## ALASKA OCCUPATIONAL SAFETY AND HEALTH

## FFY 2015 ANNUAL 21(d) PERFORMANCE PLAN

## I. <u>21d PROGRAM INFORMATION</u>

#### **General Program Overview**

The Alaska Occupational Safety and Health (AKOSH) Consultation and Training (C&T) program entered the 21d program, formerly the 7(c)(1) program in 1984. The program functions as a section of the State of Alaska, Department of Labor and Workforce Development, Division of Labor Standards and Safety. The project maintains offices in Anchorage, Juneau, Wasilla and Fairbanks.

#### **Mission Statement**

Work in partnership with Alaskan workers and employers toward eliminating workplace injuries, illnesses and deaths

#### Purpose

Encourage voluntary compliance of Alaska employers with occupational safety and health standards and recommendations with an emphasis on small employers operating in high hazard industries.

## **AKOSH Strategic Goals**

To achieve its vision, AKOSH has established three strategic goals to guide the development of programs and activities. The successful accomplishment of any one of the strategic goals will not be possible without parallel successes in relation to other goals. For example, a focus on reducing hazard exposures, injuries, illnesses and deaths in the workplace will be difficult to achieve without realizing the goal to engage workers and employees in this effort.

AKOSH's success in meeting the goals and objectives outlined in the strategic plan will be measured through results, which depend on a concerted effort from each of the agency's programs. For example, when a particular issue is being emphasized as an objective, it is expected that inspections will be targeted to insure compliance, training workshops will be offered to build necessary knowledge and skills, outreach material will be distributed, and consultation visits will be offered.

AKOSH is committed to three strategic goals for the five-year period of October 1, 2014 through September 30, 2018.

- Improve workplace safety and health in both public and private sectors as evidenced by a reduction in the rate of injuries, illnesses, and fatalities
- *Promote a safety and health culture (both public and private sectors) through compliance assistance, cooperative programs, and consultation assistance*
- Secure public confidence through excellence in the development and delivery of AKOSH programs and services

## Consultation and Training (21d grant) Program

The Alaska Occupational Safety and Health Program is located in the Alaska Department of Labor and Workforce Development (DOLWD), Division of Labor Standards and Safety. A Commissioner, who is appointed by the Governor, heads the department. A Director, who is appointed by the Commissioner, heads the Division of Labor Standards and Safety, and has the authority to perform those duties delegated by the Commissioner and charged by statute (Alaska Statute 18.60.010 - 18.60.105), which include the following elements:

- Encourage Alaskan employers to voluntarily comply with safety and health standards, particularly small businesses in high-hazard industries;
- Provide C&T services through on-site consultative activities as described in 29 CFR 1908 and AS 18.60.030(14) (upon the request of an employer);
- Design educational and other programs to address specific needs of groups or individuals being served. This includes providing statewide classes customized for construction, transportation and warehousing, seafood processing and general industry;
- Dispense information and publications to employers and produce public service announcements to increase safety and health awareness throughout Alaska;
- Support Alaska's strategic outcome and performance goals as outlined in the five-year strategic plan.

This annual project plan details the specific activities and strategies the C&T program will use in FFY2015 to support AKOSH's strategic goals.

#### AKOSH CONSULTATION PROJECT STAFF AND FTE's 21(d)

	OCCUPIED I	NUMBER OF		
ON-SITE CONSULTATION PROJECT STAFF CATEGORY	NUMBER OF PERSONNEL	NUMBER OF FTEs	VACANT POSITIONS***	
1. Managerial Staff	1.00	0.16	0.00	
2. Supervisors	1.00	0.70	0.00	
3. Consultants-Safety	2.50	1.75	1.50	
4. Consultants-Health	1.00	0.70	0.50	
5. 100% State-Funded Consultants –Safety	2.50	1.50	1.50	
6. 100% State-Funded Consultants – Health	1.00	0.60	0.50	
7. Clerical/Data Systems Support	9.00	2.53	0.00	
8. Marketing Staff	0.00	0.00	0.00	
9. Trainers	0.00	0.00	0.00	
10. Other (identify)	0.00	0.00	0.00	
TOTALS	18.00	7.94	4.00	

# APPENDIX D-1 FY 2015 Staffing Chart

\* Report only occupied positions at the time of application submission.

