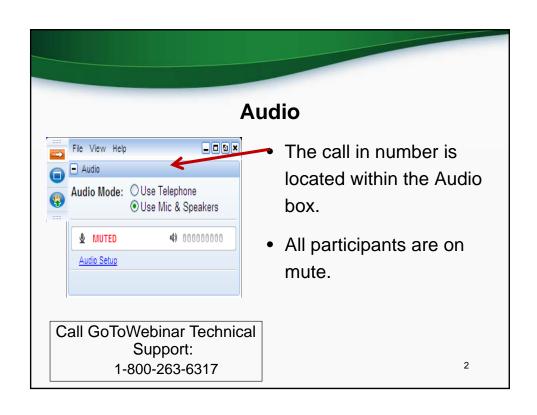
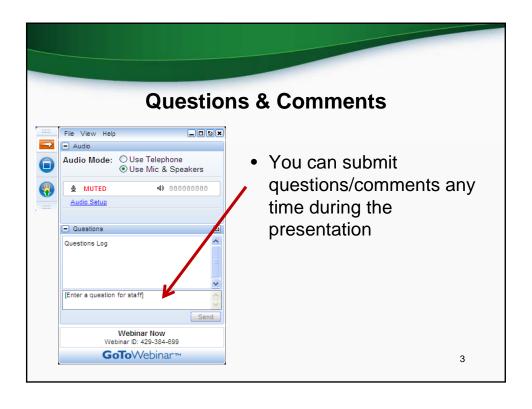
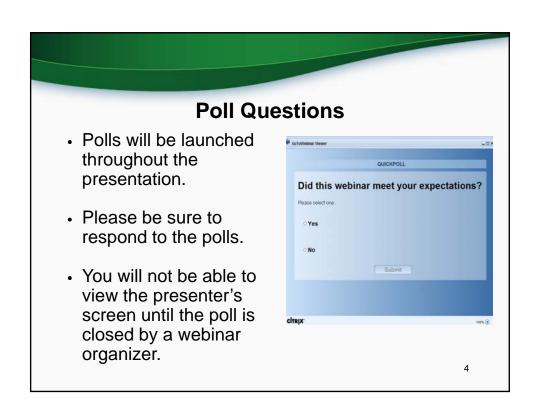
Consumer Confidence Report (CCR) Rule Retrospective Review: Electronic Delivery

U.S. EPA
Office of Ground Water and Drinking Water
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Today's Speakers

- Mindy Eisenberg, Branch Chief, U.S. EPA
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Presentation Outline

- Consumer Confidence Report (CCR) Rule Overview
- II. CCR Rule Retrospective Review
- III. CCR Delivery Options Memo
- IV. CCR Delivery
- V. Planning Your CCR Delivery Program
- VI. Suggestions for Primacy Agencies and Additional Resources

VII.Q&A

Poll Question

Who is joining us today?

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CONSUMER CONFIDENCE REPORT (CCR) RULE OVERVIEW

Consumer Confidence Reports (CCR)

- Part of the 1996 Amendments to the Safe Drinking Water Act (SDWA) effort to increase public right-to-know.
- The CCR provides consumers with local water quality information that allows for informed public health choices and increases dialogue between community water systems and their customers.
 - Some key information required:
 - · System information and source of water
 - Detected contaminants
 - Compliance with regulations
 - · Specific educational material

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Content Requirements – 8 Items

Item	Report Content Requirement						
1	Water System Information						
2	Source(s) of Water						
3	Definitions						
4	Detected Contaminant Table						
5	Information on <i>Cryptosporidium</i> , Radon and Other Contaminants						
6	Compliance with NPDWR						
7	Variances and/or Exemptions						
8	Required Additional Information						

Multilingual Requirement

- Systems that have a large proportion of non-English speaking residents must include:
 - Information in the appropriate language(s) regarding the importance of the CCR, or
 - A phone number or address where persons served may contact the water system to obtain a translated copy of the notice or assistance in the appropriate language
- As a guideline, some primacy agencies use a threshold of 5-10% of the population or 1,000 people, whichever is less, for requiring systems to provide multilingual information in their CCRs.



