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ORDER

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FACILITY IDENTIFICATION DATA STANDARD

1. PURPOSE. This Order establishes a data standard for unique facility identification codes to be maintained in all EPA data collections containing information on facilities regulated by EPA under authority of Federal environmental legislation. Standardization of the format and content of facility identification codes will enhance data integration capabilities and increase the utility of all EPA data on facilities.

2. SCOPE AND APPLICABILITY. The requirements of this Order apply to all programs responsible for data on regulated facilities reported to EPA and kept in automated or manual information collections developed for programmatic, research, or administrative purposes. The Order applies to programs operating both existing or future Agency systems in support of Federal environmental regulations.

   The principles of the standard can be extended to cover nonregulated facilities at program office discretion. Excluded from the standard are data monitoring or observation points, unless they are associated with a facility. In that case, the information collection must allow association of such data with the relevant facility.

3. REFERENCE. Chapter 5 of the EPA IRM Policy Manual sets forth the general principles on data standards within the Agency. This Order defines one of several data standards for use by EPA in implementing the policy.

4. BACKGROUND.

   a. Adoption of a consistent, Agency-wide coding scheme for facility identification will enhance the utility of EPA data by increasing access to and integration of facility information.

b. Since the early 1980s, EPA has striven to create a standard ID coding scheme for facilities that can be used not only in individual programs, but across the Agency as a whole.

c. There now exists an urgent need for improved data integration capabilities. These capabilities provide the underpinnings for the comprehensive analyses of environmental conditions that increasingly guide EPA's initiatives in protecting and improving the environment. Examples of such analyses include risk assessment, compliance behavior determination, vulnerability assessments, "hot-spot" identification, research and modeling, and special inter-program studies.

d. Environmental legislation and regulation often define specifically the meaning of the term "facility" for EPA programs. The resulting differences in use of facility identifiers make it difficult to compare and integrate information on the same facility in different data bases.

e. A variety of descriptors, such as SIC (Standard Industrial Classification) codes and DUNS (Data Universal Numbering System) numbers, are available to programs for describing the corporate characteristics of a site. A new data standard is needed to establish that, for EPA information management purposes, the uniqueness of a facility is based upon its location rather than corporate characteristics.

f. EPA has implemented other data standards, as well as standards for hardware and software. Adoption of a standardized facility identification code will help the Agency realize the potential benefits of these standards for information integration and analysis.

5. <u>AUTHORITIES</u>.

a. 15 CFR Subtitle A, Part 6, <u>Standardization of Data Elements and Representations</u>.

b. OMB Circular A-130, <u>Management of Federal Information Resources</u>.

6. <u>POLICY</u>. This Order establishes an EPA standard that each facility regulated by EPA will have a unique facility ID code, which will be the same for that facility across all EPA collections of information. Therefore:

a. Any collection of information assembled by or for EPA with data that describe a facility regulated by EPA under authority of Federal environmental statutes, including facilities regulated by state programs with delegated authority from EPA, shall contain in each record on or related to a single facility the facility identification code described in this Order and its appendix. The identification code for any one facility will be the same in all EPA collections of information.

   At the discretion of program offices, nonregulated facilities may also receive EPA IDs.

b. The facility identification code shall be comprised of a unique 12-character identification code controlled and issued through the EPA central facility data base.

c. The central facility data base will be operated by the Office of Information Resources Management. The objectives in maintaining this central data base are:

   (1) To provide a concise, comprehensive inventory of facilities regulated by EPA

   (2) To provide users with a simple method for determining a facility's ID code and ascertaining which program systems keep information on each facility.

d. The data element field used to store the identification code in program systems should be readily accessible to system users. The data element need not be a required field for initial data entry, but should always eventually be filled.

e. Program personnel may continue to use any program-specific identifiers (including DUNS numbers) needed to support the program mission, provided that such identifiers are kept in addition to the facility identification code established in this Order.

f. In the interest of maintaining the confidentiality of Confidential Business Information (CBI) data kept by the Agency, information collections with CBI data will be considered as special cases.

g. The Agency goal is to complete implementation of this standard by 1995, in recognition of the extensive time and resource commitments required by programs and OIRM to implement the standard.

h. Once this Order becomes effective, adherence to the standard will become a key step in the development of new information collections. Existing information collections may be made consistent with the standard through phased implementation. This phasing will take into account system capabilities and needs.

