# CROMERR and Verify Nonroad Spark Ignition Module Request for Certificate Process

NRSI Manufacturer Webinar December 2015

# The new Request for Certificate Module will be required for use effective Monday, February 29, 2016



#### Agenda

- Introduction
- CROMERR and the User Registration Process
- CROMERR and NRSI Certification
  - Maintain Manufacturer Information
  - Uploading Certification Documents
  - Request for Certificate Process
- Demo of CROMERR Request for Certificate Process
- Deployment Information
- Next Steps
- Questions
- Appendix: Sample CDX CRK Letters



# CROMERR AND 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



#### Cross-Media Electronic Reporting Rule (CROMERR)

- 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
    - Electronic signatures will have the same legal force as the handwritten signature
    - The CROMERR Signer is 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



### Verify/CROMERR User Roles

 All manufacturers must submit documentation to EPA for the following:

Functional Roles	Description
Company Authorizing Official (CAO)	Individual(s) responsible for identifying, vouching for, and managing (both activating and inactivating) the "Verify Submitters" and "CROMERR Signers". Also referred to as the "Company Approving Official"
Verify Submitter	Submitters of application information to Verify's Nonroad Spark Ignition (NRSI) 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)



#### What All NRSI Companies Need to Do: Company Authorizing Official (CAO)

- A Senior Manager must identify the CAO(s) through a signed Verify CAO sponsor letter signed by the Senior Manager
  - A CAO cannot sponsor themselves, it must be another senior manager within the company or notarized if the CAO is the senior manager within the company
- 2. Each CAO must complete the latest version of the Verify CAO Electronic Signature Agreement(s) (ESA)
- 3. Each CAO must complete the latest version of the Verify User Registration Information spreadsheet with all applicable Verify roles, including the new "Company Authorizing Official (CAO)" Verify role, selected
- 4. Once complete, mail all documents to the Verify Team



#### What All NRSI Companies Need to Do: <u>Verify Submitters</u>

- The CAO must identify the Verify Submitter(s) through a signed Verify CROMERR User Sponsor Letter
  - -CAOs can also be Verify Submitters and can sponsor themselves for this role with the Verify CROMERR User Sponsor Letter
- Each Verify Submitter must complete the Verify User
  Registration Information spreadsheet with the "Nonroad SparkIgnition (Large, Small, Marine, Evap Components/Equipment)"
  role selected
  - -An Electronic Signature Agreement is not required for Verify Submitters
- 3. Once complete, mail all documents to the Verify Team
- No action is needed for current NRSI Verify submitters



#### What All NRSI Companies Need to Do: CROMERR Signer

- The CAO must identify the CROMERR Signer(s) through a signed Verify CROMERR User Sponsor Letter
  - -CAOs can also be CROMERR Signers and can sponsor themselves for this role with the Verify CROMERR User Sponsor Letter
- 2. Each CROMERR Signer must complete the Verify User Registration Information spreadsheet with the "CROMERR Signer" role selected
- 3. Each CROMERR Signer must complete a Verify CROMERR Signer Electronic Signature Agreement (ESA)
- 4. Once complete, mail all documents to the Verify Team
  - In order to request a certificate, at least one user must have the CROMERR Signer Role!



