Attachment B - Correspondence As Of November 8, 2012.

The SCPP welcomed input and comments from stakeholders throughout the study on high-risk job classifications. The comments and opinions contained within the correspondence do not necessarily reflect any recommendations or opinions of the SCPP. Factual representations provided in the correspondence have not been verified by staff.

DRAFT

Wallis, Keri

From: Chris Vance <cvapv@comcast.net>
Sent: Monday, May 14, 2012 12:31 PM
To: Bailey, Rep. Barbara; Conway, Sen. Steve
Cc: kccgprez@gmail.com; kccgvp@gmail.com; Office State Actuary, WA; Gutierrez, Aaron
Subject: 2012 Study of High Risk Employees
Attachments: Pension letters.pdf

KING COUNTY CORRECTIONS GUILD

May 14, 2012

TO: Executive Committee,
Select Committee on Pension Policy

FM: Chris Vance, KCCG Public Affairs Consultant

RE: 2012 Study of Risk Classifications of High Risk Employees

The Select Committee will soon take up the study of "*risk classifications of employees in the state retirement systems that entail either high degrees of physical or psychological risk to the members own safety, or unusually high physical requirements that result in elevated risks of injury or disablement for older employees"* as mandated by SB 6378.

We believe that Corrections Officers – who are required to work until age 60 under both PERS and PSERS - are precisely the type of high risk employees contemplated by this study.

As you discuss your process to undertake this study we would ask that we be permitted to provide input, and to be kept apprised as to your process. We would like to be helpful in any way possible.

We thank you for your continuing attention to this issue. Attached is our past correspondence with you on our retirement issue.

Please contact me if you have questions, or to coordinate our members' participation. I can be reached at 253-347-9713.

Wallis, Keri

From: Mark Gjurasic [mgjurasic@comcast.net]
Sent: Thursday, June 02, 2011 12:36 PM
To: Schoesler, Sen. Mark; Seaquist, Rep. Larry; Davis, Randy; Office State Actuary, WA
Cc: Wallis, Keri
Subject: PSERS Retirement Request
Attachments: 090109 Letter to SCPP.PDF

KING COUNTY CORRECTIONS GUILD

Thursday, June 2, 2011

TO: **Sen. Mark Schoesler** - Chair– Schoesler.mark@leg.wa.gov
Rep. Larry Seaquist - Larry.Seaquist@leg.wa.gov
Vacant - Vice Chair
Steve Hill, DRS Director – SCPP Request to Forward
Randy Davis, TRS Actives - marysvillecoach@hotmail.com
Glenn Olson, PERS Employers – SCPP Request to Forward
Robert Thurston, WSPRS Retirees – SCPP Request to Forward
Matt Smith, State Actuary – state.actuary@leg.wa.gov

Dear Sen. Schoesler and Rep. Seaquist:

I am following up on my previous request to have the **Select Committee on Pension Policy** to review the **Public Safety Employees Retirement System** (PSERS) which was created in 2004.

As representing the **King County Adult Corrections Guild** (KCACG), we are respectfully **asking for a few minutes** on your **June 21 meeting**, should you have one, or **July 19 meeting** to make a request why PSERS which has not been reviewed since 2004 should be studied to ensure it maintains good public policy.

Since its formulation in 2005, in 2007 the Washington State Legislature changed PSERS Plan II and III. The change allows, with members of 30 years of service, to retire at age 62, instead of 65 without a reduction in benefits. We believe that there should be further review, to see whether the intent, at that time and today, should have been to lower their retirement age to a lower level. For further background information and rational, please see the attached letter dated September 1, 2009 to then Rep. Steve Conway that further outlines this exploratory request.

Again, the purpose of this letter is to **request that we make a presentation** at the **Select Committee on Pension Policy** on this issue and whether it should be further studied by the Pension Policy Committee and its staff.

Thank you for your time reviewing this information and addressing this policy question.

We would appreciate a spot on the agenda for discussion.

Many thanks.

Mark Gjurasic
King County Adult Corrections Guild Lobbyist
Public Affairs of Washington, LLC
mgjurasic@comcast.net
(360) 481-6000

King County Corrections Guild
6417 S. 143rd Pl.,
Tukwila, WA 98168
Phone: (206) 444-9493

September 1, 2009

Representative Steve Conway
Select Committee on Pension Policy
PO Box 40914
Olympia, WA 98504-0914

Dear Representative Conway,

As you know, the Public Safety Employees' Retirement System in Washington, (PSERS) was created by legislation in the year 2004 to create a separate retirement system for certain public employees whose jobs contain a high degree of physical risk to their own personal safety. PSERS was created to appropriately distinguish these employees serving in high risk positions from other employees in the Public Employees Retirement System (PERS) who do not work under conditions that are so dangerous and harsh.

In creating PSERS, the legislature recognized the additional risk that Washington's Public Safety Employees endure, and distinguished these employees by allowing them to retire five years earlier without a reduction of benefits. The standard age for retirement under PERS Plans 2 and 3 was 65 years of age, and the new PSERS plan set the standard retirement age at 60 years of age. It was clear that the legislature believed that allowing these public safety employees to retire five years earlier was an appropriate and sufficient distinction given because of the additional risks and hardships that come with the regular work responsibilities of these public safety employees.

In 2007, the Washington State Legislature changed PERS Plans 2 and 3. This change lowered key PERS standard retirement age requirements, and now allows certain employees that are members of PERS 2 and 3 the ability to retire three years earlier without a reduction to their retirement benefits. The change allows PERS 2 and 3 members with 30 years of service to retire at age 62 instead of 65 without a reduction in benefits. We have also seen the standard retirement age in the Law Enforcement Officers' and Fire Fighters' (LEOFF) Plan 2 lowered from 58 years, to 55 years, and has most recently to 53 years of age for LEOFF members to retire without a loss of benefits.

The public safety employees in Washington that are members of PERS now have a standard 60 year age limitation for them to retire without a reduction in benefits. The five year earlier retirement distinction that the Legislature believed was appropriate in 2000 has been reduced to a two year difference between PERS and PSERS.

I would like to request the Select Committee on Pension Policy review the question of:
Is there still an appropriate and sufficient distinction between the PERS, PSERS, and LEOFF retirement systems?

Thank you for your time reviewing this information and addressing this policy question. We appreciate your commitment to helping make our state a good place to work and live.

With Best Regards,

Sergeant Doug Justus
President
King County Corrections Guild

http://www.apcowa.org

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JUN 15 2012
Office of
The State Actuary

Washington State Legislature
Select Committee on Pension Policy
P.O. Box 40914
Olympia, WA 98504-0914

June 12, 2012

To the Select Committee on Pension Policy and Staff,

The Washington State Chapters of the Association of Public Safety Communications Officials (APCO) and the National Emergency Number Association (NENA) have recently become aware of the potential for and incidence of Post-Traumatic Stress Disorder in E9-1-1 Telecommunicators (study attached).

As a result of this knowledge, the Washington Chapter conducted a survey of Washington State communications centers taking E9-1-1 calls. Responses were received from 62% of agencies taking E9-1-1 calls, and included county, municipal, and federal agencies representing over 600 telecommunicators. Analysis of the results provided some thought-provoking information:

- 69% of telecommunicators are between the ages of 26 and 45 years.
- 11% work as telecommunicators for 20 or more years.
- 63% of responding agencies stated that telecommunicators have left employment with that agency due to the stress of the job.
- 96.7% of responding agencies have had telecommunicators retire, leave service, or be terminated because they were unable to perform the functions of the job versus retiring with dignity at the age of 65.
- The average age of those terminated in the past 10 years is 37 years.

The Chapter's limited survey, in addition to the study indicates that the career life span for a telecommunicator is relatively short. The Chapter believes that this is very likely due to the stresses of the job and the increased technological demands.

As we approach the age of Next Generation 9-1-1 (NG9-1-1), and anticipate the receipt of text, photo, and video, the Chapter is convinced that the technical expertise required to perform the functions of the job will increase astronomically. In addition to that, the visualization of crime, medical, and fire scenes will add untold stress to the intricacies of an already detailed and technical position. It will become extremely difficult for E9-1-1 centers in Washington State to recruit and retain staff.

The Washington Chapters of APCO and NENA urge the Selection Committee on Pension Policy to consider the inclusion of telecommunicators in a public safety early retirement program. The benefits to the individual who has dedicated a career to public safety as well as to the agency attempting to recruit and retain staff are well worthy of your consideration.

Sincerely,

Keith Flewelling, President
Washington State APCO – NENA Chapter

Journal of Traumatic Stress
April 2012, *25*, 211–215

BRIEF REPORT

Duty-Related Trauma Exposure in 911 Telecommunicators: Considering the Risk for Posttraumatic Stress

Heather Pierce and Michelle M. Lilly
Department of Psychology, Northern Illinois University, DeKalb, Illinois, USA

Peritraumatic distress may increase the risk for posttraumatic stress disorder (PTSD) in police officers. Much less is known about emotional reactions and PTSD symptomatology in 911 telecommunicators. The current study assessed duty-related exposure to potentially traumatic calls, peritraumatic distress, and PTSD symptomatology in a cross-sectional, convenience sample of 171 telecommunicators. Results showed that telecommunicators reported high levels of peritraumatic distress and a moderate, positive relationship was found between peritraumatic distress and PTSD symptom severity ($r = .34$). The results suggest that 911 telecommunicators are exposed to duty-related trauma that may lead to the development of PTSD, and that direct, physical exposure to trauma may not be necessary to increase risk for PTSD in this population.

Research has begun to examine the mental health impact of occupational exposure to potentially traumatic events in police officers, with rates of duty-related presumed posttraumatic stress disorder (PTSD) ranging from 7% to 19% (Marmar et al., 2006). These numbers are notably greater than the lifetime prevalence rate of 7.8%, and 12-month prevalence rate of 3.5%, observed in the general population in the United States (Kessler, Chiu, Demler, & Walters, 2005; Kessler, Sonnega, Bromet, Hughes, & Nelson, 1995). Yet, research on PTSD in 911 telecommunicators, who may experience significant duty-related trauma exposure, has remained largely absent.

Telecommunicators rely on their interrogative skills to assess an incident, secure the emergency scene, and send appropriate help, all within minutes of answering a call. Crucial to success is the ability to remain calm and suppress emotional reactions. Yet little is known about the emotional reactions and mental health of telecommunicators. It is possible that physical distance from trauma (i.e., limited risk of physical injury) serves to buffer against posttrauma psychopathology; research has shown that threat to an individual's physical integrity heightens risk for the development of PTSD symptoms (e.g., Carlier, Lamberts, & Gersons, 2000). Telecommunicators, however, have limited control over the event and may encounter extremely distressed callers and/or aversive details of traumatic events. Given these factors, one might expect the level of emotional distress surrounding this work to be elevated in telecommunicators compared to other professions. In fact, a dissertation about telecommunicators found that the majority of telecommunicators in the sample reported experiencing peritraumatic distress in reaction to at least one call handled while on duty as a telecommunicator (Troxell, 2008).

Research has demonstrated that intense emotional reactions during the experience of traumatic exposure are strongly associated with PTSD symptoms and a significant, positive relationship between peritraumatic distress and PTSD symptoms has been observed in police officers (Brunet et al., 2001). To date, research has not assessed PTSD symptomatology in telecommunicators nor examined if the association between peritraumatic distress and PTSD symptoms holds for this population. The goal of the current study was to examine work-related trauma exposure, peritraumatic distress, and PTSD symptomatology in telecommunicators. The types of calls handled by telecommunicators were coded to determine whether certain types of calls were more associated with intense fear, helplessness, or horror, and whether particular types of calls were more consistently identified by the sample as the "worst." We hypothesized that telecommunicators would report high levels of peritraumatic distress given their relative lack of control over potentially traumatic events and that there would be a significant, positive relationship between peritraumatic distress and PTSD symptoms. We therefore expected the rate of probable, current PTSD to be elevated in this sample.

Correspondence concerning this article should be addressed to Michelle M. Lilly, Northern Illinois University, Psychology-Computer Science Building, DeKalb, IL 60302. E-mail: mlilly1@niu.edu

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DOI: 10.1002/jts.21687

Method

Participants and Procedure

Recruitment was conducted via letters and advertisements sent to randomly selected agencies in the Midwest, professional association list serves, and online forums and social media outlets (i.e., Facebook). The inclusion criterion was at least part-time work as a telecommunicator in the past year, although all participants currently worked as a telecommunicator. No exclusion criteria were used. Participants were given the option to complete a hard copy or online version of the survey. Informed consent was presented online or in hard copy prior to the questionnaires. No inducement was offered for participation. The study was approved by the university's institutional review board. Subject recruitment began in October 2010 and continued for 7 months.

The convenience sample recruited for this study comprised 171 current, professional telecommunicators. Twenty-four different states were represented, though the majority were from the Midwest ($n = 76$) and Southwest ($n = 58$) regions. The sample was predominately female ($n = 126$) and Caucasian ($n = 131$), with a mean age of 38.85 years ($SD = 9.61$). Participants reported an average of 11.85 ($SD = 8.16$) years of service. The majority of the sample was married ($n = 88$, 52%), and at minimum had attended college or vocational training ($n = 138$, 81%).

Measures

Potentially traumatic events/calls. The Potentially Traumatic Events/Calls measure (Troxell, 2008) is a 21-item measure that assesses career exposure to different types of potentially traumatizing 911 calls. The measure is a checklist that determines whether participants have been exposed to that type of call and asks for an estimate of how many times he or she has been exposed to that type of call. For the purposes of this study, a frequency count was used to determine whether or not each participant had been exposed to that type of call. The measure also includes a yes or no question for each type of call that assesses whether participants experienced intense fear, helplessness, or horror in reaction to that type of call. A significant correlation has been found between the total amount of traumatic calls/events and both burnout, $r\ (418) = .28$, $p < .001$, and secondary traumatic stress, $r\ (418) = .40$, $p < .001$ (Troxell, 2008).

Posttraumatic Stress Diagnostic Scale (PDS). The PDS (Foa, 1995) assessed PTSD symptoms in the past month. Participants were provided with the following prompt: "If possible, please identify an upsetting incident that you handled while on duty at a communications center. Though you may have had many traumatic events occur, can you tell me about one you remember as the worst, or the one that has maybe stuck with you the most?" Participants briefly described their chosen event and a total PTSD symptom score was generated by tallying responses to the 17 symptom items. Response options for the 17 items were 0 = *Not at all or only one time*, 1 = *Once a week or less/once in awhile*, 2 = *2–4 Times a week/half the time*, and 3 = *5 or More times a week/almost always*. Internal consistency for the PTSD symptom score was $\alpha = .85$ in this sample. A team of four researchers (including the two authors) coded the worst event descriptions in terms of (a) whether the event qualified for Criterion A1 of PTSD according to the *Diagnostic and Statistical Manual of Mental Disorders* (4th ed., text rev.; *DSM-IV-TR*; American Psychiatric Association, 2000), and (b) what type of duty-related call was represented. Interrater reliability was not examined.

Peritraumatic Distress Inventory (PDI). The PDI (Brunet et al., 2001) was used to measure peritraumatic emotional distress related to the participants' worst duty-related event. A specific time range for when that event occurred was not assessed. A total score was calculated by averaging responses across all items with scores for each item ranging between 0 = (*Not at all*) and 4 = (*Extremely true*). For the purpose of this study, three items that were deemed unlikely to be relevant to telecommunicators were omitted (i.e., "I felt afraid for my safety"). Internal consistency was $\alpha = .86$ in the present sample.

Data Analysis

Descriptive data and hypothesis testing was performed using SPSS Version 19.0. A frequency count was first used to examine participants' exposure to different types of calls, as well as the percentage of participants that reported experiencing intense fear, helplessness, or horror in reaction to that type of call. Consensus coding was performed by four researchers (including the two authors) to examine whether the participant reported a worst event that qualified for Criterion A1 of PTSD, and further, what type of call was represented. This information was examined to determine whether particular types of calls were more consistently identified as the worst among telecommunicators. Comparison of item means on the PDI between the present sample and Brunet et al.'s (2001) sample of police officers and civilians was made by calculating Cohen's d to examine effect size of observed differences. Pearson r was then used to examine the relationship between peritraumatic distress and PTSD symptom scores. Finally, the percentage of participants with probable, current PTSD was examined by using a cutoff score of 28 or higher to denote the presence of probable, current PTSD and a frequency score was generated.

Results

The average number of different types of calls experienced by participants assessed by the Potentially Traumatic Events/Calls measure was 15.32 ($SD = 3.50$) out of 21. Participants reported

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Table 1
Frequency of Receiving, Reacting With Fear, Helplessness, or Horror, and Identifying as Worst for Types of 911 Calls

	Received		Reacted		Worst	
Type of 911 call	*n*	%	*n*	%	*n*	%
Suicide	165	96.5	64	37.4	22	12.9
Domestic violence	163	95.3	66	38.6	3	1.8
MVA with severe injury or fatality	161	94.1	58	33.9	16	9.4
Armed robbery	147	86.0	37	21.6	1	0.01
Child sexual assault	136	79.5	66	38.6	0	0
Homicide	133	77.8	40	23.4	16	9.4
Natural disaster	133	77.8	46	26.9	3	1.8
Unexpected death or injury of a child	133	77.8	94	55.0	28	16.4
Other disaster or disturbing event	130	76.0	74	43.3	6	3.5
Calls involving friends and/or family	94	55.0	52	30.4	11	6.4
Officer involved shooting	54	31.6	44	25.7	17	9.9
Unexpected death of an adult	–	–	–	–	17	9.9
Battery and assault[a]	–	–	–	–	8	4.7
Adult sexual assault[a]	–		–		4	2.3

Note. MVA = Motor vehicle accident.

