



Publicly Owned Treatment Works (POTW) Pretreatment Programs and Electronic Reporting

EPA Pretreatment Program

Under the authority of the Clean Water Act (CWA), the Pretreatment Program regulates pollutants from industrial and commercial sources that discharge into locally owned sewer systems.

www.epa.gov/npdes/national-pretreatment-program

For General Information:

<https://www.epa.gov/npdes/national-pretreatment-program-overview>

For e-Reporting Inquiries:

epa_hq_pretreatment@epa.gov

EPA Cross-Media Electronic Reporting Rule (CROMERR)

CROMERR provides the legal framework for electronic reporting under EPA's regulatory programs. The Rule sets performance-based, technology-neutral system standards to ensure the integrity and enforceability of regulatory information collected electronically.

For General Information:

www.epa.gov/cromerr/

For e-Reporting Inquiries:

cromerr@epa.gov

This document outlines the process that POTWs and State [Approval Authorities](#) should follow when seeking to ensure their electronic reporting plans are compliant with Cross-Media Electronic Reporting Rule (CROMERR) standards as well as applicable [Pretreatment Program](#) requirements.

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Is My Electronic Reporting Subject to CROMERR?

CROMERR applies if:

- you receive submissions electronically from regulated facilities,
- those submissions are required to be received by an EPA-authorized program, and
- electronic submissions are accepted in lieu of paper submissions.

EPA developed a [chart to help states, tribes, and local governments determine if CROMERR applies to their electronic reporting system](#).

It is also important to note that [attaching reports to emails is not](#) CROMERR-compliant. This is true regardless of how the document is signed. However, CROMERR does not prevent programs from receiving non-CROMERR compliant regulatory data submissions by email as a "courtesy" copy, so long as paper-based records of this submission with appropriate signature are separately retained as the legal copy of record.



Background: CROMERR Application and Approval

EPA's Office of Water (OW) and Office of Mission Support (OMS) are collaborating to support POTW Pretreatment Programs through the transition to electronic reporting.

Promulgated in October 2005 and codified under 40 CFR part 3, CROMERR sets standards for electronic reporting under EPA's regulatory programs to include key elements such as identity proofing, electronic signatures, and maintaining the integrity of electronic documents.

For electronic reporting subject to CROMERR, a state, tribe or local government applicant must document both legal and technical compliance with CROMERR standards. Upon successfully documenting this, the applicant's EPA-authorized program(s) under which e-reporting will occur must be revised to reflect the implementation or procedural plans for CROMERR compliant e-reporting under these program(s).¹

In 2021, over 75 percent of EPA-authorized programs opted to achieve CROMERR compliance either through [Shared CROMERR Services \(SCS\)](#) offered through OEI's [Central Data Exchange \(CDX\)](#) and/or through [commercial off-the-shelf \(COTS\) solutions](#) that have established, custom-developed approaches for achieving CROMERR compliance. For these options, CROMERR compliance is straightforward to obtain and maintain, but EPA still requires an application for each such system. To learn more about Shared CROMERR Services, please contact CDX at sharedcromerrservices@epacdx.net. To learn more about COTS CROMERR solutions, please contact the [vendors listed on the CROMERR website](#) directly. A POTW's CROMERR application is reviewed by EPA to determine if it complies with the standards in CROMERR.

CROMERR compliance is only one part of the requirements for POTW Pretreatment programs implementing electronic reporting. 40 CFR part 403 contains other requirements that must be met before electronic reporting can begin. In addition, 40 CFR part 403 provides for states with approved Pretreatment Programs to approve modifications to POTW Pretreatment programs in their states. Therefore, official approval for the POTW to begin collecting electronic reports comes from the POTW's [Approval Authority](#) which, in these cases, is the state in which the POTW is located, following Pretreatment Program procedures under 40 CFR part 403.

For POTWs in which EPA is the Approval Authority, the POTW Pretreatment Program's modification request is submitted to the appropriate EPA Regional Office, and approval to begin collecting electronic reports is provided by the EPA Region.

EPA's website lists [states with Pretreatment Program implementation authority](#).

¹ CROMERR provides two options for applicants seeking CROMERR approval: 1) Program revision by a state or EPA Region under the applicable media program-specific procedures, or 2) Program revision under CROMERR following procedures outlined under 40 CFR part 3.