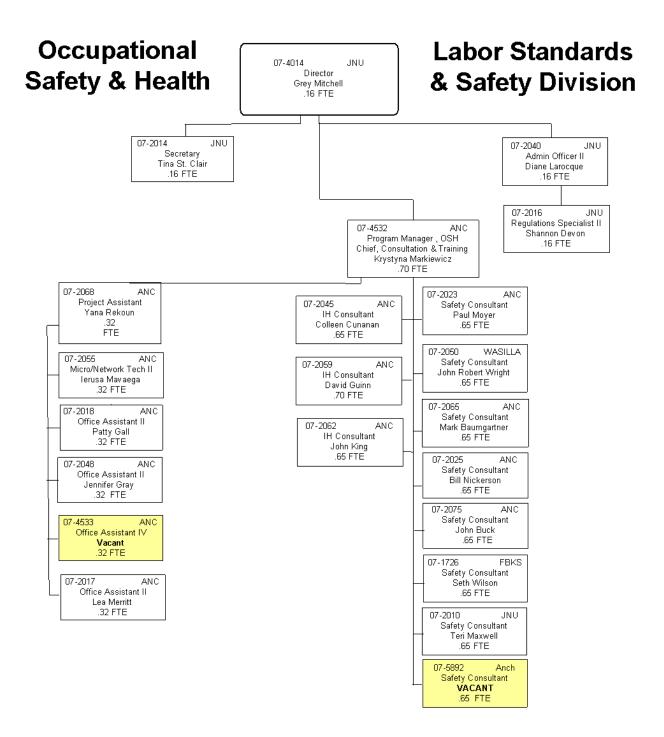
\*\* Prior Approval received from Director of DCSP

\*\*\* Positions vacant at the time of application submission.

#### APPENDIX D-2 FY 2015 Safety & Health Certifications Chart

Staff Name	Safety and Health Certifications
NONE	

#### II. <u>AKOSH CONSULTATION AND TRAINING PROJECT</u> <u>ORGANIZATIONAL CHART</u>



#### IV. OPERATIONAL DESCRIPTION BY ANNUAL PERFORMANCE GOAL

The C&T program supports the FFY2015 AKOSH Annual performance goals with emphasis on those consultation activities specified in goals: 1.1; 1.2; 1.3; 1.4, 2.1.a, 2.1.b and 2.1.c; 2.2 - exclusive 21(d) goal, 3.1.a and 3.1.b.

#### FY2015 Performance Goals 1.1, 1.2, 1.3, 1.4, 2.1.a, 2.1.b, 2.1c

**Goal 1.1:** By the end of 2018, reduce the rate of workplace fatalities caused by circumstances that are under AKOSH jurisdiction by at least 10% in comparison to the average annual rate of fatalities per 100,000 employees from FY 2009 – FY 2013.

**Goal 1.2:** Reduce the overall rate of injuries and illnesses in the construction industry as determined by the number of lost time injuries and illnesses per hundred employees by 2% per year from the baseline average of 1.53 per 100 employees (FY2009 – 2013). The FY2015 goal is a decrease from the baseline level of 1.53 to 1.47 per 100 employees in the construction industry.

**Goal 1.3:** Reduce the rate of lost time injuries and illnesses per hundred employees in the transportation and warehousing industry sector by 2% per year from the baseline average of 1.32 per 100 employees (FY2009 – 2013). The FY2015 goal is a decrease from the baseline level of 1.32 to 1.27 per 100 employees in the transportation and warehousing industry.