Check with your primacy agency for more guidance on your multilingual requirement.

Delivery Requirements

- Proper Delivery
 - Mail or otherwise directly deliver, one CCR to each customer by July 1st every year.
 - In addition, make a "good faith" effort to reach non-bill paying consumers.
 - Deliver the CCR to other agencies as prescribed by the primacy agency.
 - Make the CCR available upon request.
- Greater than 100,000 persons served:
 - Must also post the CCR on the Internet.



A bill-paying customer is one who receives a utility bill directly from the water company.

Delivery Requirements (cont'd)

- Small system mailing waiver (State's Governor or Tribal Leader approval)
 - Fewer than 10,000 persons served:
 - Publish CCR in at least one local newspaper;
 - · Notify customers that CCR will not be mailed; and
 - Make reports available upon request.
 - 500 and fewer persons served:
 - · Notify customers that CCR is available upon request, and
 - Must provide notice at least once per year by mail, door-todoor delivery or public posting that report is available.
- Electronic delivery does not replace delivery waivers but is another option for small systems.

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CCR RULE RETROSPECTIVE REVIEW

CCR Rule Retrospective Review

- October 2011 Initiated Retrospective Review.
- February 2012 Online listening session.
 - Gathered feedback on 5 areas CCR Understandability, CCR certification, Use of CCR to meet Tier 3 PN requirements, CCR units for reporting detected contaminants and CCR electronic delivery.
- September 2012 Released Draft CCR Electronic Delivery Options and Considerations document.
- October 2012 Public listening session.
- January 3, 2013 Released CCR Delivery Options memo and attachment. Released CCR Rule Retrospective Review Summary.

CCR DELIVERY

CCR Delivery Options Memo and Attachment

- Describes the electronic delivery methods and approaches.
- Important electronic delivery program considerations.
- Limitations and advantages matrix of the methods.
- Additional aspects of CCR Rule requirements.



The attachment is part of the memo PDF found at: http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/regulations.cfm

Poll Question

Does your CWS offer electronic billing?

CCR Delivery Methods and Approaches

2 Implementation Approaches

 Paper CCR Delivery with Electronic CCR Delivery Option Electronic Delivery with Paper CCR Delivery Option



Delivery Methods

- 1. Mail paper copy
- 2. Mail notification that CCR is available on website via a direct URL
- 3. Email direct URL to CCR
- 4. Email CCR sent as a file attachment
- 5. Email CCR embedded in the message
- 6. Additional electronic delivery that satisfies "otherwise directly deliver"



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"Directly Deliver" Requirements

The EPA interprets the existing rule language so that three elements must be met in order to use electronic delivery to comply with the requirement to "directly deliver" the CCR.

- Electronic delivery must provide the CCR in a manner that is "direct."
 The EPA interprets this rule requirement to mean that CWSs can
 use separate mailings, such as utility bills with a URL, to meet their
 CCR requirement if the URL provides a direct link to the CCR and if
 the communication prominently displays the URL and a notice
 explaining the nature of the link.
- If a CWS is aware of a customer's inability to receive a CCR by the chosen electronic method, it must provide the CCR by an alternative method allowed by the rule.
- 3. A CWS must prominently display a message and the direct URL in all mail notifications of CCR availability.

CCR Delivery Methods Not Allowed

- A customer must not have to navigate to another webpage to find any required CCR content if viewing the CCR on a website (e.g., address search engine.)
- 2. Use of social media (e.g., Twitter or Facebook) directed at billpaying customers does not meet the requirement to "directly deliver" since these are membership Internet outlets and would require a customer to join the website to read their CCR.
- The use of automated phone calls (e.g., emergency telephone notification systems) to distribute CCRs is not considered direct delivery, because the entire content of the CCR cannot be provided in the phone call.