Steps for POTW Pretreatment Program to Obtain Approval for CROMERR-Subject Electronic Reporting

The general steps for a POTW Pretreatment Program to obtain approval for planned electronic reporting that is subject to CROMERR are outlined below. Details regarding the activities that take place during these steps are outlined in the Roles and Responsibilities sections.

- 1) POTW notifies its [state or EPA Approval Authority](#) and EPA's CROMERR Program (cromerr@epa.gov) of the intent to receive electronic reports under its approved pretreatment program.
- 2) POTW verifies that no local laws exist that might conflict with laws or ordinances in place at the state, territorial, or municipal level establishing the legal validity of electronic signatures. The majority of U.S. states and territories have adopted [the Uniform Electronic Transactions Act \(UETA\)](#) or their own variations to establish the legal validity of e-signatures. Barriers to electronic reporting under local law are rare but their absence must be confirmed. In addition, POTW will need a certification from the state Attorney General or their designee that verifies that the co-regulator has sufficient legal authority provided by lawfully enacted or promulgated laws or regulations to implement the electronic reporting component of the affected program for which approval is sought.
- 3) POTW submits a CROMERR application to EPA's CROMERR program consisting of a [CROMERR legal certification](#) and [documentation](#), including cover sheet and checklist. At the same time, the POTW should initiate discussions of modification of its approved pretreatment program with its EPA [Approval Authority](#).
- 4) The EPA CROMERR program reviews the application and may consult with the applicant to resolve ambiguity in the application and/or revisions as needed to comply with CROMERR.
- 5) When the EPA CROMERR program deems the application complete and approvable, it will notify the POTW. The POTW is responsible for contacting its Approval Authority to initiate its pretreatment program modification for final approval.
- 6) The POTW submits to its Approval Authority a statement of the basis for its desired program modification, the documentation received from the EPA CROMERR program (#5 above), a modified program description (see 40 CFR [§403.9\(b\)](#)), or such other documents the Approval Authority determines to be necessary under the circumstances. The Approval Authority reviews the program modification submission determines the appropriate approval procedures. In addition to CROMERR, the POTW will need to comply with other provisions of 40 CFR part 403 and potentially other provisions or requirements agreed upon between the Approval Authority and POTW. CROMERR approval of a POTW's pretreatment program does not require publication of a notice in the Federal Register. However, 40 CFR part 403 does require meaningful notification to the affected and interested parties. This usually takes the form of notice in local newspapers.



Roles and Responsibilities: POTW Pretreatment Program

Verify Legal Validity of Electronic Signatures through CROMERR Legal Certification

CROMERR requires certification by the applicant of the legal validity of electronic signatures under their State or local statutes. [Most states have already broadly attested to the legal validity of e-signatures to the CROMERR Program.](#) POTW Pretreatment Programs must verify and submit a written certification that no *local* statutes or ordinances establishing the legal validity of e-signatures exist that might conflict with statutes in place at the state or territorial level. This document is typically one page, and the CROMERR Program provides [directions and a template for local governments to prepare this legal certification.](#)

POTW Pretreatment Programs should contact the CROMERR Program if they have questions, need assistance in preparing this certification, or would like a copy of the approved CROMERR certification(s) on file from their state or territory. Otherwise, once this certification is prepared, it should be included as part of the documentation provided to Approval Authority as part of the program modification request.

Prepare CROMERR System Documentation

System documentation will vary according to the type of system being deployed.

CROMERR at Section 3.1000(b) requires that State co-regulators include in their application a certification from the state Attorney General or their designee that verifies that the co-regulator has sufficient legal authority provided by lawfully enacted or promulgated laws or regulations to implement the electronic reporting component of the affected program for which approval is sought. In the case of an authorized local government or tribal government, CROMERR requires that the chief executive or chief administrative official of the governmental entity or their designee sign the certification. Although not required by CROMERR, providing a “cross walk” between the CROMERR requirements and the relevant provisions of the applicant’s authorities helps EPA evaluate submissions. In some cases, an existing certification for an already approved state system can be expressly extended to a new system in that state by means of a leveraging letter – which is a letter that confirms that the legal analysis and conclusion of the original certification from the state can be properly extended to the system for which approval is now sought. EPA will make decisions on the need for a leveraging letter on a case-by-case basis.