**Goal 1.4:** Reduce the rate of lost time injuries and illnesses per hundred employees in the seafood processing industry sector by 2% per year from the baseline average of 4.98 per 100 employees (FY2009 – 2013). The FY2015 goal is a decrease from the baseline level of 4.98 to 4.78 per 100 employees in the seafood processing industry.

**Goal 2.1.a:** Develop and deliver training to workers and employers in the construction industry that targets the most likely causes of injuries, illnesses, and fatalities. The FY2015 goal is 1,700 trained in all industrial categories with emphasis on construction, warehousing/ transportation and seafood processing.

**Goal 2.1.b:** Develop and deliver training to workers and employers in the transportation and warehousing industry sector that targets the most likely causes of injuries, illnesses, and fatalities. The FY2015 goal is 1,700 trained in all industrial categories with emphasis on construction, warehousing/transportation and seafood processing.

**Goal 2.1.c:** Develop and deliver training to workers and employers in the seafood processing industry sector that targets the most likely causes of injuries, illnesses, and fatalities. The FY2015 goal is 1,700 trained in all industrial categories with emphasis on construction, warehousing/transportation and seafood processing.

## Strategies

- AKOSH will continue to integrate its consultation and training efforts with its enforcement strategy in order to better focus on high hazard industries and workplaces. To address particular hazards and issues that cause accidents or represent recognized threats to worker safety and health, AKOSH will continue to promote industry-specific hazard control systems and safety and health program management improvements.
- Initial consultation visits and training efforts in construction (NAICS industry sector code 23) will concentrate primarily on hazard training associated with "falls" and "struck-by's."
- C&T will provide promotional activities to include any combination of training, public service announcements, partnerships, and booths at industry trade fairs or conferences.
- Initial visits and training efforts in the seafood processing and transportation and warehousing industry sectors will concentrate primarily on "falls", "struck-by's," and "caught in-between" type hazard training.
- C&T will monitor accidents that result from targeted causes for the duration of the plan and devise and disseminate prevention strategy information.

## Activities

- Provide training classes for the general public in construction related activities
- Maintain a booth at the Alaska Governor's Safety Conference
- Participate at tradeshows and/or home shows when possible
- Perform a minimum of 80 construction related visits over the year
- Perform a minimum of 14 transportation and warehousing related visits over the year
- Perform a minimum of 18 seafood processing related visits over the year

## Impact

This type of intervention strategy will lead to positive changes in employer and employee perceptions and commitments toward maintaining optimal workplace safety and health, which will ultimately produce a significant reduction in serious accidents and improve safety in high hazard industry workplaces.

## FY2015 Performance Goal 2.2

Promote cooperative/partnership agreements and recognition programs as a means of lowering accident/fatality rates.

## <u>Goal 2.2</u> (21d Annual Plan exclusive goal):

Increase SHARP/Pre-SHARP site participation by 10% over 5 years by 2018 from 12 sites to 14 sites.

## Strategies

- Encourage the growth of SHARP participation through press releases, promotional booths, and public service announcements
- Maintain current SHARP/Pre-SHARP related sites while striving for additional sites

# Activities

- Promote SHARP at every consultation visit
- Run public service announcements throughout the year to advertise AKOSH's recognition programs for excellent safety programs
- Encourage more SHARP/Pre-SHARP related sites and get public recognition in the communities that the sites are located
- Conduct seminars to promote the SHARP program
- Promote SHARP through trade shows with the AKOSH informational booth
- Conduct at least 12 SHARP/Pre-SHARP related site visits in FY2015
- Encourage employers to create safety committees at every opportunity

## Impact

Injuries and illnesses will be reduced and maintained at SHARP/Pre-SHARP related sites. By promoting the successes of SHARP/Pre-SHARP sites and encouraging mentorship and networking opportunities, other businesses will be encouraged to focus resources toward reducing workplace injuries, illnesses and fatalities.

## Goal 2.2.b:

Establish or maintain at least one partnership agreement in construction, transportation / warehousing, seafood processing over the course of the strategic plan.

