



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:	California Environmental Protection Agency (CalEPA)
Organization Code:	0555
Proposal Name:	CERS NextGen
Proposal Description:	CERS NextGen will implement a new solution or move the current version of CERS to a supported platform and introduce enhancements to re-align CERS with current business processes and to meet current and future Unified Program needs.
When do you want to start this project?:	1/3/2022
Department of Technology Project Number:	0555-018

1.2 Submittal Information

Contact Information:	
Contact First Name	Contact Last Name
Schumin	Wong
Contact Email	Contact Phone Number
Schumin.wong@calepa.ca.gov	916-327-5719
Submission Date:	Date Picker
Version Number:	
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
Assistant Secretary	Jason	Boetzer	Local Program Coordination and Emergency Response

Select + to add additional Executive Sponsors

Business Owners			
Title	First Name	Last Name	Business Program Area
Unified Program Manager	John	Paine	Unified Program

Select + to add additional Business Owners

Program Background and Context
The California Environmental Protection Agency (CalEPA) oversees the statewide implementation of the Unified Program that protects Californians from hazardous waste and hazardous materials. The Unified Program ensures consistency throughout the State concerning administrative requirements, permits, inspections, and enforcement of environmental and emergency management programs. The Unified Program includes 81 certified local government agencies, or Certified Unified Program Agencies (CUPAs). It also includes the CUPAs' 24 subordinate agencies, or Participating Agencies (PAs).

CalEPA is also responsible for supporting and maintaining the California Environmental Reporting System (CERS). CERS was established under California Legislative law, Health and Safety Code and Assembly Bill 2286, as a statewide information management system capable of receiving all data collected by the Unified Program agencies and reported by regulated businesses. All regulated businesses and local UPAs are required to submit Unified Program information electronically either through local regulatory agency (which is then transferred to CERS), or directly to CERS. CERS



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supports electronic data exchange among regulated businesses, local governments, and to United States Environmental Protection Agency (US EPA).

CERS was established in 2009, based on the existing standardized paper model (e.g., reporting form) and statutes, regulations, and environmental regulatory program processes. At the time, large and mid-sized CUPAs communicated that they were creating local reporting portals that would interface with the CERS and it was assumed that these local reporting portals will be the primary reporting portals for regulated business. The actual implementation of the CUPA reporting portals has been very different. As of 2018, only five CUPAs have partially implemented reporting portals, and that number has since declined to four. Most of the regulated businesses report through CERS. Virtually all business data flows from the state to the CUPAs and only a subset of the data flows from the CUPAs to the state. Modifications to CERS to accommodate business needs have been hampered by the rigid XML Schema as they also require all 81 CUPAs to modify their data systems. This has resulted in only the most critically necessary changes being made.

The technology supporting CERS is near-end-of life and a technology refresh is required. As many of the assumptions and processes that CERS was originally based on are no longer valid or have significantly changed, CalEPA is embarking on the CERS NextGen project to move CERS to a supported platform, streamline processes, and re-align with the overall goals of the Unified Program.

1.4 Stakeholders

Key Stakeholders

Org. Name	Name
Statewide CUPAs	Represented by the CUPA Forum Board
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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

How are Stakeholders impacted?

CUPAs are required to process the data submitted by the regulated businesses and report on their compliance and enforcement actions to CERS. This can be done either directly through CERS, or through Electronic Data Transfers (EDTs). The data reported in CERS is used during CalEPA's Unified Program evaluates the CUPA's performance every 3 years.

How will the Stakeholders participate in the project?

The California CUPA Forum was formed to provide a single statewide organization consolidating unified program implementation efforts and representing all Unified Program Agencies with a single voice. The CUPA Forum Board regularly meets with CalEPA Unified Program to discuss CERS and other issues as it relates to the Unified Programs. Representatives of the CUPAs and the Forum Board will be consulted throughout the project and maybe assigned tasks as it relates to standardizing CUPA processes. The representatives will keep the Forum Board advised on the status of the project and the CUPAs at large will be kept informed of the project via updates in the monthly CERS newsletter.