For purposes of EPA review, electronic reporting systems fall into one of four general categories, which influences what the application must contain. Those four categories are:

- 1) EPA-Developed Off-The-Shelf (EDOTS) Solutions – Systems that operate on EPA-developed software. There are two categories of EDOTS, CDX integrated and those not integrated by CDX representatives. In CDX-integrated systems, the CDX Team is responsible for the deployment and integration of all business and technical processes associated with the end-to-end software solution. In EDOTS, not integrated by CDX representatives, co-regulators or COTS systems manage at least some aspect of the deployment or integration of the business and technical processes associated with the end-to-end software solution. Applications that are EDOTS, not integrated by CDX representatives have the same content requirements as hybrid solutions, described under definition 4 below.
- 2) EPA-Vetted Commercially-Developed Off-The-Shelf (COTS) Solutions – Commercially-offered systems that EPA has previously approved for use under CROMERR.
- 3) Custom-Built System Solutions – Electronic reporting systems other than categories 1 and 2.



4) Hybrid Solutions – Electronic reporting systems that combine aspects of categories 1, 2, or 3.

EPA has developed an application cover sheet and a checklist of CROMERR regulatory requirements to assist EPA programs and co-regulators in providing a complete application to EPA CROMERR Program (cromerr@epa.gov). The cover sheet includes fields for basic information about the application, including contact information for the applicant and information about the documents that the system will receive. The checklist identifies the requirements in 40 C.F.R. part 3 and provides fields for the applicant to describe how the software or other automated processes (system functions), business processes, or some combination of the two meets the regulatory requirements. In addition to the standard checklist, EPA developed pre-populated templates for applicants using EDOTS in the non-CDX environment (EDOTS not integrated) to facilitate application preparation, review, and approval. Also, some vendors of COTS systems that have been previously approved under CROMERR for a particular POTW have pre-populated templates. POTWs implementing COTS systems might want to contact the vendor to determine whether they have a template and to receive the latest version. When using prepopulated templates, applicants will normally need to make modifications to the prepopulated checklist sections to reflect how their system will actually operate, as well as provide additional information for CROMERR business processes and system functions not included in vendor or CDX services. CROMERR is a rule and not a software certification program. **POTWs pursuing these solutions must still submit CROMERR applications.** If EPA has previously vetted a COTS system for use by a POTW, state, tribe, or other governmental entity, it does not mean that the COTS has blanket CROMERR approval for use by any other entity because EPA approves revisions to authorized, delegated, or approved governmental programs, not software packages. Moreover, COTS software does not cover all CROMERR requirements or, itself, offer proof of the needed legal authority. Additionally, COTS systems often have variations in any given implementation that require review.

The CROMERR program cover sheet, checklists, and templates can be found at:

<https://www.epa.gov/cromerr/application-tools-and-templates#Application%20forms>.

Table “**Application Elements by System Type**” (see below) lists the options for template use according to system type. The table indicates where a checklist is not needed because the system functions and business processes are managed by EDOTS integrated into EPA CDX. It also contains information on where a pre-populated checklist template is likely to be useful in describing an off-the-shelf approach that EPA has already reviewed and approved for use by a prior applicant. Terms shown in italics are defined in the definitions section.