## Strategies

- Promote the benefits of the program during enforcement inspections or consultation visits
- Conduct promotional activities at industry trade fairs and conferences
- Target promotional activity towards those businesses most likely to participate

## FY2015 Performance Goal 3.1

Ensure AKOSH staff is well trained and knowledgeable and delivers services in a fair and consistent manner.

## Goal 3.1.a

Work with the OSHA Training Institute, Region X staff and other sources to access training for consultation staffs in standard and specialized subjects necessary to effectively carry out strategic and annual goals.

## Strategies

- Continue to identify and schedule training of all existing and new AKOSH personnel.
- Update and implement annual training plan for FFY2015
- Continue discussion and promotion of local Region X training events and conferences to minimize negative impacts of training travel on other performance goals

## Activities

- Maintain training plan for 21(d) personnel
- Schedule OTI training for 21(d) consultants according to the training plan
- Pursue one OTI course scheduled in Alaska and one in another Region X state for FFY2015

#### Impact

Improved knowledge of consultation personnel will improve safety and health conditions at workplaces visited.

#### Goal 3.1.b

AKOSH will conduct annual reviews of consultation case files to evaluate effectiveness and consistency of services.

## Strategies

- AKOSH will strive to maintain adequate and accurate consultation documentation and procedures
- Train staff on issues to avoid future occurrences

## Activities

- Conduct annual case file review for each consultant
- Conduct on-site evaluations as needed to ensure adequate consultant performance

#### Impact

Improved knowledge and competency of consultation personnel will improve safety and health conditions at workplaces visited.

# FY2015 Projected Program Activities – 21(d) consultation

# ALASKA FY 2015 OPERATING PLAN

Consultation Projects in state-plan states that have not adopted Federal measures and goals (Replace the Emphasis Industries, Emphasis Hazards and Agency Measures as appropriate to your programs).

ACTIVITY & AREAS OF EMPHASIS	Safety	Health	Total
1. TOTAL VISITS	220	60	280
a. Construction	70	10	80
b. Non-Construction	150	50	200
2. Total Area of Emphasis Visits	90	22	112
3. Percentage of Area Emphasis Visits of Total Visits	41%	37%	40%
4. Emphasis Industries	90	22	112
a. Construction	70	10	80
b. Transportation and warehousing	10	4	14
c. Seafood	10	8	18
5. Emphasis Safety & Health Hazards		7	7
a. Chromium VI	0	2	2
b. Crystaline Silica	0	3	3
c. Ergonomics in nursing homes	0	2	2
6. Activities related to Agency Measures			
a. Struck by, falling (construction)	50	0	50
b. Struck by, falling, caught in or between			
(transportation/warehousing)	10	0	10
c. Falling, caught in or between, pinch-point- amputation, (seafood)	10	0	10
7. TOTAL SHARP SITES	16	]	
a. New	0		
b. Current	16		
8. TOTAL RENEWALS	7		
9. TOTAL PRE-SHARP SITES	2	]	
		ן	

10. Total Interventions (Form 66)	60

# V. <u>PROGRAM IMPACT FACTORS</u>

Many potential factors that could negatively impact the program include:

- Training of new personnel will require at least one year and this will have a significant negative impact on the number of possible visits;
- Cyclical or seasonal trends in targeted activities produces activity and hazard spikes that can be difficult to address;
- Economic impacts are expected to negatively impact employer willingness to make safety and health investments. In addition, economic conditions may produce employee willingness to accept more hazardous work environment;
- Increased transportation costs are likely to have a negative impact on the number of visits conducted in remote rural areas of Alaska;
- Lack of adequate funding to cover increasing costs will result in reduced services, which will, in turn, have a negative impact on workplace accident rates.

The combination of all the interrelated factors could result in a reduction in employer requests for services and/or AKOSH inability to provide services.

