



Consumer Confidence Reports

Electronic Delivery Options and Considerations

Community water systems can now use email to send consumer confidence reports (CCRs) to their customers. Keeping customers informed about your water system is essential, and we view email as an additional tool you can use to accomplish this important task.

In January 2013, the U.S. Environmental Protection Agency (EPA) let us know that specific methods of electronic delivery of CCRs now meet the regulatory requirement for community water systems to “mail or otherwise directly deliver” annual reports to their customers.

You can view the recent EPA “delivery options memo” and additional CCR information at <http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/regulations.cfm#elecdev>

Direct delivery requirements

For direct delivery, Group A community water systems (CWS) must provide a direct Web address (URL) to the CCR. If a water system is aware of a customer’s inability to receive a CCR electronically, it must continue to provide a paper copy.

Delivery that **doesn’t meet** the “directly deliver” requirement includes:

- Providing customers with an indirect URL that requires the customer to search for their CCR, such as a link to your main website.
- Use of social media, such as Twitter or Facebook.



For more details, see the *Delivery Method Decision Chart* on page 3.

What you need to consider

- Ensuring delivery to every customer may require a combination of paper and electronic delivery. For example, provide the CCR through an email to electronic bill-paying customers. For customers who receive paper bills, include a mail notification with a direct URL...or mail those customers a paper CCR.
- Water systems should keep their email databases updated to make sure correct emails are available for electronic delivery to their customers.



- Keep a record of your customer’s delivery preference for future CCR deliveries.
- Before providing electronic delivery of CCRs to customers, you may want to notify them of the CCR delivery change.

Additional CCR Rule Elements

To make sure all customers know about the quality of their drinking water, the CCR rule requires water systems to make a **“good faith effort”** to reach consumers who don’t receive a water bill. A good faith effort to reach consumers should include a mix of appropriate methods, such as posting on the Internet, mailing to postal patrons in metropolitan areas, advertising the availability of the report in the news media, and posting in public places.



Communities with a large portion of non-English speaking residents must provide a CCR that contains information in their languages about the importance of the report. When providing electronic delivery, water systems should consider adding translated statements to their electronic delivery methods, including emails and websites.

You don’t have to translate the entire CCR. The message can be as simple as "This report contains important information about your drinking water. Have

someone translate it for you, or speak with someone who understands it." This message has been translated into 27 languages and is available on our website at <http://www.doh.wa.gov/CommunityandEnvironment/DrinkingWater/DrinkingWaterEmergencies/PublicNotification/TranslationsforPublicNotification.aspx>

Report content requirements have not changed. Basic requirements for your CCR include the following items:

- Public water system information
- Source information
- Required statements
- Definition of terms
- Detected contaminants in finished water
- Compliance with drinking water regulations
- Required educational information

You can find more information about Consumer Confidence Reports on our website at <http://www.doh.wa.gov/CommunityandEnvironment/DrinkingWater/RegulationandCompliance/CCRReports.aspx>

Delivery Method Decision Chart

| Advantages* | CCR DELIVERY METHODS | | | | |
|--|----------------------|--|---------------------------|-----------------------------------|---------------------------------------|
| | Mail – paper copy | Mail – notification that CCR is available via direct URL | Email – direct URL to CCR | Email – CCR sent as an attachment | Email – CCR sent as an embedded image |
| Customers may have access to more information beyond what is required in the CCR because they are already on the Internet. | | ◆ | ◆ | | |
| Community water system (CWS) doesn't have to invest in new software, additional staff training or other new logistical needs for delivery. | ◆ | | | | |
| CWS has potential printing and mailing cost savings. | | ◆ | ◆ | ◆ | ◆ |
| CWS with e-billing system can use existing database and other resources. | | | ◆ | ◆ | ◆ |
| Customer can view or receive CCR with limited or no Internet access. | ◆ | | | | |
| Customer expects the CCR to be delivered by this method, based on CCR delivery history. | ◆ | | | | |
| Customer doesn't have to share a personal email account. | ◆ | ◆ | | | |
| CCR is directly available and customer doesn't have to take a second step to view (e.g., go to website or click link). | ◆ | | | | ◆ |
| Method consumes less of limited natural resources, including paper for production. | | ◆ | ◆ | ◆ | ◆ |
| CWS may be able to use the same method to reach bill-paying and non-bill-paying customers. | ◆ | ◆ | ◆ | ◆ | ◆ |
| Method assured to reach customer because it uses a reliable postal address. | ◆ | ◆ | | | |
| Use email addresses for e-bill customers to deliver CCR (reduction of inaccurate emails). | | | ◆ | ◆ | ◆ |

