



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

This document has been electronically approved and signed.

**THIS MATTER IS NOT SCHEDULED FOR A BALLOT VOTE.
A DECISIONAL MEETING FOR THIS MATTER IS SCHEDULED ON MAY 17, 2018.**

Date: April 25, 2018

TO : The Commission
Alberta E. Mills, Secretary

FROM : Patricia H. Adkins, Executive Director
Patricia M. Hanz, General Counsel

SUBJECT : FY 2018 Midyear Review and Proposed Operating Plan Adjustments

By the attached memorandum, the Executive Director requests Commission approval of recommendations to amend the fiscal year (FY) 2018 Operating Plan. The memorandum recommends: (1) aligning the FY 2018 Operating Plan funding levels with the FY 2018 Consolidated Appropriations Act enacted on March 23, 2018; (2) allocating future unexecuted balances, should balances be available, to support existing work; and (3) making three adjustments to the voluntary standards activities, two adjustments to the mandatory standards activities, and nine adjustments to the measures and milestones as presented in the FY 2018 Operating Plan.

Please indicate your vote on the following options:

- I. Approve the FY 2018 Midyear Review and Proposed Operating Plan Adjustments, as drafted.

Signature

Date

- II. Approve the FY 2018 Midyear Review and Proposed Operating Plan Adjustments, with the following specified changes:

Signature

Date

III. Do not approve the FY 2018 Midyear Review and Proposed Operating Plan Adjustments.

Signature

Date

IV. Take the other action specified below:

Signature

Date

Attachment:

Executive Director's Memorandum on the *FY 2018 Midyear Review and Proposed Operating Plan Adjustments*.



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April 25, 2018

TO: The Commission

THROUGH: Alberta E. Mills, Secretary
Patricia M. Hanz, General Counsel

FROM: Patricia H. Adkins
Executive Director

SUBJECT: Fiscal Year (FY) 2018 Midyear Review and Proposed Operating Plan Adjustments

This memorandum summarizes staff's recommendations to amend the FY 2018 Operating Plan, approved by the Commission on October 24, 2017. The first recommendation is to align the FY 2018 Operating Plan funding levels with the FY 2018 Consolidated Appropriations Act, enacted on March 23, 2018 (the Omnibus), which provided \$3.0 million more than the funding level approved in the FY 2018 Operating Plan, and is equal to the FY 2017 enacted appropriation level. The second recommendation is to allocate future unexecuted balances, should balances be available, to support existing project work (see Attachment 1). Finally, staff recommends three adjustments to the voluntary standards activities (see Attachment 2), two adjustments to the mandatory standards activities (see Attachment 3), and nine adjustments to the measures and milestones as presented in the FY 2018 Operating Plan (see Attachment 4).

The Commission's decisions in response to this memorandum's recommendations will be appended to, and will amend, the FY 2018 CPSC Operating Plan previously approved by the Commission.

Final Enacted FY 2018 Operating Level

Recommendation #1: Align the FY 2018 Operating Plan with the FY 2018 Enacted Appropriation

Staff recommends that the Commission align the FY 2018 Operating Plan funding levels with the final enacted appropriation level per Table 1.

**Table 1. FY 2018 Enacted Appropriation
Adjustments to Operating Plan**

	<u>in \$1000s</u>
FY 2017 Enacted	\$ 126,000
<i>VGB Grant Elimination</i>	<i>\$ (1,300)</i>
<i>Salary & Expenses (net)</i>	<i>\$ (1,700)</i>
FY 2018 Request/Operating Plan	\$ 123,000
<i>VGB Grant Congressional Add-Back</i>	<i>\$ 1,100</i>
<i>Unspecified Salary and Expenses</i>	<i>\$ 1,900</i>
FY 2018 Enacted Appropriation	\$ 126,000

The final enacted FY 2018 CPSC appropriation is \$126 million, which is \$3 million higher than the FY 2018 Operating Plan level previously approved by the Commission, and is equal to the FY 2017 enacted appropriation. The additional \$3 million includes \$1.1 million¹, available until expended, for the Virginia Graeme Baker Pool and Spa Safety Act (VGB) grant program and associated administrative costs. The enacted appropriation also includes an additional \$1.9 million in unspecified salary and expenses appropriations. Staff recommends that the additional unspecified salary and expenses appropriations be allocated to unfunded projects, in accordance with Recommendation #2 below.