#### Verify User Registration & CROMERR Process

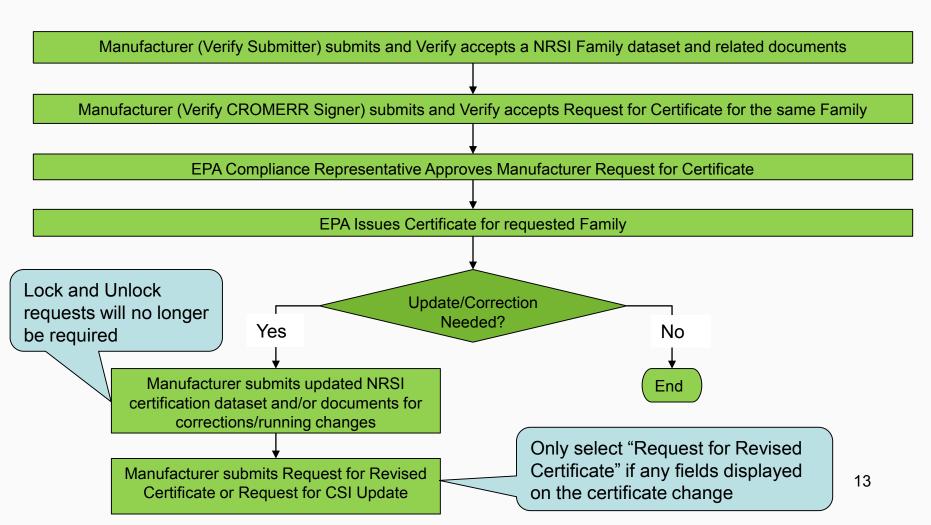
- EPA reviews all user registration materials for completeness
- For incomplete packages, the submitter will be notified of missing items
- Once the complete user registration package is received, the CDX
  Helpdesk (helpdesk@epacdx.net) will send any new users an email,
  which will contain Pre-registration Customer Retrieval Key (CRK) to
  access Verify follow the instructions of the letter (sample letters are in
  the appendix)
  - Make sure you complete the registration process when you get the email, the CRK will expire in 90 days
  - Do not forward your CRK to another user, it is meant for the identified person only, you will get locked out of CDX access
- Upon first log in with the new CROMERR signer role, the user will be required to establish security questions/answers that will be needed during the request for certificate process