7. RESPONSIBILITIES.

a. The Office of Information Resources Management (OIRM) shall:

(1) Develop, implement, and ensure adherence to this data standard.
(2) Develop a management plan describing steps for implementation of the standard.
(3) Provide guidance and technical assistance in meeting the requirements of this standard.
(4) Provide unique facility identification codes in an efficient and responsive manner.
(5) Maintain a central facility data base with identification codes and basic information associated with each facility.
(6) Oversee resolution of conflicts regarding applicability or other issues relating to the standard.

b. Assistant Administrators, Associate Administrators, Regional Administrators, Laboratory Directors, the General Counsel, and Heads of Headquarters Staff Offices shall establish procedures within their respective organizations to ensure compliance with the requirements of this data standard. Such procedures shall include the following:

(1) Oversee development of individual program implementation plans.

(2) Ensure that program representatives supply the central facility data base with program-specific IDs and with the key information necessary to assign the EPA ID code (e.g., name, address, etc.).

(3) Ensure that each system containing facility information maintains a data element field for the standardized facility identification code.

(4) Ensure that each facility record -- both new and existing -- carries the standardized facility identification code from the central facility data base.

(5) Inform facility representatives of their ID codes, as appropriate, and incorporate the codes into reporting forms.

(6) Notify OIRM of any difficulty in meeting the requirements of the data standard within the time frame specified in the program implementation plan.

c. The Procurement and Contracts Management Division shall work with EPA Program and Regional Offices and Laboratories to ensure that, where appropriate, the requirements of this standard are incorporated into EPA contracts.

d. The Grants Administration Division shall work with EPA grants management offices to require a special condition in future award documents mandating assistance recipients to use facility ID codes for any facility-related information collected under the assistance agreement, in cases where recipients are acting for EPA under delegated authority.

8. DEFINITIONS.

a. A "FACILITY" is a locational entity, deliberately established as a site for designated activities, but not primarily for habitation (even though on-site habitation may be necessary to the execution of the primary activities). Examples include a factory, a military base, a college, hospital, national park, office building, or prison. (Adapted from FIPS Pub. 55.)

In some cases, a facility with complex, multiple functions may have several plants or establishments operating within its property boundaries. For these facilities, ID codes will generally be assigned to the most comprehensive "level." However, a complex facility with multiple establishments or operations may receive several IDs, if more than one code is appropriate.

A facility may include wells or pipes located off the facility property. Although these "sub-units" will not ordinarily receive separate facility ID codes, program systems should be able to associate data on the sub-units with the record for the facility itself.

b. "FACILITY IDENTIFICATION CODE" is a 12-character code that uniquely identifies a facility. The appendix to this Order describes the format of the code in detail.

c. A "FACILITY IDENTIFICATION DATA STANDARD" is the requirement, in terms of format and content, that every record of information referring to a particular facility contain a data element field with a unique facility identification code. This code is to be used consistently across all collections of information containing information on the same facility.

9. PROVISION FOR WAIVER. In general, OIRM will attempt to work with program offices to develop a feasible implementation schedule for the standard. There may exist, however, cases in which exceptions to the requirements of this Order are warranted. In these cases, program offices shall demonstrate reasons for waiver. The process to apply for a waiver is as follows:

a. Draft an application for waiver to OIRM outlining the reasons why the facility identification data standard should not be implemented in the information collection.

b. Obtain approval by the decision official in the requesting office and the respective Senior Information Resources Management Official (SIRMO).

c. Submit application to the Director of OIRM, who has responsibility for final disposition.