[a]These events were not assessed separately on the Potentially Traumatic Events/Calls measure; therefore, a percentage for that particular type of coded event and reaction could not be assessed.

experiencing fear, helplessness, or horror in reaction to 32% of the different types of calls experienced. Table 1 shows the number and percentage of participants for the following: (a) experienced that type of call, (b) endorsed criterion A2 in reaction to that type of call, and (c) identified that type of call as the worst experienced. The most commonly (16.4%) identified worst call was the unexpected injury or death of a child, with suicidal callers next (12.9%), followed by officer involved shootings (9.9%) and calls involving the unexpected death of an adult (9.9%).

The average modified peritraumatic distress score was 2.58 ($SD = 0.93$). The average scores for each group was as follows: 1.3 (officers), 1.69 (civilians), and 2.93 (telecommunicators). Table 2 compares PDI items from the present sample to Brunet et al.'s (2001) police officer and civilian samples, including Cohen's *d* effect sizes for observed differences. Cohen's *d* was calculated by hand using the means and standard deviations of PDI items from the present sample and those presented in Brunet et al. (2001), and then double checked using an online effect size calculator (http://www.uccs.edu/~faculty/lbecker/#meansandstandarddeviations). The telecommunicators reported having experienced peritraumatic distress in reaction to many of the different types of calls. It is possible that this is due to the nature of the position, but could also result from having a sample comprised predominantly of women, who typically report greater peritraumatic distress than men (Creamer, McFarlane, & Burgess, 2005). As hypothesized, there was a significant correlation between peritraumatic distress and PTSD symptoms, $r(170) = .34, p < .001$. The average score for PTSD symptoms was 7.07 ($SD = 8.13$). There were 3.5% of the participants who scored at or above the cutoff score of 28 (Coffey, Dansky, Falsetti, Saladin, & Brady, 1998).

Discussion

To date, this is the only published study of which we are aware that examined the relationship between duty-related trauma exposure, peritraumatic distress, and PTSD symptoms in telecommunicators. Results showed that calls frequently encountered by telecommunicators can produce feelings of intense fear, helplessness, or horror. A disproportionate amount of worst calls experienced by the sample involved harm to a child or were calls that involved a personal or professional relationship with the victim/caller (i.e., police officers, emergency medical technicians, and firefighters).

As hypothesized, and similar to Troxell (2008), peritraumatic distress reported by telecommunicators was high and occurred in reaction to an average of 32% of different types of calls that may be experienced by telecommunicators. As predicted, a positive relationship was found between peritraumatic distress and PTSD. Given that lifetime and 12-month PTSD symptomatology were not assessed in this study, direct comparison to the epidemiological rates for PTSD observed in the U.S. population cannot be made (Kessler et al., 2005; Kessler et al., 1995). The 3.5% who scored above the cut off we used, however, might suggest that increased risk is present for telecommunicators, as 3.5% is equivalent to the 12-month prevalence rate found by Kessler et al. (2005) and does not account for telecommunicators that may have qualified for probable PTSD in the past 12 months, but whose symptoms

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Table 2
Comparison of Selected Peritraumatic Distress Inventory Means From Three Samples

	Officer (*N* = 702)		Civilian (*N* = 418)		911 Telecommunicators (*N* = 171)		Officer	Civilian
Abbreviated item	*M*	*SD*	*M*	*SD*	*M*	*SD*	*d*	*d*
Felt helpless to do more	1.7	1.4	2.2	1.4	3.5	1.4	1.29	0.93
Felt sadness and grief	2.1	1.5	2.8	1.4	3.5	1.4	0.96	0.50
Felt frustrated, angry could not do more	2.1	1.5	2.7	1.3	3.5	1.4	0.96	0.59
Felt guilt more was not done	1.0	1.3	1.3	1.4	3.5	1.4	1.85	1.57
Felt ashamed of my emotions	0.4	0.9	0.9	1.3	3.3	1.5	2.34	1.71
Felt worried about safety of those on scene	1.7	1.5	1.1	1.5	2.3	1.6	0.39	0.77
Felt would lose emotional control	0.7	1.1	1.6	1.4	1.5	1.3	0.66	0.07
Horrified by what happened	1.5	1.5	1.6	1.5	3.1	1.7	1.00	0.94
Had physiological reactions	1.5	1.4	2.0	1.5	1.9	1.4	0.29	0.07
Felt I might pass out	0.2	0.8	0.7	1.2	3.2	1.6	2.37	1.77

Note. Items were omitted given that they may not apply for telecommunicators who are not on the scene of the traumatic call. Adapted from "The Peritraumatic Distress Inventory: A proposed measure of PTSD Criterion A2," by A. Brunet, D. S. Weiss, T. J. Metzler, S. R. Best, T. C. Neylan, C. Rogers, . . . C. R. Marmar, 2001, *American Journal of Psychiatry, 158*, pp. 1480-1485. Copyright 2001 by the American Psychiatric Association.

have remitted prior to completion of the survey. This suggests that although telecommunicators are physically distant from the traumatic scene and their personal integrity is rarely threatened, they may not be buffered from the development of PTSD symptoms. Furthermore, a self-selection bias may have also skewed results. The sample could have been a particularly resilient group of telecommunicators, or telecommunicators with current PTSD symptomatology may have not self-selected for participation in the study due to the avoidance seen as part of the PTSD symptom picture. It is also possible that highly distressed telecommunicators quickly remove themselves from the occupation and are not well-represented among current telecommunicators. It is therefore possible that rates of PTSD symptoms would be even higher in a sample of telecommunicators not selected out of convenience.

The level of distress in the sample supports the proposed criteria for PTSD in the *DSM-5*. According to proposed Criterion A4, telecommunicators' experiences would qualify them for a diagnosis of PTSD because they are exposed to duty-related aversive details of traumatic events. Though telecommunicators may not be physically present at a traumatic event, nor have a personal relationship with the victim, exposure to duty-related aversive details can be sufficient to induce PTSD symptomatology that is severe enough to be consistent with a probable diagnosis.

The study was limited by a cross-sectional design and self-selection biases. In regard to the former, it is not possible to determine whether the development of PTSD symptoms may have colored retrospective reporting of peritraumatic distress. Further, research has shown that the consistency of retrospective reporting of peritraumatic distress is questionable, particularly for individuals that go on to develop more severe PTSD symptomatology (David, Akerib, Gaston, & Brunet, 2010), leading to limitations on the conclusions that can be drawn from this study's cross-sectional design. Considering the frequency of exposure to upsetting calls, however, and the heightened peritraumatic distress, as well as the rate of PTSD symptoms despite a self-selection bias, future research is warranted. Posttraumatic stress disorder symptoms that may be present in telecommunicators can impair decision-making abilities and functioning, which could pose significant risk to the general population that relies on them to quickly and effectively coordinate an emergency response. Finally, trauma exposure that has occurred outside of that experienced on duty should be considered in future work with this population, as PTSD symptoms among this sample may have been due to trauma that occurred outside of work and not directly related to duty-related experiences.

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Wallis, Keri

From: Gabe Hall <mrsoup@hotmail.com>
Sent: Monday, June 18, 2012 2:18 PM
To: Office State Actuary, WA; Matt Zuvich
Subject: JRA staff joining PSERS
Attachments: Pension document.doc

To: The Select Committee on Pension Policy

I am writing you to ask that you make employees of the Juvenile Rehabilitation Administration eligible for the Public Safety Employees Retirement System (PSERS). The PSERS was created to allow employees who work in high risk jobs, with high risk offenders, to be able to retire before age and infirmity make it too dangerous for them to work with that clientele. We in JRA work with volatile, dangerous youths that are, in many cases, highly aggressive. There is a high need for alertness and physical ability when supervising these youths. Fights can break out any time, caused by something as little as one resident maintaining eye contact for a second or two longer than the other resident feels is a “respectful” amount of time. The number of gang involved youth in JRA has increased significantly in recent years, leading to a marked increase in assaults by residents on each other. We staff are required to physically intervene when resident fight. We have seen an increase in staff injuries that coincides with the increase in resident fights. It does not make much sense to have 65 year old staff trying to physically control young, fit, and in many cases, large young men intent on doing damage to each other. Unlike staff, residents are not constrained from punching, kicking, biting, pinching and otherwise flailing at staff when we attempt to control them.

We staff are required to attend and pass annual refresher trainings on Dealing With Resistive Youth (DWRY) techniques. This training is certified through the Criminal Justice Training Center, as are the instructors. During these trainings, we must demonstrate proficiency in restraint techniques designed to ensure the safety of both staff and residents caught up in an incident. This involves a high level of physical ability to pass the training. Many staff have been injured while taking the original 40 hour course and the annual 8 hour refreshers. Some staff have been injured so badly during these trainings that they have had to be medically separated from their jobs. We are seeing ever higher numbers of older staff injured during these trainings.

Other employees who deal with this same population are currently eligible for PSERS. Staff of city and county juvenile detention facilities can join PSERS. Our residents come from these facilities. The detention centers generally have the residents for a few weeks or months, while they are being held for trial. Once the youths have been sentenced, they come to JRA, often for terms of several years.

So, in conclusion, it makes sense for JRA employees to be included in PSERS, for the very same reasons that PSERS was established: to allow employees in high risk jobs to not have to continue to work until there is an elevated risk of injury to older employees.

Thank you for your attention to this matter

Gabe Hall; President Local 862 of the Washington Federation of State Employees
Member of the Executive Board of Council 28 of the American Federation of State, County, and Municipal Employees

Council 28
AFSCME
Washington Federation of State Employees

STATE HEADQUARTERS OFFICE
1212 JEFFERSON ST. S.E., SUITE 300 • OLYMPIA, WA 98501-2332
(360) 352-7603 • 1-800-562-6002 • FAX: (360) 352-7608 • www.wfse.org

RECEIVED
JUN 21 2012
Office of
The State Actuary

June 21, 2012

To: Senator Steve Conway, Chair
Select Committee on Pension Policy

From: Matthew D. Zuvich, Lobbyist

RE: Member Correspondence

Attached you will find correspondence from several of our members asking the Select Committee on Pension Policy to recommend including DSHS institutional workers and Department of Transportation (DOT) Workers for inclusion t o the Public Safety Employees Retirement System (PSERS).

I cannot do a better job of speaking to the need for this recommendation than they do. We recognize that a close study of which classifications with in DSHS institutions and DOT will be necessary. We hope that you will let us partner with you in making that determination.

Please contact me if you have questions about the enclosed correspondence. I can provide more information you might need for any of our members who wrote to the committee. I can be reached at mattz@wfse.org, or at (360)352-7603 x 1031.

Thank you for reviewing my member's requests for inclusion in PSERS.

OLYMPIA FIELD OFFICE
906 Columbia St. SW, Suite 500
Olympia, WA 98501
(360) 786-1303
1-800-624-0256
Fax: (360) 786-1338

SEATTLE FIELD OFFICE
6363 7th Ave. S., Suite 220
Seattle WA, 98108-3407
(206) 525-5363
1-800-924-5754
Fax: (206) 525-5366

SMOKEY POINT FIELD OFFICE
16710 Smokey Point Blvd., Suite 308
Arlington, WA 98223-8435
(360) 659-4333
1-800-967-3816
Fax: (360) 657-3336

SPOKANE FIELD OFFICE
316 W. Boone Ave., Suite 353
Spokane, WA 99201-2346
(509) 326-4422
1-800-442-8618
Fax: (509) 326-4424

TACOMA FIELD OFFICE
6003 Tacoma Mall Blvd.
Tacoma, WA 98409-6826
(253) 581-4402
1-800-924-5753
Fax: (253) 581-4404

VANCOUVER FIELD OFFICE
3305 Main St., Suite 109
Vancouver, WA 98663-2234
(360) 735-1115
1-800-967-9356
Fax: (360) 735-1121

YAKIMA FIELD OFFICE
3804 Kern Road, Suite B
Yakima, WA 98902-7801
(509) 452-9855
1-800-439-9855
Fax:(509) 457-1939

21 June 2012

To: The Select Committee on Pension Policy

From: Gabe Hall, President AFSCME Local 862

RE: PSERS Study

I am writing you to ask that you make employees of the Juvenile Rehabilitation Administration eligible for the Public Safety Employees Retirement System (PSERS). The PSERS was created to allow employees who work in high risk jobs, with high risk offenders, to be able to retire before age and infirmity make it too dangerous for them to work with that clientele.

We in JRA work with volatile, dangerous youths that are, in many cases, highly aggressive. There is a high need for alertness and physical ability when supervising these youths. Fights can break out any time, caused by something as little as one resident maintaining eye contact for a second or two longer than the other resident feels is a "respectful" amount of time.

The number of gang involved youth in JRA has increased significantly in recent years, leading to a marked increase in assaults by residents on each other. We staff are required to physically intervene when resident fight. We have seen an increase in staff injuries that coincides with the increase in resident fights. It does not make much sense to have 65 year old staff trying to physically control young, fit, and in many cases, large young men intent on doing damage to each other. Unlike staff, residents are not constrained from punching, kicking, biting, pinching and otherwise flailing at staff when we attempt to control them.

We staff are required, as a condition of employment, to attend and pass annual refresher trainings on Dealing With Resistive Youth (DWRY) techniques. This training is certified through the Criminal Justice Training Center, as are the instructors. During these trainings, we must demonstrate

proficiency in restraint techniques designed to ensure the safety of both staff and residents caught up in an incident. This involves a high level of physical ability to pass the training. Many staff have been injured while taking the original 40 hour course and the annual 8 hour refreshers. Some staff have been injured so badly during these trainings that they have had to be medically separated from their jobs. We are seeing ever higher numbers of older staff injured during these trainings.

Other employees who deal with this same population are currently eligible for PSERS. Staff of city and county juvenile detention facilities can join PSERS. Our residents come from these facilities. The detention centers generally have the residents for a few weeks or months, while they are being held for trial. Once the youths have been sentenced, they come to JRA, often for terms of several years.

So, in conclusion, it makes sense for JRA employees to be included in PSERS, for the very same reasons that PSERS was established: to allow employees in high risk jobs to not have to continue to work until there is an elevated risk of injury to older employees.

Thank you for your attention to this matter.

Gabe Hall, President AFSCME Local 862
Email: mrsoup@hotmail.com
Phone: (360) 705-0610

June 21, 2012

To: The Select Committee on Pension Policy

From: Kathryn Rogers, AFSCME local 1060

RE: PSERS Study

My name is Kathryn Rogers. I started working for Washington State Department of Transportation as a Maintenance Tech 1 in 1985. I am 55 years old and have been a Maintenance Lead Technician since 1993.

Maintenance Technician is one of the job classes inside the Department of Transportation that are required to have and maintain a Commercial Drivers License. (CDL). One of the requirements of maintaining your CDL is that you pass a physical every two years. During this physical your eyesight, blood pressure, reflexes, dexterity are checked and blood and urine are tested. The older I get the more I am concerned with passing this physical.

Other job classes requiring a CDL are; Equipment Technicians, Bridge Maintenance Technicians, Transportation Systems Technicians.

A Maintenance Technician's job can be labor intensive. Requirements include repeatedly lifting 50 pounds, shoveling asphalt or dirt, repairing damaged guardrail, walking up and down slopes to check drainage or cutting and removing trees and brush with hand tools, setting up traffic control signs, cones and barrels. It also can be sedentary, controlling traffic with a flag paddle, operating equipment such as sweepers, backhoes, tractor mounted bush cutters, controlling traffic with a flag paddle or in the winter driving a sanding / plow truck for 12 hour shifts.

We are required to be available to return to work providing traffic control for investigated vehicle accidents, replacing down / missing regulatory signs, removing trees blocking the roadway and any other safety concern report by the State Patrol that can not wait until regular working hours. We work nights to repair the roadway surface or sweep the roadway minimizing disruptions to traffic. We are subject to emergency schedule changes to respond to snow and ice. An emergency schedule change involves switching from working 8-hour days to a 12-hour night shift with no advance notice. In short we preserve the infrastructure, insure the safety of the travelling public, and responding to emergent safety concerns in all types of weather. All of these things are the essential job functions of a Maintenance Technician 1, 2, 3, Leads and Supervisors. If we are unable to perform these essential functions or pass the CDL physical we can not be employed in Maintenance with WSDOT.

Our assigned duties can change daily. Several of these duties become more difficult the older you are. Switching from day work to night work, switching from sedentary work to physical or
repetitive work is increasingly more difficult the older you get. It takes longer to warm up / stretch before performing physical labor, you feel your aches and pains more and it takes longer to recover from the stresses and strains. I personally find the lack of sleep due being called in to work at night or shifting from day work to night work increasingly more difficult the older I get, especially when you are shifted to night work for a week or less. It takes a lot out of you.

I am proud of working for the DOT and the service I provide to the traveling public. I hope that I am able to continue to work until I reach full retirement age (65). At that time I will have 34.5 years of service to the State of Washington.

Kathryn E. Rogers
2318 S. Northbluff Road.
Greenbank, WA 98253
Phone: (360) 632-2903

To Whom it May Concern. From Bret W. Osterberg

This month, June 2012, I will have worked in JRA institutions for 16 years. I have worked in multiple settings and programs, as a Counselor. The one thing they all have in common, is the constant existance of violence and assault. I personally have been assaulted directly or indirectly multiple times over the years. Cuts, Bruises, Black eyes and cracked ribs. Fortunately I have been able to go home, to my family under my own power in the last 16 years. I have also seen my fellow co-workers be assaulted either directly and/or indirectly, and the physical damage that resulted.