Org. Name	Name
Statewide regulated businesses	Represented by Industry Technology Advisory Group and California Council for Environmental and Economic Balance
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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>



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How are Stakeholders impacted?

Regulated businesses are required to report their data electronically either through a local CUPA portal (which is then transferred to CERS), or directly through CERS.

How will the Stakeholders participate in the project?

With over 120,000 regulated businesses in California, the businesses will primarily be represented by the established Industry Technology Advisory Group (Industry TAG) and the California Council for Environmental and Economic Balance (CCEEB). Representatives from the groups will be consulted throughout the project. Businesses at large will be kept informed on the project via the monthly CERS newsletter.

Org. Name

U.S. EPA

Name

RCRA and UST Programs

Internal or External?

☐ Internal ☒ External

When is the Stakeholder impacted?

Input to Business Process

During the Business Process

Output of the Business Process

☐

☐

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How are Stakeholders impacted?

USEPA receives data on facilities and underground storage tanks from CERS via EDT.

How will the Stakeholders participate in the project?

Representatives of the U.S. EPA programs that receive data from CERS will be consulted during the project.

Org. Name

Department of Toxic Substances Control (DTSC)

Name

Hazardous Waste Management Program

Internal or External?

☐ Internal ☒ External

When is the Stakeholder impacted?

Input to Business Process

During the Business Process

Output of the Business Process

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How are Stakeholders impacted?

State agency partners involved in the implementation of the Unified Program are responsible for setting program element standards, working with CalEPA to ensure program consistency and providing technical assistance to CUPAs and PAs. DTSC evaluates and provides technical assistance for the Hazardous Waste Generator Program, including Onsite Treatment (Tiered Permitting) and the Resource Conservation Recovery Act (RCRA).

How will the Stakeholders participate in the project?

Representatives of DTSC will be consulted throughout the project. May be responsible for rulemaking if required for changes to their programs.

Org. Name

State Water Resources Control Board

Name

UST Program

Internal or External?

☐ Internal ☒ External

When is the Stakeholder impacted?

Input to Business Process

During the Business Process

Output of the Business Process

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How are Stakeholders impacted?

State agency partners involved in the implementation of the Unified Program are responsible for setting program element standards, working with CalEPA to ensure program consistency and providing technical assistance to CUPAs and PAs. The State Water Resources Control Board evaluates and provides technical assistance for the Underground Storage Tank Program.

How will the Stakeholders participate in the project?

Representatives of the State Water Board will be consulted throughout the project. May be responsible for rulemaking if required for changes to their programs.

Org. Name

Name

CAL FIRE- Office of the State Fire Marshal

Internal or External?

☐ Internal ☒ External

When is the Stakeholder impacted?

Input to Business Process

During the Business Process

Output of the Business Process

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How are Stakeholders impacted?

State agency partners involved in the implementation of the Unified Program are responsible for setting program element standards, working with CalEPA to ensure program consistency and providing technical assistance to CUPAs and PAs. The CAL FIRE- Office of the State Fire Marshal (CAL FIRE- OSFM) evaluates and provides technical assistance for the Hazardous Material Management Plan (HMMP), the Hazardous Materials Inventory Statement (HMIS) and the Aboveground Petroleum Storage Act (APSA) Programs. The HMMP and HMIS Program are closely tied to the Business Plan Program.

How will the Stakeholders participate in the project?

Representatives of the CAL FIRE- OSFM will be consulted throughout the project. May be responsible for rulemaking if required for changes to their programs.

Org. Name

Name

Governor's Office of Emergency Services

Internal or External?

☐ Internal ☒ External

When is the Stakeholder impacted?

Input to Business Process

During the Business Process

Output of the Business Process

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How are Stakeholders impacted?

State agency partners involved in the implementation of the Unified Program are responsible for setting program element standards, working with CalEPA to ensure program consistency and providing technical assistance to CUPAs and PAs. The Governor's Office of Emergency Services (CalOES) evaluates and provides technical assistance for the Hazardous Material Release Response Plan (Business Plan) Program and the Area Plan Programs, as well as the California Accidental Release Prevention Program.

How will the Stakeholders participate in the project?