The applying office will be notified in writing of the disposition of the waiver.

10. PROCEDURES. The appendix to this Order contains preliminary information relevant to implementation of the standard. OIRM will also issue a management plan, which will describe the general steps and overall schedule for implementation of the standard over the next five years. In addition to the Agency management plan, programs will develop individual implementation plans together with OIRM. These plans will consider program-specific capabilities and needs.

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APPENDIX TO THE FACILITY
IDENTIFICATION DATA STANDARD

1.0 INTRODUCTION

   1.1 Purpose of Appendix

        The purpose of this appendix is to provide further
   detail on the facility identification data standard
   announced in the preceding Order. While the Order
   introduces the data standard, it does not contain the full
   level of detail necessary for programs to form a working
   understanding of the standard.

        In addition to this appendix, an Agency-wide
   implementation plan will be issued through the Office of
   Information Resources Management (OIRM). This
   implementation plan will cover in detail such issues as
   overall schedule for implementation, instructions for
   applying for waivers, procedures adopted by OIRM to ensure
   adherence to this standard, and the role of the central
   facility index system (FINDS).

   1.2 Background of the Facility Identification Data
        Standard

        The Agency has long striven to create a standard
   coding scheme for facility ID codes that could be used not
   only in individual programs, but across the Agency as a
   whole. Such a scheme would help EPA more readily generate
   facility-specific responses to public inquiries and
   determine patterns of compliance behavior across programs.

        These reasons, however, are only part of the
   justification for adopting this new standard. EPA is
   experiencing a vigorous trend towards cross-media analyses
   such as site characterizations, risk assessments and other
   environmental analyses that require the integration of data
   on individual facilities from diverse sources. The net
   result is an even greater need for data integration and
   sharing across different environmental media and programs.
   This trend is often acknowledged by staff in single-media
   programs, who now face increasing demands for data sharing
   and integration.

OIRM, in order to support the Agency's needs for data
sharing and integration, has established an information
management policy on Data Standards. Substantial
implementation costs might be expected to be associated
with promulgation of numerous retroactive data standards,
and in the start-up phase many programs responsible for
implementing these standards would derive few immediate
benefits. For this reason, OIRM is taking a very measured
approach and has identified only two standards as being of
paramount importance.

The facility ID data standard is one. The other is
embodied in the locational data policy, which establishes
latitude and longitude, in an internationally-compatible
format, as the Agency's preferred locational coordinate
system. Both are undergoing concurrent green border review
and will be complementary when implemented. Adoption of
these selected standards at this time is absolutely
essential if the Agency is to respond effectively to the
anticipated data integration needs of the future.

As discussed above, OIRM will issue a management plan
for the facility ID data standard, which will describe the
general steps and overall schedule for implementation of
the standard over the next five years. In addition to the
Agency plan, programs will develop individual
implementation plans together with OIRM. These plans will
consider program capabilities and needs with respect to
implementation.

OIRM has attempted to furnish program personnel with
ample opportunity to provide input on the development of
the facility identification data standard. To this end,
program and system managers from EPA Headquarters, Regions,
and states have been asked to contribute both to the
development of the standard and to the formulation of this
Order. Only with full program support and participation
can OIRM establish a data standards program that will meet
EPA's needs both now and in the future.

2.0 STRUCTURE OF THE FACILITY IDENTIFICATION CODE

The facility identification code is the key feature of this
facility identification data standard. This code will consist
of a 12-character standardized identification (ID) code. The
first two characters will be the Federal Information Processing
Standard (FIPS) two-letter abbreviation for the state or
territory in which the facility is located. Abbreviations will
also be used for facilities located outside of the U.S., for
example in Canada or Mexico.

The remaining ten characters of the code will include a check digit, will have no inherent meaning, and will not attempt to describe, categorize or classify the facility in any way. This applies only to new facility ID codes issued after the effective date of implementation. Identification codes issued previously under OIRM's Facility Index Data System (FINDS) may be retained.

