RTI CHARM®

RTI CHARM (Comment Handling and Response Manager) is a secure, web-based software system that enables efficient processing of public comment letters through data management, artificial intelligence (AI)—assisted capabilities, and real-time collaboration among RTI International, our partners, and clients.

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 summarize topics discussed by multiple commenters. Users have the option to develop customized prompts and use integrated AI to generate comment summaries. These summaries can be reviewed and edited by subject matter experts, and include built-in tracking to preserve the link between each summary and the originally submitted comment.

RTI's use of generative AI follows responsible practices, including standards for data security, transparency, and human leadership and review. Within RTI CHARM, the use of generative AI is done on a "human-in-the-loop" basis to enable technical experts to focus on high-value reviews and decision-making instead of time-consuming word processing.

Why RTI CHARM?

Public comment letters can include text, new information, and attachments that can impact decision-making. RTI CHARM enables users to efficiently and 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.

In conjunction with RTI CHARM, the RTI Team can deploy RTI SmartReview (learn more: Insights and Presentation). This innovative tool utilizes natural language processing and machine learning algorithms to identify specific comments and key commenters, group similar comments such as form letters, and identify those that are most relevant to the proposal from a technical and legal perspective. RTI CHARM and SmartReview have been used together and individually to reduce burden and client processing time and allow technical staff to quickly focus efforts on client priorities. SmartReview has been successfully implemented on rules containing more than 15,000 public comments.

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

The 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
- **AI-supported summaries**, including functionality to customize prompts to tailor to specific needs
- **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 Projects

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

Project	Client	Comments
Clean Power Plan for Existing Electric Utility Generating Units	U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards	2,000
Waste Emissions Charge for Petroleum and Natural Gas Systems	U.S. Environmental Protection Agency, Office of Atmospheric Protection	835
Greenhouse Gas Emissions Standards for New, Modified, and Reconstructed Electric Utility Generating Units	U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards	600
Petroleum Refinery New Source Performance Standards and Risk and Technology Review	U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards	100

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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RTI International is an independent, scientific research institute dedicated to improving the human condition. Our vision is to address the world's most critical problems with technical and science-based solutions in pursuit of a better future. Clients rely on us to answer questions that demand an objective and multidisciplinary approach—one that integrates expertise across social, statistical, data, and laboratory sciences, engineering, and other technical disciplines to solve the world's most challenging problems. For more information, visit www.rti.org.

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