



Stage 1 Business Analysis

California Department of Technology, SIMM 19A.2 (Rev. 2.4), Revised 4/2/2018

1.1 General Information

Agency or State Entity Name:	State Water Resources Control Board
Organization Code:	3940
Proposal Name:	Lead and Copper Rule Revision Project
Proposal Description:	The State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW) proposes a data collection, evaluation, and tracking tool to meet the requirements of the U.S. Environmental Protection Agency (EPA) Lead and Copper Rule Revision.
When do you want to start this project?	7/1/2022
Department of Technology Project Number:	3940-105

1.2 Submittal Information

Contact Information:	
Contact First Name	Contact Last Name
Cheryl	Holden
Contact Email	Contact Phone Number
Cheryl.Holden@waterboards.ca.gov	(916) 327-0003
Submission Date:	6/30/2021
Version Number:	1.0

Project Approval Executive Transmittal

Attachment: Include the Project Approval Executive Transmittal as an attachment to your email submission.

1.3 Business Sponsorship

Executive Sponsors

Title	First Name	Last Name	Business Program Area
Deputy Director	Darrin	Polhemus	Division of Drinking Water

Select + to add additional Executive Sponsors

Business Owners

Title	First Name	Last Name	Business Program Area
Assistant Deputy Director	Andrew	Altevogt	Division of Drinking Water
Supervising WRCE	Betsy	Lichti	Division of Drinking Water

Select + to add additional Business Owners

Program Background and Context

Published on January 15, 2021, U.S. Environmental Protection Agency (EPA) finalized the first major update to the Lead and Copper Rule (LCR) in nearly 30 years. EPA's new Lead and Copper Rule Revisions (LCRR) strengthen every aspect of the LCR to better protect communities and children in elementary schools and childcare facilities from the risks of lead exposure. The new Rule will get the lead out of our nation's drinking water and empower communities through required public education information.

The Center for Disease Control and Prevention (CDC) states that there is no safe level of lead in blood levels of children. Reducing lead in drinking water is a critical step to reducing children's overall lead exposure. In 1974, the USEPA



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established a maximum contaminant level goal (MCLG) for lead of zero, or no lead is safe. The current LCR, promulgated nearly 30 years ago, relied on corrosion control treatment to reduce the risk of lead. The new LCRR relies more on direct material inventory of lead within a water system and removal of the lead material. The LCRR also contains direct sampling of schools and childcare facilities to protect the most vulnerable populations. Flint Michigan and Washington DC were in the headlines for widespread lead poisoning within their cities. Both cities were in compliance with the existing rule for much of the last 30 years. The additions in the LCRR will protect the citizens of California from the public health and safety risks of lead.

The LCRR requires the state drinking water programs to continue the current lead and copper rule program as well as add additional program elements not associated with any current program. This proposal seeks to develop an electronic intake system for water systems to upload required documentation and certifications, compliance forms and data in a secure portal with the ability for staff to review and query for compliance. Community water systems (2,876) and Non-transient Non-community water systems (1,492) in California will be required to comply with the LCRR (total 4,368).

1.4 Stakeholders



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Key Stakeholders		
Org. Name	Community, Non-Transient and Non-Community Water Systems	
Internal or External?	<input type="checkbox"/> Internal <input checked="" type="checkbox"/> External	
When is the Stakeholder impacted?		
Input to Business Process	During the Business Process	Output of the Business Process
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
How are Stakeholders impacted? Water systems lack adequate tools needed to report required information. This proposal will assist in compliance with state and federal law.		
How will the Stakeholders participate in the project? Participate in project activities related to the build.		
Org. Name	SWRCB Division of Drinking Water (DDW)	
Internal or External?	<input checked="" type="checkbox"/> Internal <input type="checkbox"/> External	
When is the Stakeholder impacted?		
Input to Business Process	During the Business Process	Output of the Business Process
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
How are Stakeholders impacted? Lack of tools and technology to allow full implementation of state and federal mandates.		
How will the Stakeholders participate in the project? DDW will actively participate in project planning and development activities, interact and engage internal and external stakeholders and supervise staff responsible for implementing and managing the solution.		
Org. Name	SWRCB Division of Information Technology (DIT)	
Internal or External?	<input checked="" type="checkbox"/> Internal <input type="checkbox"/> External	
When is the Stakeholder impacted?		
Input to Business Process	During the Business Process	Output of the Business Process
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
How are Stakeholders impacted? DIT will be responsible for hosting and maintaining the solution.		
How will the Stakeholders participate in the project? DIT will participate in all levels of the project, providing project management services during planning and development and maintenance services upon implementation of the project.		