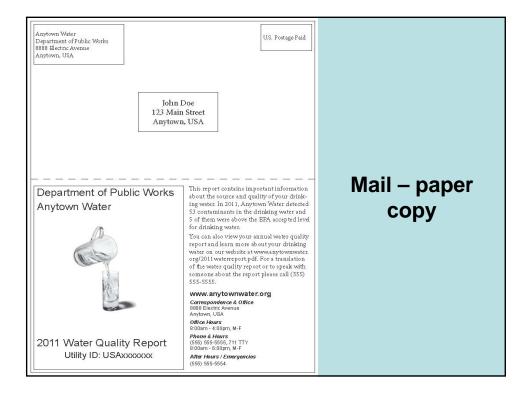
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Methods for Delivery of CCRs

- 1. Mail a paper copy of the CCR.
- CWS mails a paper copy of the CCR to bill-paying customers.
- In addition, mail to those who request paper instead of electronic delivery.

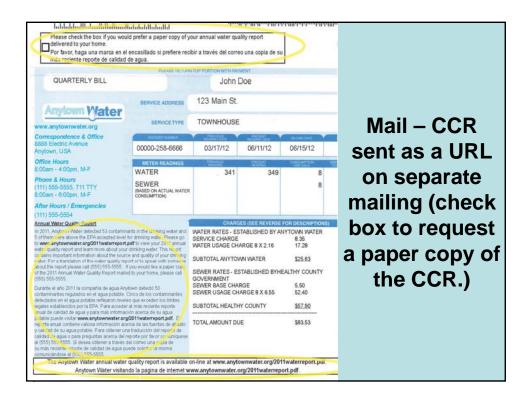


Electronic delivery may not be appropriate for all CWSs.



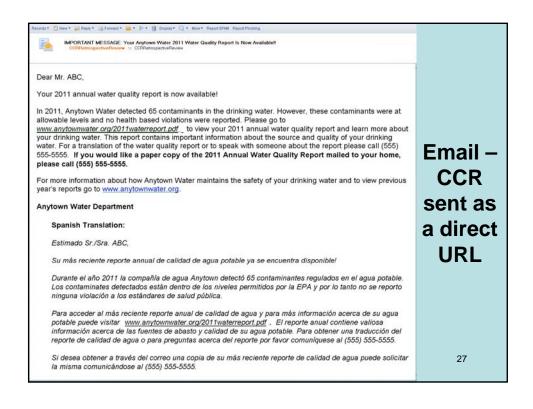
2. Mail a notification that CCR is available via direct URL.

- CWS mails bill-paying customers a notification that the CCR is available and provides a direct URL to the CCR on a publicly available site on the Internet where it can be viewed.
- The URL must be prominently displayed on the mailing.
- Other important considerations:
 - The URL should be short.
 - An option for a customer to request a paper CCR.
 - Include a short statement about water quality to promote readership.



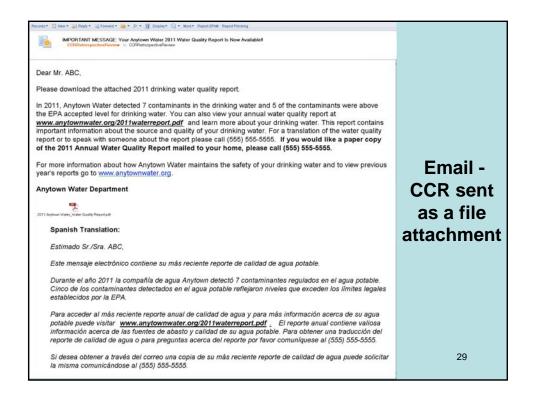
3. Email a direct URL to the CCR.

