



Communications Plan

Underground Storage Tank Cleanup Fund
Division of Financial Assistance
State Water Resources Control Board
March 2013



STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS

Introduction

We recognize the importance of meeting the expectations of our customers and stakeholders for information that is clear, easy to understand, timely, accurate and relevant to their needs. This document sets out the Underground Storage Tank Cleanup Fund's (Cleanup Fund) Communications Plan (Plan). The Plan shows how we propose to deliver our message, the intended audiences for our communications, and the expected outcomes from our communications in practical, tangible terms. It also identifies how the Cleanup Fund's stakeholders can provide information and input back to the Cleanup Fund to help us improve our business processes.

By design, this will be an "evergreen" document, with updates and revisions incorporated as our program evolves and changes to comply with legislative and State Water Board mandates, and to accommodate input from our stakeholders. Also, rather than addressing the actual messages we intend to deliver, which will be varied as the program continues to evolve, the plan primarily addresses the vehicles that we will use to deliver the messages to our varied stakeholders in a coordinated, predictable manner, and how these same stakeholders can provide feedback to us.

Issue Statement

The Cleanup Fund's business model has changed rapidly in the last several years in response to pressures for the Cleanup Fund to: 1) Improve our financial management processes to balance our revenues with our expenditures; 2) Contain and reduce costs related to reimbursement for cleanups; 3) Improve our processing efficiency for both eligibility determinations and payments; and 4) Improve our internal controls to prevent and minimize fraud, waste and abuse of Cleanup Fund monies. These changes have affected virtually all stakeholders of the Fund.

The Cleanup Fund recognizes that we can improve our communication of these changes, as well as our improve communications on our "routine" business processes, to our stakeholders. We also recognize that we can improve our avenues for soliciting and obtaining feedback from our stakeholders. This Communications Plan outlines our plan to address both of these core issues.

Goal

Our goal is that the Cleanup Fund provides access to information that is clear, timely, accurate and useful to our stakeholders, as well as provides an avenue for constructive stakeholder feedback to the Cleanup Fund to help us improve our internal processes. This information includes: 1) new developments or changes in the Cleanup Fund's procedures to stakeholders as early as possible prior to the implementation of these changes; 2) information explaining why these changes are being implemented; and 3) clear, easy to understand instructions to help stakeholders accommodate these changes in their business practices with the Cleanup Fund.

Major Issues

Historically, the Cleanup Fund has used various methods of communicating with stakeholders. At times we have received feedback that these methods have been incomplete, unpredictable and insufficient to allow stakeholders, notably our claimants and their hired consultants, to make timely business decisions regarding the cleanup at their sites.

The Cleanup Fund currently services approximately 2900 active sites, with another approximately 4700 sites on the priority list, awaiting activation. Associated with these sites are hundreds, if not thousands, of individual stakeholders, including claimants, consultants, associated subcontractors, vendors and others. Logistically, communicating both to and with this number of individual stakeholders has proven problematical. Inefficient communication has resulted in increased questions from our stakeholders, as well as decreased the time available for Cleanup Fund staff to address their routine workload.

Cleanup Fund Stakeholders

The Cleanup Fund has a variety of stakeholders that require information from the Fund. There are considerable nuances in communicating with each of these stakeholder groups. For example, not all of these stakeholders require the same information nor the same frequency of information. Listed below are stakeholders that the Cleanup Fund has identified as targets for our communication improvement efforts. Other groups may be identified in the future as the needs of our stakeholders and the Cleanup Fund program itself evolves.

Internal Stakeholders

- State Water Board Members
- State Water Board management
- State Water Board UST Program management and staff
- Cleanup Fund managers and staff
- Regulatory agency management and staff, including both Regional Water Boards and Local Oversight Programs

External Stakeholders

- Claimants to the Cleanup Fund
- Consultants hired by claimants
- Various subcontractors hired by claimants and/or consultants, including environmental laboratories, drilling operators, equipment vendors and equipment suppliers.
- Legislators and legislative staff
- Environmental justice and community groups
- Real estate and financial institutions dealing with properties associated with Cleanup Fund claims
- Federal agencies, such as the US Environmental Protection Agency

- General members of the public who may be affected or interested in properties associated with Cleanup Fund claims in their communities

Delivery of Cleanup Fund Information to Stakeholders

The Cleanup Fund will rely primarily on electronic methods to deliver information to our stakeholders for information of a general nature that is applicable to all claims.

