurabilityProcedureCarryOverNotification.docx	EPA General Applicability Compliance Document Data	Durability Procedure Carry-Over Notification	11/02/2015
<input checked="" type="checkbox"/> CertPreviewMeetingInfo.docx	EPA General Applicability Compliance Document Data	Certification Preview Meeting Information	11/02/2015
<input checked="" type="checkbox"/> CSI-GEPAV02.0V15-GEPAR0250ABC.pdf	CSI-GEPAV02.0V15-GEPAR0250ABC.pdf	CSI Report	11/02/2015

← Re-start Next →

Select all applicable certification documents and click "Next".



Request for Certificate Process

Request for Certificate

Identify Documents **Statements** Confirm eSignature Complete

Review Industry Information Hide ▾

Process Code Request for New Certificate	Industry Light-Duty Vehicle and Truck
Model Year 2016	EPA Test Group Name / EPA Evaporative Family Name GEPAV02.0V15 / GEPAR0250ABC

Review Compliance Documents Show ▸

Compliance Statements

1. Introduction to Commerce Date *
2. CARB Executive Order Number
3. Does this test group and evaporative family need a CAP 2000 conditional certificate because EPA confirmatory testing is pending (i.e., a test has been scheduled with EPA but has not occurred at the time a certificate is being requested)? *
4. Is this certificate being requested under the Independent Commercial Importer (ICI) regulations at 40 CFR Part 85.1501- 85.1515? *
5. Is this certificate being requested under the aftermarket alternative fuel conversion provisions of 40 CFR Part 85 Subpart F? *
6. I unconditionally certify that this test group/engine family/vehicle family/evaporative family complies with the requirements of its corresponding part, other referenced parts of the CFR and the Clean Air Act. * I Agree

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



Request for Certificate Process

Request for Certificate

Identify Documents Statements **Confirm** eSignature Complete

▲ RFC-COMP-BR003 - Warning: There is an issue regarding the payment of the certification fee for the EPA Test Group Name and EPA Evaporative Family Name (RFC-5/RFC-6) and Model Year (RFC-4) which may delay your certificate request. Please contact your EPA certification representative for more information.

Confirm & Review

Review Industry Information Hide

Process Code Request for New Certificate	Industry Light-Duty Vehicle and Truck
Model Year 2016	EPA Test Group Name / EPA Evaporative Family Name GEPAV02.0V15 / GEPAR0250ABC

Review Compliance Documents Hide

File Name	Document Title	Type	Date
LD RFC Testing Document-CertA pp-FOIA.docx	FOIA Initial Application	Application for Certification (FOIA); Initial Application	10/05/2015
LD-GHG Pre-ModelYearReport.docx	EPA General Applicability Compliance Document Data	LD-GHG Pre-Model Year Report	11/02/2015
EPA-OBD-Approval.docx	EPA General Applicability Compliance Document Data	EPA OBD Approval	11/02/2015
DurabilityProcedureCarryOverNotification.docx	EPA General Applicability Compliance Document Data	Durability Procedure Carry-Over Notification	11/02/2015
CertPreviewMeetingInfo.docx	EPA General Applicability Compliance Document Data	Certification Preview Meeting Information	11/02/2015
CSI-GEPAV02.0V15-GEPAR0250ABC.pdf	CSI-GEPAV02.0V15-GEPAR0250ABC.pdf	CSI Report	11/02/2015

Review Compliance Statements Hide

1. Introduction to Commerce Date	11/07/2015
3. Does this test group and evaporative family need a CAP 2000 conditional certificate because EPA confirmatory testing is pending (i.e., a test has been scheduled with EPA but has not occurred at the time a certificate is being requested)?	No
4. Is this certificate being requested under the Independent Commercial Importer (ICI) regulations at 40 CFR Part 85.1501-85.1515?	No
5. Is this certificate being requested under the aftermarket alternative fuel conversion provisions of 40 CFR Part 85 Subpart F?	No
6. I unconditionally certify that this test group/engine family/vehicle family/evaporative family complies with the requirements of its corresponding part, other referenced parts of the CFR and the Clean Air Act.	I Agree

Back Sign & Submit

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

corresponding part, other referenced parts of the CFR and the

I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Decline Accept

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".

eSignature Widget

1. Log in to CDX	2. Answer Secret Question	3. Sign File
User: SOMOZA4704	Question: Who is your favorite author?	<input type="button" value="Sign"/>
Password: ●●●●●●●●	Answer: allende	
Welcome Sandra Somoza	Correct Answer	



Request for Certificate Process

EPA VERIFY ENGINE AND VEHICLE COMPLIANCE SYSTEM My CDX CDX Inbox Welcome, SOMOZA4704! Logout
Manufacturer: EPA

Request *for* Certificate

Identify Documents Statements Confirm eSignature **Complete**

Complete

Your Request for Certificate has been submitted to EPA.

If you have any questions, please contact EPA at (888) 890-1995 or email verifyhelp@csc.com

Please check your MyCDX Inbox for a message indicating that Verify has accepted your submission.

Submission Summary

Date	07/09/2015
Process Code	Request for New Certificate
Industry	Heavy-Duty Highway Engine
EPA Engine Family Name	FEPAH13.0ABD
Model Year	2015
CROMERR Activity ID	_22dce5e7-ff12-455a-9411-551b0630ced3
CROMERR Document ID	c0c197b5-9ede-4e63-8aed-56dd65aad3b
Transaction ID	_54b75a48-d48e-4902-a009-1be9833671a6

[New Request](#) [Go to My CDX](#)



Cross Industry Services- Update Introduction to Commerce Date

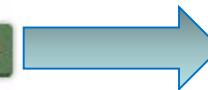


Cross Industry Services

VERIFY ENGINE AND VEHICLE COMPLIANCE SYSTEM My CDX CDX Inbox

Cross Industry Services

Update Introduction to Commerce Date



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



Update Introduction to Commerce Date

VERIFY ENGINE AND VEHICLE COMPLIANCE SYSTEM My CDX CDX In box Manufacturer: EPA

Cross Industry Services

1 Update 2 Review 3 Complete

Update Introduction to Commerce Date

Industry *

Model Year (YYYY) *

EPA Test Group Name *

EPA Evaporative Family Name *

Introduction to Commerce Date * (MM/DD/YYYY)

→



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