

In January 2013, EPA released a memo describing regulatory requirements for directly delivering a CCR to bill paying customers electronically. This section describes what EPA considers direct delivery of the CCR as well as recommendations for how to launch, maintain and electronically deliver CCRs to bill-paying customers.

What Is Considered Direct Delivery?

The CCR Rule generally requires each CWS to mail or otherwise directly deliver one copy of its CCR to each customer annually. In addition, the CWS must make a good faith effort to reach customers who do not get water bills, for example, apartment dwellers.

1. Similar to delivering a copy of the CCR through the mail, electronic delivery must provide the CCR in a manner that is “direct.” The EPA interprets this CCR Rule requirement to mean that CWSs can use other mailings, such as paper billing statements featuring a prominently displayed and explained direct website address (or URL) to the CCR, to meet their CCR delivery requirement. Each year, the CWS must also provide a method (for example contact phone number) for a customer to request a paper copy of the CCR.
2. If a CWS is aware of a customer’s inability to receive a CCR by the chosen electronic method, it must provide the CCR by an alternative method allowed by the CCR Rule.

What is electronic delivery?

Electronic delivery encompasses various delivery methods that include: email, posting a CCR on a public website and mail notification of the posting. There are specific requirements for electronic delivery of CCRs.

What Delivery Methods Does EPA Consider to be “Direct”?

There are six CCR delivery methods that EPA has identified as meeting the “direct delivery” requirement, so long as the system is providing the report directly to each customer. These are described in Table 1 below.

Table 1. Approved CCR Delivery Methods

CCR Delivery Method	Method Description
1. Mail - paper copy	CWS mails a paper copy of the CCR to each bill-paying customer.
2. Mail - notification that CCR is available on website	CWS mails to each bill-paying customer a notification that the CCR is available and provides a direct URL to the CCR where it can be viewed. A URL that navigates to a Web page that requires a customer to search for the CCR does not meet the “directly deliver” requirement. The mail method used for notification may be, but is not limited to, a postcard, water bill insert, statement on the water bill or community newsletter.
3. Email – direct URL to CCR ¹	CWS emails to each bill-paying customer a direct URL to the CCR on a publicly available site on the Internet. A URL that navigates to a Web page that requires a customer to search for the CCR does not meet the “directly deliver” requirement.
4. Email – CCR sent as an attachment to the email ¹	CWS emails to each bill-paying customer the CCR as an electronic file email attachment (for example, PDF).

CCR Delivery Method	Method Description
5. Email – CCR sent as an embedded image in an email ¹	CWS emails to each bill-paying customer the CCR text and tables inserted into the body of an email (not as an attachment).
6. Additional electronic delivery that meets “otherwise directly deliver” requirement ²	CWS delivers CCR through a method that otherwise directly delivers to each bill-paying customer and in coordination with the state.

¹This method may only be used for customers when a CWS has a valid email address to deliver the CCR electronically.

²This category is intended to encompass methods or technologies not included above. CWSs considering new methods or technologies should consult with their state to ensure it meets the intent of “otherwise directly deliver.”



A CWS will need to use a combination of delivery methods to reach all customers.

How Does Outreach Help Me with CCR Delivery?

You should perform outreach to your customers prior to electronic delivery each year. *This is especially important if you currently deliver a paper CCR to each of your customers through the mail and will begin electronic delivery for the first time.* Outreach is different than notifying your customers that the CCR is available on a Website, or an email with the CCR as an attachment. Outreach occurs before the CCR is delivered. It lets you inform customers of your CCR delivery method plans and to receive feedback on how your customers prefer to receive their CCR.

Communicating with your customers that your CCR delivery methods will include electronic delivery creates greater transparency between you and your customers. It shows your customer that you want them to be aware of the CCR and to read it.

An example of an outreach method is to send your customers postcards with information about the upcoming electronic delivery of the CCR. You may want to include information such as when the CCR will be available and where it will be located.

Outreach vs. Delivery?

Outreach is when a CWS contacts customers to tell them that they will be changing the delivery format of their CCR, or asking the customer’s opinion about delivery. This can be done at any time and there are no regulatory requirements surrounding outreach.

Delivery is the regulatory requirement to directly deliver the CCR to all bill-paying customers and make a good-faith effort at reaching non bill-paying consumers. There are specific requirements associated with direct delivery. For more information see EPA’s 2013 CCR Delivery Options Memo.