Table: Application Elements by System Type

Application Element	EDOTS CDX (CDX Integrated)*	EPA-Vetted COTS	EDOTS (Not Integrated by a CDX representative) * & Hybrids	Custom
Cover Sheet	General CROMERR Cover Sheet, Cover Sheet for EDOTS, EPA-Vetted COTS or Cover Sheet for POTWs.			
Legal	Attorney General or legal representative Certification or leveraging letter.			
Checklist - System Functions Section	CROMERR checklist not needed	May vendor for latest template and use it <i>with any modifications shown in bold and/or italics.</i>	May use appropriate CDX or pre-approved vendor-specific CROMERR template checklist, <i>with any modifications shown in bold and/or italics</i> and provide additional information for CROMERR system functions not included in vendor or CDX services.	May complete a standard CROMERR Checklist in its entirety.
Checklist - Business Process Section	CROMERR Checklist not needed	<ul style="list-style-type: none"> • May use pre-approved vendor-specific CROMERR checklist template <i>with any modifications shown in bold and/or italics</i> and provide additional information for CROMERR business processes not included in vendor services, or • May complete a standard CROMERR checklist in its entirety 	<ul style="list-style-type: none"> • May use appropriate CDX or pre-approved vendor-specific CROMERR template checklist, <i>with any modifications shown in bold and/or italics</i> and provide additional information for CROMERR business processes not included in vendor or CDX services, or • May complete a standard CROMERR checklist in its entirety, 	May complete a standard CROMERR Checklist in its entirety.
Other	Template Electronic Signature Agreement (with any customizations shown in bold and/or italics) or Custom Electronic Signature Agreement. Example Copy of Record as produced by the system.			

**In CDX-integrated systems, the CDX Team is responsible for the deployment and integration of all business and technical processes associated with the end-to-end software solution. In EDOTS, not integrated by CDX representatives, co-regulators or COTS systems manage at least some aspect of the deployment or integration of the business and technical processes associated with the end-to-end software solution.*

Review and Revise Pretreatment Program Implementation Procedures

To ensure that implementation goes smoothly, POTWs should review and update the elements of their Pretreatment Program that will be affected by electronic reporting, whether these business processes are needed to meet the requirements of CROMERR or the pretreatment regulations. Program elements that may be affected are outlined below:

- Review and revise legal authorities accordingly (*e.g.*, the sewer use ordinance (SUO), applicable multijurisdictional agreements) to ensure necessary parameters for implementing the electronic reporting system. This might include where a SUO may identify how and which reports are filed, as well as which Industrial Users are required to report electronically.
- Develop and implement procedures required per 40 CFR § 403.8(f)(2) to describe how the approved POTW Pretreatment program receives, analyzes, and retains reports and other notices submitted by Industrial Users which, for example, may need to be updated to:
 - Identify which (some or all) reports that may be received electronically in lieu of paper submission.
 - Identify changes to reviewing and analyzing Industrial User (IU) reports per 40 CFR § 403.8(f)(2)(iv) and identify any changes to procedures necessary to ensure that POTW staff is notified on a timely basis of any noncompliance so that appropriate investigation steps may be taken in accordance with the POTW Pretreatment Program's approved Enforcement Response Plan per 40 CFR § 403.8(f)(5).
 - Provide communication plans and instructional materials for electronic reporters (IUs) on how to submit reports, make corrections, ensure transmission was completed, *etc.*, including contingency plans for instances if electronic systems are temporarily inaccessible by the IUs and/or POTW. Provide communication plans and instructional materials for electronic users of the data (POTW staff, state, EPA, public), including periodic standardized reports for frequent users, as necessary to maintain public accessibility of the information per 40 CFR 403.14, including determination of recordkeeping formats for required retention times per 40 CFR 403.12(o).
- Identify POTW personnel/organizational duties and responsibilities for administering the Pretreatment Program. As described in 40 CFR 403.8(f)(5) and 403.9(b), staff should be identified who are responsible to implement the electronic reporting system. Such activities may include:
 - Input any necessary IU permit components and IU facility identifiers into the data system to enable the IU to log into the system to report their periodic data.
 - Ensure that the new Pretreatment data receipt program can produce information necessary so that the POTW adequately submits required annual reporting.
 - Assistance to IUs who need to submit reports to the electronic system.
- Ensure that the POTW has sufficient resources (funding) and qualified personnel to carry out the electronic report receipt procedures, per 40 CFR 403.8(f)(3), supporting the purchase or ongoing rental fee for the software or system, and developing contingency plans in case resource support for the electronic system decreases or ceases.



Roles and Responsibilities: EPA CROMERR Program

EPA encourages POTWs to contact the EPA CROMERR Program with any questions they have about their draft application, particularly with custom systems or systems that require substantial modification of template system function descriptions. This consultation often provides EPA an opportunity to ensure that the application has sufficient detail and describes system functionality with sufficient clarity, thereby reducing the time that it takes us to review the application.