There is a "Law of Averages" in this business. I started when I was 26 years old. I am now 42 years old. However, the residents I deal with have remained 16 to 20 year old young men. The potential of injury is not a matter of "if" but "when"; especially the older I get. I Love my job, but question the cost when there are more aches, pains and muscle strains, after having to physically handle a strong 17 or 18 year old. Can I see myself doing this job for another 20 years? Mentally yes. Will I be able to physically "perform" my duties at age 62?, Without getting injured or seriously hurt. The "Law of Averages", say, No way.

To prove my point: Please see the Executive Team (E-Team) minutes for the month of May. High Lighted at the bottom of the page. In case you don't know, Staff are the ones that have to stop fights

STATE OF WASHINGTON

DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Green Hill School 375 SW 11th Street Chehalis, Washington 98532

E-Team
June 04, 2012

Present: Dennis Harmon, Charles South, Cindy Blue, Susan Copeland, Everett Gage, Lori Nesmith, Stacy Durham, Johnny Lewis, Chris Ward, Joel Morlin, Criss Stewart, Mike Eberle, Monte Bainbridge, Tami Hodgins and Traci Newton.

AOD:

Criss Stewart shared his weekend report as AOD.

Orange Jumpsuit Uniform:

There were no youth recommended for the removal of wearing Orange Jumpsuit Uniforms.

Disproportionate Minority Contact (DMC):

Staff that did not attend a DMC Training are required to attend one of the sessions being held in Olympia on June 14, 20, and 27. Please contact Criss Stewart to register for this training.

Staff Recognition / No Unplanned Leave Usage:

Managers were asked to submit names of staff that had no unplanned absences during May to their Administrator and Traci by Friday, June 08, 2012.

JRA Extended Management Team Meeting:

There will not be an E-Team meeting next Monday due to the Leadership Team attending the JRA Extended Management Team (EMT) Meeting. The JRA EMT Meeting is being held at the Tacoma News Tribune Building.

PbS:

During the month of May there were 17 recorded resident fights for a total of 121 year-to-date. During last year at the same point there were a recorded 67 total recorded fights.

June 18, 2012

Honorable Steve Conway, Chair
Select Committee on Pension Policy
Olympia, WA 98504

Dear Senator Conway:

This letter is in regards to early retirement for specific job classes within Department of Social and Health Services. I am a licensed practical nurse #2 at Child Study and Treatment Center and have cared for mentally ill children for almost 27 years.

I care for mentally ill children that have unpredictable behavior. Often I must be involved in physical containment when a patient becomes assaultive and out of control. In 2001 I was assaulted by a male patient. I was punched on my face and head, and since then I suffer from "vertigo" on and off. Usually the symptoms come back twice a year. Also, my left knee hurts on and off due to many incidents of hitting the floor during physical containment. Presently, whenever I help do containment I notice that my neck, back, both arms and legs become sore the next day.

An early retirement at the age of 62 is impossible because the penalty is too high, and I don't make enough money to meet the demands of life. To continue working until the age of 65 seems to be too long to wait and dangerous. Just to give you information about my physical stature. I am 4'10" in height and 120 lbs. My patients at work stand between 5'5" to 6 feet tall, weighing 150 lbs to 200 lbs. For my age, considering the type of work I do, it is highly risky.

Respectfully,

Maxima R. Caintic

Maxima R. Caintic

June 9, 2012

Honorable Steve Conway, Chair
Select Committee on Pension Policy
Olympia, WA 98504

Dear Senator Conway:

My name is Darren Kistler, I am 46 years old, and I have I served the public and the patients of Western State Hospital as an Institutions Counselor since 1993. I would like to address working conditions here from a personal career vantage point. My hope is that the legislature will recognize the public service capacity that all of us provide who work directly with patients; and also understand the rigorous and often dangerous physical environment we are presented with daily here at Western State Hospital. My goal is to encourage the legislature to improve the retirement conditions and benefits for those of us who give so much daily to the citizens of Washington State.

As you are probably aware, Western State Hospital is cited as one of the most perilous worksites in the entire state. In 18 years of service I have been physically assaulted at least 9 times. I have had LNI related surgery and recovery as a result of my duties here. I cannot count the number of "hands on" restraining methods I and my coworkers have performed in order to reduce a threat level and make the environment again safe for patients and staff. This is in addition to a high level of awareness and stress that goes with working in such an environment. In spite of this, I am grateful to Washington State for providing me an opportunity to help with recovery services for some of our state's most vulnerable patients.

It's hard to imagine continuing to do this until my full retirement age of 65. An early retirement option is untenable due to the high penalty placed on an earlier retirement. My $40,000 yearly gross salary would seem insufficient to allow that kind of penalty on my earnings for future living expenses.

Please consider DSHS specific job classes, including those of us who work with volatile, high needs patients in institutions, for inclusion into a system such as the PSERS. Your attention to this is greatly appreciated.

Sincerely,

Darren Kistler

Sen. Steve Conway, Chair

Select Committee on Pension Policy

P.O. Box 40914

Olympia, WA 98504-0914

RE: Early Retirement Options for DSHS Institutions Staff

I have witnessed too many staff assaults during my nearly 17 years with JRA. Please take into account the cumulative effect of working daily with the threat of 'when not if violence' waiting for a code to be called, fights breaking out in front of you and enduring verbal abuse. I am classified as a counselor, but my job is currently more custodial than therapeutic case management. I am exposed to and expected to respond to violent, aggressive situations, the same as a security officer. I am a 57 year old female and at this point I do not feel my physical capabilities are effective in this situation. I have suggested reducing my custodial duties and increasing my counseling time. Another co-worker and I, in an effort to reduce our stress proposed a job-share plan which was denied. I am currently experiencing

health related stress problems (high blood pressure, bruxism, anxiety) you have to acknowledge that employees will age-out of this job. My co-worker and I who wanted to job share have nearly 50 years of combined experience. He quit. I can't. Don't tell me we aren't valuable and don't turn a blind eye to what we JRA employees deal with. I see drug abuse, alcohol abuse, depression and other illnesses that are directly related to job burn out. We keep doing more with less — I AM NOT DYING FOR THIS JOB — WE NEED OPTIONS!

L James GHS 6/12/12

name institution date

The Honorable Senator Steve Conway

Chair, Senate Select Committee on Pension Policy

Dear Senator Conway:

I have been employed with JRA since 1987 and am fast approaching my 25 year anniversary date. I am writing to implore you to include DSHS institution staff in the PSERS. DSHS/JRA institution employees are responsible for much of the same duties as state corrections officers and law enforcement personnel. In fact, we train under the same confrontational continuum and are subject to the same defensive tactics training from the Criminal Justice Training Commission. I am wholly supportive of any efforts to identify JRA employees as eligible for the same retirement plan as our counterparts in the adult system.

The residents I work with are adolescents and young adults, few are the height or weight of children. I have suffered serious injuries from incarcerated residents due to pre-planned assault and assault with an object I have also been grievously injured breaking up fights between residents, during physical restraint of out-of-control residents and during defensive tactics training. I have seen co-workers injured as well. For example a counselor who was held hostage after being stabbed in the neck with a bar wrench, beat up and dragged by the hair to her locker where she was forced to get, and give up, her car keys. A DNR foreman was set up by two residents who then proceeded to kick him and beat him with concrete chunks until they thought he was dead as part of an escape plan.

I currently have a permanent partial disability due to on-the-job injury to my lumbar discs. This was the direct result of job duties performed during the physical restraint of an out-of-control resident; this injury resulted in time loss through L&I and a more than year-long painful, difficult recovery. I have pain and mobility issues from this injury that will last my lifetime. The pain and suffering of the actual injury is compounded by the emotional impact and impact on personal life and family. The difficulties of managing work schedules, family, etc. with travel for physical therapy, doctor appointments, L&I medical exams, and prescriptions can be overwhelming.

I have had whiplash injuries to my neck due to being hit over the head with a thermal meal tray and also from being hit over the head with a chair. I have been punched in the face, kicked and spit on. I have had to go to the hospital for prophylactic treatment more than once due to blood borne pathogen exposure. My family has been threatened. Last year I was injured during defensive tactics training (the same techniques taught to law enforcement and corrections personnel). My right collarbone was dislocated from my sternum. Although I could continue to document the many injuries and difficult recovery I have suffered through due my job responsibilities, I believe the above gives perspective on the incredible physical demands of working with incarcerated juvenile felons.

In deciding whether to include the DSHS institution employees in the PSERS, please take into consideration that, although we train to the same confrontational continuum as law enforcement and the Department of Corrections, we are not allowed to use the same responses as they. For example

active aggression and active aggravated aggression toward law enforcement or corrections may result in use of level two or level three defensive tactics; the body or other impact weapons, lateral vascular neck restraint, firearms and lethal force. For JRA employees we are only allowed to respond to active aggression and active aggravated aggression with level one defensive tactics. This means that no matter how high the level of danger to staff, we still must respond with only strength techniques, hair holds, control points and counter joint techniques. Pepper spray is a level one defensive tactic that we are not allowed to use and are not trained to use.

I hope in reading this that you come to understand the very dangerous and difficult position JRA institution staff face every day and that the residents whom we serve can be aggressive, assaultive and combative. Currently the majority of JRA residents are committed for Assault, Robbery, Sexual Offenses, and for Murder/Manslaughter.

I began my career with JRA when I was 21 and now, at 47, cannot imagine how I will be able to continue to train and deal with out-of-control youth when I am in my late 50's and 60's. This is a very physically demanding and dangerous job and, coupled with budget restrictions and low staffing, it has become even more so. We deserve the consideration of retirement earlier than that of those DSHS employees who are not subject to grievous injury as part of their job description.

Thank you very much for your consideration of including DSHS/JRA institution staff in the PSERS.

Victoria Nanney

Victoria Nanney

Juvenile Rehabilitation Counselor Assistant

DSHS/JRA

Naselle Youth Camp/Harbor Lodge

Sen. Steve Conway, Chair

Select Committee on Pension Policy

P.O. Box 40914

Olympia, WA 98504-0914

RE: Early Retirement Options for DSHS Institutions Staff

THIS JOB IS EXTREMELY PHYSICAL. I HAVE BEEN INVOLVED IN AN AVERAGE OF TWO HANDLINGS PER WEEK. I HAVE SUFFERED NUMEROUS CUTS & BRUISES AND HAVE HAD MY GLASSES BROKEN. I AM 59 YEARS OLD

DAVID WHITNEY

D. Whitney

NASELLE YOUTH CAMP 6/17/12

Received
JUN 20 2012
WFSE/HQ

6/10/12

To whom it may concern:

I am writing this letter in response to discussions being held surrounding JRA employees' retirement system options (i.e., *PSERS*), and to voice my support of changing JRA's current retirement system to the *Public Safety Employee's Retirement System*.

I am currently employed with the Washington State Juvenile Rehabilitation Administration, and have been employed for JRA for roughly 6 years now. During this time, I have sustained numerous on the job injuries (i.e., dislocated shoulder, twisted ankle, cracked rib) as a result of meeting the requirements of my job (required to physically intervene in order to safely secure youth engaging in physical aggression). These types of injuries commonly sustained by JRA employees (both young and old) are injuries that often result in a lifetime of chronic pain and/or predispose the individual to further injuries needing more intensive medical care. I am raising this issue, as (unlike the *PSERS* plan) JRA's current retirement system plan (*PERS 1, 2, and 3*) does not address work-related injuries (which can lead to a significant negative impact on an individual's quality of life and their ability to actively function in the workplace).

Having met the eligibility criteria for *PSERS*, I am advocating that JRA switchover to the *PSERS* plan in an effort to secure the health, safety, and well-being of its employees.

Thank you for your time and attention to this matter.

Sincerely,

Jared Sagmiller

Sen. Steve Conway, Chair

Select Committee on Pension Policy

P.O. Box 40914

Olympia, WA 98504-0914

RE: Early Retirement Options for DSHS Institutions Staff

I have worked at Naselle Youth Camp for 17 years. During that time I have been involved in numerous physical restraints of the youths that I supervise. I have been punched once and spit at several times during the restraint process. Please consider the people who work at Juvenile Institutions for the PSERS Plan 2.

Sincerely,

Drew Sipes

Sen. Steve Conway, Chair

Select Committee on Pension Policy

P.O. Box 40914

Olympia, WA 98504-0914

RE: Early Retirement Options for DSHS Institutions Staff

MR. CONWAY,

I HAVE BEEN A DSHS EMPLOYEE FOR 17 YEARS WORKING AT NASELLE YOUTH CAMP. AS A STAFF MEMBER AT NASELLE WE DO NOT HAVE A SECURITY TEAM. EACH COUNSELOR, ASSISTANT COUNSELOR & ON CALL STAFF RESPOND TO CRISIS MANAGEMENT SITUATIONS. PHYSICALLY RESTRAINING OUT OF CONTROL YOUTH IS A TOUGH PART OF OUR JOB. MOST YOUTH ARE 15-19 YEARS OF AGE & ARE VERY PHYSICALLY FIT. THIS IS FINE WHEN STAFF ARE IN THEIR TWENTIES OR THIRTIES. THE TOLL IT TAKES ON ONE'S BODY IS TREMENDOUS. PLEASE CONSIDER EARLY RETIREMENT OPTIONS FOR DSHS INSTITUTIONS STAFF.

THANK YOU VERY MUCH.

SINCERELY,

CARY A. BLOOM

JRC

NASELLE YOUTH CAMP.

Mr. Conway,

I am writing this letter with regards to the PSERS option. I'm in favor of PSER Plan 2. I've worked for JRA for nearly 17 years. Part of my duties as a casemanager is providing security; to ensure custody & security of incarcerated youth ages between 14 and 20 yrs. I have been involved in hundreds of physical handlings where it is our responsibility to restrain the individuals. Many of my co-workers over the years myself included, have been injured or assaulted by these youths. I am currently 40 years old and in fair shape. It is scary to look into the future as a 60+ year old staff responsible to taking down a youth ~~you~~ who is stronger and has no concern for your safety.

Thank you for your consideration on this matter.

Michele Williams

Sen. Steve Conway, Chair

Select Committee on Pension Policy

P.O. Box 40914

Olympia, WA 98504-0914

Received
JUN 14 2012
WFSE/HQ

RE: Early Retirement Options for DSHS Institutions Staff

Hello, my name is Shawn Braeme. I am 52 years old and have just celibrated (?) my 28th year of working for DSHS as a Juv. Rehab. Security officer. I have worked at both Maple Lane School and Green Hill School continously since June of 1984. During this time I have been punched, kicked, elbowed, bitten, spit on & had various body fluids and excrement thrown on me.

There is not a day that goes by that there is not a possibility of assault or serious injury. I know that my reflexes are slowing and that as I mature, health concerns compound, I heal more slowly, take longer to recover & generally have less energy. I also have 13 more years that I have to work before I am able to retire without paying huge penalties. Since I only make 5,000 $ over the poverty line anyway, early retirement (as such) is not really an option, since you have to pay 10% penalty for each year of retirement prior to age 65, if I wanted to retire at age 55 I'd have to pay 100% penalty.

But, since I have achilles tendon issues, a reconstructed Knee, that is problematic and more or less constant back pain already, my chances of making it to age 65 are not great. So, I will probably have to leave State service, leave my retirement alone while I pursue another career path until I'm old enough to collect retirement & Social Security.

At these types of institutions, unless one is management, one is in constant danger, working stressfull shifts, with odd hours, all of which take a toll, physically, mentally + psychologically.

Not to mention the strains placed on families + relationships.

Please support early retirement for DSHS institional workers. Our jobs are al least as dangerous as those in much of DOC, with out the pay, opportunity for advancement or early retirement options.

Thank you for your consideration.

Shawn Braeme	Green Hill School	6/12/12
name	institution	date

Wallis, Keri

From: Matt Zuvich <MattZ@wfse.org>
Sent: Monday, June 25, 2012 10:49 AM
To: Office State Actuary, WA
Subject: Correspondence to the SCPP
Attachments: 06-21-2012 053848PM.JPG; Matt Zuvich.vcf

Attached you will find a letter from our member intended to address the SCPP regarding the PSERS study.

Please contact me with any questions or feedback.
Thank you!
z

06-21-2012 053848PM.JPG

Matthew D. Zuvich
Legislative and Political Action,
Washington Federation of State Employees
1212 Jefferson St. SE, Ste. 300
Olympia WA. 98501
Office: 360.352.7603 x 1031
Fax: 360.705.0176
E-Mail: mattz@wfse.org

To Whom It May Concern,

Washington State Department of Transportation (WSDOT) Highway Maintenance employees should be enrolled into the Public Safety Retirement System.

WSDOT Highway Maintenance employees are emergency responders. Having an aging workforce in this career field is dangerous and irresponsible. Our employees must be able to reach escape routes if needed from such dangers as wind blown trees or erratically driven vehicles to name a few of the many dangers we face on a daily basis.

Highway maintenance is a physically rigorous job that requires sound judgment. They are expected to lift heavy objects, operate power equipment, and be on your feet for long periods of time while being exposed to high speed traffic and inclimate weather conditions.

Highway maintenance workers must have a current CDL medical card. As the years add up from doing this job it gets harder and harder to successfully pass this medical evaluation.

Thank you for taking the time to read this letter. I hope this helps to successfully get WSDOT Highway Maintenance employees switched over to a more appropriate retirement system.