Tips: Mailing a Direct URL

The URL must provide a direct link to the CCR and the link must take the customer to the entire CCR so that the customer does not have to navigate to another Web page to find any required CCR content.

- The URL must direct the consumer to the current CCR posted. A list of various CCRs, including a list of historical of CCRs, does not meet the “direct delivery” requirement.
- A shortened URL can make customer access easier and can be accomplished through a third-party shortening service that creates a website alias or redirect.
- When using a third-party to create a shortened URL, notify your customers and familiarize them with the URL.
- A long URL increases the chances for customers to incorrectly type the URL and could discourage customers to enter the URL.

Helpful Hint

Most website hosting companies allow you to track website hits and length of stay. The number of hits will tell you if your outreach campaign alerting customers to the existence of your electronic CCR and website is a success or not. If hits are too low, you may want to increase not only your outreach efforts but your outreach methods as well. If your electronic CCR and website hits are high, but people are only staying for five seconds, this may indicate that your site is not engaging or it is too hard to find information. You may wish to work with your IT staff to improve the look and navigation of your electronic CCR and website.

Figure 8. Sample outreach postcard delivered before the direct URL has any information posted.

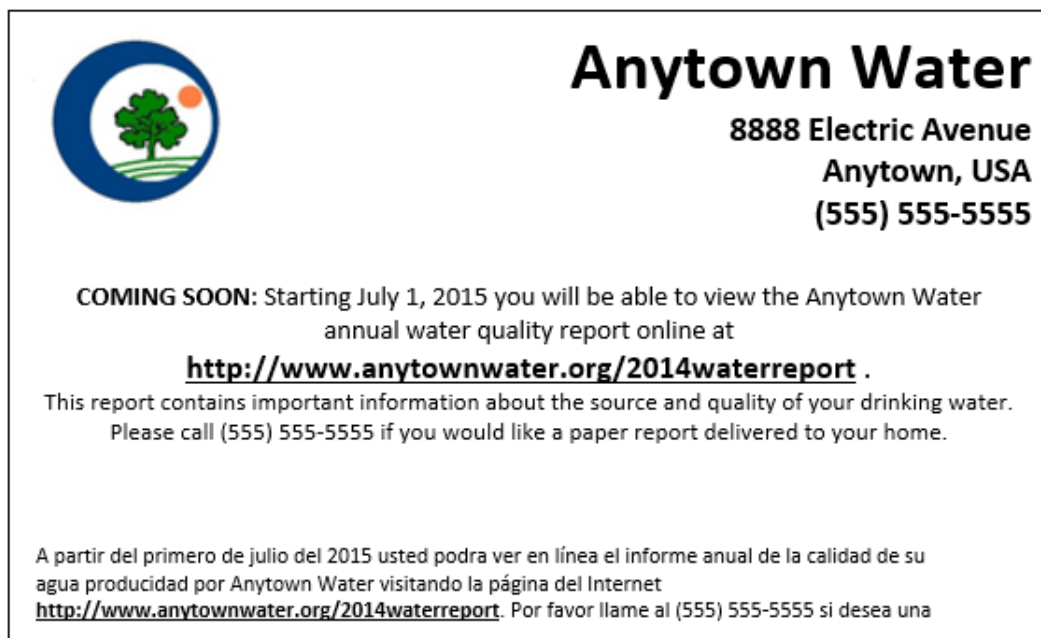
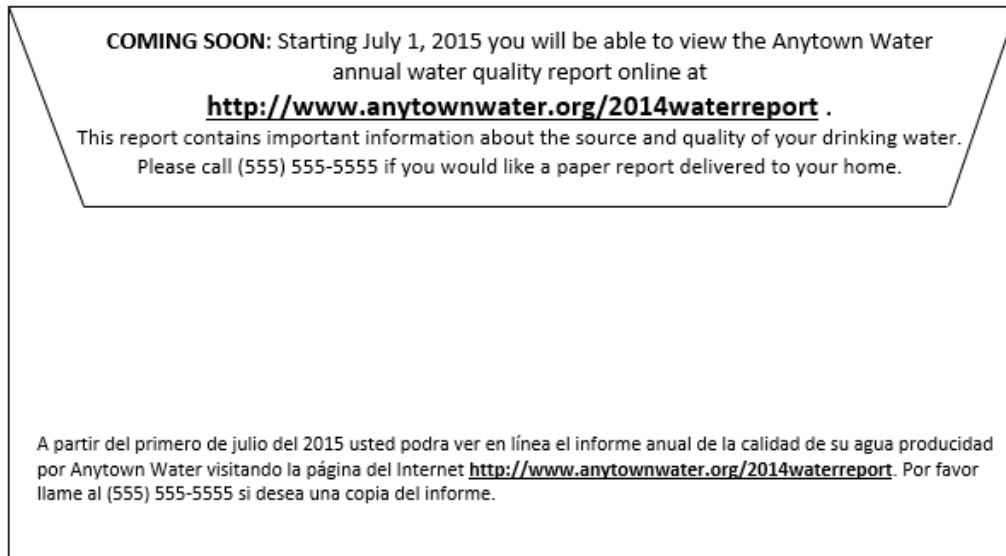