3.0 SOURCE OF THE STANDARDIZED FACILITY ID CODE

OIRM will maintain a central facility data base with basic information on each facility such as name, address, etc. This data base will serve as an inventory of facilities of interest to EPA. It will also be the means through which the unique, standardized facility ID codes will be assigned. OIRM, in cooperation with program offices, will develop methods and procedures for assigning unique ID codes efficiently. These procedures will be defined in the program-specific implementation plans, and will be automated as fully as possible

To create or identify a pre-existing ID code, key information on the facility, including particularly the facility name and address or other location information, must be made available to the central facility index system via these procedures. OIRM will develop effective and efficient procedures for ID assignments.

4.0 SCOPE OF THE FACILITY IDENTIFICATION DATA STANDARD

Section 2 of the Order, Scope and Applicability, presents the official scope of the facility identification data standard. This section augments that discussion in an attempt to anticipate questions that program managers may have regarding applicability of the standard.

4.1 Definition of a Facility

Successful implementation of a facility identification data standard hinges on a consistent understanding of what "facility" means. A common understanding is necessary for determining to which facilities the standard applies. An Agency-wide definition of "facility" is difficult to establish, however, because of differences in Federal legislation, which prescribe the program definitions of "facility." As a result, perceptions of facilities differ from program to program.

Differences notwithstanding, most program managers have developed a common-sense definition of a facility. In this approach, a facility is a single contiguous property--either an entire property or the portion thereof that is of regulatory concern. Variability in definitions of facilities usually occurs because different portions of facilities are regulated, not because of differences in facilities per se.

OIRM intends to establish a Facility Advisory Committee composed of Agency program office representatives to assist in implementing the data standard. Should further clarification of a standard facility definition be required, the committee may be called to resolve the issue.

4.2 Inclusion of Non-EPA-regulated Facilities

If desired, a facility ID code may be assigned to a facility not regulated by EPA. Such a scenario might arise, for example, if program personnel need ID codes for facilities of interest to EPA, but located outside of the United States. Additionally, ID codes can be assigned to state-regulated facilities, if appropriate.

4.3 Use of Concurrent Program Identifiers

Many program-specific codes are now used to identify facilities (e.g., permit numbers or site IDs). Program personnel may continue to use these identifiers in their own data collections under this standard, provided that the program information system accommodates both the standardized ID code and the program-specific identifiers.

If an information collection stores other identification codes in addition to the standardized ID code, these codes should be provided to the central data base under the procedures outlined in each program implementation plan. The central data base can then store listings of both facility and program-specific ID codes, which will further facilitate data integration and sharing.

4.4 Use of Previously Assigned EPA ID Codes
Facilities regulated by some programs have already been assigned EPA ID codes through FINDS under the current, DUNS-based numbering scheme. (DUNS is the Dun & Bradstreet Data Universal Numbering System for corporations.) These codes do not have to be replaced, i.e., new standardized ID

codes for these facilities need not be assigned. However, if an EPA ID number was assigned internally by program staff but was not entered into FINDS, OIRM should be notified of this number and the facility name and address associated with it. This notification will enable the central data base to keep a complete record of all EPA facilities and their associated identification codes.

5.0 RELATIONSHIP OF THE FACILITY IDENTIFICATION DATA STANDARD TO FINDS

Assignment of EPA ID codes already occurs through a central data base--FINDS--for several EPA programs. This data base will continue to operate under the new data standard. Some features of the current FINDS operation will remain the same, while others will be modified to make the system more responsive to program needs under the new standard.

5.1 Similarities Between Old and New Operations

Similarities between the old and the new FINDS are as follows:

- Program data managers will obtain facility ID codes through the central data base.

- The central data base will continue to house basic descriptive information on each facility.

- The central data base will have the Dun and Bradstreet (D&B) file available to obtain descriptive information on facilities. Information supplied by the program offices will be used in conjunction with D&B data to ensure the accuracy of facility information in the central data base.