Select + to add additional Stakeholders

1.5 Business Program

Org. Name	Name	
State Water Resources Control Board	Division of Drinking Water	
When is the unit impacted?		
Input to the Business Process	During the Business Process	Output of the Business Process
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
How is the business program unit impacted? Considerable effort will be required to continue the current lead and copper rule program as well as add additional program elements not associated with any current program and bring 4,368 water systems into compliance.		



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Org. Name	Name
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How will the business program participate in the project?

DDW will define the requirements, risk, issues, and resolutions related to the development of tools and utilize the business process output for regulatory needs.

Select + to add additional Business Programs

1.6 Business Alignment

Business Driver(s)

Financial Benefit

Increased Revenue	Cost Savings	Cost Avoidance	Cost Recovery
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Mandate(s)

State	Federal
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Improvement

Better Services to Citizens	Efficiencies to Program Operations	Improved Health and/or Human Safety	Technology Refresh
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Security

Improved Information Security	Improved Business Continuity	Improved Technology Recovery	Technology End of Life
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Strategic Business Alignment

Strategic Plan Last Updated?	6/30/2010
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Strategic Business Goal	Alignment
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Goal 6: Ensure Water Board processes are thorough, effective, efficient, consistent, and predictable; and promoting fair and equitable application of laws, regulations, policies, and procedures.	The U.S. EPA and the State Water Board have prioritized the need for fair and consistent regulation statewide. The implementation of the LCRR allows the Water Boards to provide consistent regulations to the 4,368 water systems required to comply with the LCRR. The system will align data collection activities across the state to ensure data consistency and reduce duplication across the Water Board.
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Select + to add additional Business Goals and Alignment

Executive Summary of the Business Problem or Opportunity

On January 15, 2021, U.S. Environmental Protection Agency (EPA) published the Lead and Copper Rule Revisions (LCRR), the first major update to the Lead and Copper Rule in nearly 30 years. A total of 4,368 California water systems will be required to comply with the LCRR. This proposal seeks to develop an electronic intake system for water systems to upload required documentation and certifications, compliance forms and data in a secure portal with the ability for staff to review and query for compliance.



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Business Problem or Opportunity and Objectives Table	
Problem ID	Problems/Opportunities
1.0	The DDW will be able to effectively implement the LCRR program and provide safe and affordable drinking water from lead and copper corrosion for Californians who currently lack access to it.
Objective ID	1.1
Objectives	Reduce lead and copper exposure in the drinking water provided to all Californians.
Metric	Numeric count
Baseline	74 water systems (2%) are greater than the action level in the lead and copper rule.
Target	0% of water systems will be greater than the action level of the lead and copper rule by December 2027.
Measurement Method	Number of water systems with greater than the action level in the lead and copper rule.
<i>Select + to add additional Objectives</i>	
2.0	The 4,368 water systems that will need to comply with the LCRR are currently regulated by 24 district offices and 29 LPA County programs. The DDW does not have a data intake system to allow water systems to upload required documents for review and approval. With the current system, the LCRR requirements will be handled by 53 different entities causing inefficient use of state resources.
Objective ID	2.1
Objectives	Improve data quality and provide consistent and effective implementation of the LCRR by consolidating work to one entity by January 2025.
Metric	Numeric count
Baseline	53 units
Target	1 units
Measurement Method	Number of implementation units
<i>Select + to add additional Objectives</i>	
3.0	The LCRR contains new requirements to the existing program and added programs. New requirements for the 4,368 systems include, regulatory start up and training of water systems and staff, modified tap sampling plans based off the material inventory and corrosion control and re-optimization criteria. New programs include the material inventory (CA has information on half of the service lines at this time for community water systems and no information on non-transient non-community water systems), trigger level exceedances and requirements, public education, public notifications, find and fix, school sampling and child care center sampling. The LCRR requires water systems to certify to the state 22 places in the LCRR which are not included in the current rule.
Objective ID	3.1
Objectives	Create a single on line portal for water systems to submit their inventories and certifications by January 2025.
Metric	Numeric count
Baseline	53 intake locations
Target	1 intake locations
Measurement Method	Number of intake locations
<i>Select + to add additional Objectives</i>	
<i>Select + to add additional Problems</i>	
Project Approval Lifecycle Completion and Project Execution Capacity Assessment	