Gordon Elley
Local 378 President
WSDOT Highway Maintenance Lead Tech

DRAFT LETTER FOR 760

Select Committee on Pension Policy
P.O. Box 40914
Olympia, WA 98504-0914

August 20, 2012

To Whom It May Concern:

Teamsters Local Union 760, located primarily in Central Washington, represents hundreds of municipal and county public safety employees. These employees should be considered for the Public Safety Employees Retirement System (PSERS) and the Early Retirement Factor (ERF) because the responsibilities of their job classifications come with one or more of the following factors:

- High degree of physical risk
- High stress environment
- Potential exposure to severe risk on a daily basis
- Responsibility to provide public protection of lives and/or property
- High physical demands
- Exposure to violent criminal activity and its aftermath
- Minimal opportunity to advance into managerial/supervisory roles

These employees hold a wide variety of job titles, including :

Non-commissioned local law enforcement: Local and state law enforcement agencies non-commissioned staff suffer a high risk of stress and physical harm. Clerical, dispatch, department of security officers and animal control officers are just a few of these positions with constant exposure to dangerous circumstances and potential trauma. Local 760 represents these employees at Yakima, Kittitas, Chelan, Douglas, Grant, Okanogan, and Adams Counties as well as municipal public safety including dozens of public safety employees who face daily exposure to high stress and risk.

Public road crews, waste water and solid waste: Road crews, waste water and refuse employees face high physical risks and stress from reckless drivers, construction equipment, high heat and freezing temperatures and hazardous/toxic/bio-hazardous working conditions. Our members at the Brewster, Coulee Dam, Ellensburg, Grandview, Granger, Kittitas, Mabton, Naches, Quincy, Selah, Sunnyside, Toppenish, Yakima, and Zillah Public Works and refuse

departments work hard, and have physical jobs and deserve coverage and access to early retirement benefits.

Classified School Employees: K-12 classified employees work in many different classifications of work. In some cases these classifications of work require exposure to environmental hazards which over a long career can lead to increased risk of industrial illnesses and injuries. In addition, there are K-12 classified who are required to maintain a CDL (Commercial Drivers License). As a person ages it becomes harder and harder to pass the biennial DOT physical. For these reason, facilities services employees working in high risk classifications such as custodians, grounds and building maintenance, warehouse workers and truck driver, bus drivers, and bus mechanics should be considered for inclusion in PSERS. Local 760 represents hundreds of school district employees including at the Yakima School District and West Valley School District.

Please contact me if you have any questions.

Sincerely,

Wayne Johnson

Business Representative

Teamsters local Union #760

TEAMSTERS LOCAL UNION 117

Affiliated with the International Brotherhood of Teamsters

General Public and Private Sector Employees and Special Services Employees in King and Pierce Counties and Employees of the State of Washington

August 20, 2012

Select Committee on Pension Policy
P.O. Box 40914
Olympia, WA 98504-0914

To Whom It May Concern:

Teamsters Local 117 represents a large variety of public safety employees primarily working for the Washington State Department of Corrections Prisons Division, local and state law enforcement agencies, and Emergency 9-1-1 Centers. These employees should be considered for the Public Safety Employees Retirement System (PSERS) as the responsibilities of their job classifications come with one or more of the following risks:

- High degree of physical risk
- High stress environment
- Potential exposure to severe risk on a daily basis
- Responsibility to provide public protection of lives and/or property
- High physical demands
- Exposure to violent criminal activity and its aftermath
- Minimal opportunity to advance into managerial/supervisory roles

Washington State Department of Corrections Prisons Division:
All employees in the Washington Prisons Division should be eligible to participate in PSERS. There is not one individual working in a prison that is not responsible for the safety and security of that prison through the monitoring of the inmates housed there. The responsibility of monitoring inmates can come in the form of an office assistant that is responsible for the inmate janitor that works in his/her office, a maintenance worker who is runs a ten (10) inmate work crew, or a cook who monitors multiple inmates in the kitchen with access to dangerous weapons such as knives. Additionally, medical staff, mental health professionals, and classification counselors are repeatedly placed in a one on one environment with inmates of all custody levels. The potential risk of an assault in a one on one scenario is immense. The stressful nature of the prison environment, the heightened alert that every employee must be in while working in the prison, the constant threat of an assault at any moment, and the inability to promote to a position outside of the prison causes many problems for aging workers. Please consider these factors during your review of PSERS eligible classifications.

Local and State Law Enforcement Agencies:
Local and state law enforcement agencies non-commissioned staff suffers a high risk of stress and physical harm. Property, forensics, and animal control officers are just a few of these

14675 Interurban Avenue South · Suite 307 · Tukwila, WA 98168 · Phone (206) 441-4860 · Fax (206) 441-3153 · www.teamsters117.org

positions. The duties of these employees include responding to the most heinous crime scenes imaginable for processing and collecting evidence, making contact with individuals that can become belligerent and aggressive at any moment, protecting the public from dangerous animals, and physical demands that include lifting, climbing, and running extended distances. Their schedules are ever changing as they are expected to be available twenty-four hours a day, seven days a week, and at a moment's notice. This includes on call duty where they may be expected to respond to a crime scene in the middle of the night. There are documented cases of these individuals being assaulted by someone they come in contact with in the community or by a suspect returning to a crime scene that they have been left alone at to process. The idea of these individuals being able to maintain these types of schedules along with the ongoing stress caused by the circumstances they are exposed to justifies their participation in PSERS.

Emergency 9-1-1 Center Personnel:
Emergency 9-1-1 center personnel are true first responders. These individuals are the life line to the community when they are in their most vulnerable state. Every 9-1-1 call or radio transmission has the potential for a life or death scenario. Employees in this field can change a life in the matter of seconds. The stress of giving a mother CPR instructions for her infant that is not breathing, hearing a person commit suicide, or coordinating a police response for an "officer down" call has a significant impact their physiological well being. Along with the stress of the position itself, E9-1-1 personnel frequently work rotating shifts with significant amounts of mandatory overtime. These employees are "essential staff" and are expected to respond to work during natural disasters, massive critical incidents, and terrorist attacks. They are held to same level of responsibility as police officers and firefighters during emergency situations. Ever changing technology, increased call volume, and the lack of advancement opportunities are additional factors to consider when looking at the appropriate retirement age for individuals in this line of work.

Please consider the information I have provided above when identifying groups for evaluation of inclusion into the Public Safety Employees Retirement System. These individuals dedicate their lives to provide protection to our communities. They earn the right to retire from these positions rather than being forced to make a career change when they are no longer mentally and/or physically able to perform the core functions of their positions. If you would like additional information or have questions about specific classifications we represent, please contact me at *Michelle.Woodrow@teamsters117.org*.

Sincerely,

Michelle Woodrow
Acting Director of Corrections and Law Enforcement

MW:aj

TEAMSTERS
LOCAL UNION NO. 839

GENERAL TEAMSTERS, WAREHOUSEMEN, GARAGE EMPLOYEES AND HELPERS, AND FOOD PROCESSING (EXCLUDING CONSTRUCTION); COUNTIES OF BENTON, FRANKLIN, WALLA WALLA, COLUMBIA AND GARFIELD IN THE STATE OF WASHINGTON AND ATHENA, WESTON, AND MILTON FREEWATER IN UMATILLA COUNTY IN THE STATE OF OREGON.

AFFILIATED WITH THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS

ROBERT C. HAWKS SECRETARY-TREASURER	1103 W. SYLVESTER STREET PASCO, WA 99301	PHONE (509) 547-7513 FAX (509) 546-2560

August 20, 2012

Select Committee on Pension Policy
P.O. Box 40914
Olympia, WA 98504-0914

To Whom It May Concern:

Teamsters Local 839, located primarily in Southeastern and Central Washington, represents hundreds of municipal and county public safety employees. These employees should be considered for the Public Safety Employees Retirement System (PSERS) and the Early Retirement Factor (ERF) because the responsibilities of their job classifications come with one or more of the following factors:

- High degree of physical risk
- High stress environment
- Potential exposure to severe risk on a daily basis
- Responsibility to provide public protection of lives and/or property
- High physical demands
- Exposure to violent criminal activity and its aftermath
- Minimal opportunity to advance into managerial/supervisory roles

These employees hold a wide variety of job titles, including:
Non-commissioned local law enforcement: Local and state law enforcement agencies non-commissioned staff suffer a high risk of stress and physical harm. Property, forensics, and animal control officers are just a few of these positions with constant exposure to dangerous circumstances and potential trauma. Local 839 represents these employees at the **Benton County Sherriff's Department and Benton Juvenile Detention Department**, and municipal public safety including dozens of public safety employees in **Connell, College Place, and Prosser** who face daily exposure to high stress and risk.
Public road crews: Road crews face high physical risks and stress from reckless drivers, construction equipment, high heat and freezing temperatures and hazardous working conditions. Our members at the **Prosser and Benton County Public Works**

Departments work hard, physical jobs and deserve coverage and access to early retirement benefits.

Please contact me if you have any questions.

Sincerely,

Robert C. Hawks
Secretary-Treasurer
Teamsters Union Local 839

John Witte
Executive Officer
Secretary-Treasurer
Kitsap Office
Port Angeles Office

Kim Kezer
Office Manager
Port Angeles Office
Kitsap Office

Dan Taylor
Senior Busines Representative
Port Angles Office

Mark Fuller
Business Representative
Kitsap Office

Colbie Witte
Staff/Dispatch
Kitsap Office
Port Angles Office

Teamsters, Chauffeurs, Helpers
Local Union No. 589

Affiliated with
International Brotherhood of Teamsters

PO Box 4043
Port Angeles, WA 98363-0997
Phone: 360.452.3388
Fax: 360.452.3389

KITSAP AREA OFFICE
Phone: 360.613.4062
Fax: 360.698.0629

www.teamsters589.org

DRAFT LETTER FOR 589

Select Committee on Pension Policy
P.O. Box 40914
Olympia, WA 98504-0914

August 20, 2012

To Whom It May Concern:

Teamsters Local 589, located primarily on the Olympic Peninsula, represents hundreds of municipal and county public safety employees. These employees should be considered for the Public Safety Employees Retirement System (PSERS) and the Early Retirement Factor (ERF) because the responsibilities of their job classifications come with one or more of the following factors:

- High degree of physical risk
- High stress environment
- Potential exposure to severe risk on a daily basis
- Responsibility to provide public protection of lives and/or property
- High physical demands
- Exposure to violent criminal activity and its aftermath
- Minimal opportunity to advance into managerial/supervisory roles

These employees hold a wide variety of job titles, including :

Non-commissioned local law enforcement: Local and state law enforcement agencies non-commissioned staff suffer a high risk of stress and physical harm. Property, forensics, juvenile detention and animal control officers are just a few of these positions with constant exposure to dangerous circumstances and potential trauma. Local 589 represents these employees at **Jefferson County** as well as municipal public safety including dozens of public safety employees

in **Forks, Port Angeles, Port Townsend, Poulsbo, Sequim, Port Orchard,** who face daily exposure to high stress and risk.

Public road crews: Road crews face high physical risks and stress from reckless drivers, construction equipment, high heat and freezing temperatures and hazardous working conditions. Our members at the **Jefferson County, Kitsap County and Clallam County Road Departments** work hard, physical jobs and deserve coverage and access to early retirement benefits.

Classified School Employees: K-12 classified employees work in many different classifications of work. In some cases these classifications of work require exposure to environmental hazards which over a long career can lead to increased risk of industrial illnesses and injuries. In addition, there are K-12 classified who are required to maintain a CDL (Commercial Drivers License). As a person ages it becomes harder and harder to pass the biennial DOT physical. For these reason, facilities services employees working in high risk classifications such as custodians, grounds and building maintenance, warehouse workers and truck driver, bus drivers, and bus mechanics should be considered for inclusion in PSERS. Local 589 represents hundreds of school district employees including at the **Chimacum School District No. 49, Port Angeles School District No. 121** and **Sequim School District No. 323.**

Please contact me if you have any questions.

Sincerely,

John Witte

Teamsters Local 589

Secretary Treasurer

JOINT COUNCIL OF TEAMSTERS NO. 28

Affiliated with the International Brotherhood of Teamsters

14675 Interurban Ave S, Suite 301
Tukwila, Washington 98168
(206) 441-7470 • Fax (206) 441-3157

John A. Williams, President

August 20, 2012

Select Committee on Pension Policy
PO Box 40914
Olympia, WA 98504-0914

Dear Members of the SCPP:

The Joint Council of Teamsters No. 28 has over 50,000 members in Washington State. Our membership is very diverse. In the public sector alone, Teamsters include corrections personnel, public works and refuse crews, 911 operators, local and state law enforcement and classified school employees. Many of our job classifications across these diverse sectors are high risk and high stress and should be included in the Public Safety Employees Retirement System (PSERS). We ask that the following job categories and subsequent job classifications be included in PSERS.

- Local and State law enforcement agencies
- Non-commissioned local law enforcement
- Public road crews
- Public refuse workers
- Classified staff working with environmental hazards or required to have a commercial drivers license (CDL)
- Prisons division personnel
- Emergency 9-1-1 center personnel

Additionally, we ask that classified staff be considered for early retirement factors in the context of the "School Employee Early Retirement Factor" study. Many of these people work on the front lines with the most difficult children. They do things like toilet, feed, lift, and deescalate students every day. Administrative support personnel are required to work in physically repetitive environments which lead to hand, wrist, neck, shoulder, and back problems.

Thank you very much for your consideration. Please do not hesitate to let us know if you need further information regarding any of these job categories/classifications. We hope you will recommend PSERS as the most appropriate retirement system and allow early retirement factors to be reinstated for school employees.

Sincerely,

JOINT COUNCIL OF TEAMSTERS NO. 28

Heather Weiner

HEATHER WEINER
POLITICAL ACTION DIRECTOR

HW:dm

TEAMSTERS LOCAL UNION NO. 763

PUBLIC, PROFESSIONAL & OFFICE-CLERICAL EMPLOYEES AND DRIVERS

Affiliated with the International Brotherhood of Teamsters

Scott A. Sullivan, Secretary-Treasurer

14675 Interurban Ave. S, Suite 305 · Tukwila, WA 98168 · (206) 441-0763 · 1-877-441-0763 · Fax (206) 441-6376

August 15, 2012

Re: K-12 Classified Employees to be included in PSERS

To Whom It May Concern:

Teamster Local Union No. 763 represents in excess of 2000 K-12 classified employees. For the following reasons we believe some of our members who work in high risk positions should be included in PSERS.

K-12 classified employees work in many different classifications of work. In some cases these classifications of work require exposure to environmental hazards which over a long career can lead to increased risk of industrial illnesses and injuries. In addition, there are K-12 classified who are required to maintain a CDL (Commercial Drivers License). As a person ages it becomes harder and harder to pass the biennial DOT physical. For these reason, facilities services employees working in high risk classifications such as custodians, grounds and building maintenance, warehouse workers and truck driver, bus drivers, and bus mechanics should be considered for inclusion in PSERS.

Respectfully submitted by,

TEAMSTERS LOCAL UNION NO. 763

Jason Powell

Jason Powell
Business Agent

JP: lb

Opeiu8afl-cio

TEAMSTERS LOCAL UNION NO. 763

PUBLIC, PROFESSIONAL & OFFICE-CLERICAL EMPLOYEES AND DRIVERS

Affiliated with the International Brotherhood of Teamsters

Scott A. Sullivan, Secretary-Treasurer

14675 Interurban Ave. S, Suite 305 · Tukwila, WA 98168 · (206) 441-0763 · 1-877-441-0763 · Fax (206) 441-6376

August 15, 2012

Re: ERF Education Study

To Whom It May Concern:

Teamster Local Union No. 763 represents in excess of 2000 K-12 classified employees. For the following reasons we believe some of our members who work in high risk positions should have the early retirement factor (ERF) restored.

Regarding the ERF for SERS, K-12 classified staff that work in educational and administrative support positions need to be kept in mind when considering requiring folks to work longer to be eligible for full retirement. Educational support personnel work on the front lines with the most difficult children. They do things like toilet, feed, lift, and deescalate students every day. Administrative support personnel are required to work in physically repetitive environments which lead to hand, wrist, neck, shoulder, and back problems. For these reasons at least these K-12 classified employees should be considered for reinstatement of the early retirement factor (ERF)

Respectfully submitted by,

TEAMSTERS LOCAL UNION NO. 763

Jason Powell

Jason Powell
Business Agent

JP: lb

Opeiu8afl-cio

CHAUFFEURS, TEAMSTERS & HELPERS UNION
LOCAL NO. 252

Affiliated with the International Brotherhood of Teamsters

Main Office	217 East Main Street, Centralia, WA 98531	(360) 736-9979	Fax (360) 330-0377
Olympia Branch	119½ N. Capitol Way, Olympia, WA 98501	(360) 943-1950	Fax (360) 754-7844

DARREN L. O'NEIL, SECRETARY-TREASURER

® 41

Select Committee on Pension Policy
P.O. Box 40914
Olympia, WA 98504-0914

August 20, 2012

To Whom It May Concern:

Teamsters Local 252, located primarily in Southwestern Washington, represents hundreds of municipal and county public safety employees. These employees should be considered for the Public Safety Employees Retirement System (PSERS) and the Early Retirement Factor (ERF) because the responsibilities of their job classifications come with one or more of the following factors:

- High degree of physical risk
- High stress environment
- Potential exposure to severe risk on a daily basis
- Responsibility to provide public protection of lives and/or property
- High physical demands
- Exposure to violent criminal activity and its aftermath
- Minimal opportunity to advance into managerial/supervisory roles

These employees hold a wide variety of job titles, including:

Non-commissioned local law enforcement: Local and state law enforcement agencies non-commissioned staff suffer a high risk of stress and physical harm. Property, forensics, juvenile detention and animal control officers are just a few of these positions with constant exposure to dangerous circumstances and potential trauma. Local 252 represents these employees at the **Grays Harbor, Lewis, Mason, and Pacific Counties** as well as municipal public safety including dozens of public safety employees in **Centralia, Chehalis, Montesano, Ocean Shores, Olympia, Raymond, Yelm, and Westport** who face daily exposure to high stress and risk.