Allocating Unexecuted Balances

Currently, staff forecasts that the CPSC may have an unexecuted salary and expense balance of approximately \$2.1 million. This unexecuted balance projection is attributable to the additional \$1.9 million in salary and expenses appropriations provided by Congress (see above) and other variances in operating execution.

Recommendation #2: Authorize Projects to Fund from Unexecuted Balances, if Available

Similar to past practice, and given the uncertainty of the amount of year-end unexecuted balances, staff recommends a prioritized list of projects for funding consideration. Because unexecuted balances are unplanned and not recurring, staff's recommendations for reallocation of unexecuted balances are generally limited to nonrecurring requirements (*e.g.*, contracts). Staff has identified approximately \$5 million in projects for funding consideration and placed them into two tiers that are summarized in Table 2 (see Table 2 below). The projects in Tier 1 consist of viable requirements that are within the current, \$2.1 million unexecuted balance forecast. Projects in Tier 1 will most likely be funded by September 30, if approved by the Commission. Projects in Tier 2 consist of viable requirements that are outside the current \$2.1 million unexecuted balance forecast range. However, the unexecuted balance forecast may change before year-end because of unplanned staffing variance, unexecutable contract requirements, or actual obligations for specific projects less than estimated budgeted amounts. If authorized by the Commission, the agency would fund the recommended projects in priority order, subject to available unexecuted balances and acquisition feasibility. Projects that are not funded this fiscal year could be revisited in a future fiscal year, subject to resource availability and identified needs.

Staff recommends that the Commission approve the projects in Table 2, as listed in priority order, for funding consideration should unexecuted balances become available this fiscal year. A detailed description of each proposed project can be found in Attachment 1.

¹ Total VGB Grant funding available for obligation, including prior year balances, and the just-received FY 2018 appropriations, is \$2.5 million.

Table 2. Recommended Projects*(See Attachment 1 for a detailed description of each project.)*

Tier	MY#	Office	Project Title	Amount (in \$000)
Tier 1	1.1	EXHR	Exposure and Risk Data and Analysis Methodology Expansion	\$950
	1.2	EXHR	Portable Generators	\$650
	1.3	EXHR	Furniture Tip-over	\$135
	1.4	EXHR	Gas Appliance CO Sensors	\$315
	1.5	EXHR	Safe Sleep - Play Yard Mattress Firmness Study	\$110
Tier 1 Total				\$2,160
Tier 2	2.1	EXHR	LI Battery Internal Short-Detection Technology Investigation	\$200
	2.2	EXIS	e-Commerce Requirements	\$400
	2.3	EXHR	PPPA Testing for Coin Cell Battery Packages	\$47
	2.4	EXHR	Infant and Toddler Strength Measurement	\$800
	2.5	EXHR	ATV Occupant Protection (OP)-Evaluate Existing Device	\$340
	2.6	EXHR	FMD Disposable Fuel Bottle	\$65
	2.7	EXHR	ATV R&D for OP-Develop and Evaluate Proof of Concept Device	\$695
	2.8	EXHR	Pool Drowning New Technology Investigation via Challenge.gov	\$300
Tier 2 Total				\$2,847
Grand Total				\$5,007

Other Proposed Adjustments to the FY 2018 Operating Plan**Recommendation #3: Update the Fiscal Year 2018 Voluntary Standards Activities, Mandatory Standards Activities, and Select Operating Plan Measures and Milestones**

