ELECTRONIC REPORTING TRANSITION PLAN FOR DECADE CLIENTS

El Dorado County EMD hereto referred to as Certified Unified Program Agency (CUPA).

TRANSITION PLAN REPRESENTATIVE

Name of Project Director, Title: Mark A. Moss Hazardous Materials Specialist

Street Address: 2850 Fairlane Court, Building C

City, Zip: Placerville, CA 95667

Phone: (530) 621-7665

Fax: (530) 626-7130

E-mail: mark.moss@edcgov.us

Total Number of Regulated Businesses: 800 as of 1/2011

1. General Description of Transition Plan

Certified Unified Program Agency (CUPA) will transition from Envision to EnvisionConnect in order to meet the electronic reporting requirements mandated by Assembly Bill 2286.

Currently, CUPA collects hard copy forms for the following programs:

COLLECTION METHOD	COLLECTED BY	CUPA PROGRAM
Paper	CUPA	Hazardous Materials Business Plan
Paper	CUPA	Hazardous Waste Generator and Hazardous Waste Onsite Treatment Programs
Paper	CUPA	California Accidental Release Preventions (CalARP) Program
Paper	CUPA	Underground Storage Tanks
Paper	CUPA	Aboveground Storage Tanks
Paper	CUPA	Uniform Fire Code Hazardous Material Management Plans and Inventories

Currently regulated businesses submit their paper based UPCFs by mail, email, fax, or directly to CUPA staff. Non-responders are mailed courtesy reminders that are followed-up with phone calls. Once forms are approved, the CUPA uploads the information into Envisions.

With grant approval, the CUPA will transition form Envisions to Envision Connect. CUPA staff will upload existing Owner and Facility information from Envisions to Envisions Connect and then to CERS. Envision Connect will capture the assigned CERS ID for future data exchanges. After initial upload, CUPA will participate in a frequent two-way data exchange between EnvisionConnect and CERS in order to synchronize the two systems.

Paper UPCFs will continue to be accepted, approved, and entered by CUPA for 6 months after initial upload. After 6 months, businesses will need to enter their data online. Subsequent submissions of hard copy documents may be charged a fee.

Informational pamphlets will be developed and distributed to the businesses in the current inventory. The pamphlets will be sent out with their 2011 and 2012 CUPA statements to notify them about the transition process, program compliance and training. Additional resources, such as Cal/EPA web links, will be included in the pamphlets and on CUPA web site. Business training will be a multi facetted outreach approach including web based training, FAQ forms, classroom workshop training and on site training during inspections.

CUPA staff will review ongoing electronic submissions to determine approval status. Online submittals will undergo an initial completeness review by CUPA clerical staff that will set submittal status as either "received" or "in process". CUPA inspection staff will perform more comprehensive reviews and make final approval decisions. Transferred electronic data will be validated by inspection staff. Businesses will be required to review their data online within 3 months after the transfer and make and necessary changes. CUPA will notify businesses by an e-mailed and/or mailed courtesy letter of the completed transition and transfer of their data.

2. Needs Assessment

CUPA recognizes that converting their business-to-CUPA reporting system from paper/hardcopy to electronic will require an assessment of the resources needed to implement the new system. There are some critical needs that must be addressed in order to efficiently and effectively convert to and manage data electronically. The needs and the steps to address them include:

- Apply for Cal/EPA electronic reporting grant funds to fully implement electronic reporting.
- Review and consider fee adjustments to cover long-term operational costs.
- Extend existing contract with Decade to cover EnvisionConnect upgrade.
- Upgrade current data management system to EnvisionConnect to be able to download UPCF information from CERS and to store and transfer Inspection and Enforcement information.
- Assess existing data for completeness, accuracy, and compliance with Title 27 Data Dictionary.

The Department will utilize a combination of the services listed below that are offered by Decade.

 Data Assessment (Gap Analysis) – Decade Software staff evaluate the CUPA's existing data for completeness, accuracy, and compliance with Title 27 Data Dictionary. The result is a Data Gap Analysis report.

- Data Remediation (Data Remediation Plan) Decade Software staff work with CUPA to author a Data Remediation Plan based on findings in the Data Gap Analysis report.
- Data Remediation (Scripting Services) Decade Software staff design, test, and implement SQL scripts necessary to satisfy Data Remediation Plan.

Transfer CUPA hardcopy documents to EnvisionConnect and CERS.

The Department will utilize its current staff for any required manual data entry. When necessary, CUPA staff will transcribe paper records to EnvisionConnect. Staff will also:

- Implement and configure EnvisionConnect's machine-to-machine data exchange with CERS.
- Review and update procedures for managing CUPA program.
- Conduct CERS training for CUPA staff.
- Conduct CERS training for businesses.
- Accommodate businesses that do not regularly use a computer.
- Obtain EnvisionConnect technical support from Decade Software.
- Businesses and CUPA email CERS help desk for CERS-specific questions or problems.

3. Collecting, Submitting, and Storing Unified Program Related Information

CUPA will exchange data with CERS through EnvisionConnect. Regulated businesses will submit their information online using CERS. By exception, CUPA may collect paper / hardcopy data from the regulated businesses and enter data into EnvisionConnect. EnvisionConnect will synchronize with CERS. Any documents such as site plans, facility maps, and emergency contingency plans will be transferred with submission data.