# VI. <u>CHANGES TO INTERNAL QUALITY ASSURANCE PROGRAM</u>

• None anticipated

# ANNUAL TRAINING PLAN - 21(d) On-site Consultation FFY 2015

# APPENDIX I ANNUAL TRAINING PLAN - FY 2015

State: Alaska

Date: 7/11/2014

List Personnel by Name, ID Number and Type (Mgt/S/IH/etc.)	Training Activity & Location	Estimated 100% Federal Costs (Include Per Diem/Airfare/Reg. Fee/Misc./etc.)			Estimated 90% (Include Per Di Fee/Mi	Indicate by Number the Competency Area that Training will Address*	
Colleen	OSHA 1500						
Cunanan							1,3,5,6
Industrial Hygienist	Basic On-Site Consultation Program	Airfare	\$	900.00	Airfare	\$	
Hygiellist	OTI 10/21-29/2014	Lodging	ֆ \$	1,600.00	Lodging	\$	-
	9 days training	Per Diem	ф \$	781.00	Per Diem	\$	
	2 days travel	Registration Fee	ֆ \$	781.00	Registration Fee	\$	
		Ground Transport	\$	50.00	Ground Transport	\$	_
		Miscellaneous	\$	100.00	Miscellaneous	\$	_
		Total Budget	\$	3,431.00	Total Budget	\$	
	OSHA 1500		ψ	3,431.00		ψ	-
Dh:1 Janaan	OSIIA 1500						1250
Phil Jensen Safety	Basic On-Site						1,3,5,6
Consultant	Consultation Program	Airfare	\$	900.00	Airfare	\$	_
Consultant	OTI 10/21-29/2014	Lodging	\$	1,600.00	Lodging	\$	_
	9 days training	Per Diem	\$	781.00	Per Diem	\$	_
	2 days travel	Registration Fee	\$	-	Registration Fee	\$	_
		Ground Transport	\$	50.00	Ground Transport	\$	_
		Miscellaneous	\$	100.00	Miscellaneous	\$	_
		Total Budget	\$	3,431.00	Total Budget	\$	_
	OSHA 1500			,			
New Hire	001111000						1,3,5,6
Safety	Basic On-Site						1,5,5,0
Consultant	Consultation Program	Airfare	\$	900.00	Airfare	\$	-
	OTI 10/21-29/2014	Lodging	\$	1,600.00	Lodging	\$	-
	9 days training	Per Diem	\$	781.00	Per Diem	\$	-
	2 days travel	<b>Registration Fee</b>	\$	-	<b>Registration Fee</b>	\$	-
		Ground Transport	\$	50.00	Ground Transport	\$	-
		Miscellaneous	\$	100.00	Miscellaneous	\$	-
		Total Budget	\$	3,431.00	Total Budget	\$	-
	OSHA 1500						
New Hire							1,3,5,6
Safety	Basic On-Site						
Consultant	Consultation Program	Airfare	\$	900.00	Airfare	\$	-
	OTI 10/21-29/2014	Lodging	\$	1,600.00	Lodging	\$	-
	9 days training	Per Diem	\$	781.00	Per Diem	\$	-
	2 days travel	Registration Fee	\$	-	Registration Fee	\$	-
		Ground Transport	\$	50.00	Ground Transport	\$	-
		Miscellaneous	\$	100.00	Miscellaneous	\$	-
		Total Budget	\$	3,431.00	Total Budget	\$	-