Staff has evaluated progress in implementing the FY 2018 Operating Plan and identified changes to the Commission-approved FY 2018 voluntary standards activities, mandatory standards activities, and select measures and milestones. Staff recommends the following changes to the FY 2018 Operating Plan:

Voluntary Standards *(amends pages 5-7 of the FY 2018 Operating Plan)*

Regarding voluntary standards activities for FY 2018, staff recommends the following changes that are reflected in Attachment 2:

Add:

- Electric Fans: Staff is proposing new UL work in this area.
- Gas Grills: Staff is proposing new work in this area.

Delete:

- Methylene Chloride: ASTM is not pursuing this effort.

These proposed changes will result in a net increase of one voluntary standard activity to the CPSC's FY 2018 voluntary standards activities.

Mandatory Standards *(amends pages 8-9 of the FY 2018 Operating Plan)*

Regarding mandatory standards activities for FY 2018, staff recommends the following changes that are reflected in Attachment 3:

Revise:

- Technical change to Furniture Tip-over: Add ANPR. The ANPR was planned for completion in FY 2017, that was not completed until FY 2018. This change reflects completion of the ANPR in FY 2018.

Add:

- Furnaces (CO Sensors) as DA/TR: Staff is proposing to start work in FY 2018. Originally, staff had anticipated work commencing in FY 2019, as annotated in the FY 2019 Performance Budget Request to Congress, dated February 12, 2018.

These proposed changes will result in a net increase of one candidate for rulemaking.

Measures and Milestones (amends multiple pages of the FY 2018 Operating Plan)

Staff recommends 11 changes to measures and milestones throughout the FY 2018 Operating Plan; the types of changes are in one of four categories:

1. Adjusting Targets: 4
2. Replacing Measures: 1
3. Deleting Measures: 4
4. Clarifying Measure Statements: 2

Attachment 4 contains a detailed description of the proposed changes to measures and milestones.

For Additional Information

If you have any questions on these staff recommendations, please contact me directly.

Thank you.

Attachments:

Attachment 1: Detailed Project Descriptions

Attachment 2: Changes to Voluntary Standards Table

Attachment 3: Changes to Mandatory Standards Table

Attachment 4: Changes to Measures and Milestones

Detailed Project Descriptions

MY#	Project Title	Amount (in \$000)	Description
1.1	Exposure and Risk Data and Analysis Methodology Expansion Program	\$950	This project focuses on creating and maintaining a data collection effort for consumer product use for exposure and risk through the means of a dynamic, ongoing, omnibus survey, called the National Consumer Activity for Risk and Exposure Survey (NCARES). This is the first of a proposed multiyear effort completed in stages of design, PRA requirements, including the OMB process to obtain approval, pilot survey, pilot analysis, and full-scale implementation. The results will address the most significant data gap identified by staff, namely the level of consumer exposure to products.
1.2	Portable Generators	\$650	This project expands the work deliverables on an existing interagency agreement (IAA) with NIST for additional modeling needs to evaluate the effectiveness of ANSI/PGMA G300 and UL 2201 voluntary standards. UL 2201 did not have CO mitigation requirements when the original IAA was signed, and therefore, this work was not planned in original scope of project.
1.3	Furniture Tip-over	\$135	This project supports planned voluntary standard and mandatory standard development for clothing storage unit safety. Funding supports a focus group to obtain information from consumers on their decision-making process when selecting furniture for children, attaching furniture to the wall, and placing TVs on furniture. These data will inform staff interactions with the voluntary standards committee and potentially the rulemaking activity. Staff intends to target user-behavior questions to general consumers unlikely to comment during the public comment period, to provide deeper insight than is typically obtained through public comment. Funding also supports development of data for key performance requirements that may be proposed, and to obtain dresser samples and test supplies to assess key unknowns in a clothing storage unit performance standard.