Public road crews: Road crews face high physical risks and stress from reckless drivers, construction equipment, high heat and freezing temperatures and hazardous working conditions. Our members at the **Mason County, Centralia, Chehalis, Elma, Montesano, McCleary, Morton, Napavine, South Bend, Tumwater, Winlock, Ocean Shores and Yelm Public Works Departments** work hard, physical jobs and deserve coverage and access to early retirement benefits.

Classified School Employees: K-12 classified employees work in many different classifications of work. In some cases these classifications of work require exposure to environmental hazards which over a long career can lead to increased risk of industrial illnesses and injuries. In addition, there are K-12 classified who are required to maintain a CDL (Commercial Drivers License). As a person ages it becomes harder and harder to pass the biennial DOT physical. For these reasons, facilities services employees working in high risk classifications such as custodians, grounds and building maintenance, warehouse workers and truck driver, bus drivers, and bus mechanics should be considered for inclusion in PSERS. Local 252 represents hundreds of school district employees including at the **Centralia School District No. 401, Chehalis School District No. 302, Griffin School District No. 324, Shelton School District No. 209, and Olympia School District No. 111.**

Please contact me if you have any questions.

Sincerely,

Darren L. O'Neil, Secretary-Treasurer
Teamsters Union Local #252

General Teamsters' Local Union, No. 231

General Teamsters, Warehouse Employees, Law Enforcement and Public Employees, Food Processing and Cannery Workers, Whatcom, San Juan, Skagit and Island Counties, Washington, including Food Processing, Cannery Workers and Warehousemen in the Cities of Stanwood, Arlington, Snohomish and Monroe in Snohomish County, Washington

Affiliated with the International Brotherhood of Teamsters

LEONARD KELLEY, *Secretary-Treasurer*
1700 N. State Street
P.O. Box "H"
Bellingham, WA 98227-0298
(360) 734-7780 • Fax (360) 734-8501

BRANCH OFFICE:
420 Gates Street
P.O. Box 764
Mt. Vernon, WA 98273-0764
(360) 336-3129 • Fax (360) 336-3120

Select Committee on Pension Policy
P.O. Box 40914
Olympia, WA 98504-0914

August 20, 2012

To Whom It May Concern:

Teamsters Local 231, located primarily in Northwestern Washington, represents hundreds of municipal and county public safety employees. These employees should be considered for the Public Safety Employees Retirement System (PSERS) and the Early Retirement Factor (ERF) because the responsibilities of their job classifications come with one or more of the following factors:

- High degree of physical risk
- High stress environment
- Potential exposure to severe risk on a daily basis
- Responsibility to provide public protection of lives and/or property
- High physical demands
- Exposure to violent criminal activity and its aftermath
- Minimal opportunity to advance into managerial/supervisory roles

These employees hold a wide variety of job titles, including :

Non-commissioned local law enforcement: Local and state law enforcement agencies non-commissioned staff suffer a high risk of stress and physical harm. Property, forensics, juvenile detention and animal control officers are just a few of these positions with constant exposure to dangerous circumstances and potential trauma. Local 231 represents these employees at **Whatcom, and Skagit Counties** as well as municipal public safety including dozens of public safety employees in **Blaine, Everson, and Lynden** who face daily exposure to high stress and risk.

Public road crews: Road crews face high physical risks and stress from reckless drivers, construction equipment, high heat and freezing temperatures and hazardous working conditions. Our members at the **Burlington, Ferndale, Lynden** public works departments work hard, physical jobs and deserve coverage and access to early retirement benefits.

Classified School Employees: K-12 classified employees work in many different classifications of work. In some cases these classifications of work require exposure to environmental hazards which over a long career can lead to increased risk of industrial illnesses and injuries. In addition, there are K-12 classified who are required to maintain a CDL (Commercial Drivers License). As a person ages it becomes harder and harder to pass the biennial DOT physical. For these reason, facilities services employees working in high risk classifications such as custodians, grounds and building maintenance, warehouse workers and truck driver, bus drivers, and bus mechanics should be considered for inclusion in PSERS. Local 231 represents hundreds of school district employees including at the

considered for inclusion in PSERS. Local 231 represents hundreds of school district employees including at the **Bellingham School District No. 501, Coupeville School District No. 204, Ferndale School District No. 502, and Mount Vernon School District No. 320.**

Please contact me if you have any questions.

Sincerely,

Leonard Kelley

Leonard Kelley
Secretary Treasurer
Teamsters Local Union No.231

From: Karen & Dave
To: Office State Actuary, WA
Subject: SB 6378
Date: Thursday, August 23, 2012 12:06:50 PM

Greetings; My name is John Griffith, & I am member of PERS 2. I read Section 8 and am interested in what would be required to have your committee consider my work group to determine if it should qualify under your review criteria. I am a member of the Nuclear Security guard force at the Energy-Northwest commercial Columbia Generating Station near Richland, WA. The physical & psychological standards to qualify for these positions is pretty rigorous. Our older security officers in their 60's are expected to meet the same physical requirements as newly hired employees in their 20's. These qualifications become much more challenging and difficult for our older members to meet. An earlier retirement option could allow members to separate from employment in better health on more favorable terms. Please let me know if you would need additional information to consider this request, or any other information that is pertinent to this inquiry.
Respectfully, John Griffith

Teamsters Local Union No. 690

Affiliated with the International Brotherhood of Teamsters

1912 North Division #200
Spokane, WA 99207

Val Holstrom
Secretary-Treasurer

Phone: (509) 455-9410
Fax: (509) 326-9507
Email: info@teamsterslocal690.org

RECEIVED

AUG 29 2012

Office of
The State Actuary

Select Committee on Pension Policy
P.O. Box 40914
Olympia, WA 98504-0914

August 20, 2012

To Whom It May Concern:

Teamsters Local 690, located primarily in Eastern Washington, represents hundreds of municipal and county public safety employees. These employees should be considered for the Public Safety Employees Retirement System (PSERS) and the Early Retirement Factor (ERF) because the responsibilities of their job classifications come with one or more of the following factors:

- High degree of physical risk
- High stress environment
- Potential exposure to severe risk on a daily basis
- Responsibility to provide public protection of lives and/or property
- High physical demands
- Exposure to violent criminal activity and its aftermath
- Minimal opportunity to advance into managerial/supervisory roles

These employees hold a wide variety of job titles, including :

Non-commissioned local law enforcement: Local and state law enforcement agencies non-commissioned staff suffer a high risk of stress and physical harm. Property, forensics, and animal control officers are just a few of these positions with constant exposure to dangerous circumstances and potential trauma. Local 690 represents these employees at the **Whitman County, Stevens County, and Pend Oreille County** as well as municipal public safety including dozens of public safety employees in **Colville, Chewelah, Kettle Falls, and Liberty Lake** who face daily exposure to high stress and risk.

PAPERMILL PRINTING

Emergency Dispatch (911): Emergency dispatch and 911 operators have a high risk of post traumatic stress disorder and related health disorders. Our members at the Cheney Emergency Dispatch Services deserve consideration under PSERS and ERF.

Public road crews: Road crews face high physical risks and stress from reckless drivers, construction equipment, high heat and freezing temperatures and hazardous working conditions. Our members at the **Whitman Public Works Department** work hard, physical jobs and deserve coverage and access to early retirement benefits.

Please contact me if you have any questions.

Sincerely,

Val Holstrom,
Secretary-Treasurer

To: Select Committee on Pension Policy-SB 6378

Date: September 1, 2012

Select Committee on Pension Policy members, we request that you consider PSERS eligibility for the Nuclear Security Officer's (NSO's) of Energy Northwest's Columbia Generating Station commercial nuclear power plant located on the Hanford Nuclear Reservation near Richland, WA. We currently have NSO's enrolled as members of PERS 2 and PERS 3.

We must successfully complete a training program approved by the criminal justice training commission as provided in RCW 43.52.520. Our officers are authorized under RCW 43.52.530 to "use reasonable force to detain, search, or remove persons who enter or remain without permission within the nuclear power plant site exclusion area, or whenever, upon probably cause, it appears to a member of the security force that a person had committed, or is attempting to commit a crime."

The Code of Federal Regulations, 10 CFR 73.55 provides our mandate to maintain "properly trained, qualified and equipped personnel required to interdict and neutralize threats"…"of radiological sabotage." Further 10.CFR.73.55 requires our training prepare us to "prevent or impede attempted acts of radiological sabotage by using force sufficient to counter the force directed at the person, including the use of deadly force…"

NSO's are required to meet stringent standards, with initial training approximately 3 months in duration before individual duty assignment. All NSO's must maintain approximately 30 annual qualifications to continue employment in their capacity. Examples of some of the required qualifications are: Full medical physical (with Nuclear Regulatory Commission (NRC) required standards)

Tactical Weapons Qualification Course (stress induced timed course 100% score

Required to pass)

Day/Night Fire Weapons Qualification Course (timed and scored test)

Radiological testing

Force on Force Drills

Quarterly Job Duty evaluation and testing

Annual Written Exam

We can provide a full list of required qualifications if the Select Committee requests.

The NRC has designated NSO's as one of two critical groups in 10CFR73.55. This requires a full psychological screening upon initial employment and every 3 years thereafter. The psychological screening consists of a Minnesota Multiphasic Personality Inventory (MMPI) test and a clinical interview with a licensed psychologist.

NSO's required equipment to carry and have available at all times are: Handgun, Rifle, Ammunition for both weapons, Radio, Handcuffs, Defense Spray, Flashlight, and Gas Mask. The approximate weight of this equipment is 25 pounds.

The physical demands of our job have proven to be difficult to maintain. In the last 5 years we have had at least 10 NSO's ranging in age from early 50's to early 60's with either medical issues that prevented them from meeting our stringent requirements or were injured during our Tactical Weapons Qualification course, resulting in loss of employment. We have also experienced two on the job fatalities, heart attack and aneurysm.

Our NSO's work 12 hour rotating shifts (6 am-6 pm, 6 pm-6 am), alternating 4 days, 3 nights, 3 days, 4 nights over a period of 21 days that repeats every 28 days. Negative effects of shiftwork on the body and long term health are well documented.

These standards require a level of physical fitness and psychological adeptness that becomes much more challenging for our members as we age. Members in their 60's must meet the same standards as younger employees in their 20's.

We currently have officers who have more than 30 years of service in the security force with service credit in PERS 2 that are only in their 50's. The requirements of this job make the prospect of continuing to meet and maintain these standards until full retirement age in PERS 2 a difficult task.

We hope you will consider our Nuclear Security Officers deserving of inclusion in PSERS.

Respectfully,

Dave Griffith

and

Energy Northwest Nuclear Security Officers

Wallis, Keri

Subject: FW: Energy Northwest, Security Officers PSERS information
Attachments: SCPP PSERS letter.doc; SCPP BILL 6378.docx; SCPP RCW 43 FORCE.docx; SCPP RCW 43 vehicles.docx; CFR-2012-title10-vol2-part73-appB[1].pdf

-----Original Message-----
From: Bouse, Isaac J. [mailto:ijbouse@energy-northwest.com]
Sent: Wednesday, September 26, 2012 8:54 PM
To: Nichols, Devon
Cc: ijbouse@gmail.com
Subject: Energy Northwest, Security Officers PSERS information

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Devon Nichols,

Thank you for your time in this matter. I know that there are many hopeful groups and organizations that desire inclusion into PSERS. I have a number of documents to send to you at this time. However, I do not have all of the information at hand that I wish to send. Some of the information I wish to send requires personal approval to share. I will send the documents that I have at my disposal currently and send the others as they come to me. I hope that this is acceptable, and I will endeavor to provide the information in a speedy manor. Please let me know if this method is acceptable or for any questions.

Thank You,

Isaac J Bouse

Nuclear Security Officer
Energy Northwest, Columbia Generating Station

To: Select Committee on Pension Policy-SB 6378

Date: September 1, 2012

Select Committee on Pension Policy members, we request that you consider PSERS eligibility for the Nuclear Security Officer's (NSO's) of Energy Northwest's Columbia Generating Station commercial nuclear power plant located on the Hanford Nuclear Reservation near Richland, WA. We currently have NSO's enrolled as members of PERS 2 and PERS 3.

We must successfully complete a training program approved by the criminal justice training commission as provided in RCW 43.52.520. Our officers are authorized under RCW 43.52.530 to "use reasonable force to detain, search, or remove persons who enter or remain without permission within the nuclear power plant site exclusion area, or whenever, upon probably cause, it appears to a member of the security force that a person had committed, or is attempting to commit a crime."

The Code of Federal Regulations, 10 CFR 73.55 provides our mandate to maintain "properly trained, qualified and equipped personnel required to interdict and neutralize threats…of radiological sabotage." Further 10.CFR.73.55 requires our training prepare us to "prevent or impede attempted acts of radiological sabotage by using force sufficient to counter the force directed at the person, including the use of deadly force…"

NSO's are required to meet stringent standards, with initial training approximately 3 months in duration before individual duty assignment. All NSO's must maintain approximately 30 annual qualifications to continue employment in their capacity. Examples of some of the required qualifications are: Full medical physical (with Nuclear Regulatory Commission (NRC) required standards)

Tactical Weapons Qualification Course (stress induced timed course 100% score

Required to pass)

Day/Night Fire Weapons Qualification Course (timed and scored test)

Radiological testing

Force on Force Drills

Quarterly Job Duty evaluation and testing

Annual Written Exam

We can provide a full list of required qualifications if the Select Committee requests.

The NRC has designated NSO's as one of two critical groups in 10CFR73.55. This requires a full psychological screening upon initial employment and every 3 years thereafter. The psychological screening consists of a Minnesota Multiphasic Personality Inventory (MMPI) test and a clinical interview with a licensed psychologist.

NSO's required equipment to carry and have available at all times are: Handgun, Rifle, Ammunition for both weapons, Radio, Handcuffs, Defense Spray, Flashlight, and Gas Mask. The approximate weight of this equipment is 25 pounds.

The physical demands of our job have proven to be difficult to maintain. In the last 5 years we have had at least 10 NSO's ranging in age from early 50's to early 60's with either medical issues that prevented them from meeting our stringent requirements or were injured during our Tactical Weapons Qualification course, resulting in loss of employment. We have also experienced two on the job fatalities, heart attack and aneurysm.

Our NSO's work 12 hour rotating shifts (6 am-6 pm, 6 pm-6 am), alternating 4 days, 3 nights, 3 days, 4 nights over a period of 21 days that repeats every 28 days. Negative effects of shiftwork on the body and long term health are well documented.

These standards require a level of physical fitness and psychological adeptness that becomes much more challenging for our members as we age. Members in their 60's must meet the same standards as younger employees in their 20's.

We currently have officers who have more than 30 years of service in the security force with service credit in PERS 2 that are only in their 50's. The requirements of this job make the prospect of continuing to meet and maintain these standards until full retirement age in PERS 2 a difficult task.

We hope you will consider our Nuclear Security Officers deserving of inclusion in PSERS.

Respectfully,

Members of the Nuclear Security Force

Energy Northwest, Columbia Generating Station

CERTIFICATION OF ENROLLMENT
SECOND ENGROSSED SENATE BILL 6378
62nd Legislature
2012 1st Special Session

http://apps.leg.wa.gov/documents/billdocs/2011-12/Pdf/Bills/Senate%20Passed%20Legislature/6378.PL.pdf

11 NEW SECTION. **Sec. 8.** The select committee on pension policy, with
12 the assistance of the department of labor and industries, shall study
13 the issue of risk classifications of employees in the Washington state
14 retirement systems that entail either high degrees of physical or
15 psychological risk to the members' own safety or unusually high
16 physical requirements that result in elevated risks of injury or
17 disablement for older employees. The select committee on pension
18 policy, with the assistance of the office of the superintendent of
19 public instruction, shall also study existing early retirement factors
20 and job requirements that may limit the effectiveness of the older
21 classroom employee. The study shall identify groups and evaluate them
22 for inclusion in the public safety employees' retirement system or the
23 creation of other early retirement factors in the teachers' or school
24 employees' retirement systems. The select committee on pension policy
25 shall report the findings and recommendations of its study to the
26 legislative fiscal committees by no later than December

15, 2012.

This is the area of focus for Energy Northwest nuclear security officers (NSO's).

RCW 43.52.520

Security force — Authorized.

An operating agency constructing or operating a nuclear power plant under a site certificate issued under chapter 80.50 RCW may establish a security force for the protection and security of each nuclear power plant site exclusion area. Members of the security force may be supplied with uniforms and badges indicating their position as security force members if the uniforms and badges do not closely resemble the uniforms or badges of any law enforcement agency or other agency possessing law enforcement powers in the surrounding area of the nuclear power plant exclusion area. Members of the security force shall enroll in and successfully complete a training program approved by the criminal justice training commission which does not conflict with any requirements of the United States nuclear regulatory commission for the training of security personnel at nuclear power plants. All costs incurred by the criminal justice training commission in the preparation, delivery, or certification of the training programs shall be paid by the operating agency.

[1981 c 301 § 1.]

RCW 43.52.530

Security force — Powers and duties — Rules on speed, operation, location of vehicles authorized.

(1) Members of an operating agency security force authorized under RCW 43.52.520 may use reasonable force to detain, search, or remove persons who enter or remain without permission within the nuclear power plant site exclusion area or whenever, upon probable cause, it appears to a member of the security force that a person has committed or is attempting to commit a crime. Should any person be detained, the security force shall immediately notify the law enforcement agency, having jurisdiction over the nuclear power plant site, of the detainment. The security force is authorized to detain the person for a reasonable time until custody can be transferred to a law enforcement officer. Members of a security force may use that force necessary in the protection of persons and properties located within the confines of the nuclear power plant site exclusion area.