Electronic delivery of information is the preferred method due to the large number of stakeholders to the Cleanup Fund, the expense, staff time and complicated logistics involved in notifying all stakeholders, or even our primary stakeholders, by mail. We believe that most stakeholders will be able to access this information electronically, based on our experience. We know of a certain very limited number of claimants who have notified us that they do not have access to electronic information via the internet, and would like to continue to receive notifications through the regular mail system. We will continue to send those claimants who do not have access to the internet paper copies of information through the mail. For claim-specific information, such as routine processing of reimbursement requests, the Cleanup Fund will continue to rely on both electronic methods and the regular postal system.

Electronic Content Management – “Paperless Office”

Over the next year the Cleanup Fund will be transitioning to an Electronic Content Management or “paperless office” system. The first phase of this transition will be internal functions of the Cleanup Fund. Later phases will address both information incoming to the Cleanup Fund and outgoing information from the Cleanup Fund. It is likely that routine submittals to the Cleanup Fund from stakeholders, such as reimbursement requests will eventually be handled electronically. The Cleanup Fund also anticipates that routine outgoing correspondence will be more readily available to stakeholders through this system. Although the exact changes to the Cleanup Fund procedures and information flow due to the implementation of this new system are not yet well defined, the Cleanup Fund will keep stakeholders informed throughout the transition process. This Plan will also be updated as changes due to this new system are implemented.

Information Delivery Timing

Generally, Cleanup Fund staff will deliver information to stakeholders as soon as practicable after the information becomes available or program changes are planned or implemented. If program changes necessitate stakeholders making changes in their routine business processes, such as invoicing procedures, the Cleanup Fund will notify stakeholders at least two months in advance of the changes being implemented. This will allow stakeholders time to transition their internal processes to incorporate the required changes.

Occasionally, the Cleanup Fund will not be able to provide information in as timely a manner as we would like. This is generally due to the information being unavailable to us, for reasons beyond our control. An example of this is budget change orders to support additional site work. Although we will try to approve these as soon as the

information to support them is available, occasionally we will not have the revenue information to allow us to determine if we will have sufficient funding to support these requests. In those instances, we will need to wait for the revenue information to come to us prior to approving change orders.

General Cleanup Fund Information

The Cleanup Fund will use the following methods to deliver non-claim-specific information to stakeholders. These electronic methods include both active methods and longer-term passive methods, whereby the information is available for download for longer periods of time.

1. Cleanup Fund Website: This will be our primary means of providing information to our stakeholders electronically. Information will be posted on our website as soon as it is available for long-term access by interested parties. Although this is a passive method of communication, that is stakeholders need to initiate the information transfer by visiting the website, it is also the best current option for long-term access of this information.
 - a. http://www.waterboards.ca.gov/water_issues/programs/ustcf/
 - b. Most general information necessary to do business with the Cleanup Fund will be placed on our website. This includes forms, frequently asked questions, contact information, laws and regulations, general program updates, specific updates or procedural changes, and various reports the Cleanup Fund generates.
 - c. Some claim specific information, such as payment status for individual claims, will also continue to be posted on our website.
2. Lyris Email Subscription Service: We encourage all stakeholders to also sign up for our email list subscription. At the same time that general interest documents or information is posted to our website, we will also send out a notification via our Lyris email subscription service members notifying subscribers that this information is now available on our website. The electronic information file will be included in the email notification if it is not too large. If the file posted to the website is large, a link will be provided in the Lyris email message so stakeholders can download the information themselves.
 - a. http://www.waterboards.ca.gov/resources/email_subscriptions/ust_subscribe.shtml
3. GeoTracker: The Cleanup Fund is coordinating internally with the Division of Water Quality to make additional information, particularly with respect to site/claim closures, available on the public side of GeoTracker.
 - a. <http://geotracker.waterboards.ca.gov/>
4. Cleanup Fund Outreach Efforts: Cleanup Fund staff will continue our ongoing outreach efforts to provide information to stakeholders via in-person presentations or webinars. Examples of these outreach efforts include:
 - a. Quarterly Program Roundtables, with both the Regional Board and Local Oversight Agency managers and staff
 - b. Meetings with stakeholder interest groups
 - c. Presentations at the annual CUPA Conference
 - d. Presentations at stakeholder trade shows

- e. Programmatic webinars
5. Regular Mail Delivery: As indicated above, the Cleanup Fund will continue to communicate with those claimants who do not have access to the internet via the regular postal system.

