Change Management Policy: Unified Program Violation Library

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Purpose: The [Unified Program Violation Library](#) is a repository of standard violation descriptions Unified Program Agencies **may** use in their field inspections, and **must** use when reporting violation data to the California Environmental Reporting System (CERS). Because the Violation Library will be used both manually and electronically by many different government entities, this document establishes a process when State and Local government agencies wish to make changes to the content of the Unified Program Violation Library. The processes described in this policy will ensure timely notification to all affected parties and maintain the accuracy and continuity of previously reported violation data.

Proposing Changes to the Unified Program Violation Library

Change proposals will be submitted using the change management process implemented by the Data Management Steering Committee. Violation amendments will include the violation(s) seven-digit violation identification number, the proposed amendment(s), the relevant citation(s), and the reason for amendment(s). New violation proposals will include the proposed violation(s), the relevant citation(s), and the reason for adding the violation(s) including any required or desirable implementation dates.

Change proposals may be submitted by the following:
- California government agencies responsible for the six environmental and emergency response programs within the Unified Program. These are the California Environmental Protection Agency (Cal/EPA), the California Emergency Management Agency (Cal EMA), the Department of Toxic Substances Control (DTSC), the Office of the State Fire Marshal (OSFM), and the State Water Resources Control Board (SWRCB).
- Local government agencies that implement the standards of the Unified Program. These are the Certified Unified Program Agencies (CUPA) and Participating Agencies (PA).

Change Types: Substantive vs. Non-Substantive

A substantive change to the library will occur when a new violation is added or when the language of an existing violation is altered to a point where the basic meaning or intent changes. A substantive change will require a new violation to be added to the library. The violation will be completely new or replace an exist violation.

A non-substantive change to the library will occur when an alteration of an existing violation does not affect the basic meaning or intent of the violation, ensuring past data attributed to the violation will not become inaccurate or misleading. A non-substantive change will not create a new violation in the library.

Proposal Review/Approval Process

Change proposals will be submitted to and reviewed by the Enforcement Steering Committee (ESC). The ESC will review each proposal submitted in the previous quarter and do one of the following:

- Approve the proposal
- Approve the proposal after ESC modification
- Reject the proposal

All ESC approved proposals will be submitted to the California Environmental Reporting Sytem (CERS) Change Management Committee (CMC) for processing. The CMC will address the proposals in the regularly scheduled meetings as they receive them. In consultation with Cal/EPA, the CMC will make the determination when the requested change will be made and provide that information to the ESC. The ESC will notify the requestor of rejection or approval.

Change Implementation in CERS

The approved changes will be incorporated into the Unified Program Violation Library by Cal/EPA program staff charged with those duties.

Notification of Changes

The most current version of the Unified Program Violation Library will be posted in the CERS Data Registry on the CERS web site. A notification of the update will be posted in Unified Program newsletters Listserv and through the CERS technical listserv when changes to the violation library are made.