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# CALIFORNIA ENVIRONMENTAL REPORTING SYSTEM (CERS)
# BULLETIN #5
## UPA Steps to Implement eReporting

This bulletin provides an update to the Electronic Reporting Work Group and serves as an introduction to the UPA Help and Support Guide.

1.  **Updates:** Information to help you implement electronic reporting in your jurisdiction.

2.  **Action Items:** These are suggestions for actions that you should be taking RIGHT NOW.

3.  **New FAQs:** Aimed at answering many of your questions.

Please send your comments and ideas to improve these bulletins to cupa@calepa.ca.gov.

**Reminder:** January 1, 2013 all businesses and UPAs are required to report electronically.

**UPDATES**

- The work group continues to meet regularly via teleconference. The work group has developed a Help and Support Guide for UPAs available at www.calepa.ca.gov/CUPA/EReporting. The scope of this document includes guidance to Cal/EPA and UPAs defining a support system for the implementation of CERS as well as discussion of various issues a UPA and regulated facilities may encounter in complying with electronic reporting requirements.

- CERS went live on September 30, 2009. UPAs who currently utilize Unidocs Hazardous Material Online Information Project (HMOIP) were able to use CERS immediately. All data from Unidocs HMOIP was moved to CERS.

- Cal/EPA sent user credentials for CERS by email in late September to the current Unidocs HMOIP users. Cal/EPA activated these user accounts the last week of September.

- Unified Program management is working to finalize and get approval for the surcharge allocation to UPAs.

**ACTION ITEMS-**

What you have to do as a UPA under AB2286 as being implemented:

1. Collect and Report the additional E-Reporting Surcharge for 3 years.
2. Have a designated contact for the statewide system, the California Environmental Reporting System (CERS).
3. Upon request, authorize regulated facilities in your jurisdiction to file in CERS on behalf of a specific site.
4. Accept Title 27 forms from regulated businesses electronically by January 1, 2013
5. Report specific inspection, violation and enforcement related data (think of the raw data you use to prepare your CUPA to State Reports - quarterly, semiannual, and annual) electronically by January 1, 2013.
6. Provide technical assistance to regulated businesses to comply with the e-reporting requirements.

**10 Steps UPAs need to take to get started on e-reporting**

1. Modify your billing and payment tracking system to collect the additional e-reporting surcharge funds in a way that you can report it separately on the revised Quarterly Surcharge Transmittal Report 1.

2.  Identify your current information system capabilities and select a basic strategy.  Some agencies are establishing their own website 'portals' (acquiring/designing software) for businesses to use in lieu of reporting to CERS to collect additional information or conduct e-commerce beyond just the requirements of AB2286 and/or the Unified Program.  If you are not currently doing electronic reporting and have no compelling reasons or resources to establish a portal of your own, and if you need to use some of the data from the Title 27 forms to run your local regulatory programs, then you can assume that the regulated facility information will come from a combination of:
   A.  information from updates to your existing information system and
   B.  regulated facilities filing Title 27 information in CERS.

3.  Go to  http://www.calepa.ca.gov/CUPA/EReporting/default.htm  and read up on the requirements of the AB2286, the status of CERS, the latest on the e-reporting grant application process.  Get the http://www.calepa.ca.gov/CUPA/Documents/eReporting/GoLive.pdf and Support and Help Guide Unified Program Agency Implementation of CERS (PDF) for your UPA and Information Technology (IT) staff.

4.  Meet with your local IT support and/or vendor and discuss the known or planned mechanisms for exchanging (continuous) and/or uploading/downloading (periodic) from CERS.  Consider whether you need to upgrade your software (e.g. from Envision to EnvisionConnect) in order to exchange or upload/download data.  UPAs in CUPA-PA arrangements need to plan together. Keep in mind that your data management system will still need to enable you to issue permits, process inspection data, track compliance and enforcement, bill facilities, generate summary reports, etc.

5.  CalEPA has a designated contact for each UPA for CERS.  If you haven't already done so, establish your CERS-Key account.

6.  Establish a process for authorizing users.  The UPA has to approve most users on CERS.  (Some possible exceptions with multi-jurisdictional filers like AT&T, Verizon, with sites statewide)

7.  Determine what you can do with current resources and what you could do with some additional money (e.g. grant/surcharge allocation) to:
   a.  accept electronic data from CERS (e.g. business plan inventories, UST forms, etc.)
   b.  provide electronic data to CERS (e.g. names, addresses, and local identification numbers of regulated businesses)
   c.  electronically report your inspection, violation, and other CUPA to State data now reported in summary form periodically to the State
   d.  provide outreach and technical assistance.

8.  Perform initial outreach to businesses to let them know of the upcoming requirement and your general approach.  You may want to let them know how long you expect to continue to require paper documents, if you are requiring full electronic reporting prior to the Jan 1, 2013 deadline, and how to get more information.  This could be through emails, newsletters, web pages, billing inserts, etc.

9.  Plan to apply for the e-reporting grant funding available for your jurisdiction. Those grants will need to specify how the UPA will use the funds to accomplish the requirements of AB2286 and grant funding is not expected to cover the full transition costs for any UPA.  Plan additional local funding mechanisms to cover the necessary transitional and ongoing costs of e-reporting.  The grant money is expected to become available for a 3 year period starting in 2009-10, but that can be a single grant for one or multiple years.

10.  While attention is currently on the regulated business filing of Title 27 forms, don't forget that AB2286 will also include the UPA side of the Title 27 data dictionary, e.g. inspection and violation information.  To begin to learn about that, you can get a UPDS account

([https://securecupa.calepa.ca.gov/UPDS/Web/Forms/Public/Login.aspx](https://securecupa.calepa.ca.gov/UPDS/Web/Forms/Public/Login.aspx)) and begin to use it for your quarterly RCRA LQG reports to CalEPA.  In general you may want to look at all the processes you go through for your various CUPA to State Reports.

New FAQs:

Q.14:  Can the regulator create businesses and enter the data into CERS?

A.14:  Yes, the regulator can always create a new business entry and they can enter the chemical inventory and upload documents such as site plans. However, once a business 'claims' the site record in CERS the business will have to approve regulator access to make future changes. Currently this would require the regulator apply in CERS for access to that site and the business would then approve.

Note that there is nothing that would prevent a business from logging in to CERS and then have the inspector enter/update information on behalf of the business.

Note also that a local agency may choose to accept a paper submission if the local agency then enters the information in CERS or in their local system for exchanging with CERS.  At least one agency has created an hourly 'hazardous materials data entry' fee that they can charge if a business cannot do the electronic submission on their own.

Q.15:  Can the regulator go into CERS and update or correct information for a specific business without further involvement from the facility, and if so for how long?

A.15:  As long as a business has not 'claimed' a site in CERS the local agency can modify the data. Once a business claims a site in CERS only the business can add or modify data, other than the business name, address and facility ID number, unless the business approves access through the CERS access request process. This is intended to ensure appropriate ownership of the data.

The regulator will always control the business name, address and facility ID. CERS controls the CERS ID number.

Q.16:  When will the grant applications be sent to the UPAs?

A.16:  The grant applications will be sent by approximately March 2010.