(2) An operating agency may adopt and enforce rules controlling the speed, operation, and location of vehicles on property owned or occupied by the operating agency. Such rules shall be conspicuously posted and persons violating the rules may be expelled or detained.

(3) The rights granted in subsection (1) of this section are in addition to any others that may exist by law including, but not limited to, the rights granted in RCW 9A.16.020(4).

[1981 c 301 § 3.]

force

	Address	Telephone (24 hour)	E-Mail
Region IV: Alaska, Arizona, Arkansas, California, Colorado, Hawaii, Idaho, Kansas, Louisiana, Montana, Nebraska, Nevada, New Mexico, North Dakota, Oklahoma, Oregon, South Dakota, Texas, Utah, Washington, Wyoming, and the U.S. territories and possessions in the Pacific	US NRC, Region IV, 1600 E. Lamar Blvd., Arlington, TX 76011–4511.	(817) 860–8100, (800) 952–9677, TDD: (301) 415–5575.	*RidsRgn4MailCenter@nrc.gov*

CLASSIFIED MAILING ADDRESSES

	Address
NRC Headquarters	U.S. NRC, Caller Box 2500, Rockville, MD 20852.
Region I	U.S. NRC, 475 Allendale Road, King of Prussia, PA 19406.
Region II	USNRC, P.O. Box 56267, Atlanta, GA 30343.
Region III	USNRC, Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532–4352.
Region IV	US NRC, Region IV, 1600 E. Lamar Blvd., Arlington, TX 76011–4511.

I. Classified mail shall be transmitted in accordance with §95.39 of this chapter to the appropriate NRC classified mailing address listed in this appendix.

II. Classified documents may be hand delivered to the NRC to the appropriate NRC street address listed in this appendix. Hand delivered classified documents shall be transmitted in accordance with §95.39 of this chapter.

[68 FR 58820, Oct. 10, 2003, as amended at 71 FR 15012, Mar. 27, 2006; 73 FR 30460, May 28, 2008; 75 FR 21981, Apr. 27, 2010; 76 FR 72086, Nov. 22, 2011]

APPENDIX B TO PART 73—GENERAL CRITERIA FOR SECURITY PERSONNEL

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INTRODUCTION

Applicants and power reactor licensees subject to the requirements of §73.55 shall comply only with the requirements of section VI of this appendix. All other licensees, applicants, or certificate holders shall comply only with sections I through V of this appendix.

Security personnel who are responsible for the protection of special nuclear material on site or in transit and for the protection of the facility or shipment vehicle against radiological sabotage should, like other elements of the physical security system, be required to meet minimum criteria to ensure that they will effectively perform their assigned security-related job duties. In order to ensure that those individuals responsible for security are properly equipped and qualified to execute the job duties prescribed for

them, the NRC has developed general criteria that specify security personnel qualification requirements.

These general criteria establish requirements for the selection, training, equipping, testing, and qualification of individuals who will be responsible for protecting special nuclear materials, nuclear facilities, and nuclear shipments.

When required to have security personnel that have been trained, equipped, and qualified to perform assigned security job duties in accordance with the criteria in this appendix, the licensee must establish, maintain, and follow a plan that shows how the criteria will be met. The plan must be submitted to the NRC for approval and must be implemented within 30 days after approval by the NRC unless otherwise specified by the NRC in writing.

DEFINITIONS

Terms defined in parts 50, 70, and 73 of this chapter have the same meaning when used in this appendix.

CRITERIA

I. Employment suitability and qualification.

A. Suitability: 1. Prior to employment, or assignment to the security organization, an individual shall meet the following suitability criteria:

a. Educational development—Possess a high school diploma or pass an equivalent performance examination designed to measure basic job-related mathematical, language, and reasoning skills, ability, and knowledge, required to perform security job duties.

b. Felony convictions—Have no felony convictions involving the use of a weapon and no felony convictions that reflect on the individual's reliability.

2. Prior to employment or assignment to the security organization in an armed capacity, the individual, in addition to (a) and (b) above, must be 21 years of age or older.

B. Physical and mental qualifications. 1. Physical qualifications:

a. Individuals whose security tasks and job duties are directly associated with the effective implementation of the licensee physical security and contingency plans shall have no physical weaknesses or abnormalities that would adversely affect their performance of assigned security job duties.

b. In addition to a. above, guards, armed response personnel, armed escorts, and central alarm station operators shall successfully pass a physical examination administered by a licensed physician. The examination shall be designed to measure the individual's physical ability to perform assigned security job duties as identified in the licensee physical security and contingency plans. Armed personnel shall meet the following additional physical requirements:

(1) Vision: (a) For each individual, distant visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye and 20/40 in the other eye with eyeglasses or contact lenses. If uncorrected distance vision is not at least 20/40 in the better eye, the individual shall carry an extra pair of corrective lenses. Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye. Field of vision must be at least 70° horizontal meridian in each eye. The ability to distinguish red, green, and yellow colors is required. Loss of vision in one eye is disqualifying. Glaucoma shall be disqualifying, unless controlled by acceptable medical or surgical means, provided such medications as may be used for controlling glaucoma do not cause undesirable side effects which adversely affect the individual's ability to perform assigned security job duties, and provided the visual acuity and field of vision requirements stated above are met. On-the-job evaluation shall be used for individuals who exhibit a mild color vision defect.

(b) Where corrective eyeglasses are required, they shall be of the safety glass type.

(c) The use of corrective eyeglasses or contact lenses shall not interfere with an individual's ability to effectively perform assigned security job duties during normal or emergency operations.

(2) Hearing: (a) Individuals shall have no hearing loss in the better ear greater than 30 decibels average at 500 Hz, 1,000 Hz, and 2,000 Hz with no level greater that 40 decibels at any one frequency (by ISO 389 ''Standard Reference Zero for the Calibration of Puritone Audiometer'' (1975) or ANSI S3.6–1969 (R. 1973) ''Specifications for Audiometers''). ISO 389 and ANSI S3.6–1969 have been approved for incorporation by reference by the Director of the Federal Register. A copy of each standard is available for inspection at the NRC Library, 11545 Rockville Pike, Rockville, Maryland 20852-2738.

(b) A hearing aid is acceptable provided suitable testing procedures demonstrate auditory acuity equivalent to the above stated requirement.

(c) The use of a hearing aid shall not decrease the effective performance of the individual's assigned security job duties during normal or emergency operations.

(3) Diseases—Individuals shall have no established medical history or medical diagnosis of epilepsy or diabetes, or, where such a condition exists, the individual shall provide medical evidence that the condition can be controlled with proper medication so that the individual will not lapse into a coma or unconscious state while performing assigned security job duties.

(4) Addiction—Individuals shall have no established medical history or medical diagnosis of habitual alcoholism or drug addiction, or, where such a condition has existed, the individual shall provide certified documentation of having completed a rehabilitation program which would give a reasonable degree of confidence that the individual would be capable of performing assigned security job duties.

(5) Other physical requirements—An individual who has been incapacitated due to a serious illness, injury, disease, or operation, which could interfere with the effective performance of assigned security job duties shall, prior to resumption of such duties, provide medical evidence of recovery and ability to perform such security job duties.

2. Mental qualifications: a. Individuals whose security tasks and job duties are directly associated with the effective implementation of the licensee physical security and contingency plans shall demonstrate mental alertness and the capability to exercise good judgment, implement instructions, assimilate assigned security tasks, and possess the acuity of senses and ability of expression sufficient to permit accurate communication by written, spoken, audible, visible, or other signals required by assigned job duties.

b. Armed individuals, and central alarm station operators, in addition to meeting the requirement stated in paragraph a. above, shall have no emotional instability that would interfere with the effective performance of assigned security job duties. The determination shall be made by a licensed psychologist or psychiatrist, or physician, or other person professionally trained to identify emotional instability.

c. The licensee shall arrange for continued observation of security personnel and for appropriate corrective measures by responsible supervisors for indications of emotional instability of individuals in the course of performing assigned security job duties. Identification of emotional instability by responsible supervisors shall be subject to verification by a licensed, trained person.

C. Medical examinations and physical fitness qualifications—Guards, armed response personnel, armed escorts and other armed security force members shall be given a medical examination including a determination and written certification by a licensed physician that there are no medical contraindications as disclosed by the medical examination to participation by the individual in physical fitness tests. Subsequent to this medical examination, guards, armed response personnel, armed escorts and other armed security force members shall demonstrate physical fitness for assigned security job duties by performing a practical physical exercise program within a specific time period. The exercise program performance objectives shall be described in the license training and qualifications plan and shall consider job-related functions such as strenuous activity, physical exertion, levels of stress, and exposure to the elements as they pertain to each individual's assigned security job duties for both normal and emergency operations. The physical fitness qualification of each guard, armed response person, armed escort, and other security force member shall be documented and attested to by a licensee security supervisor. The licensee shall retain this documentation as a record for three years from the date of each qualification.

D. Contract security personnel—Contract security personnel shall be required to meet the suitability, physical, and mental requirements as appropriate to their assigned security job duties in accordance with section I of this appendix.

E. Physical requalification—At least every 12 months, central alarm station operators shall be required to meet the physical requirements of B.1.b of this section, and guards, armed response personnel, and armed escorts shall be required to meet the physical requirements of paragraphs B.1.b (1) and (2), and C of this section. The licensee shall document each individual's physical requalification and shall retain this documentation of requalification as a record for three years from the date of each requalification.

F. Documentation—The results of suitability, physical, and mental qualifications data and test results must be documented by the licensee or the licensee's agent. The licensee or the agent shall retain this documentation as a record for three years from the date of obtaining and recording these results.

G. Nothing herein authorizes or requires a licensee to investigate into or judge the reading habits, political or religious beliefs, or attitudes on social, economic, or political issues of any person.

II. Training and qualifications.

A. Training requirements—Each individual who requires training to perform assigned security-related job tasks or job duties as identified in the licensee physical security or contingency plans shall, prior to assignment, be trained to perform these tasks and duties in accordance with the licensee or the licensee's agent's documented training and qualifications plan. The licensee or the agent shall maintain documentation of the current plan and retain this documentation of the plan as a record for three years after the close of period for which the licensee possesses the special nuclear material under each license for which the plan was developed and, if any portion of the plan is superseded, retain the material that is superseded for three years after each change.

B. Qualification requirements—Each person who performs security-related job tasks

or job duties required to implement the licensee physical security or contingency plan shall, prior to being assigned to these tasks or duties, be qualified in accordance with the licensee's NRC-approved training and qualifications plan. The qualifications of each individual must be documented and attested by a licensee security supervisor. The licensee shall retain this documentation of each individual's qualifications as a record for three years after the employee ends employment in the security-related capacity and for three years after the close of period for which the licensee possesses the special nuclear material under each license, and superseded material for three years after each change.

C. Contract personnel—Contract personnel shall be trained, equipped, and qualified as appropriate to their assigned security-related job tasks or job duties, in accordance with sections II, III, IV, and V of this appendix. The qualifications of each individual must be documented and attested by a licensee security supervisor. The licensee shall retain this documentation of each individual's qualifications as a record for three years after the employee ends employment in the security-related capacity and for three years after the close of period for which the licensee possesses the special nuclear material under each license, and superseded material for three years after each change.

D. Security knowledge, skills, and abilities—Each individual assigned to perform the security related task identified in the licensee physical security or contingency plan shall demonstrate the required knowledge, skill, and ability in accordance with the specified standards for each task as stated in the NRC approved licensee training and qualifications plan. The areas of knowledge, skills, and abilities that shall be considered in the licensee's training and qualifications plan are as follows:

1. Protection of nuclear facilities, transport vehicles, and special nuclear material.
2. NRC requirements and guidance for physical security at nuclear facilities and for transportation.
3. The private security guard's role in providing physical protection for the nuclear industry.
4. The authority of private guards.
5. The use of nonlethal weapons.
6. The use of deadly force.
7. Power of arrest and authority to detain individuals.
8. Authority to search individuals and seize property.
9. Adversary group operations.
10. Motivation and objectives of adversary groups.
11. Tactics and force that might be used by adversary groups to achieve their objectives.
12. Recognition of sabotage related devices and equipment that might be used against the licensee's facility or shipment vehicle.
13. Facility security organization and operation.
14. Types of physical barriers.
15. Weapons, lock and key control system operation.
16. Location of SNM and/or vital areas within a facility.
17. Protected area security and vulnerability.
18. Types of alarm systems used.
19. Response and assessment to alarm annunciations and other indications of intrusion.
20. Familiarization with types of special nuclear material processed.
21. General concepts of fixed site security systems.
22. Vulnerabilities and consequences of theft of special nuclear material or radiological sabotage of a facility.
23. Protection of security system information.
24. Personal equipment use and operation for normal and contingency operations.
25. Surveillance and assessment systems and techniques.
26. Communications systems operation, fixed site.
27. Access control systems and operation for individuals, packages, and vehicles.
28. Contraband detection systems and techniques.
29. Barriers and other delay systems around material access or vital areas.
30. Exterior and interior alarm systems operation.
31. Duress alarm operation.
32. Alarm stations operation.
33. Response force organization.
34. Response force mission.
35. Response force operation.
36. Response force engagement.
37. Security command and control system during normal operation.
38. Security command and control system during contingency operation.
39. Transportation systems security organization and operation.
40. Types of SNM transport vehicles.
41. Types of SNM escort vehicles.
42. Modes of transportation for SNM.
43. Road transport security system command and control structure.
44. Use of weapons.
45. Communications systems operation for transportation, shipment to control center and intraconvoy.
46. Vulnerabilities and consequences of theft of special nuclear material or radiological sabotage of a transport vehicle.
47. Protection of transport system security information.
48. Control of area around transport vehicle.

49. Normal convoy techniques and operations.
50. Familiarization with types of special nuclear materials shipped.
51. Fixed post station operations.
52. Access control system operation.
53. Search techniques and systems for individuals, packages and vehicles.
54. Escort and patrol responsibilities and operation.
55. Contengency response to confirmed intrusion or attempted intrusion.
56. Security system operation after component failure.
57. Fixed site security information protection.
58. Security coordination with local law enforcement agencies.
59. Security and situation reporting, documentation and report writing.
60. Contingency duties.
61. Self defense.
62. Use of and defenses against incapacitating agents.
63. Security equipment testing.
64. Contingency procedures.
65. Night vision devices and systems.
66. Mechanics of detention.
67. Basic armed and unarmed defensive tactics.
68. Response force deployment.
69. Security alert procedures.
70. Security briefing procedures.
71. Response force tactical movement.
72. Response force withdrawal.
73. Reponse force use of support fire.
74. Response to bomb and attack threats.
75. Response to civil disturbances (e.g., strikes, demonstrators).
76. Response to confirmed attempted theft of special nuclear material and/or radiological sabotage of facilities.
77. Response to hostage situations.
78. Site specific armed tactical procedures and operation.
79. Security response to emergency situations other than security incidents.
80. Basic transportation defensive response tactics.
81. Armed escort deployment.
82. Armed escort adversary engagement.
83. Armed escort formations.
84. Armed escort use of weapons fire (tactical and combat).
85. Armed escort and shipment movement under fire.
86. Tactical convoying techniques and operations.
87. Armed escort tactical exercises.
88. Armed escort response to bomb and attack threats.
89. Verification of shipment documentation and contents.
90. Continuous surveillance of shipment vehicle.
91. Normal and contingency operation for shipment mode transfer.
92. Armed personnel procedures and operation during temporary storage between mode transfers of shipments.
93. Armed escort threat assessment and response.
94. System for and operation of shipment vehicle lock and key control.
95. Techniques and procedures for isolation of shipment vehicle during a contingency situation.
96. Transportation coordination with local law enforcement agencies.
97. Procedures for verification of shipment locks and seals.
98. Transportation security and situation reporting, documentation, and report writing.
99. Procedures for shipment delivery and pickup.
100. Transportation security system for escort by road, rail, air and sea.

E. Requalification—Security personnel shall be requalified at least every 12 months to perform assigned security-related job tasks and duties for both normal and contingency operations. Requalification shall be in accordance with the NRC-approved licensee training and qualifications plan. The results of requalification must be documented and attested by a licensee security supervisor. The licensee shall retain this documentation of each individual's requalification as a record for three years from the date of each requalification.

III. Weapons training.

A. Guards, armed response personnel and armed escorts requiring weapons training to perform assigned security related job tasks or job duties shall be trained in accordance with the licensees' documented weapons training programs. Each individual shall be proficient in the use of his assigned weapon(s) and shall meet prescribed standards in the following areas:

1. Mechanical assembly, dissasembly, range penetration capability of weapon, and bullseye firing.
2. Weapons cleaning and storage.
3. Combat firing, day and night.
4. Safe weapons handling.
5. Clearing, loading, unloading, and reloading.
6. When to draw and point a weapon.
7. Rapid fire techniques.
8. Close quarter firing.
9. Stress firing.
10. Zeroing assigned weapon(s).

IV. Weapons qualification and requalification program.

Qualification firing for the handgun and the rifle must be for daylight firing, and each individual shall perform night firing for familiarization with assigned weapon(s). The results of weapons qualification and requalification must be documented by the licensee or the licensee's agent. Each individual shall

be requalified at least every 12 months. The licensee shall retain this documentation of each qualification and requalification as a record for three years from the date of the qualification or requalification, as appropriate.

A. Handgun—Guards, armed escorts and armed response personnel shall qualify with a revolver or semiautomatic pistol firing the national police course, or an equivalent nationally recognized course. Qualifying score shall be an accumulated total of 70 percent of the maximum obtainable score.

