



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

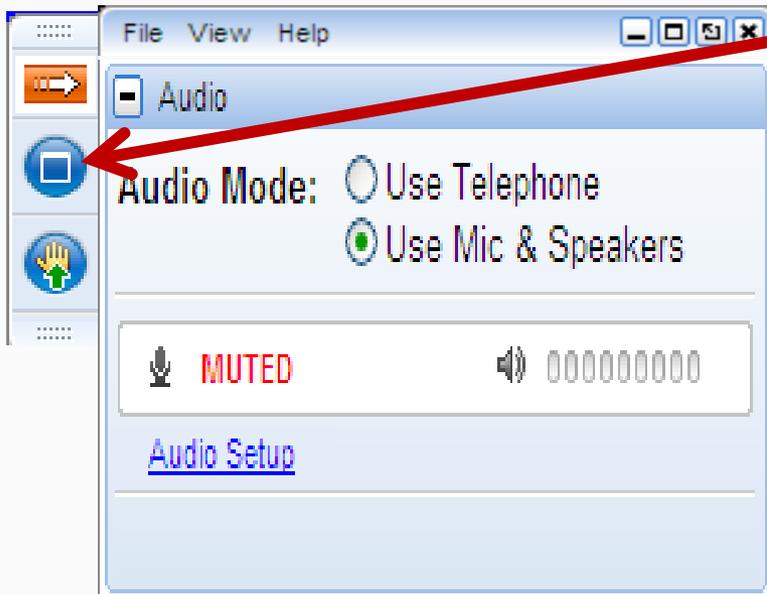
Public Meeting

U.S. EPA

Office of Ground Water and Drinking Water

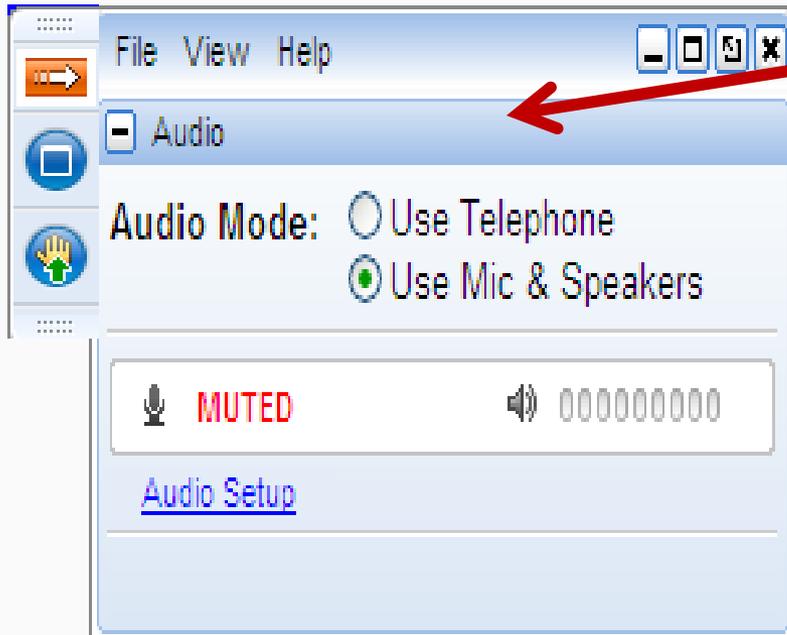
October 1, 2012

Maximize Your Screen



- For a full screen view hit F5 or full screen icon on your console
- To return to the regular view, hit F5 again or regular screen icon
 - You need to be in “regular” view to submit text questions
- Hitting Control + H will also give you a larger view

Audio



- The call in number is located within the Audio box.
- All participants are on mute. We will not be using the chat section of the Webinar unless it is to report technical difficulties.
- Please submit written comments, by October 11, 2012, to ccrretrospectivereview@epa.gov

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Today's Speakers

- **Mindy Eisenberg**, Branch Chief, U.S. EPA
Office of Ground Water and Drinking Water,
Drinking Water Protection Branch
- **Adrienne Harris**, Environmental Scientist, U.S.
EPA Office of Ground Water and Drinking Water,
Drinking Water Protection Branch
- **Jamie Harris**, Environmental Scientist, U.S. EPA
Office of Ground Water and Drinking Water,
Drinking Water Protection Branch
- **Thomas Noble**, Horsley Witten Group, Facilitator

