

**MISSOURI**



**NATURAL  
RESOURCES**

# Compliance Monitoring Toolkit

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Governance Board Charter

October 1, 2019

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## Revision History

<b>Version</b>	<b>Date</b>	<b>Organization/Point of Contact</b>	<b>Description of Changes</b>
1.0	5/9/2018	Governance Board Team Leaders: Tanya Turner, Josh Martin, Mike Smith	First Draft
2.0	5/22/18	Governance Board	Second Draft
3.0	6/6/18	Governance Board – Mike Smith	Update Steering Committee Members
4.0	4/5/19	Team Leader – Tanya Turner	Update members and address comments
5.0	10/1/19	Team Leader – Tanya Turner	Update based on Governance Board comments and suggestions

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## Introduction

This charter defines the purpose, scope, and high-level roles and responsibilities of the Governance Board for the Compliance Monitoring Toolkit (Toolkit). This charter provides guidance to the Governance Board and will be refined, as needed, as the governance developmental process matures. These revisions will continue to clarify and align the structure, processes, roles and responsibilities of the Governance Board.

This charter builds upon the Lean E3 Design Event held in April 2018. During the event, the board developed a Toolkit, which is a high-level design for conducting, writing, and reviewing inspections and investigations. The event also developed a hierarchy for completion with a steering committee, governance board, project matter experts and program workgroups to ensure the best product result.

## Project Background

The purpose of the Toolkit is to improve efficiencies in producing inspection reports and to have better statewide consistency of documentation of inspection findings, violations, and required actions. The new process will also ensure faster and more effective service for customers. The new process will develop an application that is maintained by a single point of contact with a Department administrator in conjunction with the developing vendor with initial assistance from ITSD. This will speed the entire inspection process from assignment, inspection, data entry, to final documentation.

Vision: To change processes within the Department to ensure a quality, accurate report is generated to shorten the time and create a more consistent and concise document to the customer.

Goal: To implement the inspection process designed by the E3 event and carried on by the Governance Board and any decisions made at the E3 Design event and by the Governance Board.

### Objectives:

- To develop an application that is easily maintained to ensure speed and consistency in the development of reports.
- Ensure one point of contact, Department administrator in conjunction with the developing vendor.
- Develop workgroups to ensure consistent language
- Identify and obtain current technology that can be utilized to improve efficiency for the inspectors.
- Create Standard Checklists for all programs to use.
- Create language of citations and required actions.
- Reduce time on data entry and passing of paper documents, which will incur cost savings.
- Reduce time for the report to reach the customer.

These visions, goals, and objectives will serve as reference points to guide strategic direction, project decisions, analysis and prioritization.

# Governance Board Charter

## Purpose and Scope

The purpose of the Compliance Monitoring Toolkit Charter document is to provide guidance and a foundation for the Compliance Monitoring Toolkit Governance Board. This Charter will also be incorporated into the Communication Plan and Project Roadmap that will be developed and approved by the Steering Committee.

The Governance Board will ensure a successful interaction between technology, people, processes, and enable a proactive approach to addressing issues and mitigating risk as it relates to shared governance of creating, using and maintaining the toolkit for the Department.

### Vision:

Our vision is to establish and maintain a guiding framework for compliance monitoring activities across the Department. This framework will enable the Department to communicate compliance findings and recommendations in a more consistent and effective format which will improve timeframes and improve overall compliance by creating time for additional compliance assistance.

### Goal:

The Governance Board will develop and maintain compliance monitoring (i.e. inspections, investigations, compliance assistance communications) policies, procedures, standards, and metrics to ensure that the Department achieves the vision, goals, and objectives of the Mission Statement.

### Objectives:

The Governance Board will:

- Create workgroups within each program to create standard language for checklists and citations.
- Develop a Communication Plan
- Develop a Project Roadmap
- Develop a Cost Benefit Analysis, Return on Investment
- Develop and ensure a consistent checklist format template
- Ensure consistent communication within all workgroups and ITSD
- Will ensure all decisions are communicated to the Toolkit Steering Committee
- Will develop language for updates in PACE

## Roles and Responsibilities

It was discussed and agreed to the following roles and responsibilities of the Governance Board:

- Develop and Maintain Standards and Policies for Compliance Monitoring as it pertains to the new toolkit
- Define Metrics and Measurements for Data Generation
- Resolve or escalate issues, as appropriate
- Develop and maintain the inspection report and checklist formats
- Participate in workgroups as time allows
- Manage and communicate progress toward objectives

These roles and responsibilities will be reviewed periodically and discussed by the members of the Toolkit Steering Committee and Governance Board to further clarify and develop alignment as needed.