### **CROMERR and NRSI**

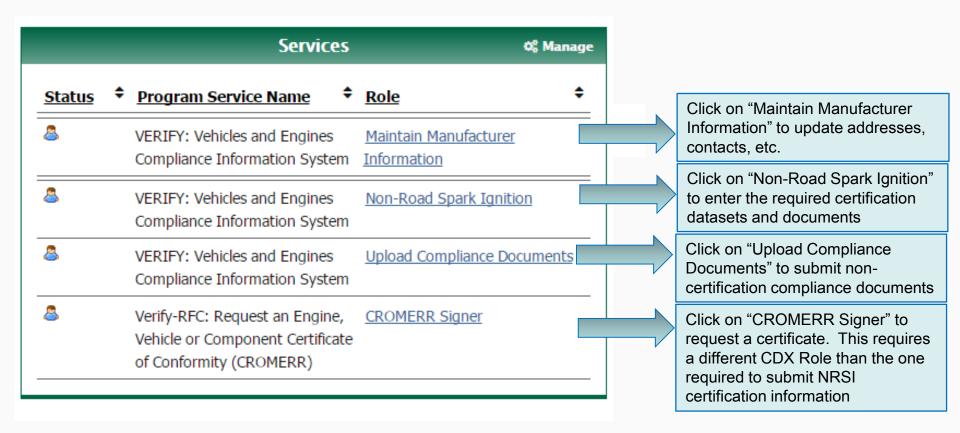


### NRSI Verify Certification Process Overview





### Potential "My CDX" Roles





#### Maintain Manufacturer Information

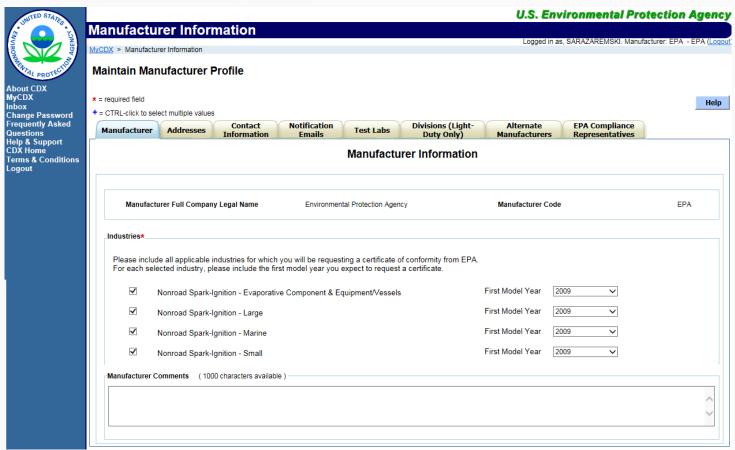


#### Maintain Manufacturer Information

- Each company is responsible for keeping all of the information in Verify's "Maintain Manufacturer Information" module complete and up to date
  - Add any new or missing addresses, contacts, test labs, etc
  - Inactivate any obsolete addresses, contacts, test labs, etc
- EPA certification representatives rely on this information



#### Maintain Manufacturer Information

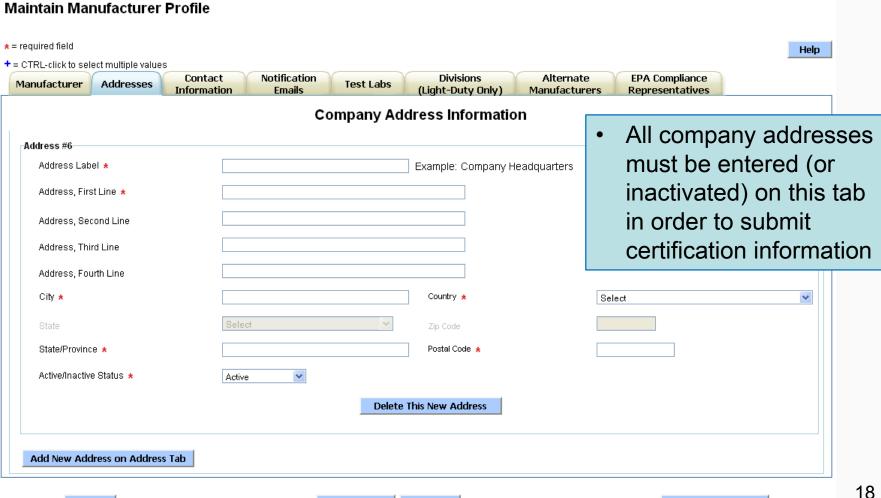


 The appropriate industry sector(s) must be selected as industries here in order to submit certification information



Review & Submit

#### Maintain Manufacturer Information



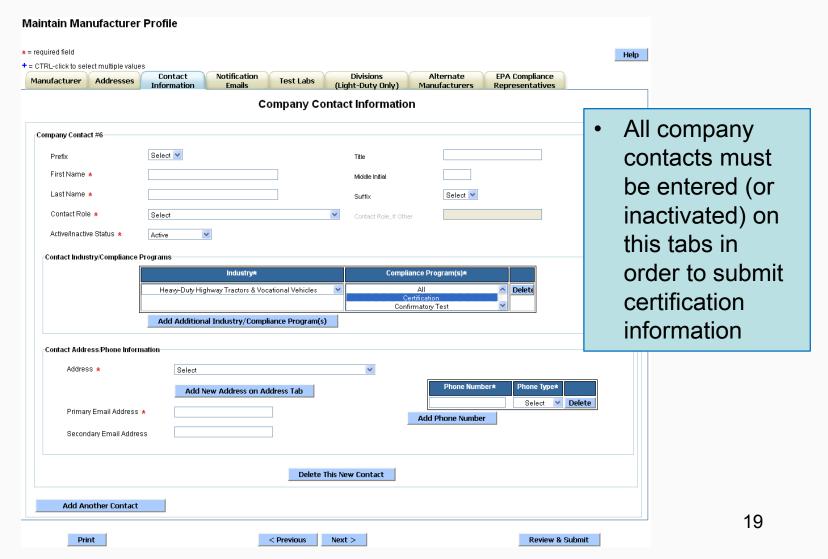
Next >

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#### Maintain Manufacturer Information - Continued





