

CROMERR solutions

Is CROMERR applicable to my agency?

Any State, tribal, or local government that is authorized to administer EPA programs under Title 40 of the Code of Federal Regulations is required to achieve CROMERR compliance in order to accept electronic submission of compliance information from regulated entities.

DELIVERING IT SOLUTIONS THROUGH EXPERIENCE AND EXPERTISE

State environmental protection agencies, tribes and local governments are looking for solutions to achieve compliance with the U.S. Environmental Protection Agency's (EPA) Cross-Media Electronic Reporting Regulation (CROMERR). With over 25 years as a leading provider of federal, state and local IT solutions, CGI's environmental solution professionals are committed to answering that call. Having partnered with more than ten state agencies to navigate the complexities of CROMERR requirements, CGI offers a CROMERR-compliant electronic reporting solution developed through hard-earned, hands-on experience.

What is CROMERR?

Published in October 2005, CROMERR is an EPA rule that establishes a legal framework by which states, tribes, and local governments can lawfully accept electronic reports from entities regulated under EPA-authorized programs. Furthermore, the rule requires each state, tribe, or local government to obtain EPA approval for information systems that support electronic submissions under EPA-authorized programs. Since EPA approval is based on an electronic reporting system's ability to satisfy specific performance-based criteria, each government entity is responsible for determining the IT solutions that will be leveraged to achieve compliance with CROMERR.

What is CROMERR's impact on my agency?

Once a state, tribe, or local government has determined they are responsible for achieving compliance with CROMERR, it can be difficult to identify an approach, navigate the approval process, and to understand the impact of achieving compliance. When first approached by clients, CGI is often presented with the following questions:

- How will CROMERR impact my existing processes?
- Will CROMERR impact my agency's broader IT infrastructure?
- How significant will "the lift" be from my existing system to a CROMERR compliant system?
- What resources will I need to dedicate towards achieving compliance?
- What are other states, tribes, or local governments doing to achieve compliance?
- Is there federal support/funding available for CROMERR?

While the questions are always similar across states, tribes, and local governments, the answers are always unique to the agency. In each case, the answers will help define an agency's approach towards achieving compliance with CROMERR.

How will CGI help your agency achieve compliance with CROMERR?

As the market leader in CROMERR-related consulting services and technology solutions, CGI provides comprehensive support to help agencies achieve CROMERR compliance. Our dedicated team of over 200 environmental solution experts is committed to helping your agency:

- Understand how CROMERR impacts your systems and processes,
- Establish a strategic approach for achieving CROMERR compliance,
- Identify, develop, implement, and maintain IT solutions that are CROMERR compliant, and
- Maintain the compliance of your systems over time, and ensure that all future implementations adhere to CROMERR compliance standards.

How has CGI helped other agencies obtain compliance with CROMERR?

CGI's experience working with environmental protection agencies is extensive. Because of our working relationships in the industry, it became clear that our clients were experiencing shared challenges when it came to obtaining compliance with CROMERR. In response to the shared challenges of our clients, CGI created the CROMERR Working Group.

The CROMERR Working Group was established by CGI as a consortium of public and private IT leaders committed to taking a collaborative approach towards achieving CROMERR compliance through cost-effective IT solutions.

The shared experience of the Group's fifteen participating state environmental agencies combined with CGI's technical expertise and industry-leading environmental consulting services have served as unique enablers for fostering a collaborative environment. The Group identified common CROMERR-related challenges and business needs across all environmental agencies and a reusable CROMERR Roadmap for reaching compliance. It is this advantage – the leveraging of shared challenges and business needs – that has created an opportunity for our partners to engage in cost-sharing methods that will enable them to identify and implement optimal IT solutions.

For instance, CGI has facilitated a series of roundtable discussions with partners resulting in a consensus of common pain-points that states have encountered while attempting to achieve compliance with CROMERR. This feedback was used by CGI to develop a generic compliance methodology - CROMERR Compliance Roadmap - which is being leveraged by states as they seek to implement solutions to common challenges through collaboration and continued partnership.

The CROMERR Roadmap

For more information regarding the CROMERR Compliance Roadmap, and how CGI can apply its proven methodology to help your agency achieve CROMERR compliance, contact CGI at ehs@cgi.com.

What criteria does the EPA use to determine CROMERR compliance?

Your electronic reporting system must be able to:

- Establish a copy of record
- Maintain integrity of electronic document
- Provide opportunity to review and repudiate copy of record
- Validate electronic signature
- Determine the identity of the individual uniquely entitled to use a signature device