Figure 9. An example of an outreach message on the back of an envelope from the CWS alerting customers that the CCR will be available online.



Another outreach method is to include a message on billing statements or the outside of envelopes that the CCR will be available.

As shown in Figure 9, since the URL is being shared as a part of outreach efforts, the URL does not need to link to your CCR just yet. That is why the phrase “Coming Soon” is used on the envelope. You are not just limited to these two examples in your outreach efforts. The more outreach you do, employing a variety of methods, the greater the chance of reaching your customers. **Note – if the URL does not have the current CCR posted when sending out a link, it is not considered direct delivery and does not satisfy the delivery requirement for the CCR Rule.**

Other outreach methods could include:

- Social media
- Newspaper article
- Notice on website
- Message sent through a reverse calling system
- Article in your CWS newsletter
- Handouts at community events
- Email to all e-billing customers
- Radio ads

By informing your customers of the change to (or addition of) electronic delivery of the CCR it may ease their transition knowing you still want them to read their CCR. Remember, outreach efforts are different than, and do not replace, CCR delivery requirements.



If the most current CCR is not linked to the URL that is being mailed out then you are not meeting the direct delivery regulatory requirement.

Figure 10. Example of a water bill.

Annual Water Quality Report	CHARGES (SEE REVERSE FOR DESCRIPTIONS)				
<p>In 2014, Anytown Water detected 53 contaminants in the drinking water and 5 of them were above the EPA accepted level for drinking water. Please go to http://www.anytownwater.org/2014waterreport.pdf to view your 2011 annual water quality report and learn more about your drinking water. This report contains important information about the source and quality of your drinking water. For a translation of the water quality report or to speak with someone about the report please call (555) 555-5555. If you would like a paper copy of the 2014 Annual Water Quality Report mailed to your home, please call (555) 555-5555.</p>	<p>WATER RATES - ESTABLISHED BY ANYTOWN WATER</p> <table> <tr> <td>SERVICE CHARGE</td> <td>8.35</td> </tr> <tr> <td>WATER USAGE CHARGE 8 X 2.16</td> <td>17.28</td> </tr> </table>	SERVICE CHARGE	8.35	WATER USAGE CHARGE 8 X 2.16	17.28
SERVICE CHARGE	8.35				
WATER USAGE CHARGE 8 X 2.16	17.28				
<p>Durante el año 2014 la empresa de agua Anytown detecto 53 contaminantes regulados en el agua potable. Cinco de los contaminantes detectados en el agua potable reflejaron niveles que exceden los límites legales establecidos por la EPA. Para accede al mas reciente reporte anual de calidad de agua y para mas informacion acerca de su agua potable puede visitar http://www.anytownwater.org/2014waterreport.pdf. El reporte anual contiene valiosa información acerca de las fuentes de abasto y calidad de su agua potable. Para obtener una traducción del reporte de calidad de agua o para preguntas acerca del reporte por favor comuniquese al (555) 555-5555. Si desea obtener a través del correo una copia de su más reciente reporte de calidad de agua</p>	<p>SUBTOTAL ANYTOWN WATER \$25.63</p>				
	<p>SEWER RATES - ESTABLISHED BY HEALTHY COUNTY GOVERNMENT</p> <table> <tr> <td>SEWER BASE CHARGE</td> <td>5.50</td> </tr> <tr> <td>SEWER USAGE CHARGE 8 X 6.55</td> <td>52.40</td> </tr> </table>	SEWER BASE CHARGE	5.50	SEWER USAGE CHARGE 8 X 6.55	52.40
SEWER BASE CHARGE	5.50				
SEWER USAGE CHARGE 8 X 6.55	52.40				
	<p>SUBTOTAL HEALTHY COUNTY \$57.90</p>				
	<p>TOTAL AMOUNT DUE \$83.53</p>				

What Are Best Practices and Important Considerations for CCR Electronic Delivery?