- Program personnel will work with the OIRM system manager in keeping the descriptive information up-to-date by notifying OIRM through automated procedures when they become aware of a change in this information. OIRM will work with program offices to accomplish regular and responsive updating.

5.2 Differences Between the Old and the New FINDS

Differences between the current and the new FINDS are as follows:

- The new identification code will no longer be based on the 9-digit DUNS identification code.

- EPA will actively encourage states to use FINDS and to supply information to it on facilities regulated by state law.

- To the extent possible, the system will store information on all regulated facilities reported to EPA, and will not exclude facilities based on size or type of operations.

5.3 Use and Availability of DUNS Numbers

OIRM has based the decision to use a unique, nondescriptive ID rather than a DUNS-based ID on a determination that, due to facility definition problems, the DUNS number does not fully meet EPA's needs for a unique ID code. For example, when an establishment moves, the DUNS number moves with it, and many EPA programs in this case would require new permit numbers to be assigned.

The fact that the facility ID code will no longer be based on the DUNS number does not diminish the importance of these numbers. OIRM continues to encourage programs to collect and maintain DUNS numbers in their information systems, if these numbers are needed for the program mission. So that program personnel can obtain these numbers more easily, EPA will continue to purchase on-line access to the Dun and Bradstreet file of facilities.

5.4 Relationship of Facility Identification Data Standard to Locational Data Policy

OIRM has previously issued two data standards, one for use of Chemical Abstract Service numbers and the other for electronic transmission of laboratory data (EPA Orders No. 2180.1 and No. 2180.2). OIRM is also planning to issue a locational data policy, currently in green border review. This policy establishes the principles for collecting and

documenting latitude/longitude coordinates for facilities, sites and monitoring and observation points regulated or tracked under federal environmental programs within EPA's jurisdiction.

All of these efforts are related in that they increase the potential for data sharing and integration. The locational data policy, however, is directly related to the facility identification data standard. These two efforts complement each other by providing primary identification and locational information on entities of interest to EPA. An important difference in scope is that the facility ID data standard applies primarily to regulated facilities, whereas the locational data policy covers both facilities and other locations, such as monitoring stations, where environmental data are collected. FINDS will continue to allow entry of locational information for facilities.

6.0 IMPLEMENTATION OF THE FACILITY IDENTIFICATION DATA STANDARD

OIRM intends to establish an advisory committee composed of Agency program office representatives to assist in the implementation of the data standard.

6.1 Schedule for Implementation of this Standard

In the forthcoming Agency implementation plan, OIRM will publish the general schedule for implementation of the standard over the next five years. This plan will be followed by development of individual program implementation plans, which programs will formulate together with OIRM. For the individual program plans, OIRM will work on a one-to-one basis with program staff to develop a realistic implementation schedule that takes into account such factors as mission priorities, system capabilities, and the size of the information collection. OIRM recognizes that implementation of the standard is a large-scale undertaking, and it has already considered that for some program offices, implementation should be phased over several years.

6.2   Procedures for Adopting the Standard

The program implementation plans will discuss:

- procedures to obtain IDs for facilities that are being newly regulated by the program

- procedures to obtain new IDs for facilities with existing records in program data bases

- methods for communicating changes in facility descriptive information.

The plans will define individual procedures for the exchange of facility IDs and related information between specific program systems and FINDS.

6.3   Procedures Adopted by OIRM for Assuring Adherence to this Standard

In addition to the assurance that comes from extensive communication with program offices when developing and executing implementation plans, OIRM has a number of alternatives for assuring adherence to the information management requirements of the standard. These include:

- Exercising the right to refuse to endorse any computer-based collections of information that do not include a field for the standard facility ID code

- Not concurring on forms for systems-related information collection that do not reference the standard facility ID code.

Further potential enforcement measures as well as procedures for sharing enforcement responsibilities with other EPA management offices will be addressed in the implementation plan.