Representatives of the CalOES will be consulted throughout the project. May be responsible for rulemaking if required for changes to their programs.

Select + to add additional Stakeholders

1.5 Business Program

Org. Name

Name

CalEPA – Unified Program

Unified Program

When is the unit impacted?

Input to the Business Process

During the Business Process

Output of the Business Process

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How is the business program unit impacted?

The CalEPA Unified Program is directly responsible for coordinating and evaluating the administration of the Unified Program and certifying Unified Program Agencies (UPAs).

How will the business program participate in the project?

The Unified Program is leading the CERS NextGen project with staff participating as SMEs. Will coordinate and participate in rulemaking if required.

[Click here to enter text.](#)

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

Mandate(s)

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

Security

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

Strategic Business Alignment

Strategic Plan Last Updated?	Date Picker November 2018
Strategic Business Goal	Alignment
<p>Goal 5: Improve the capabilities and functionality of the California Environmental Reporting System (CERS) for current and future needs.</p> <p>Objectives:</p> <p>5.1 - Examine functionality and efficiency of CERS and local CUPA business processes and database systems.</p> <p>5.2.1 Document and implement governance structures to prioritize need of management tool, assess and develop business cases and objectives.</p>	<p>As part of the planning process for CERS NextGen, CalEPA is conducting a Business Process Re-Engineering effort to examine current CERS functionality and business processes to identify the opportunities for adding efficiency for both the regulated community, CUPAs and state regulators.</p> <p>One of the outputs from the BPR process will be to update the current governance process for new enhancement requests.</p>
Strategic Business Goal	Alignment
<p>Goal 6: Enrich and curate CERS data to make informed decisions that advance the Unified Program goals, objectives and public safety.</p> <p>Objectives:</p>	<p>Changes to reporting requirements, lack of training, and lack of data validations tools and controls in the system has lead to data quality being cited as the biggest pain point for stakeholders.</p>



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6.1 - Develop and implement a process to enrich data quality in the California Environmental Reporting System (CERS).

6.2 - Develop and share analytic methodologies for trend analysis of CERS data.

The CERS NextGen project will include a data analysis and data cleanup effort of current data in preparation for data migration. Working with both internal and external stakeholders, CalEPA will identifying data validation and business rules, improvements to user training tools, which will help improve future data quality.

Development of Key Performance Indicators and reports with stakeholder involvement will provide clear metrics and transparency.

Select + to add additional Business Goals and Alignment

Executive Summary of the Business Problem or Opportunity

Business Problem or Opportunity and Objectives Table

Problem ID	Problems/Opportunities
1	Incomplete, inadequate, or incorrect data entered into CERS has made it difficult to use CERS data to make informed decisions. Often the data quality leads to trickle down effect resulting in additional time needed to correct and review the data in CERS for all users, data transfers being rejected due to not meeting standards, missing data from external systems (such as RCRAInfo).
Objective ID	1.1
Objectives	Ensure only validated EPA ID numbers are entered into CERS to allow for successful reporting to RCRAInfo.
Metric	Percentage of EPA IDs that are identified as valid during the RCRAInfo data transfer process.
Baseline	70% valid IDs
Target	100% for all new records by time of implementation. 100% for all records within 3 years of implementation.
Measurement Method	Number of EPA IDs unable to validate/ Number of EPA IDs entered into the system.
<i>Select + to add additional Objectives</i>	
Objective ID	1.2
Objectives	Ensure all Minimum Required Fields (MRF) are populated and valid.
Metric	Percentage of MRF identified as valid entries.
Baseline	Not in place – MRF have not been defined.
Target	100% for all new records at time of implementation. 100% for all records within 3 years of implementation.
Measurement Method	Percentage of MRF identified as valid entries.
<i>Select + to add additional Objectives</i>	
2	Current design and processes have lead to inefficiencies for businesses, CUPAs, and state regulators. Inorder to correct any information after submission of a submittal, businesses must resubmit the submittal in it's entirety. This results in "duplicate" submittals, which CUPAs have to analysis to determine which version is the correct submittal. Lack of review tools for the CUPAs can result in lengthy review times.
Objective ID	2.1
Objectives	Reduce the number of submittals that would be considered "duplicates".