Outline

- I. Consumer Confidence Report (CCR) Rule Overview
- II. CCR Rule Retrospective Review Analysis
- III. Draft CCR Electronic Delivery Options and Considerations Document
- IV. Draft CCR Electronic Delivery Methods
- V. Draft CCR Delivery Implementation Approaches for Bill-Paying Customers
- VI. Next Steps



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.
 - Key information required:
 - System information and source of water
 - Detected contaminants
 - Compliance with regulations
 - Specific educational material

Community Water System Reporting and Recordkeeping Requirements

- Mail or otherwise directly deliver a copy of the CCR to each of their customers by July 1 annually.
- Make a good faith effort to provide CCRs to non-bill-paying consumers.
- Send a copy to the director of the primacy agency (e.g., state drinking water program.)
- Submit to the primacy agency a certification, within 3 months of mailing, that the community water system distributed the CCR, and that the content is correct.
- If the community water system serves 100,000 or more people, post the CCR on the Internet.



CCR RULE RETROSPECTIVE REVIEW ANALYSIS

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.
- Evaluated listening session feedback and other information gathered.
- September 2012 – Released Draft CCR Electronic Delivery Options and Considerations document
- October 2012 - Public listening session.
- Complete review by end of 2012.

Summary of the Retrospective Review

- The Retrospective Review includes the five topics identified by stakeholders including electronic delivery of CCRs.
- EPA examined how similar industries adapted the delivery information to electronic methods.
- Based on research, EPA identified:
 - 5 draft methods of electronic delivery, and
 - 2 draft implementation approaches
- EPA also identified delivery methods that are not consistent with the existing regulation.

Purpose of Listening Session

- This is a listening session on electronic delivery of the CCR.
- Feedback on draft electronic delivery methods and approaches document.
 - Community water system implementation.
 - Customer acceptance.

Key Points From Review

- In order to meet the SDWA and CCR Rule requirement of directly delivering a CCR to every customer a community water system may need to use a combination of paper and/or electronic delivery.
- There is not one solution that will fit every customer and every community water system.
- Community water systems may want to take the time to find out what customers prefer before implementing an approach.
- Projected cost savings may not be immediate.
- All customers may not be ready for electronic delivery.¹³

Independent Surveys and Pilot Studies

- American Water Works Association (AWWA) Consumer Survey (2011)
 - Preferred CCR delivery methods
 - Confidence in water quality from CCR
- AWWA Cost Savings Utility Survey (2012)
 - Electronic delivery method preference
- 2012 Minnesota CCR Pilot Study
 - Post consumer delivery survey
- Community Water System Electronic Delivery Pilots
 - York County, PA, Ames, IA & Phoenix, AZ

EPA Analysis

Market Research Information

- Market research conducted on the process of electronic delivery of product(s) in similar industries.
- Researched drinking water, wastewater, stormwater, public safety and energy sectors.
- Suggestions for electronic delivery based on market research:
 - Mail postcard w/ multiple delivery options
 - Electronic billers “opt-in” for electronic delivery

EPA Analysis

Cost Savings Estimate

- Estimated savings for systems serving 10,000 or greater persons.
- Data sets:
 - AWWA utility and customer surveys
 - Minnesota customer survey
 - EPA Information Collection Request for the Public Water System Supervision Program
- Identify the “break even point.”
- Compare mail vs. electronic delivery costs.



**DRAFT CCR ELECTRONIC
DELIVERY OPTIONS AND
CONSIDERATIONS DOCUMENT**

Electronic Delivery

- The CCR rule states that a community water system must “mail or otherwise directly deliver” a copy of the CCR to each customer by July 1, annually.
- EPA interprets the existing rule language “mail or otherwise directly deliver” to allow any form of delivery of the CCR, including electronic, so long as the system is providing the report directly to each customer.
- Product of retrospective review: EPA interpretive memo with attachment providing details and considerations.