# Uploading NRSI Family Datasets & Certification Documents



# Uploading NRSI Family Datasets & Certification Documents



MyCDX
Inbox
Change Password
Frequently Asked
Questions
Help & Support
CDX Home
Terms & Conditions

Logout

#### Verify: Engine and Vehicle Compliance System

MyCDX > Nonroad Spark Ignit

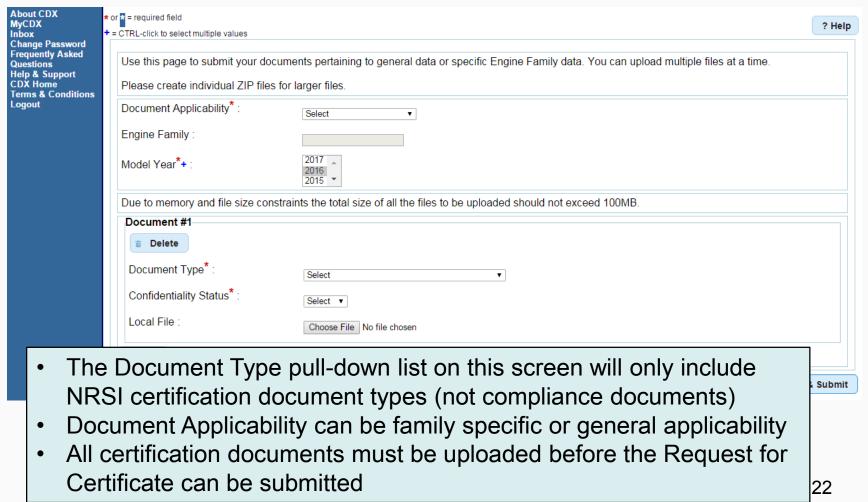
#### Certification

- Upload Nonroad SI Compliance Documents
- Nonroad SI Evaporative Components/Equipment
- Small SI Engine Family
- Large SI Engine Family
- Marine SI Engine Family
- Request for Certificate

 The family datasets for each of the NRSI industry sectors are not being changed as part of the new Request for Certificate module deployment



### **Uploading Certification Documents**





## **CROMERR** Request for Certificate Process



#### Prerequisites

- The full amount of the certification fee is paid for the Family
- The Family Dataset for the Family 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
- User submitting the Request for Certificate must have the "CROMERR Signer" Role in Verify



#### **CROMERR Signer Role in Request for Certificate Module**

#### The CROMERR Signer

Request

Makes the Request for Certificate or CSI Update

Review

- Reviews the application and related documents that have been submitted through Verify
- Determines completeness

Attest

Attests that the submission is true and accurate

Sign

Electronically signs the request for certificate



### Request for Certificate – CROMERR Package

- The CROMERR package is compiled and stored in the CROMERR Archive when a Request for Certificate (or Revised Certificate) is completed and includes:
  - Formatted Certificate Summary Information (CSI) PDF report
  - Supporting certification documents
  - RFC Compliance Statement Answers
  - Encrypted electronic signature information
- A link to the CROMERR package will be in the CROMERR signer's CDX in-box



#### Request for New Certificate

Request a certificate for a Family that has not been previously certified

## Request for Revised Certificate

 Request a revised certificate for a certified Family if any fields displayed on the certificate have changed

# Request for CSI Update

Request a Certificate Summary Information (CSI) update for a certified Family where updates have been made to the Family dataset and/or certification documents but no changes to any fields displayed on the certificate

### Delete Request for Certificate

 Delete a request for a certificate (only for a Family that has not been acted upon by EPA)