- CWS emails bill-paying customers a notification that the CCR is available and provides a direct URL to the CCR on a publicly available site on the Internet.
- A URL that navigates to a webpage that requires a customer to search for the CCR or enter other information does <u>not</u> meet the "directly deliver" requirement.
- Other important considerations:
 - Include a short statement encouraging readership.
 - Information on how to request a paper CCR.
 - Email bounce-backs respond by sending the customer a CCR by another allowable delivery method.



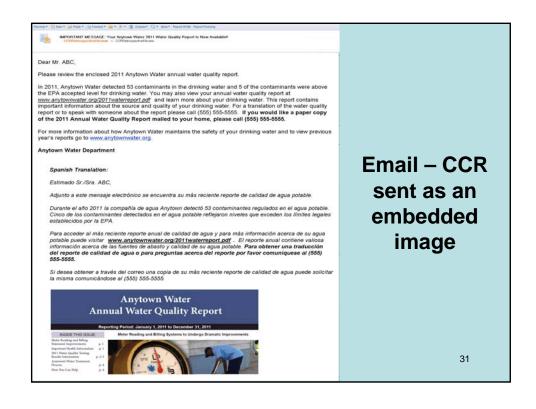
4. Email the CCR as a file attachment.

- CWS emails the CCR as an electronic file email attachment (e.g., portable document format (PDF)).
- Other important considerations:
 - Include a short statement encouraging readership.
 - Information on how to request a paper CCR.
 - Email bounce-backs respond by sending the customer a CCR by another allowable delivery method.



5. Email the CCR embedded in the message

- CWS emails the CCR text and tables or an image inserted into the body of an email.
- Other important considerations:
 - Information on how to request a paper CCR.
 - Email bounce-backs respond by sending the customer a CCR by another allowable delivery method.



- 6. Additional electronic delivery that satisfies "otherwise directly deliver" (to account for future technologies)
- CWS delivers the CCR through a method that will "otherwise directly deliver" to each bill-paying customer and in coordination with the primacy agency.
- This category is intended to encompass methods or technologies not included in the other methods. CWSs and primacy agencies considering new methods or technologies should consult with the EPA to ensure it meets the intent of "otherwise directly deliver."



A CWS will need to use a combination of delivery methods to reach all customers.

Poll Question

Which CCR delivery method(s) do you think your customers will prefer?

(You can choose more than one.)

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CCR Delivery Methods and Approaches

2 Implementation Approaches

 Paper CCR Delivery with Electronic CCR Delivery Option 2. Electronic Delivery with Paper CCR Delivery Option



Delivery Methods

- 1. Mail paper copy
- 2. Mail notification that CCR is available on website via a direct URL
- 3. Email direct URL to CCR
- 4. Email CCR sent as a file attachment
- 5. Email CCR embedded in message
- 6. Additional electronic delivery that satisfies "otherwise directly deliver"



CCR Delivery Approaches for Bill-Paying Customers

1. Paper CCR delivery with a customer option to request an electronic CCR.

- CWS informs customers of the electronic delivery option and registers customers who identify electronic delivery preference.
 - The CWS may obtain this delivery preference through a variety of methods (e.g., public outreach, community newsletter, etc.)

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CCR Delivery Approaches for Bill-Paying Customers

- 2. Electronic CCR delivery with a customer option to request a paper CCR.
- CWS delivers CCR electronically, with an option to request paper CCR delivery.
- Customer must take action if they do not wish to receive their CCR electronically.
- If a CWS knows some customers cannot receive the CCR electronically (e.g., no internet access) they must send a paper CCR.

