FAQs on new CERS2 "Organization" Entity

Prepared by Chris Allen, Cal/EPA Unified Program November 2010

This document provides information in a "frequently asked questions" format about the new "Organization" feature that will be implemented in CERS2. The document was prepared to help explain the feature and solicit feedback from the CERS Change Management Committee (CMC) and other interested parties. ***Note: On November 16, 2010 the CMC settled on the terminology of this feature as "Organization" instead of the placeholder name "Business Entity" that was used in previous discussions and issue papers.***

What is the "Organization" feature planned for CERS2?

When CERS2 is deployed in Summer 2011, Cal/EPA staff is planning to include features to support security management for multiple facilities. **The "Organization" feature will support management of a collection of one or more users to manage a group of one or more facilities.** This will allow business users that manage data for more than one facility in CERS to perform user/security management collectively for all of their facilities (rather than on a facility-per-facility basis as required currently in CERS1). While primarily focused on larger, multi-UPA businesses like AT&T, Verizon, Target, etc., this feature will be usable by any business that has more than one facility in CERS. The origination and focus of this feature has been on user→facility security management in the CERS user interface—no significant thought or planning has been spent to see if there are other functional needs in the Unified Program this feature could address.

Why is this new feature's name in quotes ("Business Entity")?

Unfortunately, the terms "business" and "facility" are sometimes used interchangeably in Unified Program forms, although they can each have very specific legal meanings depending on the applicable/relevant statute or regulation. While the largest audience of CERS users (businesses) can probably relate to the idea that a "facility" is a single physical location, not all business and regulators may understand/agree that the term "business" consists of one or more facilities, as such usage would not perfectly align with the diverse legal definitions across state and federal regulations. Thus Cal/EPA staff is currently calling this new feature "Business Entity" until a name is agreed upon. *[The CMC decided upon "Organization" at its 11/16/2010 meeting]*

Why is this feature needed?

Based on Census Statistics (2007 County Business Patterns and 2007 Economic Census, http://www.census.gov/econ/susb/), at least 21% of California businesses ("firms" as defined by the Census) have more than one facility ("establishment" as defined by the Census). Although Cal/EPA staff is unclear how well this 21% number aligns with the compliment of businesses regulated under the Unified Program, even half of that number represents thousands of businesses that own/operate tens of thousands of facilities. So there are many businesses that could benefit from managing multiple users for multiple facilities.

What are potential names for the "Business Entity" planned for CERS2?

Listed below are several terms that could be used for the "Business Entity" that have been discussed or seen during research. *[The CMC decided upon "Organization" at its 11/16/2010 meeting]*

Term	Advantages	Disadvantages
"Business"	Commonly used and potentially easy to understand	Different meanings in statutes and regulations. Does not intrinsically include non-commercial entities.
"Enterprise"	Does not appear to conflict with key UP regulations/statutes. General enough to potentially include non-commercial entities. Used by U.S. Census.	Not necessarily a commonly used word (especially for small business community). Potentially vague/ambiguous.
"Firm"	Does not appear to conflict with key UP regulations/statutes. Used by U.S. Census.	Potentially vague/ambiguous. Does not intrinsically include non-commercial entities.
"Organization"	Does not appear to conflict with key UP regulations/statutes. General enough to potentially include non-commercial entities.	Vague/ambiguous.

Will the "Organization" feature support a business configuring a user to manage ALL program data for only SOME facilities (differential facility security)?

Cal/EPA's Technology Services staff (TSU) has determined this would be an extremely expensive requirement to implement. Additionally, the extra configuration required for this feature might make the security configuration for more typical user scenarios overly complex/confusing. TSU is proposing that businesses with this need could create multiple "organizations" representing their different security needs. For example, if ACME Enterprise needed to have different groups of users managing their Northern and Southern California facilities, two different organizations would be created: ACME Enterprise North and ACME Enterprise South. In general these types of more complex business entity needs would be reviewed and implemented by Cal/EPA on behalf of businesses and UPAs.

Will the "Organization" feature support a business configuring a user to manage only SOME program elements for ALL of their facilities (differential program element security)?

In general CERS is meant to be a reporting tool, not a data management tool. Supporting differential program element security would appear to cross that threshold. TSU staff has determined that this feature could be implemented for a significant cost and probably not in the initial rollout of CERS2. Cal/EPA will need more feedback from the CERS community to determine if this is a critical need for CERS2.

How will facilities map to "Organizations" in electronic data transfers?

This problem has only been recently identified by TSU and has not been fully researched. While business owner/operators can readily self-identify and map their facilities to their business entity in the CERS 2 web

pages/user interface, it is unclear how this will occur and be coordinated among UPAs in electronic data transfers.