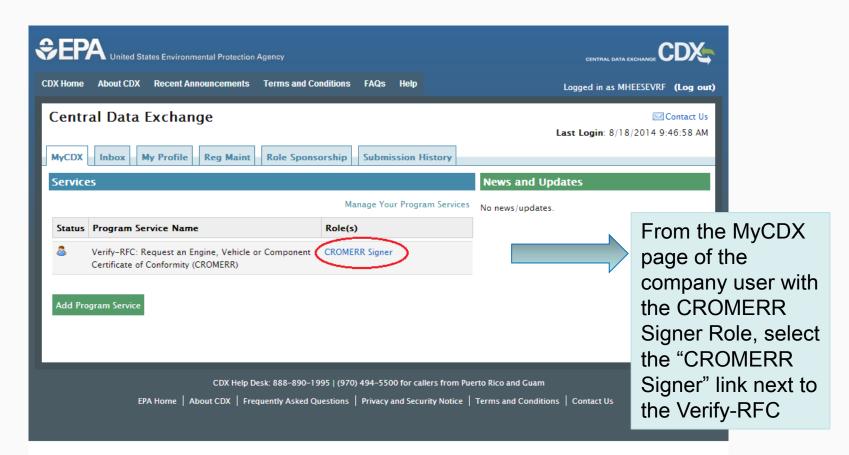
### **Post-Certification Updates**

- Any updates to either the family dataset or supporting documents must be completed by submitting a Request for CSI Update or Request for Revised Certificate when applicable.
  - CDX in-box notifications will remind the CROMERR Signer that submitted the original request for certificate to complete the required update
  - If updates are not completed by the required date, the updates (family dataset and/or documents) will be deleted
  - Recompiles the CROMERR package with the updated information