PLANNING YOUR CCR DELIVERY PROGRAM

	CCR DELIVERY METHODS									
ADVANTAGES*	Mail – Paper Copy	Mail – Notification that CCR is available via direct URL	Email – direct URL to CCR	Email — CCR sent as an attachment	Email – CCR sent as an embedded image		Delivery Method			
Customers may have access to more information beyond what is required in the CCR because they are already on the Internet.	•		•							
CWS does not have to invest in new software, additional staff trainingor other new logistical needs for delivery.	•						D	ec)	isio	n
CWS has potential printing and mailing cost savings.		•	•	•	•		Matrices		S	
CWS with e-billing systems can use existing database and other resources.			•	•	•					
Customer can view or receive CCR with limited or no Internet access.	•						CCR DELI	VERY MI	ETHODS	
		LIMITATIONS*				Mail – Notification that CCR is available via direct URL	Email – direct URL to CCR	Email – CCR sent as an attachment	Email – CCR sent a an embedd image	
	than one de	CWS must dedicate staff to manage more than one delivery method, including collecting and updating email addresses.					•	•	•	
Found on page and 8 of the	and train sta	CWS may have to invest in new software and train staff. CWS incurs printing and mailing costs.					•	•	•	
Memorandum attachment	CWS needs	CWS needs Internet access and adequate bandwidth to distribute large numbers of emails at once.					-	•	•	
attaotimont		due to lack	of software	ive CCR by emai compatibility, s e size limitation	pam			•		•

- Research customer technology capabilities.
 - Internet access? Internet speed?
 - Possible resources Census records, customer advisory boards, other city departments
 - Past experiences e-bill/e-pay participation, other electronic communication efforts, current website usage
- Research delivery methods and CWS technical capabilities.
 - Are you able to send mass emails? Do you have a website? Will your computer network, internet connection, etc. support electronic CCR delivery?
 - Advantages & Limitations Matrices

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Planning Your CCR Delivery Program

- Research delivery approaches and weigh benefits and challenges for successful delivery.
 - Which approach benefits my customers and my system?
 - Would a gradual transition benefit my system?
 - What are the resource implications of each approach? Can I provide the needed resources?
 - How best to identify customers who cannot receive the CCR electronically?
- Remember delivery certification is required. 40

Poll Question

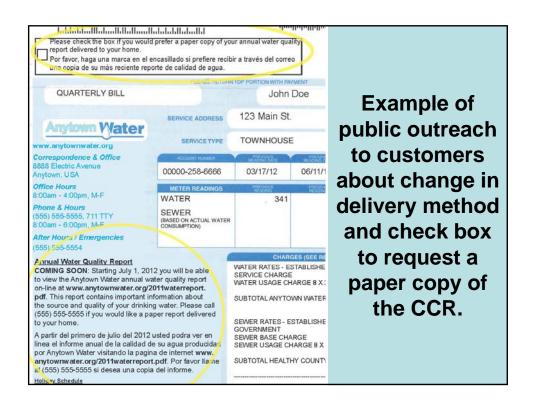
Which CCR delivery methods do you think your CWS will use? (You can choose more than one.)

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Planning Your CCR Delivery Program

- Estimate and compare costs for various delivery approaches and methods including start-up costs.
 - Do you have to create a website? Do you have to redesign your billing statement to include a CCR URL?
 - Do you create multiple CCRs and will need to develop and deliver different electronic CCRs?
- Make decisions with the information you've gathered.
 - Include public input and consult your primacy agency.
- Prepare your staff for the new delivery method(s).
 - Dedicate staff to receive paper CCR requests and monitor out-ofdate email addresses.

- Conduct public outreach about upcoming delivery changes (e.g., bill insert, press release.)
 - Share the delivery method(s) that will be used.
 - Provide customers a contact number for questions and comments.
 - Send a dedicated email (with a CCR-related subject line) to inform ebill/e-pay customers of the availability of the CCR each year.
- Prepare the CCR with required content.
 - Include all eight items.
 - Remember all required information must be on one webpage.



- Convert the CCR into an electronic format.
 - Choose a format (e.g., pdf version) that the CCR can be delivered both electronically and on paper.
 - Create a short, direct URL.
 - Write an informational statement to promote readership.
 - Water quality summary.
 - Importance of the CCR in English and other languages as directed by your primacy agency and information on how to request a paper CCR.
 - A CWS should display the direct URL on every mailing.
 - Include a check box on every water bill, similar to change of address or pay by credit card, in which a customer can elect to receive a paper CCR.
 - Display the URL in typeface that is at least as large as the largest type on the statement or other mailing notification.