| Limitations* | CCR DELIVERY METHODS | | | | |
|--|----------------------|--|---------------------------|-----------------------------------|---------------------------------------|
| | Mail – paper copy | Mail – notification that CCR is available via direct URL | Email – direct URL to CCR | Email – CCR sent as an attachment | Email – CCR sent as an embedded image |
| Community water system (CWS) must dedicate staff to manage more than one delivery method, including collecting and updating email addresses. | | | ◆ | ◆ | ◆ |
| CWS may have to invest in new software and train staff. | | ◆ | ◆ | ◆ | ◆ |
| CWS incurs printing and mailing costs. | ◆ | ◆ | | | |
| CWS needs Internet access and adequate bandwidth to distribute large numbers of emails at once. | | | ◆ | ◆ | ◆ |
| Customer may not receive CCR by email due to lack of software compatibility, spam filtering, firewalls, or file size limitations. | | | ◆ | ◆ | ◆ |
| Customer may be reluctant to download an attachment or click/visit a URL to an unfamiliar website. | | ◆ | ◆ | ◆ | |
| Customer may be reluctant to open email from an unfamiliar email address. | | | ◆ | ◆ | ◆ |
| Customer may be reluctant to share personal email address. | | | ◆ | ◆ | ◆ |
| Responsibility of customer to take the next step to view the CCR (e.g., access website, click URL, or download attachment). | | ◆ | ◆ | ◆ | |
| Customer needs Internet access to view or receive CCR. | | ◆ | ◆ | ◆ | ◆ |
| Method consumes natural resources, including paper for production. | ◆ | ◆ | | | |
| Method uses email addresses, which are less reliable than postal addresses (unless part of e-billing system). | | | ◆ | ◆ | ◆ |

*Advantages and limitations are not in any ranked order.

Top 10 Things to Remember

1. Delivery is your responsibility

Community water systems must certify delivery to every bill-paying customer. Systems will need to use a combination of methods for their service area. Also, remember to send a copy of your CCR and certification to your regional office (email addresses listed below).

2. Know your customer base

Find out if there are customers who don't have Internet service. Know your electronic delivery method capabilities.

3. Give customers a heads-up and an option

Inform customers of the change in delivery approach before sending out your CCR. Give them a chance to choose if they prefer a paper or electronic CCR.

4. Tell everyone, all the time

Water systems mailing a direct URL should include an option on every water bill for a customer to choose to receive a paper CCR.

5. Know your costs

Systems may not see savings in the first year. It may take a few years for people to be comfortable with e-delivery.

6. Catch your customers' attention

Include a short message to encourage readership of the CCR.

7. Email delivery

If an email bounces back, resend the CCR by an alternative means. Keep email databases up to date.

8. Make it bold – Make it short

The direct URL printed on the statement should be in a font size that is at least as large as the largest type on the mailing notification. You should create a short, easy to type, direct URL to your CCR.

9. Keep a record

Remember customer delivery preferences for future CCR deliveries.

10. Remind auto-pay customers

To make sure electronic bill and auto-pay customers are aware of their CCR, you should send a separate CCR-related email.

For more information

Call or email your ODW regional office.

| | | |
|-----------------------------------|--------------|--|
| Eastern Region: Spokane | 509-329-2100 | ccr.ero@doh.wa.gov |
| Northwest Region: Kent | 253-395-6750 | ccr.nwro@doh.wa.gov |
| Southwest Region: Tumwater | 360-236-3030 | ccr.swro@doh.wa.gov |

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