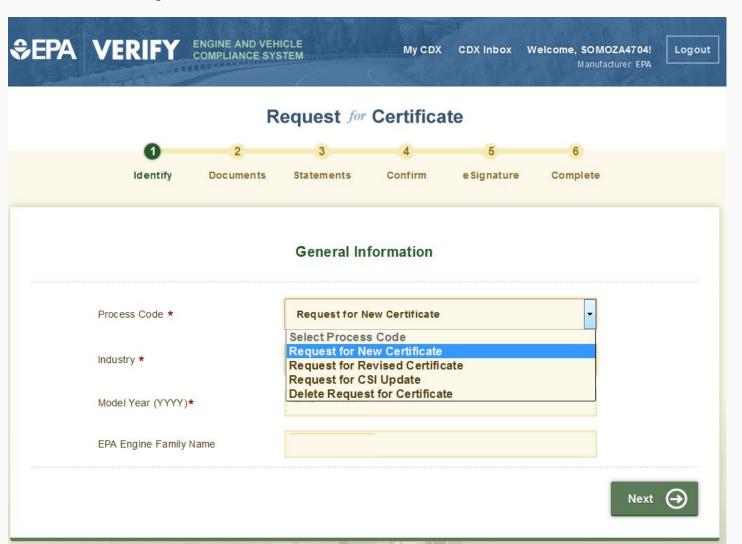


# CROMERR Request for Certificate Screenshots



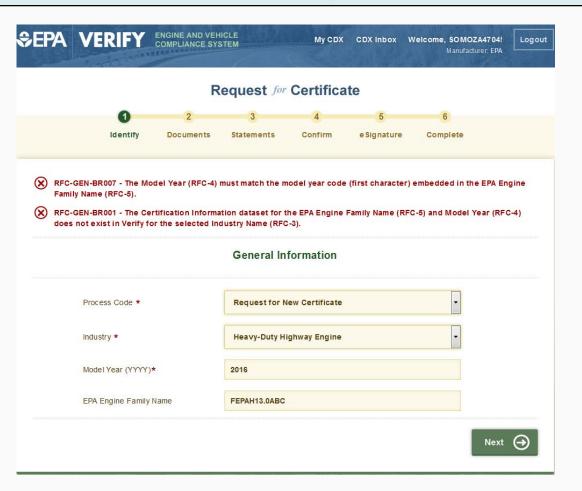






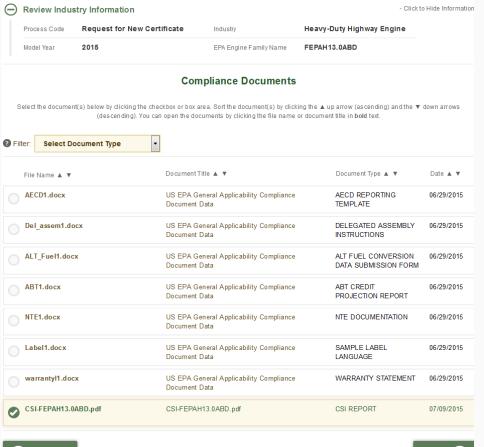


Any validation errors will be displayed at the top of each screen.





Select all applicable certification documents and click "Next"



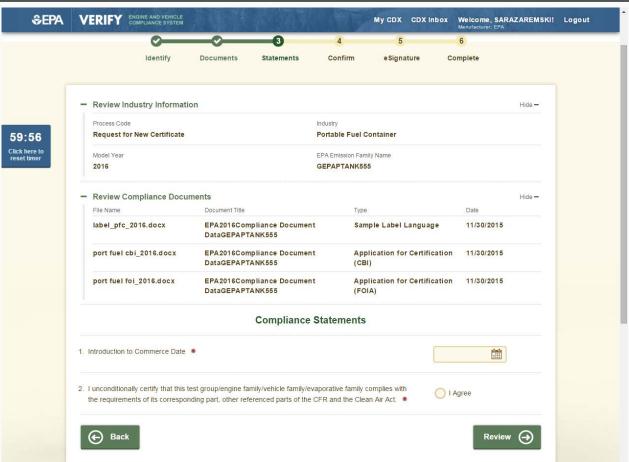
If any required documents are not selected, errors will be displayed at the top of the Review & Confirm screen.





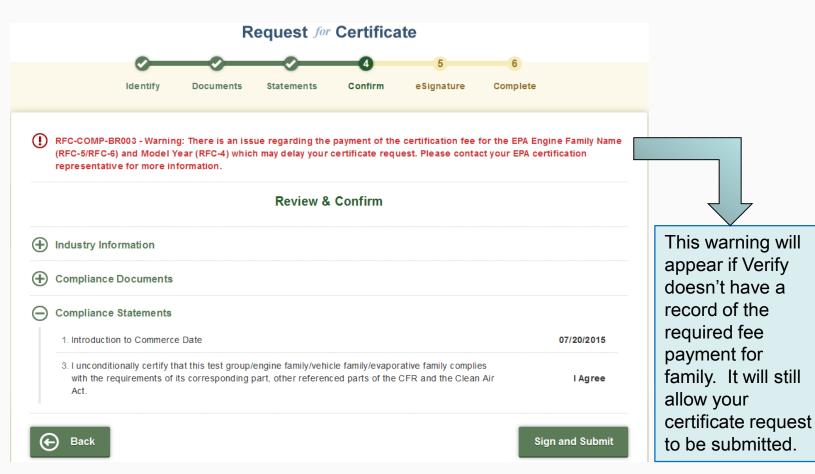


 Provide the Introduction to Commerce Date, Agree to the Compliance statements and click "Review".



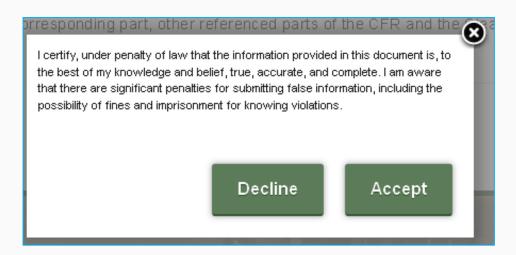


 Review the information you provided and click "Sign and Submit" if everything is correct.