## **Board Members**

The E3 event chose the following members to be the Governance Board:

- TBD (DEQ) - Department Administrator
- Josh Martin (SLRO) - Team Lead
- Tanya Turner (SWRO) - Team Lead
- Joe Stoops (CFO)
- Dan Skouby (SERO)
- Jamie Shinn (NERO)
- Joe Trunko (SLRO)
- Josh Wilkerson (SERO)
- Judy Charlton (SWRO)
- Michael Cunningham (KCRO)
- Steve Boone (NERO)
- Tina White (SWRO)
- Scott Honig (KCRO)
- Michael Stith (NERO)
- Darryl Slade (HWP Tanks)
- Aaron Forsythe (ITSD)
- Keith Bertels (DEQ) - as needed

Additional criteria for membership are:

- Engagement in the Compliance Monitoring Toolkit
- Ability to influence colleagues and other stakeholders
- Thorough understanding of Compliance Monitoring Process

Each member selected to serve on the Governance Board will provide leadership, commitment and the ability to work with a team to make important decisions that will benefit the long-term goals for the Department. The size of the Governance Board may vary over time.

## **Coordination with the Toolkit Steering Committee**

The Governance Board will have periodic meetings with the Toolkit Steering Committee to provide project updates and obtain Steering Committee decisions and/or direction as needed.

The Compliance Monitoring Toolkit Steering Committee consists of the following members:

- Erin Lepper – DNR DEQ – DEQ Coordinator
- Ed Galbraith – DNR DEQ – Director
- Kyra Moore – DNR DEQ – Deputy Director
- Carey Bridges – DNR DEQ – Deputy Director
- Dawn Brooks – DNR DEQ - IT Policy Director
- Jennifer Eddy – DNR DAS – Division Director
- Brandon Ousley –ITSD – Client Services Manager

## Signatures:

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Ed Galbraith  
DEQ, Director

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Date

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Erin Lepper  
Department of Environmental Quality Coordinator

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Date

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Kyra Moore  
DEQ Deputy Director

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Date

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Carey Bridges  
DEQ Deputy Director

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Date

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Dawn Brooks  
IT Policy Director

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Date

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Jennifer Eddy  
DNR DAS Division Director

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Date

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Brandon Ousley  
ITSD, Client Services Manager

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Date

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# Compliance Monitoring Toolkit

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Communications Plan

October 1, 2019

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## Revision History

<b>Version</b>	<b>Date</b>	<b>Organization/Point of Contact</b>	<b>Description of Changes</b>
1.0	6/7/18	Compliance Monitoring Toolkit Communications Committee	Draft version ready for review by Governance Board
1.1	10/17/18	Erin Lepper	Updated tables
2.0	10/1/19	Tanya Turner	Updated based on comments from Governance Board

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## Introduction

The Compliance Monitoring Toolkit (CMT) generates consistent and concise inspection, investigation, and compliance assistance documentation in a shorter time frame. As CMT progresses, there will be a need to communicate with internal and external stakeholders.

This Communication Plan sets the communication framework for the CMT Governance Board (Board). This plan is a guide for communications throughout the life of the project and will need to be updated as communication needs change.

The purposes of the communication plan for CMT are to:

- Establish communication objectives
- Choose which aspects, processes, or information from the development and implementation of CMT need to be communicated from the Board
- Identify with whom the Board needs to communicate
- Determine what the Board needs to convey and when
- Determine the most effective means of communication for each audience

## Communication Objectives

- **Awareness:**
  - Build enthusiastic engagement of staff members for CMT
  - Encourage trust in the CMT product
- **Education:**
  - Convey the importance of having a better inspection report writing process.
  - Update stakeholders about the CMT process and its anticipated benefits
- **Readiness:**
  - Communicate Implementation Strategies

## Stakeholder Analysis

The following list contains the stakeholders for CMT:

- **ACE** – Assistance Compliance and Enforcement Program which houses information related to compliance activities.
- **CMT Project Leader (DNR)** – Provide ongoing maintenance and development of the CMT product.(currently not identified)
- **Employee of DEQ**– Uses the CMT products to produce inspection documentation on regulated entities.

