

To: Jim Bohon, Unified Program Manager
Date: October 22, 2010
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Subject: **Issue Paper: Locally Collected Information Fields in CERS**

Issue

California Code of Regulations, Title 27, Division 1, Subdivision 4, Chapter 1 sections 15185 and 15187 and Division 3, Subdivision 1, Data Dictionary allows local agencies to collect additional information beyond that defined in the Data Dictionary . Local agencies have used this ability to gather a variety of information. Technical concerns with the information exchange between local agencies and the state have been identified that may require a change in the process of this regulatory allowance if electronic reporting is to be successful on a statewide basis. This paper proposes a change in past practice to raise likelihood of overall electronic reporting project success.

Background

CERS, the California Environmental Reporting System is being developed and deployed to meet the electronic reporting mandate for business and local agency required by AB 2286 (2008). The Title 27 Data Dictionary, promulgated in 1998 and updated in 2004 and 2007, provided for the collection of 'locally collected information' through three fields: Chapter 1, Business Activities, field 15, Business Owner/Operator Information, field 133, and Chapter 2, Hazardous Materials Inventory, field 246. Local agencies have collected a variety of information through the use of these fields for many years.

An initial effort to identify locally collected information was undertaken several years ago under a Unidocs UST-related grant. Locally collected information from a group of Unified Program Agencies (UPAs) that were participating in the grant project was collected and later integrated into Unidocs. These fields were carried over in the transition to CERS. In August 2010 a request was sent from the Cal/EPA Unified Program to all local agency CERS managers requesting a list of any additional locally collected information. Thirteen of the 117 UPAs responded.

Discussion

The attached table lists all of the currently known locally collected information. The list has been edited to consolidate like fields. The remaining data elements have been categorized as those that should be required in CERS and those that should not, based on factors described below.

Until recently, Cal/EPA intended to provide local fields and allow UPAs to select the fields they wanted for their jurisdiction. Several technical resources have expressed concern regarding the ability to create such a system. Cal/EPA internal technical staff have confirmed that this approach would require several hundreds of hours of technical staff time to design, test and build, if it can be determined that it could

work at all, and will substantially increase risk of data exchange complications and substantially increases the risk of project failure.

Electronic data exchange requirements were not considered when the locally collected information fields were created in 1998. Data validation is necessary for machine to machine data exchange, but cannot occur unless the fields are required and the content defined. The currently identified locally collected data fields do not provide the ability to validate data electronically. One solution is to make fields required so an entry must be made. In this case fields would be required for reporting in all UPA jurisdictions.

A further justification for this approach is that many business users of CERS have sites in many jurisdictions. A key benefit of electronic reporting for these businesses will be the ability to report site information in an XML data exchange, including locally collected information. In order for this process to be designed, built and managed, the locally collected information must be standardized across the state and defined in CERS.

Cal/EPA has reviewed the list of locally collected information submitted from the 13 UPAs that responded to the request and has made an initial recommendation to add eight new required fields in CERS, and the Data Dictionary, as shown on the attached table. The remaining fields would not be included in CERS and therefore would not be collected electronically by local agencies.

Recommendations

1. Regulator User Group reviews proposed list of locally collected information. Obtain a vote on November 9, 2010 to accept the fields proposed to be added as new required fields in CERS.
2. Review the technical issues presented in this paper and the recommendations of the Regulator User Group with the Data Steering Committee on November 30, 2010. Obtain a vote from the DSC to support the approach recommended in this paper.
3. Confirm that data and fields that are not included in CERS will not be collected by UPAs
4. Add the proposed new fields to the Title 27 Data Dictionary through the regulatory process.
5. For all future new data and information needs, follow the existing approved change management process established by the Data Management Steering Committee prior to adding any new fields, including new 'locally collected information' to CERS and to the Data Dictionary. In some instances it appears likely that fields could be added to CERS in advance of their addition to the Data Dictionary.

Attachment

- List of proposed fields to be added to CERS