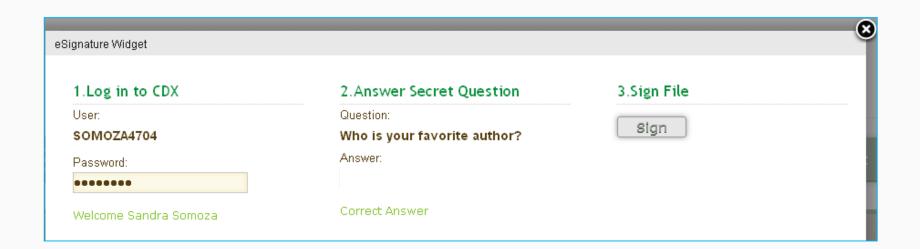
 Read the CROMERR Electronic Signature message and click "Accept" to continue.





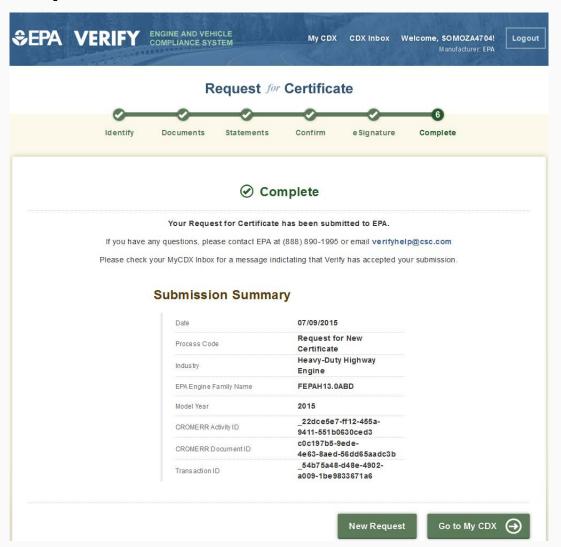
#### Request for Certificate Process

 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







- There will <u>not</u> be a NRSI manufacturer testing period for this release
- EPA will conduct a second manufacturer webinar in February to demo a testing version of the Request for Certificate module
  - The second webinar will be announced via a Verify list server message as soon as it is scheduled



- The new NRSI Request for Certificate module will be deployed to production on Friday, February 26, 2016
- All NRSI Request for Certificate submissions (including requests for revised certificates) will need to be submitted via this new module beginning on Monday, February 29, 2016
- In preparation for this deployment, EPA must complete or "deny" all pending NRSI certificate requests by 3 PM EST Thursday, February 25, 2016



- To increase the likelihood that EPA completes your certificate requests by Thursday, February 25, 2016, submit them by COB Friday, February 5, 2016
  - However, even if a certificate request is submitted by February 5, 2016, EPA cannot guarantee that it will be completed prior to the deadline
- Any certificate requests "denied" by EPA must then be resubmitted by the manufacturer using the new Request for Certificate module beginning on Monday, February 29, 2016
  - The family dataset will not need to be resubmitted, only the Request for Certificate

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#### **Next Steps**

- Submit all required CROMERR documents for CAO, CROMERR Signers and new Verify submitters
  - To help ensure your documentation is processed by Monday, February 29, 2016, beginning immediately and no later than COB Friday, February 5, 2016 submit required documentation for your company
- Mail <u>complete</u> hard-copy documentation to:

Verify Team

c/o CGI Federal, Inc.

12601 Fair Lakes Circle

Fairfax, VA 22033

IMPORTANT- Only CROMERR Signers who have completed the Verify registration process will be able to see and access the new RFC module which will be available on Monday, February 29, 2016



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### Summary of Documentation Requirements

Verify Functional Roles	Description	Verify CROMERR Company Authorizing Official (CAO) Sponsor Letter	Verify Company Authorizing Official (CAO) Electronic Signature Agreement (ESA)	Verify CROMERR User Sponsor Letter (Submitters) and Signers)	Verify CROMERR Signer Electronic Signature Agreement (ESA)	Verify User Registration Information Spreadsheet
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"		X			X
Verify Submitter	Submitters of certification and compliance information to Verify except for requests for certificates of conformity			Х		X
CROMERR Signer	Individual(s) taking legal responsibility for all of the information used as the basis for a request for certificate through the Request for Certificate module (Could be the same person as the Verify submitter)			X	X	X