- **Environmental Protection Agency (EPA) Representative** – Receive information from regional office inspections. Provide agreement for CMT inspection documentation and checklist process.
- **Governance Board** – Group formed from E3 Design Event to develop the Compliance Monitoring Toolkit.
- **IT Policy Director - Information Technology (ITSD)** – Develops specific Department IT application or data set and has a detailed understanding of the data applications they use.
- **Program Director** – Manages one of the programs for the Division of Environmental Quality.
- **Public** – Retrieves information on a facility through a sunshine request.
- **Regional Director** – Manages one of the regional offices for the Division of Environmental Quality.
- **Regulated Entity** – They participate in inspections and receive inspection documentation.
- **Steering Committee** – Develops the vision and goals of CMT. The steering committee encourages cooperation and collaboration, monitors the progress towards the goals, and resolves conflicts.
- **Subject Matter Expert (SME)** – Regional Office or Program Office staff from each media that will develop inspection checklist questions, and inspection documentation. Will lead the workgroups to create language.
- **Workgroups** – Regional and Program staff from each media that will create language for inspection checklists and provide it to the SME group (Workgroup Leads for each program).

## Key Messages

The following is a list of key messages that will be sent to the stakeholders.

### CMT is EPA and MOGEM Compatible (CROMERR and Reporting)

Timing or Trigger	Responsible Person	Recipients	Channel
Prior to development/ Implementation	IT Policy Director	DEQ Administration	Routine meetings or email (results of communication routed back to Governance Board)
Prior to development/ implementation	Governance Board members	IT Policy Director, OA ITSD, DEQ Administration	Meetings or emails
During development/ implementation	Program Staff/Workgroups	DEQ Administration	Email or meetings (results of communication routed back to Governance Board)

After development	Program staff and CMT Project Leader	OA, ITSD, DEQ Administration and Directors	Electronic submittals (SDWIS, MoCWIS, HEL forms, ICIS databases)
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**CMT produces more consistent and precise inspection documentation and saves time. CMT moves inspection reporting and documentation towards a more fully electronic process.**

Timing or Trigger	Responsible Person	Recipients	Channel
Introduction	Governance Board members in each region and Subject Matter Experts in each program	Steering committee, All DEQ staff	Share presentation slide show during Program and Regional Office Staff meetings
All staff meeting – During Development and after development	CMT Project Leader/ DEQ Coordinator	All Staff	All Staff Meetings
Every Regional Office / Central Office (RO/CO) Meeting – During and after development	Governance Board Member for the Program and the Subject Matter Experts in each program	Regional and Program Office Managers, all inspectors in that media	Regional Office / Central Office (RO/CO) Meetings within DEQ

### Implementation of new CMT processes and procedures

Timing or Trigger	Responsible Person	Recipients	Channel
Once product selection and implementation plan complete	Governance Board	Steering Committee	Meeting
Two months before new processes become effective	CMT Project Leader	Regional and Program Office Managers, Steering Committee	Email
One month before new processes become effective	Project Leader and SME group	Regional and Program Office Managers and	WebEx training

		applicable inspectors	
Quarterly, for first year	Governance Board or CMT Project Leader	Steering Committee	Steering Committee meeting or update
Not more than 2 weeks prior to implementation	Governance Board or CMT Project Leader	All staff who will utilize the system	Classroom training
Date of implementation	CMT Project Leader and SME group	Regulated Entities	Written correspondence

## CHANNELS

The department will use the following types of communication channels to reach the stakeholders:

- Email
- Intranet
- DNR Web Page
- Staff Meetings
- Regional Office/Central Office Meetings
- WebEx training
- Classroom Training
- Steering Committee Quarterly Meetings or Update
- Industry meetings, such as ECOS
- SOP/Training Reference Guide

## MESSAGE DEVELOPMENT

The Board and/or Department of Natural Resources' CMT Project Leader will develop the language for delivering key messages through the various channels. The responsible people identified in tables 1 through 3 will deliver the messages through the channels. If a responsible person is not available, the department's CMT Project Leader or DEQ Administration will deliver the message.

## WEB CONTENT DEVELOPMENT

The Board will develop initial content for the CMT web page on the Department's website. The Department's CMT Project Leader will coordinate with the Department communications staff to design the web page and post the content.

## **GLOSSARY OF TERMS**

- **AWWA** – American Water Works Association
- **CROMERR** – Cross Media Electronic Reporting Rule provides the legal framework for electronic reporting under EPA’s regulatory programs.
- **DEQ** – Department of Environmental Quality within the Department of Natural Resources
- **ECOS** – Environmental Council of States
- **Fees and Taxes** – Hazardous Waste Information System
- **HEL** – Handler Evaluation Log utilized by Hazardous Waste for data entry
- **ICIS** – Integrated Compliance Monitoring System through EPA
- **Information Technology (ITSD)** – Develops specific Department IT application or data set and has a detailed understanding of the data applications they use.
- **MOCWIS** – Missouri Clean Water Information System
- **MOGEM** – Missouri Gateway for Environmental Management
- **MOEIS** – Missouri Emission Inventory System for Air Program
- **MWEA** – Missouri Water Environment Association
- **OA** – Office of Administration
- **REGFORM** – Regulatory Environmental Group for Missouri
- **SDWIS** – Safe Drinking Water Information System
- **SOP** – Standard Operating Procedure