4. Management of Data Changes/Updates

Businesses will submit UPCF changes/updates using CERS. CUPA staff will review submissions, compare with previously submitted information using EnvisionConnect, and will make a determination on the approval status. If a business submission is not approved, CUPA staff will enter a notation in EnvisionConnect specifying what is needed to complete the approval process. Businesses that receive an incomplete approval status from CUPA will receive an email notice of their status. Businesses will make the required corrections and resubmit. Approved submissions will be transferred to EnvisionConnect from CERS.

5. Inspection/Enforcement

CUPA will use EnvisionConnect to collect and manage Inspection and Enforcement information in the field. Inspectors will schedule inspections in EnvisionConnect. CUPA will use EnvisionConnect to push inspection and enforcement information to CERS at a yet to be defined frequency acceptable to Cal/EPA.

6. Billing/Invoicing

CUPA will use EnvisionConnect to generate invoices for regulated facilities. EnvisionConnect will utilize localized UPCF information to assess fees and generate permits. CERS does not provide for invoicing of businesses.

7. Training

Staff Training

As part of the CUPA upgrade to EnvisionConnect, Decade Software will provide comprehensive onsite training for management. Management will then utilize web based training and hands on training to train inspection, and administrative staff. New staff will be scheduled for the initial EnvisionConnect training within four weeks after hire. CUPA management will administer data management system training for all new hires. CUPA will take advantage of ongoing online training provided by Decade Software.

Business Training

Business training will rely on a multi facetted outreach approach that would include but not be limited to the following.

- Informational pamphlets including basic CERS instructions will be sent out with invoices to all regulated businesses for the 2011 and 2012 billing cycles.
- b. Multiple CERS data inputting terminals will be located throughout the County and be available for use during business hours.
- A web based FAQ will be developed and posted on the department website.
- d. A training request form will be available on the department website once a suitable number of requests is made a training class will be offered.
- e. Inspectors will be available to provide limited field based training or assistance to businesses on an appointment basis.

8. Help System

CUPA will offer a basic level of assistance for CERS to regulated businesses. Businesses may call or email CUPA clerical staff for this assistance. Inspection staff will also provide onsite training. CERS web site will contain guidance on the general operation of CERS. For technical or complicated issues with CERS, CUPA staff and or businesses will contact CERS support by email at cers@calepa.ca.gov.

9. Service Contract and Grant (fiscal)

CUPA will apply for electronic reporting grants using the application provided by Cal/EPA. The funds will be used to cover the initial costs of implementing electronic reporting. The tentative fund distribution request is as follows:

	Activity	Total Cost
Agency	Agency Hardware (new computers, backup server)	
	Hardware (installation, configuration)	
	Business Outreach	\$500.00
	Training (regulated businesses, UPA staff)	\$2400.00
Decade Software Training Per Dier	EnvisionConnect Upgrade Contract (includes Training, Vendor Operating Expenses for Travel, Per Diem, and Accommodations associated with onsite training)	\$5797.00
	Optional Data Assessment - Gap Analysis	\$14,700.00
	Optional Data Remediation – Data Remediation Plan	\$7350.00
Optional Data Remediation – Scripting Services	\$12,700.00	
	Total E-Reporting Transition Cost	\$54,820.00

10. Ongoing Support and Maintenance

EDC EMD does not anticipate annual EnvisionConnect costs to change dramatically with CERS ereporting. Minimal changes are generally accounted for in the annual operating budget. If EDC EMD finds there is a significant increase in operational and maintenance costs, a fee increase request may be submitted to the EDC Board of Supervisors.

11. Electronic Reporting Transition Plan Tracking

CUPA will submit a quarterly status report and invoice to Cal/EPA to update the progress of the CUPA transition plan. The following tables denote the list of milestones that will be tracked and reported to Cal/EPA.

Milestones Reported to Cal/EPA		Date
1	Estimated/actual start date of the CUPA Electronic Reporting Transition Plan	10/2010
2	Date CUPA select preferred data exchange methodology	12/2010
3	Date Electronic Reporting Transition Plan & Grant Application submitted	4/2011
4	Date Cal/EPA awards grant	6/2011
5	Date transfer of existing data from UPA system to CERS complete	6/2012
6	Date authorized business electronic submission	11/2012
7	Date CERS data exchange operational: business data	11/2012
8	Date CERS data exchange operational: inspection & enforcement data	11/2012
9	Date CUPA electronic reporting transition process complete (including PAs)	11/2012

EDC EMD Targeted Milestones	Date
Upgrade to current version of Envision-Connect	5/2011
Train CUPA staff to use CERS and Envision-Connect	7/2011
Train EDCEMD staff on use of Envision-Connect field inspection system	7/2011
Purchase PCs and equipment for business kiosks	9/2011
Data remediation complete	11/2011
Implement Envisions-Connect based electronic field inspection system	11/2012
Business outreach and training complete	11/2012

12. SB 2286 Grant Application Process

CUPA will submit its Electronic Reporting Transition Plan along with its grant application to the Cal/EPA. Status reports on the use of grant funds will be submitted to Cal/EPA periodically before release of grant funds to the CUPA.