RTI developed RTI-CHARM to increase productivity and provide a fluid, easily accessible system to manage public comment projects. After public comments are loaded into the system, users can easily access the comments, excerpt substantive information, and place excerpts into a project-specific set of categories that serve as sections in a response-to-comments (RTC) document outline. Users can then aggregate groups of closely related excerpts in a given section to form summaries of topics discussed by multiple commenters.

Why RTI-CHARM?

Public comment letters can include text, new information, and attachments that can impact decision-making. RTI-CHARM enables users to collaboratively sort through substantive information within public comments, parse out specific statements and information, and aggregate similar statements made by multiple commenters to inform the client of hot-button issues, new data, or issues that need to be addressed.

Although comment processing can be completed using a word processor, this approach can be limiting for multiple users in different locations who are trying to maintain version control on a single inclusive document. RTI-CHARM solves the version control dilemma by allowing numerous team members to compile material in the system simultaneously from anywhere using a web browser.

In addition, RTI-CHARM provides a level of tracking that is nearly impossible to achieve through a word processor alone. RTI-CHARM documents the location of a single excerpted piece of text all the way through the comment management process so that a user at any stage can go back and view the original comment.

RTI-CHARM has been trusted in many time-sensitive federal rulemaking projects involving thousands of public comments. RTI-CHARM streamlines the process of accepting and responding to public comments in national, state, local, and other programs involving permitting, rulemaking, and peer review.

The RTI-CHARM Advantage

RTI-CHARM provides the following:

- Password-protected web-based access to approved project team members and reviewers
- Quick and easy web login from any location
- Hosting of dozens of users simultaneously in a secure environment
- Ready access to each public comment letter (including attachments), text excerpt, summary, and response
- Tracking back to the pages of public comment letters from which each text excerpt originated
- Project management features to track status and make assignments
• Search function that allows users to query comment excerpts, summaries, and responses for keywords or phrases
• Section-by-section RTC document generation with real-time access to the most recent version
• Easy adjustments to comment categories in the RTC document outline
• Date and last-edited-by stamps on text excerpt, summaries, and responses.

Selected Project Highlights
RTI routinely screens and identifies unique, substantive comments to load into RTI-CHARM for processing and has used the system successfully for many projects.

<table>
<thead>
<tr>
<th>Project</th>
<th>Client</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clean Power Plan for Existing Electric Utility Generating Units</td>
<td>U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards</td>
<td>2,000</td>
</tr>
<tr>
<td>Greenhouse Gas Emissions Standards for New, Modified, and Reconstructed Electric Utility Generating Units</td>
<td>U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards</td>
<td>600</td>
</tr>
<tr>
<td>Petroleum Refinery New Source Performance Standards and Risk and Technology Review</td>
<td>U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards</td>
<td>100</td>
</tr>
<tr>
<td>High Risk Food Project—Peer Review Comments</td>
<td>U.S. Food and Drug Administration</td>
<td>50</td>
</tr>
<tr>
<td>Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings</td>
<td>U.S. Environmental Protection Agency, Office of Indoor Air and Radiation</td>
<td>100</td>
</tr>
</tbody>
</table>

Using RTI-CHARM
RTI-CHARM is available for use through contracted projects. We host RTI-CHARM on our secure and reliable servers and provide training and technical assistance. A brief initial project setup includes establishing user permissions, creating comment categories to serve as the RTC document outline, and loading comment files.

For more comprehensive project support, RTI will screen comments for substance, uniqueness, and prioritization; excerpt or categorize information from comment letters into the RTC document outline; prepare comment summaries; and draft comment responses. We also facilitate bulk comment downloads from www.regulations.gov.

More Information
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