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1. Does the proposal development or project execution anticipate sharing resources (state staff, vendors, consultants or financial) with other priorities within the Agency/state entity (projects, PALs, or programmatic/technology workload)?

Yes No Clear

2. Does the Agency/ state entity anticipate this proposal will result in the creation of new business processes or changes to existing business processes?

No New Processes Existing Processes Both New and Existing Clear

1.7 Project Management

Project Management Risk Score: 4.5

Attach completed Statewide Information Management Manual (SIMM) Section 45 Appendix A: Include the completed SIMM 45 Appendix A as an attachment to your email submission.

Existing Data Governance and Data

<p>1. Does the Agency/state entity have an established data governance body with well-defined roles and responsibilities to support data governance activities? If an existing data governance org chart is used, please attach.</p>	<p><input type="radio"/> Unknown <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear</p>	<p>If applicable, include the data governance org chart as an attachment to your email submission.</p>
<p>2. Does the Agency/state entity have data governance policies (data policies, data standards, etc.) formally defined, documented, and implemented? If yes, please attach the existing data governance plan, policies or IT standards used.</p>	<p><input type="radio"/> Unknown <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear</p>	<p>If applicable, include the data governance policies as an attachment to your email submission.</p>
<p>3. Does the Agency/state entity have data security policies, standards, controls, and procedures formally defined, documented, and implemented? If yes, please attach the existing documented security policies, standards, and controls used.</p>	<p><input type="radio"/> Unknown <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear</p>	<p>If applicable, include the documented security policies, standards, and controls as an attachment to your email submission.</p>
<p>4. Does the Agency/state entity have user accessibility policies, standards, controls, and procedures formally defined, documented, and implemented? If yes, please attach the existing documented policies, accessibility governance plan, and standards used, or provide additional information below.</p>	<p><input type="radio"/> Unknown <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear</p>	<p>If applicable, include the documented accessibility policies, standards, and controls as an attachment to your email submission.</p>



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Project Management Risk Score:	4.5
5. Do you have existing data that you are going to want to access in your new solution?	<input type="radio"/> Unknown <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear
If applicable, include the data migration plan as an attachment to your email submission.	
6. If data migration is required, please rate the quality of the data.	Some issues identified with the existing data

1.8 Criticality Assessment

Business Criticality	
Legislative Mandates:	N/A <input type="checkbox"/>
Bill Number(s)/Code(s):	Federal Register Volume 86, Number 10, Section 141.2 - 142.16
Language that includes system relevant requirements:	
Business Complexity Score	2.6
Include the completed SIMM 45 Appendix C as an attachment to your email submission.	

Noncompliance Issues					
Indicate if your current operations include noncompliance issues and provide a narrative explaining the how the business process is noncompliant.					
Programmatic Regulations	HIPPA/CJIS/FTI/PII/PCI	Security	ADA	Other	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1. What is the proposed project start date?	7/1/2022
2. Is this proposal anticipated to have high public visibility?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear

If "Yes," please identify the dynamics of the anticipated high visibility below:
 Community water systems (2,876) and Non-transient Non-community water systems (1,492) in California will be required to comply with the LCRR (total 4,368) to reduce lead exposure to all Californians, especially infants and children.