The tips below will help you to ensure successful electronic delivery of CCRs. These tips have been arranged under the broad categories of Before You Begin, Content Considerations and Email Tips.

Tips: Before You Begin

1. As noted above, consider conducting customer outreach to inform them of the option for electronic delivery. Your customers' preferred delivery methods should be assessed prior to beginning electronic delivery. Not all customers have Internet access and even if a customer has Internet access he or she may still want to receive a paper copy of the CCR.
2. To ensure delivery to every bill-paying customer, you may need to implement a combination of paper and electronic delivery. Start the development of your CCR early and coordinate with other departments in your organization that may be involved (for example, Information Technology (IT) and billing departments). Customers likely will have questions about electronic delivery, and personnel in all departments will need to have the same information to share with customers. IT staff may need plenty of time to develop a website to accommodate the posting of your CCR.



EPA's CCR Delivery Options Memo (January 2013) contains information to help assess which type of CCR delivery program is best for your CWS.

Tips: Content Considerations

1. When using a mail notification method with a direct URL (for example, on a water bill), you should display the direct URL on every mailing throughout the year.
2. If you mail a direct URL to customers, consider including a check box on every mailing (see Figure 11), similar to a change of address or pay by credit card option, so that a customer can elect to continue receiving a paper CCR. Be sure to coordinate with the billing department to note those customers who would like to continue receiving a paper CCR so that one can be sent as soon as possible.

Figure 11. Checkbox for customers to elect to continue receiving a paper CCR.

Please check the box if you would prefer a paper copy of your annual water quality report delivered to your home.
Por favor, haga una marca en el encasillado si prefiere recibir a través del correo una copia de su más reciente reporte de calidad de agua.

☐

3. As noted above, the direct URL should be displayed in typeface that is at least as large as the largest type on the billing statement or other notification. You should also create a short, easy-to-type URL. This sounds easy, but if your CWS does not have its own website, this could be challenging. For example, if you will be posting your electronic CCR on your Web page which is on your municipality's website, the URL could become quite long. One thing to consider is a website alias or redirect, which can be obtained through a shortening service. This allows you to have a short, easy-to-remember URL that actually takes your customer to the Web page with the longer URL. An example of this is <http://epa.gov/watersecurity> which takes you to the much longer URL <http://water.epa.gov/infrastructure/watersecurity/index.cfm>.
4. When sending a direct URL notification or email attachment, include a short message to encourage readership of the CCR (see Figure 12). Remember, the purpose of the CCR is to inform customers about the quality of their drinking water and to raise customers' awareness of where their drinking water comes from and what it takes to deliver water to their home, as well as the importance of protecting drinking water sources. This message is different than the required explanation of the URL, which tells your customer that the URL links to the current CCR. This short message should tell them why they should read the CCR.

Helpful Hint

Once a customer requests a paper or electronic CCR, keep a record of this delivery preference for future CCR deliveries. For those who select paper, you may still wish to ask them at least once a year if that is still their preference. This customer may get Internet access or sign up for an email account in the future, and it would be good to remind them of the electronic delivery option.

Figure 12. Direct URL notification, including a short message to encourage readership of the CCR.

In 2014, Anytown Water detected 53 contaminants in the drinking water and 5 of them were above the EPA accepted level for drinking water. The Anytown annual water quality report is available online at <http://www.anytownwater.org/2014waterreport.pdf>.

Durante el año 2014 Anytown Water detectó 53 contaminantes regulados en el agua potable. Cinco de los contaminantes detectados en el agua potable reflejaron niveles que exceden los límites legales establecidos por la EPA. Puede ver en línea el informe anual de la calidad del agua de Anytown Water visitando la página del Internet: <http://www.anytownwater.org/2014waterreport.pdf>.

5. You may want to prepare your CCR in a format (for example, PDF) that can be delivered both electronically and on paper. This decreases the burden of creating two versions for delivery. Try to make the file size as small as practicable if you are planning on delivering it by email.
6. The CCR could also provide links to other, non-required information on the Internet that all customers can visit for more information. This information can be used to encourage your customers to opt for electronic delivery of their CCR. Advertise the fact that your customers can find out much more about their CWS by receiving their CCR electronically or by visiting your website.
7. If you are required to have information in your CCR in different languages based on a large portion of non-English speaking residents, you should also consider including any outreach information in the other languages.