	OSHA 1500							
New Hire								1,3,5,6
Industrial	Basic On-Site							
Hygienist	Consultation Program	Airfare	\$	900.00	Airfare	\$	-	
	OTI 10/21-29/2014	Lodging	\$	1,600.00	Lodging	\$	-	
	9 days training	Per Diem	\$	781.00	Per Diem	\$	-	
	2 days travel	<b>Registration Fee</b>	\$	-	Registration Fee	\$	-	
		Ground Transport	\$	50.00	Ground Transport	\$	-	
		Miscellaneous	\$	100.00	Miscellaneous	\$	-	
		Total Budget	\$	3,431.00	Total Budget	\$	-	
	OSHA 1500							
New Hire								1,3,5,6
Safety	Basic On-Site							
Consultant	Consultation Program	Airfare	\$	900.00	Airfare	\$	-	
	OTI 10/21-29/2014	Lodging	\$	1,600.00	Lodging	\$	-	
	9 days training	Per Diem	\$	781.00	Per Diem	\$	-	
	2 days travel	<b>Registration Fee</b>	\$	-	Registration Fee	\$	-	
		Ground Transport	\$	50.00	Ground Transport	\$	-	
		Miscellaneous	\$	100.00	Miscellaneous	\$	-	
		Total Budget	\$	3,431.00	Total Budget	\$	-	
Colleen	OSHA 3430							
Cunanan								1,3,5,6
Industrial	Advanced PSM in the							1,5,5,6
Hygienist	chemical	Airfare	\$	900.00	Airfare	\$	_	
18	OTI / Western Region	Lodging	\$	1,920.00	Lodging	\$	_	
	12/2-12/2014	Per Diem	\$	923.00	Per Diem	\$	_	
	11 days training	Registration Fee	\$	-	Registration Fee	\$	_	
	2 days travel	Ground Transport	\$	50.00	Ground Transport	\$	_	
		Miscellaneous	\$	100.00	Miscellaneous	\$	_	
		Total Budget	\$	3,893.00	Total Budget	\$	-	
	OSHA 3430			,				
Dave Guinn	0.51112.120							1,3,5,6
Industrial	Advanced PSM in the							1,5,5,0
Hygienist	chemical	Airfare	\$	900.00	Airfare	\$	_	
)8	OTI / Western Region	Lodging	\$	1,920.00	Lodging	\$	_	
	12/2-12/2014	Per Diem	\$	923.00	Per Diem	\$	_	
	11 days training	Registration Fee	\$	-	Registration Fee	\$	_	
	2 days travel	Ground Transport	\$	50.00	Ground Transport	\$	_	
		Miscellaneous	\$	100.00	Miscellaneous	\$		
		Total Budget	\$	3,893.00	Total Budget	\$ \$	_	
Colleen			Ŧ	-,->0.00		Ŧ		
Cunanan	OSHA 2200							1,3,5,6
Industrial								
Hygienist	Industrial Noise	Airfare	\$	900.00	Airfare	\$	-	
	OTI	Lodging	\$	1,440.00	Lodging	\$	-	
	1/21-28/2015	Per Diem	\$	710.00	Per Diem	\$	-	
	8 days training	<b>Registration Fee</b>	\$	-	<b>Registration Fee</b>	\$	-	
	2 days travel	Ground Transport	\$	50.00	Ground Transport	\$	-	
		Miscellaneous	\$	100.00	Miscellaneous	\$	-	
			¢	2 200 00	T. ( 1 D 1	¢		
		Total Budget	\$	3,200.00	Total Budget	\$	-	

