

## ATTACHMENT A

### Consideration of “open enrollment” period for NEIEN reporting

Currently, changes to the NEIEN XML schema can occur at any time. This produces a situation where the jurisdictions’ personnel who are responsible for reporting do not have a static set of rules to map data. Without clear and up to date documentation of changes to the XML schema it is very difficult to comply with the annual reporting. An example of this problem occurred with the 2011 Virginia data submittal for street sweeping. For whatever reason the staff who do the data mapping did not have the latest documentation that indicated a change to the schema as to the measures and components required for submittal of this BMP. Therefore, the state spent time mapping the data to the old schema which in turn produced an error and had to spend additional time correcting the submittal.

Since there are a large number of moving parts involved in the data submission process through the NEIEN schema – and to avoid confusion over definitions or reporting requirements for the jurisdictions – it is proposed to have a sort of “open enrollment” period where modifications to the NEIEN XML schema can occur. Outside of that period there would not be any changes to the schema allowed.

Changes to the NEIEN data submission requirements (XML schema) for the states would be locked-down after a specific date; any subsequent alterations to the jurisdictions’ reporting requirements or NEIEN XML schema would not occur until the following progress run/reporting year or the annual open enrollment period.

EPA could still fix any technical issues with Scenario Builder, but the states would not be asked to adjust their data submitted via NEIEN XML schema until the next year when the schema would be modified during the open enrollment period. It is this open enrollment period where interim/draft BMPs that have gotten final approval are included formally in the schema for the upcoming annual data exchange.

The dates/deadlines would correspond to the progress runs. Proposed schedule would be open enrollment for changes to the schema January through August or September. Schema lock down occurs annually between September and the end of December.

Changes to reporting/submission requirements or schema would be clearly documented and summarized in preparation for that reporting cycle and sent directly to the persons who prepare the data for submission via the schema.

This allows the state a static set of rules to follow for a given progress run reporting window annually. Most of the year would be open for modifications to the NEIEN schema. However, after a specified date to allow the states a clear and unchanging set of rules to map the data to no additional changes would be allowed to the NEIEN schema until after that progress years reporting and the open enrollment period became available.