B. Semiautomatic Rifle—Guards, armed escorts and armed response personnel, assigned to use the semiautomatic rifle by the licensee training and qualifications plan, shall qualify with a semiautomatic rifle by firing the 100-yard course of fire specified in section 17.5(1) of the National Rifle Association, High Power Rifle Rules book (effective March 15, 1976),[1] or a nationally recognized equivalent course of fire. Targets used shall be as stated in section 17.5 for the 100-yard course. Time limits for individuals shall be as specified in section 8.2 of the NRA rule book, regardless of the course fired. Qualifying score shall be an accumulated total of 80 percent of the maximum obtainable score.

C. Shotgun—Guards, armed escorts, and armed response personnel assigned to use the 12 gauge shotgun by the licensee training and qualifications plan shall qualify with a full choke or improved modified choke 12 gauge shotgun firing the following course:

Range	Position	No. Rounds [1]	Target [2]
15 yds	Hip fire point	4	B–27
25 yds	Shoulder	4	B–27

[1] The 4 rounds shall be fired at 4 separate targets within 10 seconds using 00 gauge (9 pellet) shotgun shells.

[2] As set forth by the National Rifle Association (NRA) in its official rules and regulations, ''NRA Target Manufacturers Index,'' December 1976. The Index has been approved for incorporation by reference by the Director of the Federal Register. A copy of the index is available for inspection at the NRC Library, 11545 Rockville Pike, Rockville, Maryland 20852-2738.

To qualify the individual shall be required to place 50 percent of all pellets (36 pellets) within the black silhouette.

D. Requalification—Individuals shall be weapons requalified at least every 12 months in accordance with the NRC approved licensee training and qualifications plan, and in accordance with the requirements stated in A, B, and C of this section.

V. Guard, armed response personnel, and armed escort equipment.

A. Fixed Site—Fixed site guards and armed response personnel shall either be equipped with or have available the following security equipment appropriate to the individual's assigned contingency security related tasks or job duties as described in the licensee physical security and contingency plans:

1. Semiautomatic rifles with following nominal minimum specifications:

(a) .223 caliber.

(b) Muzzle velocity, 1980 ft/sec.

(c) Muzzle energy, 955 foot-pounds.

(d) Magazine or clip load of 10 rounds.

(e) Magazine reload, < 10 seconds.

(f) Operable in any environment in which it will be used.

2. 12 gauge shotguns with the following capabilities:

(a) 4 round pump or semiautomatic.

(b) Operable in any environment in which it will be used.

(c) Full or modified choke.

3. Semiautomatic pistols or revolvers with the following nominal minimum specifications:

(a) .354 caliber.

(b) Muzzle energy, 250 foot-pounds.

(c) Full magazine or cylinder reload capability < 6 seconds.

(d) Muzzle velocity, 850 ft/sec.

(e) Full cylinder or magazine capacity, 6 rounds.

(f) Operable in any environment in which it will be used.

4. Ammunition:

(a) For each assigned weapon as appropriate to the individual's assigned contingency security job duties and as readily available as the weapon:

(1) 18 rounds per handgun.

(2) 100 rounds per semiautomatic rifle.

(3) 12 rounds each per shotgun (00 gauge and slug).

(b) Ammunition available on site—two (2) times the amount stated in (a) above for each weapon.

5. Personal equipment to be readily available for individuals whose assigned contingency security job duties, as described in the licensee physical security and contingency plans, warrant such equipment:

(a) Helmet, combat.

(b) Gas mask, full face.

(c) Body armor (bullet-resistant vest).

(d) Flashlights and batteries.

(e) Baton.

(f) Handcuffs.

(g) Ammunition/equipment belt.

6. Binoculars.

7. Night vision aids, *i.e.*, hand-fired illumination flares or equivalent.

8. Tear gas or other nonlethal gas.

9. Duress alarms.

10. Two-way portable radios (handi-talkie) 2 channels minimum, 1 operating and 1 emergency.

[1] Copies of the ''NRA High Power Rifle Rules'' may be examined at, or obtained from, the National Rifle Association, 1600 Rhode Island Avenue NW., Washington, DC 20036.

B. Transportation—Armed escorts shall either be equipped with or have readily available the following security equipment appropriate to the individual's assigned contingency security related tasks or job duties, as described in the licensee physical security and contingency plans:

1. Semiautomatic rifles with the following nominal minimum specifications:

(a) .223 caliber.

(b) Muzzle velocity, 1,980 ft/sec.

(c) Muzzle energy, 955 foot-pounds.

(d) Magazine or clip of 10 rounds.

(e) Reload capability, 10 seconds.

(f) Operable in any environment in which it will be used.

2. 12 gauge shotguns.

(a) 4 round pump or semiautomatic.

(b) Operable in any environment in which it will be used.

(c) Full or modified choke.

3. Semiautomatic pistols or revolvers with the following nominal minimum specifications:

(a) .354 caliber.

(b) Muzzle energy, 250 foot-pounds.

(c) Full magazine or cylinder reload capability 6 seconds.

(d) Muzzle velocity, 850 ft/sec.

(e) Full cylinder or magazine capacity, 6 rounds.

(f) Operable in any environment in which it will be used.

4. Ammunition for each shipment.

(a) For each assigned weapon as appropriate to the individual's assigned contingency security job duties and as readily available as the weapon:

(1) 36 rounds per handgun.

(2) 120 rounds per semiautomatic rifle.

(3) 12 rounds each per shotgun (00 gauge and slug).

5. Escort vehicles, bullet resisting, equipped with communications systems, red flares, first aid kit, emergency tool kit, tire changing equipment, battery chargers for radios (where appropriate, for recharging portable radio batteries).

6. Personal equipment to be readily available for individuals whose assigned contingency security job duties, as described in the licensee physical security and contingency plans, warrant such equipment:

(a) Helmet, combat.

(b) Gas mask, full face.

(c) Body armor (bullet-resistant vest).

(d) Flashlights and batteries.

(e) Baton.

(f) Ammunition/equipment belt.

(g) Pager/duress alarms.

7. Binoculars.

8. Night vision aids, *i.e.*, hand-fired illumination flares or equivalent.

9. Tear gas or other nonlethal gas.

VI. Nuclear Power Reactor Training and Qualification Plan for Personnel Performing Security Program Duties

A. General Requirements and Introduction

1. The licensee shall ensure that all individuals who are assigned duties and responsibilities required to prevent significant core damage and spent fuel sabotage, implement the Commission-approved security plans, licensee response strategy, and implementing procedures, meet minimum training and qualification requirements to ensure each individual possesses the knowledge, skills, and abilities required to effectively perform the assigned duties and responsibilities.

2. To ensure that those individuals who are assigned to perform duties and responsibilities required for the implementation of the Commission-approved security plans, licensee response strategy, and implementing procedures are properly suited, trained, equipped, and qualified to perform their assigned duties and responsibilities, the Commission has developed minimum training and qualification requirements that must be implemented through a Commission-approved training and qualification plan.

3. The licensee shall establish, maintain, and follow a Commission-approved training and qualification plan, describing how the minimum training and qualification requirements set forth in this appendix will be met, to include the processes by which all individuals, will be selected, trained, equipped, tested, and qualified.

4. Each individual assigned to perform security program duties and responsibilities required to effectively implement the Commission-approved security plans, licensee protective strategy, and the licensee implementing procedures, shall demonstrate the knowledge, skills, and abilities required to effectively perform the assigned duties and responsibilities before the individual is assigned the duty or responsibility.

5. The licensee shall ensure that the training and qualification program simulates, as closely as practicable, the specific conditions under which the individual shall be required to perform assigned duties and responsibilities.

6. The licensee may not allow any individual to perform any security function, assume any security duties or responsibilities, or return to security duty, until that individual satisfies the training and qualification requirements of this appendix and the Commission-approved training and qualification plan, unless specifically authorized by the Commission.

7. Annual requirements must be scheduled at a nominal twelve (12) month periodicity. Annual requirements may be completed up to three (3) months before or three (3) months after the scheduled date. However, the next annual training must be scheduled twelve (12) months from the previously scheduled date rather than the date the training was actually completed.

B. Employment Suitability and Qualification

1. Suitability.

(a) Before employment, or assignment to the security organization, an individual shall:

(1) Possess a high school diploma or pass an equivalent performance examination designed to measure basic mathematical, language, and reasoning skills, abilities, and knowledge required to perform security duties and responsibilities;

(2) Have attained the age of 21 for an armed capacity or the age of 18 for an unarmed capacity; and

(3) Not have any felony convictions that reflect on the individual's reliability.

(4) Individuals in an armed capacity, would not be disqualified from possessing or using firearms or ammunition in accordance with applicable state or Federal law, to include 18 U.S.C. 922. Licensees shall use information that has been obtained during the completion of the individual's background investigation for unescorted access to determine suitability. Satisfactory completion of a firearms background check for the individual under 10 CFR 73.19 of this part will also fulfill this requirement.

(b) The qualification of each individual to perform assigned duties and responsibilities must be documented by a qualified training instructor and attested to by a security supervisor.

2. Physical qualifications.

(a) General physical qualifications.

(1) Individuals whose duties and responsibilities are directly associated with the effective implementation of the Commission-approved security plans, licensee protective strategy, and implementing procedures, may not have any physical conditions that would adversely affect their performance of assigned security duties and responsibilities.

(2) Armed and unarmed individuals assigned security duties and responsibilities shall be subject to a physical examination designed to measure the individual's physical ability to perform assigned duties and responsibilities as identified in the Commission-approved security plans, licensee protective strategy, and implementing procedures.

(3) This physical examination must be administered by a licensed health professional with the final determination being made by a licensed physician to verify the individual's physical capability to perform assigned duties and responsibilities.

(4) The licensee shall ensure that both armed and unarmed individuals who are assigned security duties and responsibilities identified in the Commission-approved security plans, the licensee protective strategy, and implementing procedures, meet the following minimum physical requirements, as required to effectively perform their assigned duties.

(b) Vision.

(1) For each individual, distant visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye and 20/40 in the other eye with eyeglasses or contact lenses.

(2) Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye.

(3) Field of vision must be at least 70 degrees horizontal meridian in each eye.

(4) The ability to distinguish red, green, and yellow colors is required.

(5) Loss of vision in one eye is disqualifying.

(6) Glaucoma is disqualifying, unless controlled by acceptable medical or surgical means, provided that medications used for controlling glaucoma do not cause undesirable side effects which adversely affect the individual's ability to perform assigned security duties, and provided the visual acuity and field of vision requirements stated previously are met.

(7) On-the-job evaluation must be used for individuals who exhibit a mild color vision defect.

(8) If uncorrected distance vision is not at least 20/40 in the better eye, the individual shall carry an extra pair of corrective lenses in the event that the primaries are damaged. Corrective eyeglasses must be of the safety glass type.

(9) The use of corrective eyeglasses or contact lenses may not interfere with an individual's ability to effectively perform assigned duties and responsibilities during normal or emergency conditions.

(c) Hearing.

(1) Individuals may not have hearing loss in the better ear greater than 30 decibels average at 500 Hz, 1,000 Hz, and 2,000 Hz with no level greater than 40 decibels at any one frequency.

(2) A hearing aid is acceptable provided suitable testing procedures demonstrate auditory acuity equivalent to the hearing requirement.

(3) The use of a hearing aid may not decrease the effective performance of the individual's assigned security duties during normal or emergency operations.

(d) Existing medical conditions.

(1) Individuals may not have an established medical history or medical diagnosis of existing medical conditions which could interfere with or prevent the individual from effectively performing assigned duties and responsibilities.

(2) If a medical condition exists, the individual shall provide medical evidence that the condition can be controlled with medical treatment in a manner which does not adversely affect the individual's fitness-for-duty, mental alertness, physical condition,

or capability to otherwise effectively perform assigned duties and responsibilities.

(e) Addiction. Individuals may not have any established medical history or medical diagnosis of habitual alcoholism or drug addiction, or, where this type of condition has existed, the individual shall provide certified documentation of having completed a rehabilitation program which would give a reasonable degree of confidence that the individual would be capable of effectively performing assigned duties and responsibilities.

(f) Other physical requirements. An individual who has been incapacitated due to a serious illness, injury, disease, or operation, which could interfere with the effective performance of assigned duties and responsibilities shall, before resumption of assigned duties and responsibilities, provide medical evidence of recovery and ability to perform these duties and responsibilities.

3. Psychological qualifications.

(a) Armed and unarmed individuals shall demonstrate the ability to apply good judgment, mental alertness, the capability to implement instructions and assigned tasks, and possess the acuity of senses and ability of expression sufficient to permit accurate communication by written, spoken, audible, visible, or other signals required by assigned duties and responsibilities.

(b) A licensed psychologist, psychiatrist, or physician trained in part to identify emotional instability shall determine whether armed members of the security organization and alarm station operators in addition to meeting the requirement stated in paragraph (a) of this section, have no emotional instability that would interfere with the effective performance of assigned duties and responsibilities.

(c) A person professionally trained to identify emotional instability shall determine whether unarmed individuals in addition to meeting the requirement stated in paragraph (a) of this section, have no emotional instability that would interfere with the effective performance of assigned duties and responsibilities.

4. Medical examinations and physical fitness qualifications.

(a) Armed members of the security organization shall be subject to a medical examination by a licensed physician, to determine the individual's fitness to participate in physical fitness tests.

(1) The licensee shall obtain and retain a written certification from the licensed physician that no medical conditions were disclosed by the medical examination that would preclude the individual's ability to participate in the physical fitness tests or meet the physical fitness attributes or objectives associated with assigned duties.

(b) Before assignment, armed members of the security organization shall demonstrate physical fitness for assigned duties and responsibilities by performing a practical physical fitness test.

(1) The physical fitness test must consider physical conditions such as strenuous activity, physical exertion, levels of stress, and exposure to the elements as they pertain to each individual's assigned security duties for both normal and emergency operations and must simulate site specific conditions under which the individual will be required to perform assigned duties and responsibilities.

(2) The licensee shall describe the physical fitness test in the Commission-approved training and qualification plan.

(3) The physical fitness test must include physical attributes and performance objectives which demonstrate the strength, endurance, and agility, consistent with assigned duties in the Commission-approved security plans, licensee protective strategy, and implementing procedures during normal and emergency conditions.

(4) The physical fitness qualification of each armed member of the security organization must be documented by a qualified training instructor and attested to by a security supervisor.

5. Physical requalification.

(a) At least annually, armed and unarmed individuals shall be required to demonstrate the capability to meet the physical requirements of this appendix and the licensee training and qualification plan.

(b) The physical requalification of each armed and unarmed individual must be documented by a qualified training instructor and attested to by a security supervisor.

C. Duty Training

1. Duty training and qualification requirements. All personnel who are assigned to perform any security-related duty or responsibility shall be trained and qualified to perform assigned duties and responsibilities to ensure that each individual possesses the minimum knowledge, skills, and abilities required to effectively carry out those assigned duties and responsibilities.

(a) The areas of knowledge, skills, and abilities that are required to perform assigned duties and responsibilities must be identified in the licensee's Commission-approved training and qualification plan.

(b) Each individual who is assigned duties and responsibilities identified in the Commission-approved security plans, licensee protective strategy, and implementing procedures shall, before assignment:

(1) Be trained to perform assigned duties and responsibilities in accordance with the requirements of this appendix and the Commission-approved training and qualification plan.

(2) Meet the minimum qualification requirements of this appendix and the Commission-approved training and qualification plan.

(3) Be trained and qualified in the use of all equipment or devices required to effectively perform all assigned duties and responsibilities.

2. On-the-job training.

(a) The licensee training and qualification program must include on-the-job training performance standards and criteria to ensure that each individual demonstrates the requisite knowledge, skills, and abilities needed to effectively carry-out assigned duties and responsibilities in accordance with the Commission-approved security plans, licensee protective strategy, and implementing procedures, before the individual is assigned the duty or responsibility.

(b) In addition to meeting the requirement stated in paragraph C.2.(a) of this appendix, before assignment, individuals (e.g., response team leaders, alarm station operators, armed responders, and armed security officers designated as a component of the protective strategy) assigned duties and responsibilities to implement the Safeguards Contingency Plan shall complete a minimum of 40 hours of on-the-job training to demonstrate their ability to effectively apply the knowledge, skills, and abilities required to effectively perform assigned *contingency* duties and responsibilities in accordance with the approved safeguards contingency plan, other security plans, licensee protective strategy, and implementing procedures. On-the-job training must be documented by a qualified training instructor and attested to by a security supervisor.

(c) On-the-job training for contingency activities and drills must include, but is not limited to, hands-on application of knowledge, skills, and abilities related to:

(1) Response team duties.

(2) Use of force.

(3) Tactical movement.

(4) Cover and concealment.

(5) Defensive positions.

(6) Fields-of-fire.

(7) Re-deployment.

(8) Communications (primary and alternate).

(9) Use of assigned equipment.

(10) Target sets.

(11) Table top drills.

(12) Command and control duties.

(13) Licensee Protective Strategy.

3. Performance Evaluation Program.

(a) Licensees shall develop, implement and maintain a Performance Evaluation Program that is documented in procedures which describes how the licensee will demonstrate and assess the effectiveness of their onsite physical protection program and protective strategy, including the capability of the armed response team to carry out their assigned duties and responsibilities during safeguards contingency events. The Performance Evaluation Program and procedures shall be referenced in the licensee's Training and Qualifications Plan.

(b) The Performance Evaluation Program shall include procedures for the conduct of tactical response drills and force-on-force exercises designed to demonstrate and assess the effectiveness of the licensee's physical protection program, protective strategy and contingency event response by all individuals with responsibilities for implementing the safeguards contingency plan.