Roles and Responsibilities: EPA or Approved State Pretreatment Program Approval Authority

Approved State Pretreatment Programs and EPA acting as Pretreatment Program Approval Authorities provide technical and legal assistance to POTWs in developing and implementing local Pretreatment programs.

EPA expects that obtaining the authority and required technology needed to receive electronic reports from Industrial Users will require most POTW Pretreatment Programs to change their current program implementation. Consequently, EPA expects that POTWs will need to review and modify their existing programs to reflect these changes.

Specifically, upon notification from the POTW Pretreatment Program that the POTW wants to begin receiving reports electronically from its Industrial Users, the EPA or Approved State Pretreatment Program staff will:

- 1) Work with the POTW Pretreatment Program to assist in identification of programmatic authorities and procedures that the POTW should modify to implement electronic reporting for its Industrial Users.
- 2) Receive the recommendation from the CROMERR Program that the CROMERR system documentation has been reviewed and/or revised as needed and is determined to be CROMERR-compliant.
- 3) Receive and process the POTW Pretreatment Program's program modification request in accordance with procedures in 40 CFR § 403.18, including that the POTW has ensured that affected stakeholders are appropriately notified of the changes in reporting procedures under 40 CFR 403.8(f)(2).
- 4) Notify all stakeholders, including the POTW, Authorized State Pretreatment Programs, the EPA Regional Office, EPA Office of Water, and the EPA CROMERR Team, as appropriate, of the POTW's intent to begin electronic reporting, and keep all stakeholders apprised of CROMERR review and 40 CFR Part 403 review and approval progress.

Definitions

Pretreatment Program "Approval Authority"

The Director in a National Pollutant Discharge Elimination System (NPDES) State with an approved State pretreatment program and the appropriate Regional Administrator in a non-NPDES State or NPDES State without an approved State pretreatment program (40 CFR 403.3). [More than two-thirds of states implement approved State pretreatment programs](#). EPA is the Approval Authority for the remaining States, Tribes, and Territories that have not been approved.

“Approved POTW Pretreatment Program or POTW Pretreatment Program”

A program administered by a POTW that meets the criteria established in 40 CFR 403.8 and 403.9 and which has been approved by a Regional Administrator or State Director in accordance with 40 CFR 403.11. The Approved POTW Pretreatment Program is also called a “Control Authority.” Where the POTW is not the Control Authority, the Approval Authority is the Control Authority, i.e., EPA or approved State pretreatment program.

“Control Authority”

The term Control Authority refers to: (1) The POTW if the POTW's Pretreatment Program Submission has been approved in accordance with the requirements of § 403.11; or (2) The Approval Authority if the Submission has not been approved. The Control Authority is the authorized State Pretreatment Authority, where the POTW is not approved, or the EPA where neither the POTW nor State is approved to implement the Pretreatment Program

“Publicly Owned Treatment Works or POTW”

A treatment works as defined in section 212 of the Clean Water Act (CWA), which is owned by a State or municipality. This definition includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes, and other conveyances only if they convey wastewater to a POTW Treatment Plant (that portion of the POTW, which is designed to provide treatment, including recycling and reclamation of municipal sewage and industrial waste).

The term also means the municipality as defined in section 502(4) of the CWA, which has jurisdiction over the indirect discharges to and the discharges from such a treatment works. An approved POTW Pretreatment Program is usually required to implement its approved program in accordance with requirements contained in an NPDES permit.

“Direct Implementation”

An environmental program in a state, tribe, or locality that is implemented directly by EPA (i.e., the program has not been authorized or approved by EPA to be implemented by the state, tribe, or local agency.).

Definitions required to establish framework of electronic reporting, pursuant to 40 CFR 3;

(a) *Copy of record* means a true and correct copy of an electronic document received by an electronic document receiving system, which copy can be viewed in a human-readable format that clearly and accurately associates all the information provided in the electronic document with descriptions or labeling of the information. A copy of record includes:

- (1) All electronic signatures contained in or logically associated with that document;
- (2) The date and time of receipt; and
- (3) Any other information used to record the meaning of the document or the circumstances of its receipt.