# Field Process Simplifiers

## Return on Investment

The Department of Natural Resources performs several different types of field activities to fulfill its obligations and responsibilities. This project is focused on improving the efficiency of inspections and investigations. Tables 1 and 2 show staff time and the costs of staff time to complete these activities. Current and future costs are calculated using the lowest effective hourly rate paid to staff capable of completing each portion. These are the rates we currently charge to fulfill Sunshine Law Requests.

**Table 1**

Estimated Average Cost Per Inspection

	Unit Cost	Estimated Hours Spent		Staff Time Cost	
		Current	Future	Current	Future
File Review	\$ 30.00	4.0	3.0	\$ 120.00	\$ 90.00
Field Inspection	\$ 30.00	4.0	3.5	\$ 120.00	\$ 105.00
Report Preparation	\$ 30.00	6.0	2.5	\$ 180.00	\$ 75.00
Supervisory Review	\$ 45.00	2.0	0.5	\$ 90.00	\$ 22.50
Admin Review, print, mail	\$ 15.00	2.0	0.5	\$ 30.00	\$ 7.50
Data Entry	\$ 15.00	0.5	0.0	\$ 7.50	\$ -
<b>TOTAL:</b>		<b>18.5</b>	<b>10.0</b>	<b>\$ 547.50</b>	<b>\$ 300.00</b>

**Table 2**

Estimated Average Cost Per Investigation

	Unit Cost	Estimated Hours Spent		Staff Time Cost	
		Current	Future	Current	Future
Concern Review	\$ 30.00	0.50	0.50	\$ 15.00	\$ 15.00
Investigation	\$ 30.00	2.00	2.00	\$ 60.00	\$ 60.00
Report Preparation	\$ 30.00	2.00	1.00	\$ 60.00	\$ 30.00
Supervisory Review	\$ 45.00	0.25	0.25	\$ 11.25	\$ 11.25
Admin Review, print, mail	\$ 15.00	0.50	0.25	\$ 7.50	\$ 3.75
Data Entry	\$ 15.00	0.25	0.00	\$ 3.75	\$ -
TOTAL:		5.50	4.00	\$ 157.50	\$ 120.00

Tables 3 and 4 show total estimated annual inspection and investigation staff time costs and savings. Inspection and investigation instances are based on actual field activities in State Fiscal Year 2018 that would have benefited from this project. We expect the project will redirect \$1,725,975.00 worth of staff time each year after the project is implemented leading to a total of \$6,903,900 over five years. These efficiencies will be utilized to ensure staff can interact more frequently with facilities, which will result in a more proactive approach to achieve environmental compliance.

**Table 3**

Estimated Annual Inspection Cost

	Instances per Year	Staff Time Cost Per Instance	Annual Cost	Annual Savings
Current	6,020	\$ 547.50	\$ 3,295,950.00	
Future	6,020	\$ 300.00	\$ 1,806,000.00	\$ 1,489,950.00

**Table 4**Estimated Annual Investigation Cost

	Instances per Year	Staff Time Cost Per Instance	Annual Cost	Annual Savings
Current	6,294	\$ 157.50	\$ 991,305.00	
Future	6,294	\$ 120.00	\$ 755,280.00	\$ 236,025.00

Table 5 shows total project expenses by year, with cumulative savings minus expenses on the bottom row. Tablets are expected to cost \$600 each, with 300 units purchased in year one. The chosen contractor will integrate the field inspection product with the Department of Natural Resources' existing data systems. These expenses along with deployment, training, and enhanced initial support by the product provider will create a one-time cost of \$470,000 in the first year. Full implementation is expected to take one year, with the project becoming a net positive in the second year.

