

Appendix D
2013 Annual Water Quality Report (AWQR) Delivery Options
Questions and Answers for Water Suppliers

In January 2013, the United States Environmental Protection Agency (USEPA) determined that specific methods of electronic delivery may be used by a community water supplier to meet the regulatory requirement to “mail or otherwise directly deliver” Consumer Confidence Reports, also known as the Annual Water Quality Report (AWQR), to their bill paying customers. In conformance with the USEPA’s efforts, community water systems in New York State may now use electronic delivery as an additional option in order to distribute the AWQR. A list of frequently asked questions along with the answers is provided to assist you with the different acceptable options.

Q. Why the change?

A. There has been an increase in the number and type of communication tools available to water systems since AWQR requirements were first enacted in 1999. This updated interpretation of the rules for direct delivery will improve the communication with your customers and may reduce costs associated with printing and mailing your AWQR to customers.

Q. What does this mean for a water supplier?

A. Beginning in 2013, there are additional options for directly delivering an AWQR. You may continue to report as you have always reported, or you may decide to use some alternative methods to distribute the AWQR to your water customers.

Q. Does this mean I can go totally electronic (paperless)?

A. No. It will depend on your customers. More than one method of delivery may be necessary to reach all your bill paying customers. You will be required to provide a paper copy to those customers who cannot receive the report electronically or who prefer to receive a paper copy.

Q. What new AWQR delivery methods are now acceptable?

A. In addition to mailing paper copies to your customers, you may now also use the following methods:

- Notification by monthly/quarterly bill, newsletter or separate mailing that the AWQR is available on a public website via a direct URL;
- Email with a message containing a direct URL link to the AWQR;
- Email with the AWQR, in electronic form, as an attachment;

- Email with the AWQR included as an embedded image.

Q. How do we implement an electronic AWQR delivery approach?

- A. There are two overall approaches you can take: (1) a paper AWQR delivery with an electronic AWQR delivery option; or (2) an electronic delivery with a paper AWQR delivery option.

Q. Are there any restrictions on the URL used to provide access to the AWQR?

- A. Yes. The URL must take the customer directly to the entire AWQR. The URL must be to a public webpage that is readily viewed by commonly available browsers, and that does not require subscription, payment or login accounts. It is recommended that the URL be short and easy to type. Any URL that requires the customer to search for or navigate through a website to retrieve the AWQR does not meet the “directly deliver” requirement.

Q. What electronic methods are not allowed?

- A. Social media such as Twitter and Facebook, automated telephone notifications systems, and using an indirect URL that requires the customer to search for the AWQR on your water systems main website are not acceptable methods for direct delivery.

Q. If the AWQR is posted on a website, how often do we need to make notification to our customers?

- A. At a minimum, notification must be made once annually. However, we recommend that notification be made on a more frequent basis (e.g. on customer billing statements, in newsletters, or in correspondence) to ensure the message is widely delivered.

Q. If we decide to mail notifications that the AWQR is available on our website via a direct URL, are there rules about how the notification is displayed?

- A. Yes. The message and direct URL must be prominently displayed in a typeface that is at least as large as the largest type on the statement or other mail notification. There must also be an option included (e.g. a checkbox on return portion of the utility bill) for customers to request a paper copy, and directions must be provided on how to request a paper copy via phone, mail, or email.

Q. What if we email a direct URL to the AWQR to customers?

- A. The email must include a direct URL link and should also include a short statement encouraging readership. The message must also provide information on how to request a paper copy of the AWQR. If an email is returned undelivered, the email must be sent to a corrected email address or the report delivered by another acceptable direct delivery method.

Q. Is it acceptable to email customers and include the AWQR as an attachment?

A. Yes. The AWQR as an electronic file (e.g. portable document format PDF) can be attached to an email. The email should also include a short statement encouraging readership and it must provide information on how to request a paper copy of the AWQR. If an email is returned undelivered, the email must be sent to a corrected email address or the report delivered by another acceptable direct delivery method.

Q. Is it acceptable to email the AWQR embedded in the message?

A. Yes. You may email the AWQR text and tables as an image inserted into the body of an email. The email must also provide information on how to request a paper copy of the AWQR. If an email is returned undelivered, the email must be sent to a corrected email address or the report delivered by another acceptable direct delivery method.

Q. What if I select more than one delivery method? How do I know I've reached my intended audience?

A. It is your responsibility to ensure delivery of the AWQR to each bill paying customer. Employing a variety of delivery methods enhances the likelihood you reached all customers.

Q. What do I need to consider as I plan my AWQR delivery program?

A. Here are some recommendations:

Know your customer base: Find out if there are customers who don't have internet service. Learn from your past experiences including e-bill or e-pay participation, other electronic communication efforts and current website usage.

Know your electronic delivery method capabilities: Research the various delivery methods and your system's technical capabilities. Are you able to send mass emails? Do you have the resources to handle emails returned as undeliverable? Do you have a public website? Will your computer network, internet server, etc. support electronic AWQR delivery?

Know your costs: Determine the costs and benefits. Would a gradual transition benefit your system? What resources will you need and which approach will be best? Are you ready to make a change?

Give customers a heads up and an option: Inform customers of the change in delivery approach before delivery of the AWQRs to the customers. Give them a chance to choose if they prefer to receive paper or electronic reports.

Get the word out and catch customers' attention: If you are mailing a direct URL, include an option on every water bill for a customer to choose to receive a paper AWQR. Include a short message to encourage readership of the AWQR.

Keep a record: Record customer delivery preferences for future AWQR deliveries.

Remind auto-pay customers: To ensure that electronic bill and auto-pay customers are aware of their AWQR, a separate email should be sent to them.

Respond to requests and email: Be prepared to respond to requests for mailed paper copies of the AWQRs. If an email is returned as undeliverable, resend the AWQR by an alternative means. Keep your email database up to date.

Q. Do we still need to certify how the AWQR was distributed?

A. Yes. By September 1, 2013, you must provide certification on how the AWQR was distributed. The certification form has been revised to include the electronic delivery options.

Q. Where can we obtain more information?

A. Information on AWQR preparation and delivery options can be found on the New York State Health Department's website in the document, Preparing Your Drinking Water Annual Report – Guidance for Water Suppliers at:

http://www.health.ny.gov/environmental/water/drinking/annual_water_quality_report/

or you may contact your local health department.