3. If there is an existing Privacy Information Assessment, include as an attachment to your email submission.	
4. Does this proposal affect business program staff located in multiple geographic locations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear

If "Yes," provide an overview of the geographic dynamics below and enter the specific information in the space provided.

City	State	Number of Locations	Approximate Number of Staff

Select + to add Locations

1.9 Funding

1. Does the Agency/state entity anticipate requesting additional resources through a budget action to complete the project approval lifecycle?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear
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1. Does the Agency/state entity anticipate requesting additional resources through a budget action to complete the project approval lifecycle?		<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear
2. Will the state possibly incur a financial sanction or penalty if this proposal is not implemented? If yes, please identify the financial impact to the state below:		<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear
3. Has the funding source(s) been identified for this proposal?		<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear
FUNDING SOURCE		FUND AVAILABILITY DATE
General Fund	<input type="checkbox"/>	Date Picker
Special Fund	<input type="checkbox"/>	Date Picker
Federal Fund	<input type="checkbox"/>	Date Picker
Reimbursement	<input type="checkbox"/>	Date Picker
Bond Fund	<input type="checkbox"/>	Date Picker
Other Fund	<input checked="" type="checkbox"/>	7/1/2022
If "Other Fund" is checked, specify the funding:	The Safe Drinking Water Act Fund is made up of fees from the public water systems that we regulate. The fees will need to be adjusted to compensate for the additional costs.	

1.10 Reportability Assessment

1. Does the Agency/state entity's IT activity meet the definition of an IT Project found in the State administrative Manual (SAM) Section 4819.2? If "No," this initiative is not an IT project and is not required to complete the Project Approval Lifecycle.		<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear
2. Does the activity meet the definition of Maintenance or Operations found in SAM Section 4819.2? If "Yes," this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report. And provide an explanation below.		<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear
3. Has the project/effort been previously approved and considered an ongoing IT activity identified in SAM Section 4819.2, 4819.40? If "Yes," this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report.		<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear



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<p>1. Does the Agency/state entity anticipate requesting additional resources through a budget action to complete the project approval lifecycle?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear</p>
<p>4. Is the project directly associated with any of the following as defined by SAM Section 4812.32?</p> <p>Single-function process-control systems; analog data collection devices, or telemetry systems; telecommunications equipment used exclusively for voice communications; Voice Over Internet Protocol (VOIP) phone systems; acquisition of printers, scanners and copiers.</p> <p>If “Yes,” this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear</p>
<p>5. Is the primary objective of the project to acquire desktop and mobile computing commodities as defined by SAM Section 4819.34, 4989?</p> <p>If “Yes,” this initiative is a non-reportable project. Approval of the Project Approval Lifecycle is delegated to the head of the state entity. Submit a copy of the completed, approved Stage 1 Business Analysis to the CDT and track the initiative on the Agency Portfolio Report.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear</p>
<p>6. Does the project meet all of the criteria for Commercial-off-the-Shelf (COTS) Software and Cloud Software-as-a-Services (SaaS) delegation as defined in SAM 4819.34, 4989.2 and SIMM 22</p> <p>If “Yes,” this initiative is a non-reportable project. Approval of the Project Approval Lifecycle is delegated to the head of the state entity; however, submit an approved SIMM Section 22 form to CDT.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear</p>
<p>7. Will the project require a Budget Action to be completed?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear</p>
<p>8. Is it anticipated that the project will exceed the delegated cost threshold assigned by CDT as identified in SIMM 10?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear</p>
<p>9. Are there any previously imposed conditions place on the state entity or this project by the CDT (e.g., Corrective Action Plan)?</p> <p>If “Yes,” provide the details regarding the conditions below.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear</p>
<p>10. Is the system specifically mandated by legislation?</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear</p>

Department of Technology Use Only

Original “New Submission” Date	7/19/2021	
Form Received Date	7/19/2021	
Form Accepted Date	7/19/2021	
Form Status	Completed	
Form Status Date	7/19/2021	
Form Disposition	Approved	If “Other,” specify:
Form Disposition Date	7/19/2021	



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