(c) The licensee shall conduct tactical response drills and force-on-force exercises in accordance with Commission-approved security plans, licensee protective strategy, and implementing procedures.

(d) Tactical response drills and force-on-force exercises must be designed to challenge the site protective strategy against elements of the design basis threat and ensure each participant assigned security duties and responsibilities identified in the Commission-approved security plans, the licensee protective strategy, and implementing procedures demonstrate the requisite knowledge, skills, and abilities.

(e) Tactical response drills, force-on-force exercises, and associated contingency response training shall be conducted under conditions that simulate, as closely as practicable, the site-specific conditions under which each member will, or may be, required to perform assigned duties and responsibilities.

(f) The scope of tactical response drills conducted for training purposes shall be determined by the licensee and must address site-specific, individual or programmatic elements, and may be limited to specific portions of the site protective strategy.

(g) Each tactical response drill and force-on-force exercise shall include a documented post-exercise critique in which participants identify failures, deficiencies or other findings in performance, plans, equipment or strategies.

(h) Licensees shall document scenarios and participants for all tactical response drills and annual force-on-force exercises conducted.

(i) Findings, deficiencies and failures identified during tactical response drills and force-on-force exercises that adversely affect or decrease the effectiveness of the protective strategy and physical protection program shall be entered into the licensee's corrective action program to ensure that timely corrections are made to the appropriate program areas.

(j) Findings, deficiencies and failures associated with the onsite physical protection program and protective strategy shall be protected as necessary in accordance with the requirements of 10 CFR 73.21.

(k) For the purpose of tactical response drills and force-on-force exercises, licensees shall:

(1) Use no more than the total number of armed responders and armed security officers documented in the security plans.

(2) Minimize the number and effects of artificialities associated with tactical response drills and force-on-force exercises.

(3) Implement the use of systems or methodologies that simulate the realities of armed engagement through visual and audible means, and reflect the capabilities of armed personnel to neutralize a target though the use of firearms.

(4) Ensure that each scenario used provides a credible, realistic challenge to the protective strategy and the capabilities of the security response organization.

(l) The Performance Evaluation Program must be designed to ensure that:

(1) Each member of each shift who is assigned duties and responsibilities required to implement the safeguards contingency plan and licensee protective strategy participates in at least one (1) tactical response drill on a quarterly basis and one (1) force-on-force exercise on an annual basis. Force-on-force exercises conducted to satisfy the NRC triennial evaluation requirement can be used to satisfy the annual force-on-force requirement for the personnel that participate in the capacity of the security response organization.

(2) The mock adversary force replicates, as closely as possible, adversary characteristics and capabilities of the design basis threat described in 10 CFR 73.1(a)(1), and is capable of exploiting and challenging the licensees protective strategy, personnel, command and control, and implementing procedures.

(3) Protective strategies can be evaluated and challenged through the conduct of tactical response tabletop demonstrations.

(4) Drill and exercise controllers are trained and qualified to ensure that each controller has the requisite knowledge and experience to control and evaluate exercises.

(5) Tactical response drills and force-on-force exercises are conducted safely and in accordance with site safety plans.

(m) Scenarios.

(1) Licensees shall develop and document multiple scenarios for use in conducting quarterly tactical response drills and annual force-on-force exercises.

(2) Licensee scenarios must be designed to test and challenge any components or combination of components, of the onsite physical protection program and protective strategy.

(3) Each scenario must use a unique target set or target sets, and varying combinations of adversary equipment, strategies, and tactics, to ensure that the combination of all scenarios challenges every component of the onsite physical protection program and protective strategy to include, but not limited to, equipment, implementing procedures, and personnel.

D. Duty Qualification and Requalification

1. Qualification demonstration.

(a) Armed and unarmed individuals shall demonstrate the required knowledge, skills, and abilities to carry out assigned duties and responsibilities as stated in the Commission-approved security plans, licensee protective strategy, and implementing procedures.

(b) This demonstration must include written exams and hands-on performance demonstrations.

(1) Written Exams. The written exams must include those elements listed in the Commission-approved training and qualification plan and shall require a minimum score of 80 percent to demonstrate an acceptable understanding of assigned duties and responsibilities, to include the recognition of potential tampering involving both safety and security equipment and systems.

(2) Hands-on Performance Demonstrations. Armed and unarmed individuals shall demonstrate hands-on performance for assigned duties and responsibilities by performing a practical hands-on demonstration for required tasks. The hands-on demonstration must ensure that theory and associated learning objectives for each required task are considered and each individual demonstrates the knowledge, skills, and abilities required to effectively perform the task.

(3) Annual Written Exam. Armed individuals shall be administered an annual written exam that demonstrates the required knowledge, skills, and abilities to carry out assigned duties and responsibilities as an armed member of the security organization. The annual written exam must include those elements listed in the Commission-approved training and qualification plan and shall require a minimum score of 80 percent to demonstrate an acceptable understanding of assigned duties and responsibilities.

(c) Upon request by an authorized representative of the Commission, any individual assigned to perform any security-related duty or responsibility shall demonstrate the required knowledge, skills, and abilities for each assigned duty and responsibility, as stated in the Commission-approved security plans, licensee protective strategy, or implementing procedures.

2. Requalification.

(a) Armed and unarmed individuals shall be requalified at least annually in accordance with the requirements of this appendix and the Commission-approved training and qualification plan.

(b) The results of requalification must be documented by a qualified training instructor and attested by a security supervisor.

E. Weapons Training

1. General firearms training.

(a) Armed members of the security organization shall be trained and qualified in accordance with the requirements of this appendix and the Commission-approved training and qualification plan.

(b) Firearms instructors.

(1) Each armed member of the security organization shall be trained and qualified by a certified firearms instructor for the use and maintenance of each assigned weapon to include but not limited to, marksmanship, assembly, disassembly, cleaning, storage, handling, clearing, loading, unloading, and reloading, for each assigned weapon.

(2) Firearms instructors shall be certified from a national or state recognized entity.

(3) Certification must specify the weapon or weapon type(s) for which the instructor is qualified to teach.

(4) Firearms instructors shall be recertified in accordance with the standards recognized by the certifying national or state entity, but in no case shall recertification exceed three (3) years.

(c) Annual firearms familiarization. The licensee shall conduct annual firearms familiarization training in accordance with the Commission-approved training and qualification plan.

(d) The Commission-approved training and qualification plan shall include, but is not limited to, the following areas:

(1) Mechanical assembly, disassembly, weapons capabilities and fundamentals of marksmanship.

(2) Weapons cleaning and storage.

(3) Combat firing, day and night.

(4) Safe weapons handling.

(5) Clearing, loading, unloading, and reloading.

(6) Firing under stress.

(7) Zeroing duty weapon(s) and weapons sighting adjustments.

(8) Target identification and engagement.

(9) Weapon malfunctions.

(10) Cover and concealment.

(11) Weapon familiarization.

(e) The licensee shall ensure that each armed member of the security organization is instructed on the use of deadly force as authorized by applicable state law.

(f) Armed members of the security organization shall participate in weapons range activities on a nominal four (4) month periodicity. Performance may be conducted up to five (5) weeks before, to five (5) weeks after, the scheduled date. The next scheduled date must be four (4) months from the originally scheduled date.

F. Weapons Qualification and Requalification Program

1. General weapons qualification requirements.

(a) Qualification firing must be accomplished in accordance with Commission requirements and the Commission-approved training and qualification plan for assigned weapons.

(b) The results of weapons qualification and requalification must be documented and retained as a record.

2. Tactical weapons qualification. The licensee Training and Qualification Plan must describe the firearms used, the firearms qualification program, and other tactical training required to implement the Commission-approved security plans, licensee protective strategy, and implementing procedures. Licensee developed tactical qualification and re-qualification courses must describe the performance criteria needed to include the site specific conditions (such as lighting, elevation, fields-of-fire) under which assigned personnel shall be required to carry-out their assigned duties.

3. Firearms qualification courses. The licensee shall conduct the following qualification courses for each weapon used.

(a) Annual daylight qualification course. Qualifying score must be an accumulated total of 70 percent with handgun and shotgun, and 80 percent with semiautomatic rifle and/or enhanced weapons, of the maximum obtainable target score.

(b) Annual night fire qualification course. Qualifying score must be an accumulated total of 70 percent with handgun and shotgun, and 80 percent with semiautomatic rifle and/or enhanced weapons, of the maximum obtainable target score.

(c) Annual tactical qualification course. Qualifying score must be an accumulated total of 80 percent of the maximum obtainable score.

4. Courses of fire.

(a) Handgun. Armed members of the security organization, assigned duties and responsibilities involving the use of a revolver or semiautomatic pistol shall qualify in accordance with standards established by a law enforcement course, or an equivalent nationally recognized course.

(b) Semiautomatic rifle. Armed members of the security organization, assigned duties and responsibilities involving the use of a semiautomatic rifle shall qualify in accordance with the standards established by a law enforcement course, or an equivalent nationally recognized course.

(c) Shotgun. Armed members of the security organization, assigned duties and responsibilities involving the use of a shotgun shall qualify in accordance with standards established by a law enforcement course, or an equivalent nationally recognized course.

(d) Enhanced weapons. Armed members of the security organization, assigned duties and responsibilities involving the use of any weapon or weapons not described previously shall qualify in accordance with applicable standards established by a law enforcement course or an equivalent nationally recognized course for these weapons.

5. Firearms requalification.

(a) Armed members of the security organization shall be re-qualified for each assigned weapon at least annually in accordance with Commission requirements and the Commission-approved training and qualification plan, and the results documented and retained as a record.

(b) Firearms requalification must be conducted using the courses of fire outlined in paragraphs F.2, F.3, and F.4 of this section.

G. Weapons, Personal Equipment and Maintenance

1. Weapons. The licensee shall provide armed personnel with weapons that are capable of performing the function stated in the Commission-approved security plans, licensee protective strategy, and implementing procedures.

2. Personal equipment.

(a) The licensee shall ensure that each individual is equipped or has ready access to all personal equipment or devices required for the effective implementation of the Commission-approved security plans, licensee protective strategy, and implementing procedures.

(b) The licensee shall provide armed security personnel, required for the effective implementation of the Commission-approved Safeguards Contingency Plan and implementing procedures, at a minimum, but is not limited to, the following:

(1) Gas mask, full face.

(2) Body armor (bullet-resistant vest).

(3) Ammunition/equipment belt.

(4) Two-way portable radios, 2 channels minimum, 1 operating and 1 emergency.

(c) Based upon the licensee protective strategy and the specific duties and responsibilities assigned to each individual, the licensee should provide, as appropriate, but is not limited to, the following.

(1) Flashlights and batteries.

(2) Baton or other non-lethal weapons.

(3) Handcuffs.

(4) Binoculars.

(5) Night vision aids (e.g., goggles, weapons sights).

(6) Hand-fired illumination flares or equivalent.

(7) Duress alarms.

3. Maintenance.

(a) Firearms maintenance program. Each licensee shall implement a firearms maintenance and accountability program in accordance with the Commission regulations and the Commission-approved training and qualification plan. The program must include:

(1) Semiannual test firing for accuracy and functionality.

(2) Firearms maintenance procedures that include cleaning schedules and cleaning requirements.

(3) Program activity documentation.

(4) Control and accountability (weapons and ammunition).

(5) Firearm storage requirements.

(6) Armorer certification.

H. Records

1. The licensee shall retain all reports, records, or other documentation required by this appendix in accordance with the requirements of §73.55(r).

2. The licensee shall retain each individual's initial qualification record for three (3) years after termination of the individual's employment and shall retain each re-qualification record for three (3) years after it is superseded.

3. The licensee shall document data and test results from each individual's suitability, physical, and psychological qualification and shall retain this documentation as a record for three (3) years from the date of obtaining and recording these results.

I. Reviews

The licensee shall review the Commission-approved training and qualification program in accordance with the requirements of §73.55(n).

J. Definitions

Terms defined in parts 50, 70, and 73 of this chapter have the same meaning when used in this appendix.

[43 FR 37426, Aug. 23, 1978, as amended at 46 FR 2026, Jan. 8, 1981; 53 FR 405, Jan. 7, 1988; 53 FR 19261, May 27, 1988; 57 FR 33432, July 29, 1992; 57 FR 61787, Dec. 29, 1992; 59 FR 50689, Oct. 5, 1994; 74 FR 13987, Mar. 27, 2009]

APPENDIX C TO PART 73—NUCLEAR POWER PLANT SAFEGUARDS CONTINGENCY PLANS

I. SAFEGUARDS CONTINGENCY PLAN

Licensee, applicants, and certificate holders, with the exception of those who are subject to the requirements of §73.55 shall comply with the requirements of this section.

INTRODUCTION

A licensee safeguards contingency plan is a documented plan to give guidance to licensee personnel in order to accomplish specific defined objectives in the event of threats, thefts, or radiological sabotage relating to special nuclear material or nuclear facilities licensed under the Atomic Energy Act of 1954, as amended. An acceptable safeguards contingency plan must contain:

(1) A predetermined set of decisions and actions to satisfy stated objectives;

(2) An identification of the data, criteria, procedures, and mechanisms necessary to efficiently implement the decisions; and

(3) A stipulation of the individual, group, or organizational entity responsible for each decision and action.

The goals of licensee safeguards contingency plans for responding to threats, thefts, and radiological sabotage are:

Wallis, Keri

Subject: FW: Reports Related to Retirement Issue
Attachments: JOURNAL of TRAUMATIC STRESS ARTICLE APRIL 2012.pdf; TROXELL REPORT.pdf

Importance: High

http://books.google.com/books?id=vpjzrmCrt7MC&pg=PA211&lpg=PA211&dq=indirect+exposure+to+the+trauma+of+others:+the+experiences+of+911&source=bl&ots=mYgWRwF2CF&sig=fqMC_rL19NONzAHOkfIkuC3baIU&hl=en&sa=X&ei=h2KRUI38OeOJjAL78oCgBg&ved=0CEAQ6AEwAg#v=onepage&q=indirect%20exposure%20to%20the%20trauma%20of%20others%3A%20the%20experiences%20of%20911&f=true

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From: Pat Thompson [mailto:patt@council2.com]
Sent: Tuesday, October 30, 2012 3:51 PM
To: Nichols, Devon
Subject: FW: Reports Related to Retirement Issue
Importance: High

Devon,

Here's the study that was forwarded to me.

Pat

Wallis, Keri

From: Lori James <lfjaws@hotmail.com>
Sent: Tuesday, November 13, 2012 9:39 AM
To: Office State Actuary, WA
Subject: High Risk Job Re-classification

My name is Lorraine James and I have worked on the front lines with dangerous residents at both Maple Lane and Green Hill School for 17 + years. My job title is Juvenile Rehabilitation Residential Counselor.

- I am subjected **daily** to threats of physical violence verbal abuse.

- I am required to carry handcuffs as well as protection from **blood, spit, urine, feces and semen.**

- I supervise anywhere from 10 to 16 residents **by myself**. They include gang members, youth with **severe mental health** issues, and most have histories of **violent behavior**.

- I have witnessed many assaults on both staff and residents, sometimes **daily.**

- **There is a huge toll that comes with constantly being hyper-vigilante for dangerous situations.** I am currently under a physician's care for hypertension, insomnia, anxiety, and bruxism which required surgery.

Every day I experience the feelings of dread that come with being in potentially dangerous situations. Hearing feet scuffle, yelling, all precursors to assaults which brings feelings of panic and **constant stress.**

I am nearing 58 years of age. I cannot physically restrain a strong, out of control resident. It is not fair to my younger able-bodied co-workers to have to "pick up the slack" of older staff who frequently become injured during a restraint. We are required to attend yearly training on "Dealing With Resistive Youth". The training itself is very rigorous and has resulted in many injuries. Each training becomes more difficult to pass

I cannot do this until age 65. I don't know if I can do this until age sixty. This is a job that the

employee **WILL** age out of physically in addition to suffering the results of constant stress. If I could transfer to another agency, I would gladly go, however my age works against me in that I am seen as someone who is nearing retirement age and therefore it would not be wise to invest a lot of time and training into a person who won't be around long.

I would like to be able to end my career with JRA with dignity and pride in a job well done, **not out on disability.**

Thank you,
Lorraine James
Green Hill School
360-740-3421

Wallis, Keri

Subject: FW: 911 Telecommunicators
Attachments: WaAPCO_ltr Select Committee on Pension Policy.pdf; JOURNAL of TRAUMATIC STRESS ARTICLE APRIL 2012.pdf; TROXELL REPORT.pdf

From: Pat Thompson [mailto:patt@council2.com]
Sent: Monday, December 03, 2012 2:41 PM
To: Conway, Sen. Steve; Bailey, Rep. Barbara
Cc: Smith, Matt; Nichols, Devon
Subject: 911 Telecommunicators

Senator Conway,

Per your request, this is our formal request to include 911 telecommunicators in the Public Safety Employee Retirement System. In addition to the public testimony already offered, please see the attachments for details on this job classification and the need for its inclusion in PESER's. It should also be noted that fire dispatchers are currently in the LEOFF system. Thank you for your consideration.

Pat Thompson
County and City Employees

http://books.google.com/books?id=vpjzrmCrt7MC&pg=PA211&lpg=PA211&dq=indirect+exposure+to+the+trauma+of+others:+the+experiences+of+911&source=bl&ots=mYgWRwF2CF&sig=fqMC_rL19NONzAHOkfIkuC3baIU&hl=en&sa=X&ei=h2KRUI38OeOJjAL78oCgBg&ved=0CEAQ6AEwAg#v=onepage&q=indirect%20exposure%20to%20the%20trauma%20of%20others%3A%20the%20experiences%20of%20911&f=true