June 28, 2013

Unified Program Guidance Letter 13-06

GENERIC EMAIL ACCOUNTS FOR BUSINESS USERS IN CERS

To: Unified Program Agencies

Questions have been raised recently regarding the business use of generic email accounts and the need for an appropriate email format for CERS business users. This guidance document is intended to clarify Cal/EPA's requirements and it's rationale for these requirements.

- All business user accounts in CERS must be associated with only one person. This is explicitly stated in the first item in the CERS Conditions of Use, 'I agree I will not allow others to use my CERS Account...'

- The preferred format for email accounts is person'sname@businessname.com so it is clear to the regulator users that the account is an employee of the business. However, this format is a recommendation, not a requirement. Any email format is acceptable provided that the CERS business user account identifies a single person. Regulators can verify the individual associated with a CERS business user account by viewing the 'Person Details' screen in the Business Organization.

- Any business user CERS Account found to be a generic account or one used by more than one person will be suspended or deleted. Regulators that identify such an account should notify the CERS Technical Services Unit Help at CERS@calepa.ca.gov.

Rationale

Electronic reporting has been determined to be an acceptable alternative to signed, hard copy submissions because the electronic filer is specifically identified by the CERS account profile and is known to be an authorized representative of the business. This authorization results from either a formal request by an authorized representative of the business to either Cal/EPA or to the CUPA for the individual to be associated with the business in CERS, or by approval of a lead business user in CERS.
If more than one person is associated with a CERS business user account the effective chain of responsibility is broken because there is no longer a certainty of who made an electronic submission.

Jim Bohon, Assistant Secretary
California Environmental Protection Agency