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Metric	Number of submittals received compared to number of submittal expected.
Baseline	Not in place
Target	Less than 10% of new submittals would be considered “duplicate” within 3 years of implementation
Measurement Method	Comparison of number of expected submittals received (that are not rescinded or rejected) to the number of actual submittals.
<i>Select + to add additional Objectives</i>	
Objective ID	2.2
Objectives	Reduce the review cycle time from submittal to acceptance/non-acceptance.
Metric	Number of submittal reviews outstanding after the agreed upon review timeframe by submittal element (for example, after 15 business days after submission).
Baseline	Not in place – standard review times have not been established for all submittal elements.
Target	95% of submittals reviewed within agreed upon timeframe within 3 years of implementation.
Measurement Method	Date of submission to date of submittal review final status.
<i>Select + to add additional Objectives</i>	
<i>Select + to add additional Problems</i>	
Problem ID	Problems/Opportunities
3	Lack of standardized performance measurement tools leads to difficulties in tracking and enforcement of accountability.
Objective ID	3.1
Objectives	Improve number of on-time facility inspected.
Metric	Number of facilities inspected within appropriate timeframe.
Baseline	85%
Target	95% of facilities are inspected within the appropriate timeframe within 3 years of implementation
Measurement Method	Number of inspections completed with the appropriate timeframe.
Objective ID	3.2
Objectives	Improve number of on-time submittals.
Metric	Number of submittals received within appropriate timeframe.
Baseline	73%
Target	95% of submittals are received within the appropriate timeframe within 3 years of implementation.
Measurement Method	Number of submittal received within the appropriate timeframe compared to expected submittals within timeframe.
<i>Select + to add additional Objectives</i>	
<i>Select + to add additional Problems</i>	
Project Approval Lifecycle Completion and Project Execution Capacity Assessment	
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)?	
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> 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?	



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☐ No ☐ New Processes ☐ Existing Processes ☒ Both New and Existing ☐ Clear

	1	
	<input type="radio"/> Unknown <input checked="" type="radio"/> Yes <input type="radio"/> No	
	<input type="radio"/> Unknown <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear	
	<input type="radio"/> Unknown <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear	
	<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



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Legislative Mandates:	N/A <input type="checkbox"/>				
Bill Number(s)/Code(s):		AB 2286 (Feuer)			
Language that includes system relevant requirements:		Assembly Bill (AB) 2286 (Feuer) went into effect Jan. 1, 2009. The law requires all regulated businesses and all regulated local government Unified Program Agencies (UPAs) to electronically report and submit required Unified Program information previously recorded on paper forms. This includes facility data regarding hazardous material regulatory activities, chemical inventories, underground and aboveground storage tanks, and hazardous waste generation. It also includes UPA data such as inspections and enforcement actions. All businesses must submit and report Unified Program information to either the statewide California Environmental Reporting System (CERS), or to the local UPAs reporting portal.			
Business Complexity Score	1.1	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 checked="" type="checkbox"/>
1. What is the proposed project start date?					
				1/3/2022	
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:					
CERS is utilized by over 120,000 businesses within California to report their Unified Program data. Changes to required reporting fields can result in significant impact to the regulated business community as well as to local and state regulators.					
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	
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	



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3. Has the funding source(s) been identified for this proposal?			<input type="radio"/> Yes <input checked="" 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 type="checkbox"/>	Date Picker	
If "Other Fund" is checked, specify the funding:			

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>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>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear
<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>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear
<p>7. Will the project require a Budget Action to be completed?</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear
<p>8. Is it anticipated that the project will exceed the delegated cost threshold assigned by CDT as identified in SIMM 10?</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear
<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>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Clear
<p>10. Is the system specifically mandated by legislation?</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Clear

Department of Technology Use Only

Original "New Submission" Date	1/13/2020	
Form Received Date	1/13/2020	
Form Accepted Date	1/13/2020	
Form Status	Completed	
Form Status Date	1/13/2020	
Form Disposition	Approved	If "Other," specify:
Form Disposition Date	1/13/2020	