Draft CCR Electronic Delivery Options and Considerations Document

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



CCR ELECTRONIC DELIVERY METHODS

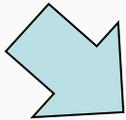
(DESCRIBED IN DRAFT DOCUMENT)

Electronic Delivery Methods and Approaches

2 Draft Implementation Approaches

1. Paper CCR Delivery with Electronic CCR Delivery Option

2. Electronic Delivery with Paper CCR Delivery Option



5 Draft Electronic Delivery Methods

1. CCR is embedded in the email message
2. Email the CCR as a file attachment
3. Email direct URL to CCR
4. Mail direct URL to CCR
5. Additional electronic delivery that satisfies “otherwise directly deliver”



Electronic Delivery

“Directly Deliver” Requirement

- EPA interprets the existing rule language so that two elements must be met for electronic delivery to comply with the requirement to “directly deliver”:
 - The community water system must provide a direct URL to the CCR or provide the CCR by email.
 - If a community water system is aware of a customer’s inability to receive a CCR electronically, it must continue providing a paper CCR (or follow requirements for distribution by other means if the system has a small system mailing waiver.)

Potential Limitations Using Email

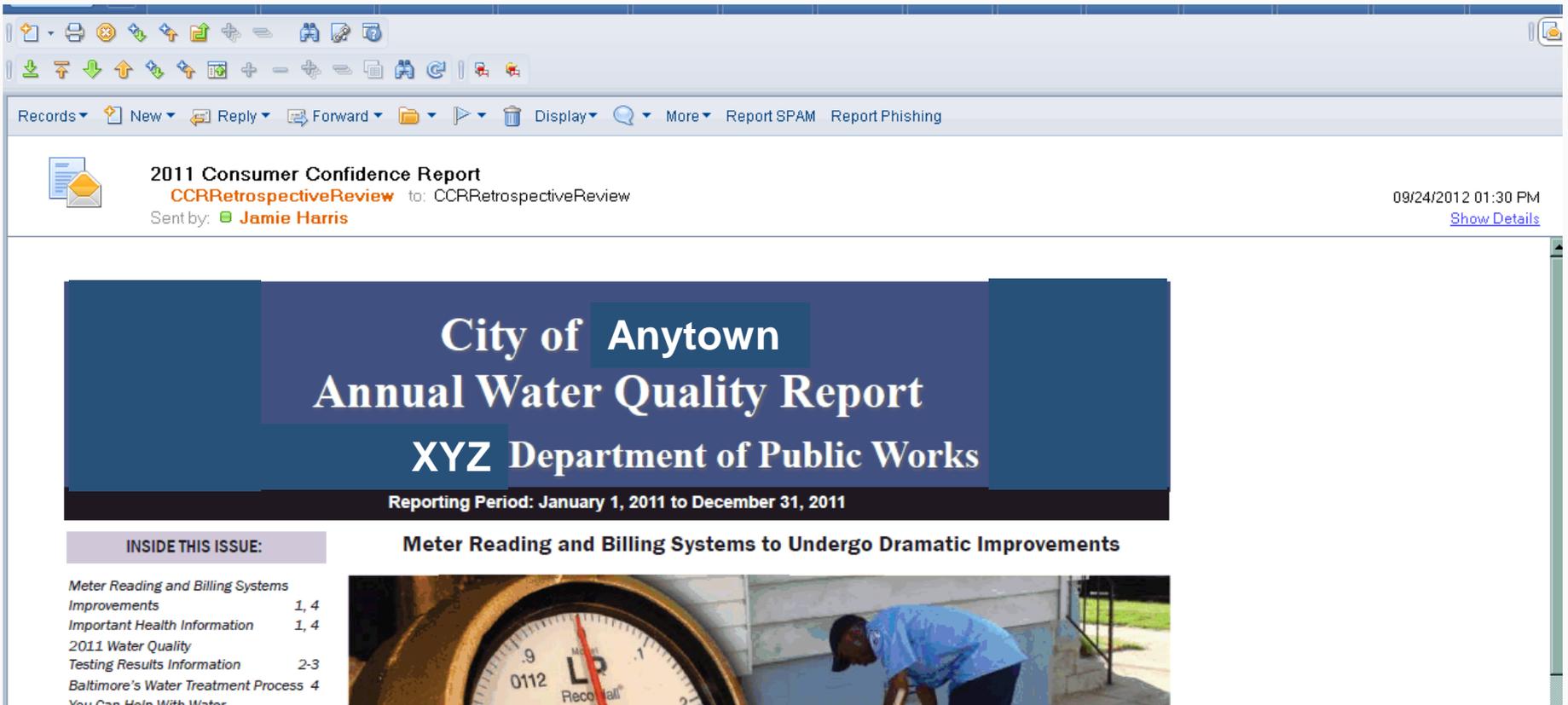
- Technology costs - software, bandwidth, etc.
- Technology hurdles - software compatibility, spam filters, firewalls or file size limitations.
- Obtaining and maintaining accurate email addresses.
- Customer reluctance with unfamiliar email or attachments.