Mail – CCR 06/15/12 sent as a URL on separate mailing (check box to request a paper copy of \$25.63 the CCR.) \$83.53

Indicated and the Indicated and Indicated at Indicated at Indicated Indicate Please check the box if you would prefer a paper copy of your annual water quality repor delivered to your home.

Por favor, haga una marca en el encasiliado si prefiere recibir a través del correo una copia de se más reciente reporte de calidad de agua. QUARTERLY BILL John Doe 123 Main St TOWNHOUSE 00000-258-6666 03/17/12 WATER SEWER (BASED ON ACTUAL WATER CONSUMPTION) Annual Water Quality Report WATER RATES - ESTABLISHED BY ANYTOWN WATER your 2015 annual WATER USAGE CHARGE 8 X 2.16 SUBTOTAL ANYTOWN WATER SEWER RATES - ESTABLISHED BYHEALTHY COUNTY GOVERNMENT SEWER BASE CHARGE SEWER USAGE CHARGE 8 X 6.55 SUBTOTAL HEALTHY COUNTY TOTAL AMOUNT DUE ort is available on-line at www.anytownwater.org/2011waterreport.pu Anytown Water visitando la pagina de internet www.anytownwater.org/2011waterreport.pdf.

- Deliver paper and electronic CCRs to customers and any other required parties.
 - A mixture of paper and electronic CCRs will be necessary.
- Make a good faith effort to deliver CCR to non-bill paying customers.
 - Electronic delivery can provide additional avenues to reach all consumers (e.g., electronic newsletters, website signups, etc.)
- Respond to additional requests for mailed paper CCRs and update email databases.
 - Provide CCRs through an alternative means if email bounces back.
- Submit copy of the CCR and certification to primacy agency.
 - CWS certifies the CCR contained all required content and was delivered to all customers.
- Maintain a copy of your CCR for three years.

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Poll Question

Do you think you will be using electronic delivery for your 2012 CCR?

Top 10 Things To Remember

1. Delivery is your responsibility!

 A CWS must certify delivery to every bill-paying customer so keep in touch with your primacy agency. CWSs will need to use a combination of methods for their service area.

2. Know your customer base!

Specified electronic delivery method capabilities.

3. Give customers a heads up and an option!

 Inform customers of the change in delivery approach before delivery of the CCRs to customers. Give them a chance to choose if they prefer paper or electronic CCRs.

4. Tell everyone, all the time!

 A CWS mailing a direct URL should include an option on every water bill for a customer to elect to receive a paper CCR.

5. Know your costs!

 May not see savings in the first year, may take a few years for people to be comfortable with e-delivery.

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Top 10 Things To Remember

6. Catch customers' attentions!

Include a short message to encourage readership of the CCR.

7. Email delivery!

 If an email bounces back resend the CCR by an alternative means. Keep email databases up to date.

8. Make it bold! Make it short!

- The direct URL should be in typeface that is at least as large as the largest type on the statement or other mailing notification.
- A CWS should also create a short, easy to type direct URL.

9. Keep a record!

Remember customer delivery preferences for future CCR deliveries.

10. Remind auto-pay customers!

 To ensure that electronic bill and auto-pay customers are aware of their CCR, a CWS should send a separate CCR-related email.

SUGGESTIONS FOR PRIMACY AGENCIES AND ADDITIONAL RESOURCES

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Suggestions for Primacy Agencies

- Be a resource
 - Share the EPA memo and webinar presentation
 - Write newsletter articles
- Delivery certification
 - Update CCR certification forms
 - Verify the URL listed by the CWS
- Promote best practices
 - Encourage CWSs to share "lessons learned" and best practices
- Keep EPA in the loop
 - Share progress, implementation successes and challenges with your EPA Regional office.