Tips: Using Email

1. Notify customers early to add your email address to their "safe sender" list to avoid the CCR being classified as junk mail or being removed by spam filters. Many spam filters look for embedded image emails and reject them, especially if the sender is not on the recipient's "safe sender" list.
2. If you send the CCR via email and receive a message that the email bounced back, be prepared to send the CCR by an allowable alternative means. This means customers may need to be called to verify email addresses. If a customer no longer has an active email account, this should be noted in your records and a paper CCR mailed to them.
3. Consider your CWS's capacity to send large volumes of email and whether a third-party is needed to manage the delivery of the CCR. Be sure to update your email database regularly throughout the year to make sure emails are up-to-date so that when you send the CCR you do not get many bounce-backs.
4. Track how many emails are opened to help measure the success of your CCR's electronic delivery. Statistics you may wish to track include the open rate (percentage of customers that opened the email), opened (number of customers that opened the email more than once), and forward opens (how many times the email was forwarded). You will want to coordinate with your IT department ahead of time to capture these statistics. Depending on your email service provider, open statistics will vary. You may need to contract with an outside provider to obtain this information.

5. Electronic bill and auto-pay customers may not open or may ignore their billing statements. Therefore, to ensure that your customer is aware that the email they are receiving is not the bill or notice of payment, you should send a separate email (with a CCR-related subject line) to inform your customers of the availability of the CCR each year. You may want to send more than one email to ensure that the message is received.

What Are the Top Ten Things to Remember When Utilizing Electronic Delivery?

- 1 Delivery is your responsibility! A CWS must certify distribution of the CCR to all customers to their privacy agency. CWSs will need to use a combination of delivery methods to best reach customers in their service area.
- 2 Know your customer base! Customer surveys show preferences are split between wanting electronic versus mail delivery of the CCR. Be sure to communicate with your customers to find out their preferences.
- 3 Give customers a heads up and an option! Inform customers of the change in delivery approach before beginning electronic delivery of your CCR to customers. Remember that it is a requirement to include an option for customers to elect to receive a paper CCR.
- 4 Tell everyone, all the time! A CWS mailing a direct URL should display the direct URL on all mailings.
- 5 Know your costs! You may not see delivery savings in the first year, and it may take a few years for people to become comfortable with electronic delivery and to maximize participation.
- 6 Catch your customers' attention! Include a short message in outreach and notification materials to encourage readership of the CCR.
- 7 Be aware of email pitfalls! If an email bounces back, resend the CCR by an allowable alternative means. Keep email databases up-to-date.
- 8 Make it bold! Make it short! The direct URL should be in typeface that is at least as large as the largest type on the billing statement or other mailing notification. You should also create a short, easy-to-type direct URL.
- 9 Keep a record! Remember your customers' delivery preferences for future CCR deliveries.
- 10 Remind auto-pay customers! To ensure that e-bill and auto-pay customers are aware of their CCR, a CWS should send a separate CCR notification email.

Where Do I Find More Information?

The following resources are available to assist you in developing a CCR electronic delivery program. These resources may be found at <http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/index.cfm>.

- EPA's CCR Delivery Options Memo (January 2013).
- EPA's Consumer Confidence Report (CCR) Rule Retrospective Review Summary (December 2012).
- Where You Live: Your Drinking Water Quality Reports Online. EPA publicly accessible database of CCR hosted websites.

Disclaimer

This document provides guidance and contains EPA's current policy recommendations for complying with the CCR Rule. Throughout this document, the terms "state" and "states" are used to refer to all types of primacy agencies including U.S. territories, Native American tribes and EPA.

The statutory provisions and EPA regulations described in this document contain legally binding requirements. This document is not a regulation itself, nor does it change or substitute for those provisions and regulations. Thus, it does not impose legally binding requirements on EPA, states or CWSs. This guidance does not confer legal rights or impose legal obligations upon any member of the public. While EPA has made every effort to ensure the accuracy of the discussion in this factsheet, the obligations of the regulated community are determined by statutes, regulations, or other legally binding requirements. In the event of a conflict between the discussion in this document and any statute or regulation, this document would not be controlling.

The general description provided here may not apply to a particular situation based upon the circumstances. Interested parties are free to raise questions and objections about the substance of this guidance and the appropriateness of the application of this guidance to a particular situation. EPA and other decision makers retain the discretion to adopt approaches on a case-by-case basis that differ from those described in this guidance, where appropriate.

Mention of trade names or commercial products does not constitute endorsement or recommendation for their use. This is a living document and may be revised periodically without public notice. EPA welcomes public input on this document at any time.