(b) *Electronic document* means any information in digital form that is conveyed to an agency or third-party, where “information” may include data, text, sounds, codes, computer programs, software, or databases. “Data,” in this context, refers to a delimited set of data elements, each of which consists of a content or value together with an understanding of what the content or value means; where the electronic document includes data, this understanding

of what the data element content or value means must be explicitly included in the electronic document itself or else be readily available to the electronic document recipient.

(c) *Electronic document receiving system* means any set of apparatus, procedures, software, records, or documentation used to receive electronic documents.

(d) *Electronic signature agreement* means an agreement signed by an individual with respect to an electronic signature device that the individual will use to create his or her electronic signatures requiring such individual to protect the electronic signature device from compromise; to promptly report to the agency or agencies relying on the electronic signatures created any evidence discovered that the device has been compromised; and to be held as legally bound, obligated, or responsible by the electronic signatures created as by a handwritten signature.

(e) *Electronic signature device* means a code or other mechanism that is used to create electronic signatures. Where the device is used to create an individual's electronic signature, then the code or mechanism must be unique to that individual at the time the signature is created and he or she must be uniquely entitled to use it. The device is compromised if the code or mechanism is available for use by any other person.

(f) *Electronic signature* means any information in digital form that is included in or logically associated with an electronic document for the purpose of expressing the same meaning and intention as would a handwritten signature if affixed to an equivalent paper document with the same reference to the same content. The electronic document bears or has on it an electronic signature where it includes or has logically associated with it such information.

(g) *Handwritten signature* means the scripted name or legal mark of an individual, handwritten by that individual with a marking- or writing-instrument such as a pen or stylus and executed or adopted with the present intention to authenticate a writing in a permanent form, where "a writing" means any intentional recording of words in a visual form, whether in the form of handwriting, printing, typewriting, or any other tangible form. The physical instance of the scripted name or mark so created constitutes the handwritten signature. The scripted name or legal mark, while conventionally applied to paper, may also be applied to other media.

(h) *Valid electronic signature* means an electronic signature on an electronic document that has been created with an electronic signature device that the identified signatory is uniquely entitled to use for signing that document, where this device has not been compromised, and where the signatory is an individual who is authorized to sign the document by virtue of his or her legal status and/or his or her relationship to the entity on whose behalf the signature is executed.

"EPA-Developed Off-The-Shelf (EDOTS) Solutions"

Systems that operate on EPA-developed software. There are two categories of EDOTS, CDX integrated and those not integrated by CDX representatives. In CDX-integrated systems, the CDX Team is responsible for the deployment and integration of all business and technical processes associated with the end-to-end software solution. In EDOTS, not integrated by CDX representatives, co-regulators or COTS systems manage at least some aspect of the deployment or integration of the business and technical processes associated with the end-to-end software solution.

"EPA-Vetted Commercially-Developed Off-The-Shelf (COTS) Solutions"

Commercially offered systems that EPA has previously approved for use under CROMERR.



“Custom-Built System Solutions”

Electronic reporting systems other than EPA-Developed (EDOTS) Solutions and EPA-Vetted Commercially Developed Off-The-Shelf (COTS) Solutions.

“Hybrid Solutions”

Electronic reporting systems that combine aspects of EDOTS, COTS, and custom-built solutions.

"Attorney General Statement"

To ensure that there are no legal impediments under state law to the implementation and enforcement of an electronic reporting system and the documents that it generates, EPA asks for a certification from the State Attorney General that no such impediment exists. Customarily, this certification is accompanied by a “crosswalk” between the requirements of CROMERR and corresponding provisions in state law and, in the case of POTWs, local law. EPA has template certification language and sample crosswalks [available here](#).

"Leveraging Letter"

In many cases, an existing Attorney General Statement will speak to the specific program or system for which it was initially written, even though the underlying legal analysis would apply more broadly. In these cases, the Attorney General or their designee can sign a letter that confirms that the legal analysis and conclusion of the original statement can be properly extended to the POTW system for which approval is now sought. Please [contact the EPA CROMERR program](#) for an example leveraging letter.

"Signature Holder Agreement"

This agreement defines the terms and conditions by which a user is permitted to use an electronic reporting system. Some elements of the agreement are compelled by CROMERR, but POTWs may modify and/or supplement these conditions as their needs require, provided that these changes do not conflict with the requirements of CROMERR. [Template signature holder agreements can be found here](#).