#### Sources for Latest CROMERR Documents

Document Name	Document URL			
Verify CROMERR Company Authorizing Official (CAO) Sponsor Letter	http://www3.epa.gov/otaq/verify/documents/verify-cromerr-cao-sponsor-letter-2015-09-23.doc			
Verify Company Authorizing Official (CAO) Electronic Signature Agreement (ESA)	http://www3.epa.gov/otaq/verify/documents/verify-cromerr-cao-esa-2015-09-23.doc			
Verify CROMERR User Sponsor Letter (Submitters and Signers)	http://www3.epa.gov/otaq/verify/documents/verify-cromerr-user-sponsor-letter-2015-09-23.doc			
Verify CROMERR Signer Electronic Signature Agreement (ESA)	http://www3.epa.gov/otaq/verify/documents/verify-cromerr-signer-esa-2015-09-23.doc			
Verify User Registration Information Spreadsheet	http://www3.epa.gov/otaq/verify/documents/verify-user-registration-information-spreadsheet-2015-09-23.xls			



#### Additional Verify Information Sources

- Verify Website: <a href="www.epa.gov/otaq/verify">www.epa.gov/otaq/verify</a>
- Verify Listserver: <u>https://lists.epa.gov/read/all\_forums/subscribe?name=verify</u>
- Manufacturer Guidance letters: <u>www.epa.gov/dis</u>
- For CROMERR and User Registration questions, please contact <u>helpdesk@epacdx.net</u>
- For Verify Request for Certificate questions, please contact: <a href="mailto:evcishelpdesk@epacdx.net">evcishelpdesk@epacdx.net</a>



# **QUESTIONS**



# APPENDIX – SAMPLE CRK EMAILS



#### CRK Email – U.S. Template

Hello [Persons name here],

A Pre-registration Customer Retrieval Key (CRK) has been created for you to utilize the VERIFY application via the Central Data Exchange (CDX) using the Manufacture Code of [insert MFR here] with a Role of "Submitter" and an ID Type of:

Certification Module: Nonroad Spark-Ignited (Large, Small, Marine, Evap Components/Equipment)

Please contact the CDX Helpdesk at (888)890-1995 or (970) 494-5500 where you will need to refer to this ticket [enter ticket number here] to obtain your CRK VERIFY CRK notification for [enter MFR here]

Once you have received your CRK, please access the CDX website using the following link:

https://cdx.epa.gov/SSL/CDX/preregistration.asp

If you already have a CDX account, you will be asked to provide the password for it.

If you have more than one CDX account, you will be asked to select the one you wish the CRK to be applied to and then provide the password for it.

If you don't currently have a CDX account, you will be asked to create an account with a user ID of your choice.

If you have any questions or require assistance, please contact us by utilizing one of the two contact numbers above or by emailing us at Helpdesk@epacdx.net



#### CRK Email – International Template

Hello [Persons name here],

A Pre-registration Customer Retrieval Key (CRK) has been created for you to utilize the VERIFY application via the Central Data Exchange (CDX) using the Manufacture Code of [insert MFR here] with a Role of "Submitter" and an ID Type of:

Certification Module: Nonroad Spark-Ignited (Large, Small, Marine, Evap Components/Equipment)

Please contact the CDX Helpdesk at (888)890-1995, 970-494-5500 internationally or by email, <a href="mailto:Helpdesk@epacdx.net">Helpdesk@epacdx.net</a> where you will need to refer to this ticket [enter ticket number here] to obtain your CRK VERIFY CRK notification for [enter MFR here]

Once you have received your CRK, please access the CDX website using the following link:

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