	OSHA 2200							1,3,5,6
Dave Guinn	Industrial Noise	Airfare	\$	900.00	Airfare	\$	-	
Industrial	OTI	Lodging	\$	1,440.00	Lodging	\$	-	
Hygienist	1/21-28/2015	Per Diem	\$	710.00	Per Diem	\$	-	
	8 days training	<b>Registration Fee</b>	\$	-	Registration Fee	\$	-	
	2 days travel	Ground Transport	\$	50.00	Ground Transport	\$	-	
		Miscellaneous	\$	100.00	Miscellaneous	\$	-	
		Total Budget	\$	3,200.00	Total Budget	\$	-	
Phil Jensen	OSHA 3000			,	6			1,3,5,6
i iii jensen	Safety & Health for							1,5,5,0
Safety	Oil & Gas Well							
Consultant	Operations	Airfare	\$	900.00	Airfare	\$	-	
	OTI	Lodging	\$	640.00	Lodging	\$	-	
	5/5-7/2015	Per Diem	\$	355.00	Per Diem	\$	-	
	3 days training	Registration Fee	\$	-	Registration Fee	\$	-	
	2 days travel	Ground Transport	\$	50.00	Ground Transport	\$	-	
		Miscellaneous	\$	100.00	Miscellaneous	\$	_	
		Total Budget	\$	2,045.00	Total Budget	\$	_	
	OSHA 3000		φ	2,043.00		Ψ	-	
C . 41. XX7'1	Safety & Health							1055
Seth Wilson Safety	for Oil & Gas Well							1,3,5,6
Consultant	Operations	Airfare	\$	900.00	Airfare	\$	_	
Consultant	OTI		ֆ \$	900.00 640.00	Lodging	ֆ \$	-	
	5/5-7/2015	Lodging Per Diem			Per Diem		-	
	3 days training		\$ ¢	355.00		\$	-	
	2 days travel	Registration Fee	\$	-	Registration Fee	\$	-	
	2 days traver	Ground Transport	\$	50.00	Ground Transport	\$	-	
		Miscellaneous	\$	100.00	Miscellaneous	\$	-	
		Total Budget	\$	2,045.00	Total Budget	\$	-	
	OSHA 3190							
Bill Nickerson	Electrical Power,							1,3,5,6
<b>C</b> - <b>C</b> - (	Generation,							
Safety Consultant	Transmissions & Distribution	Airfare	¢	900.00	Airfare	¢		
Consultant	OTI		\$ ¢			\$ ¢	-	
	06/17-23/2015	Lodging Par Diam	\$ ¢	1,280.00	Lodging Per Diam	\$ \$	-	
		Per Diem	\$ ¢	639.00	Per Diem	\$	-	
	7 days training	Registration Fee	\$	-	Registration Fee	\$	-	
	2 days travel	Ground Transport	\$	50.00	Ground Transport	\$	-	
		Miscellaneous	\$ \$	100.00	Miscellaneous	\$	-	
		Total Budget	\$	2,969.00	Total Budget	\$	-	
Krystyna	OSHCON							
Markiewicz	Conference							1,3,5,6
Program								
Manager	TBD	Airfare	\$	900.00	Airfare	\$	-	
	3 day conference	Lodging	\$	640.00	Lodging	\$	-	
	2 days travel	Per Diem	\$	355.00	Per Diem	\$	-	
		<b>Registration Fee</b>	\$	-	<b>Registration Fee</b>	\$	-	
		Ground Transport	\$	50.00	Ground Transport	\$	-	
		Miscellaneous	\$	100.00	Miscellaneous	\$	-	
		Total Budget	\$	2,045.00	Total Budget	\$	-	
	1	- <b>O</b>		,			I	
		100% Federal			90% Federal			

# COMMENTS:

- \* 1. Recognition and Evaluation of Occupational Hazards
  - 2. Evaluate Safety and Health Management Systems
  - 3. Provide Occupational Safety and Health Training
  - 4. Manage Program Processes and Reports
  - 5. Provide Hazard Prevention and Control Assistance
  - 6. Provide Off-site Technical Support
  - 7. Promote OSHA Consultation Services
  - 8. OSHA Consultant Professionalism
  - 9. Other (specify)

## NOTES:

- Funds sufficient to cover travel requirements to conduct proposed training should be budgeted in **Part A: Consultation and Part B: Administration**. These costs must be specific to the activities identified as determined by the location and duration of the training. The Annual Training Plan should only list out-of-state travel and training that is eligible for 100% federal funding and is subject to approval by the Director of the Office of Small Business Assistance. **The total amount on this form must agree with the amount reported on the OSHA 110 Line 2.**
- Deviations from this plan involving out-of-state travel to courses and/or locations other than those proposed must be approved in writing by the Regional Administrator prior to the actual travel.
- See Informal Training Requirements Memo, issued June 9, 2010, and 21(d) Onsite Consultation Training Policy.