Draft Methods for Electronic Delivery of CCRs

1. CCR is embedded in the email message

- Community water system emails the CCR text and tables inserted into the body of an email (not as an attachment.)

Example of Embedded Email



The screenshot shows an email client interface with a toolbar at the top containing icons for print, delete, undo, redo, and other actions. Below the toolbar is a menu bar with options like 'Records', 'New', 'Reply', 'Forward', 'Display', 'More', 'Report SPAM', and 'Report Phishing'. The email header displays the subject '2011 Consumer Confidence Report', the sender 'CCRRetrospectiveReview', and the recipient 'to: CCRRetrospectiveReview'. The email was sent by 'Jamie Harris' on '09/24/2012 01:30 PM'. A 'Show Details' link is visible in the top right corner.

2011 Consumer Confidence Report
CCRRetrospectiveReview to: CCRRetrospectiveReview
Sent by: Jamie Harris

09/24/2012 01:30 PM
[Show Details](#)

City of Anytown Annual Water Quality Report XYZ Department of Public Works

Reporting Period: January 1, 2011 to December 31, 2011

INSIDE THIS ISSUE:

- Meter Reading and Billing Systems to Undergo Dramatic Improvements
- Important Health Information 1, 4
- 2011 Water Quality
- Testing Results Information 2-3
- Baltimore's Water Treatment Process 4
- You Can Help With Water



The image shows a close-up of a water meter with a dial and a needle. The dial has numbers 0, 1, 2, 3, 4, 5, 6, 7, 8, 9 and the text '0112' and 'Recorall'. A utility worker in a blue shirt and cap is leaning over, working on the meter.

Draft Methods for Electronic Delivery of CCRs

2. Email the CCR as a file attachment

- Community water system emails the CCR as an electronic file email attachment (e.g., portable document format (PDF)).

Example of Email Attachment



2011 Consumer Confidence Report

CCRRetrospectiveReview to: [CCRRetrospectiveReview](#)

Sent by: **Jamie Harris**

09/24/2012 01:42 PM

[Show Details](#)

In 2011 XYZ Water System was in compliance with all EPA and Anystate drinking water regulations. You will find the details of your drinking water in your 2011 Consumer Confidence Report which is found in an attachment to this email.

If you have any questions, or would prefer a paper version of this report, please contact us at (xxx) xxx-xxxx.