Additional Resources for CCRs

- CCR Rule: Quick Reference Guide
- Guidance Documents
 - Preparing Your Drinking Water Consumer Confidence Report (April 2010)
 - Revised State Implementation Guidance for the CCR Rule (April 2010)
 - Appendix A to the Code of Federal Regulation Title 40, Part 141, Subpart O - Consumer Confidence Report Rule – Table to help with numerical conversions of lab results to CCR units.

http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/compliancehelp.cfm

- EPA's on-line CCR Catalog (http://cfpub.epa.gov/safewater/ccr/index.cfm)
- Update your CCR Catalog link and contact information (http://cfpub.epa.gov/safewater/ccr/index.cfm?action=ccrupdate)
- CCRiWriter (www.ccriwriter.com)

Vow are here: UPA Home a Water a Consumer Information a Consumer Confidence Reports a Where You Live
Where You Live:
Your Drinking Water Quality Reports Online
Consumer Confidence Reports on the State Information

Welcome East-year by July 1st you should receive in the mail an annual water quality reports. However, you can find the name, address, and phone number for your water system by browning the first of systems, in your state.

Any community water system that serves more than 100,000 people in required to make so CCR available to customers on a publishy accessible web-site. Other community water systems may choose to inches CCRs policy on your state on the map below, or

- See if your annual direking water quality reports posted on-line by circking on your state on the map below.

Choose a state or territory from the map below.

Choose a state or territory from the map below.

Please swind frequency questions about flower report.

You may also peaced directly by entering your circ, sown, counts, 207 code, or water system name below.

Please swind frequency on the property of the state of the control of the property of the peace of the control of the control of the peace of the cont

QUESTIONS?

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Contact Information

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202-250-8793

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harris.jamie@epa.gov

202-564-6956

Additional Information

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Important Considerations

- A CWS needs to ensure delivery to every bill-paying customer, which
 may require a combination of paper and/or electronic delivery in a
 service area.
- If a CWS sends the CCR via email and it receives a message that the email failed to reach the customer (i.e., it bounced back) the CWS should send the CCR by an allowable alternative means.
- CWSs should assess their customer bases for specified electronic delivery method capabilities prior to beginning electronic delivery. A CWS should determine which customers do not have access to the Internet and continue delivering a paper CCR.
- Before providing electronic delivery of CCRs to customers, a CWS should conduct public outreach to provide advance notification of the change in delivery approach.
- A CWS mailing a direct URL notification should also consider include a check box on every water bill, similar to a change of address or pay by credit card, in which a customer can elect to receive a paper CCR.

Important Considerations (cont'd)

- When using a mail notification method with a direct URL, a CWS should display the direct URL on every mailing (e.g., quarterly water bill.)
- The direct URL notification should be displayed in typeface that is at least as large as the largest type on the statement or other mailing notification. A CWS should also create a short, easy to type direct URL.
- CWSs sending a direct URL notification or email attachment should include a short message to encourage readership of the CCR.
- Electronic bill and auto-pay customers may not receive and/or may ignore their billing statements. Therefore, to ensure that the customer is aware of how to obtain their CCR a CWS should send a dedicated email (with a CCR-related subject line) to inform their customers of the availability of the CCR each year.

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Important Considerations (cont'd)

- CWSs should manage their email databases regularly to ensure correct emails are being used for electronic delivery to their customers.
- Once a customer requests a paper or electronic CCR for one year, a CWS should keep record of this delivery preference for future CCR deliveries.
- A CWS may want to prepare its CCR in a format (e.g., pdf version) that
 can be delivered both electronically and on paper. This decreases the
 burden of creating two versions for delivery. The format could also
 provide links to other, non-required information on the Internet that all
 consumers can visit for more information.

These considerations are not required by the existing CCR Rule language but are important in continually promoting consumer awareness and confidence.