Claim-Specific Information

Most claim-specific, routine business will continue to be conducted as usual with individual claimants, and their duly-named representatives, through the regular postal system. As has been our past practice, the Cleanup Fund does not anticipate making most claim-specific information generally available to the public in the future, due to financial and privacy concerns and restrictions. By law, certain information has to be redacted from some claim-specific documents before they can be released to the public. To help ensure these privacy restrictions are met, Cleanup Fund staff will continue to address requests for claim-specific documents on a case-by-case basis. The Cleanup Fund is, however, assessing what claim-specific documents, if any, could potentially be routinely made public through either GeoTracker or the paperless office system, without compromising these privacy and confidentiality restrictions. This plan will be updated as the Cleanup Fund makes these determinations and implements them in the future.

Information on Requesting a Public Record is located on the State Water Board webpage at:

- http://www.waterboards.ca.gov/resources/public_records/

Currently, certain claim-specific information is already made public on the Cleanup Fund's website. This information includes payment information that is updated at least monthly, the status of approved budget change orders, and claim budgets for the fiscal year. This information will continue to be posted to our website, and stakeholders are encouraged to check our website for this information as it is required.

Cleanup Fund Questions and Feedback from Stakeholders

There are currently several different ways that stakeholders can contact the Cleanup Fund to provide feedback and request information, including telephone, email, and written requests. Typical inquiries from stakeholders include general program information requests, as well as requests for claim-specific information. In the past stakeholders typically called or wrote individual staff members directly for answers. Unfortunately, due to the volume of information requests that the Cleanup Fund receives on any given day, this resulted in inefficient usage of staff time, and oftentimes delays in staff responding to information requests. We are currently re-evaluating our methods of receiving and responding to information requests from stakeholders via telephone and emails methods to help us determine the most effective and efficient means of responding. Changes to our process determined to be more effective and efficient will be documented in future revisions of this Plan.

In order to increase the efficiency and effectiveness of staff responding to these information requests, stakeholders are asked to contact the Cleanup Fund through one

of the following centralized methods. Stakeholders are encouraged to provide enough detail to allow us to investigate the issue and have an answer ready when we respond. Requests submitted through these means can be for either general information or site-specific information. Inquiries received through one of these centralized methods will be processed several times daily, and the inquiry routed to the proper staff person for a response. Staff assigned these requests are expected to respond in a timely manner, with information available at the time of their response adequate to answer the request.

1. Telephone: For either general or claim-specific questions, concerns, or feedback, stakeholders are encouraged to call our message line at:
 - a. 1-800-813-Fund (3863)
2. Email: Stakeholders can submit inquiries via email to one of the following general addresses:
 - a. For general information, or non-payment related inquiries:
 - i. ustcleanupfund@waterboards.ca.gov
 - b. For inquiries related to payments, or to request forms, publications or applications:
 - i. ustcf_payments@waterboards.ca.gov
3. Postal Service Mail:
 - a. UST Cleanup Fund
PO Box 944212
Sacramento, CA 94244-2120
 - b. UST Cleanup Fund
1001 I Street, 17th floor
Sacramento, CA 95814

Customer Service Survey

Information about how stakeholders may also provide feedback, particularly concerning our customer service, is located at:

- <http://www.calepa.ca.gov/Customer/>

Evaluation of Communication Strategies

As indicated earlier, this Communication Plan will be revised and improved in the future as we continue to evaluate our on-going communication efforts, including what is working well, what isn't working as planned, and areas of improvement. Revisions to the Plan will also be made as we continue to receive, evaluate and implement suggestions based on feedback from our stakeholders. Although we anticipate this evaluation to be ongoing, at least annually the Plan will be reviewed in its entirety to determine if any major revisions are necessary. When revisions are made to the Plan, the revised Plan will be posted on the Cleanup Fund's website, and a notification sent out via the Lyris email list.