Thank you,

Jane Doe
XYZ Water System
General Manager



2011 XYZ Consumer Confidence Report.pdf



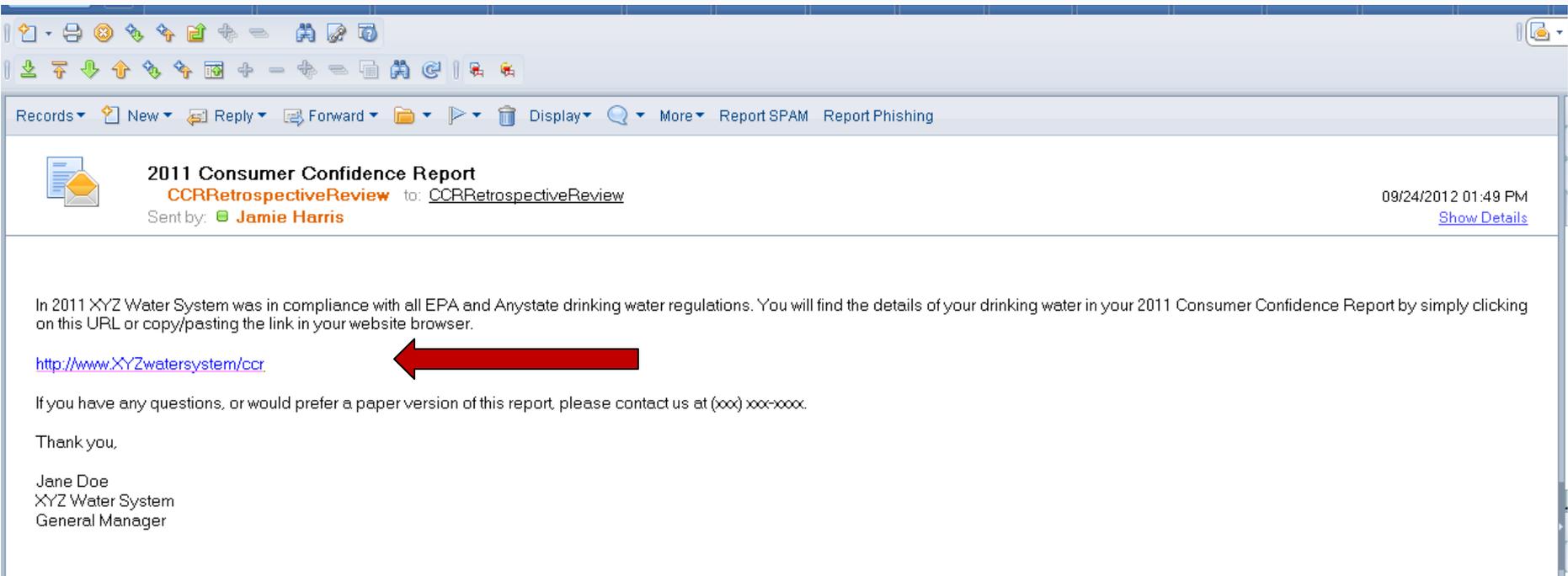
XYZ Water System
PO Box 333
Anytown, Anystate

Draft Methods for Electronic Delivery of CCRs

3. Email direct URL to CCR

- Community water system emails a direct URL to the CCR on a publicly - available Internet site.
- The URL must navigate directly to a webpage that displays the CCR.

Example of a Direct URL Link in an Email



Draft Methods for Electronic Delivery of CCRs

4. Mail direct URL to CCR

- Community water system mails to each bill-paying customer a notification that the CCR is available and provides a direct URL to the CCR where it can be viewed.
- The URL must navigate directly to a webpage that displays the CCR.
- The mail method for the notification may be, but is not limited to, a postcard, water bill insert, statement on the water bill or community newsletter.

Example of a Postcard Notice

2011 CONSUMER CONFIDENCE REPORT
City of xxxxxxxx, PWSID xxxxxxx

Dear Customers,

In an effort to Go Green your community water supply is now posting the 2011 Drinking Water Report (CCR) on the web in lieu of sending the report to you by mail.

- In 2011 your public water supply exceeded the lead action level
- Optional - In 2011 no contaminants were detected at levels that violated federal drinking water standards

Please go to: www.webaddresshere.com to learn about the quality of your drinking water. You can also contact XXX/XXX-XXXX to request a paper copy of the report.

Example of Notice on Bill Statement



Water	\$50.82
R-O-W Recovery Fee	\$22.50
Sanitary Sewer	\$38.83
TOTAL CURRENT CHARGES	\$112.15
TOTAL AMOUNT DUE	\$112.15

METER READINGS

Current Date	Current Reading	Previous Date	Previous Reading	Usage	Days
4/3/12	2410	10/10/11	2389	21	176
Total				21	176
Prior Period				32	88



SPRWS meets all standards for drinking water quality. To read the full water quality report, go to www.xyzwatersystem/ccr in effort to 'go green,' paper copies are only available upon request at _____

SPRWS satisfae todos los estándares de calidad de agua potable. Por favor dirijase a _____ para leer el reporte completo de calidad del agua. Copias en papel del reporte solamente son disponibles llamando al _____

SPRWS waxay la kullida dhamaan heerarka u dagan tayada biyaha la cabo. Si aadi u akhrisid dhamaan warbixinta ku saabsan tayada biyaha, tag www.stpaul.gov/waterquality. Waxaa la heli karaa kooxda warqadaha marka laga codsado tel. _____

SPRWS ua tau zoo raabta tag nrho cov quag ntawm dej zoo haus. Xav nyeem tsab ntawv. oeb toom tag nrho trog dej zoo haus, mus rau _____ . Tsuas muaj cov ntawv luam tawm yog nuos ntawm _____



Moving? Please call Customer Service at _____ ; TDD hearing impaired at _____
 E-mail us at _____

Detach here and mail bottom portion with your payment.