**Table 5**

<u>Project Cost by Year</u>	Year				
	1	2	3	4	5
Tablets	\$ 180,000.00		\$ 60,000.00	\$ 60,000.00	\$ 60,000.00
System Administrator	\$ 60,000.00	\$ 60,000.00	\$ 60,000.00	\$ 60,000.00	\$ 60,000.00
Deployment/Training	\$ 40,000.00				
Backend Integration	\$ 250,000.00				
Annual License	\$ 192,000.00	\$ 192,000.00	\$ 192,000.00	\$ 192,000.00	\$ 192,000.00
Cloud Hosting	\$ 40,000.00	\$ 40,000.00	\$ 40,000.00	\$ 40,000.00	\$ 40,000.00
Support	\$ 19,000.00	\$ 7,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00
Annual Project Cost:	\$ 781,000.00	\$ 299,000.00	\$ 353,000.00	\$ 353,000.00	\$ 353,000.00
<b>Cumulative Project Cost:</b>	\$ 781,000.00	\$ 1,080,000.00	\$ 1,433,000.00	\$ 1,786,000.00	\$ 2,139,000.00
<b>Cumulative Gross Savings:</b>	\$ -	\$ 1,725,975.00	\$ 3,451,950.00	\$ 5,177,925.00	\$ 6,903,900.00
<b>Cumulative Net Savings:</b>	\$ (781,000.00)	\$ 645,975.00	\$ 2,018,950.00	\$ 3,391,925.00	\$ 4,764,900.00

<b>DELIVERABLES/FEATURES</b>	<b>Criticality (1-3)*</b>
<b>CONFIGURABLE FEATURES</b>	
Built-in configurable form structure and content, with ability to create and store inspection checklist templates.	1
Configurable output templates (reports, forms, etc.) to be stored in the tool/cloud and updated by technical staff to ensure relevance with regulations and/or department direction (likely to occur on a monthly basis).	1
Ability to take a photo while in the field, add it into the form, and later print in the report.	1
Ability to insert a pdf document, jpeg, aerial photo, or Microsoft documents such as factsheets or other reference materials.	2
Ability to add polygons, arrows, and notes to a current aerial photo or white space to diagram system assets.	3
Inspector selects compliance determination and selects associated cover letter template with timeframes for a required response if applicable.	1
If an inspection results in referral to one of the department's enforcement sections, relevant referral documents will be auto filled and included.	1
If data cannot automatically be migrated from and to the department's legacy systems, data entry sheets for this manual entry will be auto generated and filled in with inspection data.	1
<b>DATA CONNECTIVITY</b>	
Failsafe's in place to prevent duplicity and data entry errors.	1
Storage bank of previously completed checklists (repopulate data from previous inspections) (recorded in new cloud storage database)	1
Data system compatibility with the department's legacy systems to facilitate autofill reports and to save information for future retrieval and communication with federal systems.	1
Automated data upload of inspection/investigation information into the department's legacy systems for transmittal to federal systems or direct upload to federal systems.	1
<b>WORKFLOW / ROUTING</b>	
Electronic workflow/routing with email notification of transfer of review status.	1
Ability to assign specific facility inspections to an inspector.	1
Ability to view inspection status (assigned, in process, in review etc.) from inspection list page.	1
Final product report will print out in an easy to read format with no additional formatting edits needed.	1
<b>META DATA</b>	
Meta data collection (times, inspection date, report submitted for review, review finalization, mailing).	1
Ad-hoc queries and reporting for facility data, meta data stored, from the product, on the cloud.	1
<b>ACCESS</b>	
Permissions - varying levels of ability to edit.	1
Multiple users able to access form templates at the same time, to perform similar types of inspections at the same time.	1
Multiple users will be able to view the same document/form within the tool at the same time for consultation purposes (review capabilities/editing/final reports).	2

<b>GIS / HARDWARE</b>	
Ability to collect GIS locational data where inspections are performed and photographs are taken (minimum of 4-meter degree of accuracy).	1
Ability to access current aerial photographs and electronically (manually) add and edit a pin on such photograph (minimum of 4 meter degree of accuracy).	2
Ability to transfer collected locational data to State GIS Enterprise System.	1
Ability to mark the GIS location on an aerial photo where a photo was taken.	2
Ability to pull information from data layers by selecting an area on an aerial photo and using that information to create a diagram within the report.	3
Auto input Huc 8 watershed names into the report.	3
Autofill Section, Township and Range into a report.	3
<b>COMPATIBILITY</b>	
Cloud compatible.	1
IOS, Android and Windows compatible.	1
Regular upkeep and maintenance of the tool will be required to ensure continued and effective usability with changing technology requirements, regulatory changes, and policy clarifications.	1
<b>OTHER DATA INPUTS / OUTPUTS</b>	
Auto generate concern number identifiers.	1
Auto generate Notice of Violation number identifiers	1
Ability to use electronic signatures and sign documents within the form or report with a "draw-type" tool.	2
Ability to transfer collected location data to State GIS Enterprise System	1
* A ranking of 1 is critical, 2 is important and 3 is not critical	