Account Number: _____

Draft Methods for Electronic Delivery of CCRs

- 5. Additional electronic delivery that satisfies “otherwise directly deliver” (to account for future technologies)**
 - Community water system delivers CCR through a method that will “otherwise directly deliver” to each bill-paying customer and in coordination with the primacy agency.

CCR Delivery Methods Not Allowed

EPA also identified current electronic delivery methods that do not meet existing CCR Rule requirements.

- Providing customers with an indirect URL to their CCR which would require the customer to search on a website and possibly not find the CCR is not “directly delivering” the CCR.
- Solely using social media (e.g., Twitter or Facebook) for bill-paying 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.



CCR IMPLEMENTATION DELIVERY APPROACHES FOR BILL-PAYING CUSTOMERS

(Described in draft document)

CCR Delivery Approaches for Bill-Paying Customers

1. Paper CCR Delivery with Electronic CCR Delivery Option
 - Community water system informs customers of the electronic delivery option and registers customers who identify electronic delivery preference.
 - The community water system may obtain this delivery preference through a variety of methods (e.g., community newsletter or postcard).
 - If customer does not identify electronic delivery preference, community water system delivers paper CCR.

CCR Delivery Approaches for Bill-Paying Customers

2. Electronic Delivery with Paper CCR Delivery Option
 - Community water system delivers CCR electronically, with an option to request paper CCR delivery.
 - Customer must respond if they do not wish to receive their CCR electronically.

Electronic Delivery Considerations

- Conduct public outreach to inform customers of the upcoming change in delivery method and opportunity to contact the community water system with any concerns.
- Display the direct URL to the CCR on every mailing (e.g., quarterly water bill.)
- Send a dedicated email (with a CCR-related subject line) informing customers of the availability of the CCR each year.
- Manage email databases regularly to ensure correct emails are being used for electronic delivery to customers.
- A community water system may want to consider keeping a record of each customer's delivery preference for future CCR deliveries.

Additional Aspects of CCR Rule Requirements

- “Good faith” effort for non-bill paying consumers (e.g., apartment tenants)
 - Recommend practices to reach non-bill paying customers electronically such as social media.
- Multilingual requirement
 - Community water systems may want to put email notices in the languages required by the primacy agency for this section of the CCR Rule.
- Small system delivery waivers
 - Electronic delivery does not replace delivery waivers but is an option for small systems.
- Delivery certification requirement
 - Primacy agencies may want to add an option for electronic delivery to their certification form.

Summary

- Provided a framework for electronic delivery of the CCR.
- There are 2 implementation approaches and 5 electronic delivery methods.
- Outlined some considerations for community water systems before carrying out electronic delivery.
- Highlighted aspects of CCR Rule that still must be met.
- **Bottom line: Community water systems must make sure that CCRs are being directly delivered to all bill-paying customers.**



NEXT STEPS

Next Steps

- Public comments through October 11, 2012.
- End of year release:
 - EPA CCR Interpretive Memo
 - CCR Electronic Delivery Options and Considerations (memo attachment)
 - Summary Issues Document
- Planning for outreach activities in 2013.



**Please submit comments to:
ccrretrospectivereview@epa.gov**

Prepared Statements



Facilitated Discussion



Discussion Ground Rules

- 1. Participate to the fullest of your ability.**
- 2. Speak from your own experience.**
- 3. Listen actively -- Do not interrupt others as they are speaking.**
- 4. Be respectful of others' opinions and ideas.**
- 5. Feel free to build on what others are saying.**
- 6. Work to understand others' point of view by asking questions to clarify.**
- 7. The goal is for EPA to gain a deeper understanding of your thoughts and ideas.**

Electronic Delivery Methods and Approaches

2 Draft Implementation Approaches

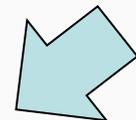
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