Detailed Project Descriptions

MY#	Project Title	Amount (in \$000)	Description
1.4	Gas Appliance CO Sensors	\$315	This project seeks to address key uncertainties in support of voluntary standards activities and a planned FY 2019 ANPR. The project is comprised of two components accomplished via a contract. The first component will assess whether a lifespan of 15 or 20 years for CO sensors is possible within gas appliances. The second component will evaluate the effectiveness of CO sensors in Japan and Europe (where these sensors are most widely used in this context). Overall, the project will also provide analysis to further support staff's 2015 CO shutoff/response proposal to the ANSI Z21 gas appliance standards for gas furnaces and boilers, building on work initiated in FY 2017.
1.5	Safe Sleep - Play Yard Mattress Firmness Study	\$110	This project proposes forming two focus groups to address key Safe Sleep issues. The first focus group will assess potential comfort concerns with play yard mattresses, as evidenced in the supplemental mattress petition package. Specifically, the focus group will attempt to establish more details pertaining to perceived comfort of play yard mattresses, and also assess the overall Safe Sleep messaging (<i>e.g.</i> , added bedding, warnings, other messaging). The second focus group will expand on the Safe Sleep messaging work done by WPI students while being hosted by CPSC. It will be used to help staff develop messages for warning labels and inform other technical work relevant to safe sleep.
2.1	LI Battery Internal Short-Detection Technology Investigation	\$200	This project is a collaboration with Navy research work on internal short-detection technology to mitigate fire risks with lithium-ion batteries that are used in consumer products. High-Energy Density lithium-ion battery products require complex battery-management systems to mitigate fire risks from their use in consumer products and from charging. This project analyzes internal short-detection technology, collecting data and testing the technology's ability to detect lithium-ion battery failures before the failures manifest into a thermal runaway event. Currently, the Department of the Navy is evaluating several technologies for government and industrial use, and a recent iteration of a new technology has been developed that could be implemented for evaluation on an e-mobility device or consumer product.

Detailed Project Descriptions

MY#	Project Title	Amount (in \$000)	Description
2.2	e-Commerce Requirements	\$400	Manifest data are the only importation information provided when shipment values are less than \$800 (previously \$200). The advent of e-commerce and direct-to-consumer shipping, increased value for manifest-only filings (\$800), and associated adaption by trade, has increased the need to study and understand how to address this segment of importation.
2.3	PPPA Testing for Coin Cell Battery Packages	\$47	Compare test procedure and child-panel testing. This research would focus on evaluating a potential test method for ensuring children cannot get into coin cell battery packages as proposed by industry.
2.4	Infant and Toddler Strength Measurement	\$800	Address critical gaps in strength data for toddlers to improve voluntary standard performance requirements, inform the development of mandatory standards, and inform work done to support the Office of Compliance.
2.5	ATV Occupant Protection (OP)- Evaluate Existing Device	\$340	This project is being conducted under Priority 5 of the Commission ATV priority plan regarding roll-over protection systems for ATVs. This project would fund a task order on an existing contract to purchase and install on ATVs commercially available roll-over occupant protection devices. This project would also fund testing to evaluate the efficacy of the devices in protecting the rider during ATV rollover.
2.6	FMD Disposable Fuel Bottle	\$65	This project will extend flame-mitigation device (FMD) work previously contracted pertaining to disposable fuel containers. Specifically, work will assess how squeezing these containers, drawing air into and out of the container, affects flame mitigation.
2.7	ATV R&D for OP- Develop and Evaluate Proof-of - Concept Device	\$695	This project is being conducted under Priority 5 of the Commission ATV priority plan regarding roll-over protection systems for ATVs. This project would fund a task order on an existing contract to design new occupant protection devices that would improve rider protection during an ATV rollover event. The project would also fund the manufacturing of prototype samples and the subsequent testing of these samples on ATVs to evaluate the efficacy of the prototype devices in protecting the rider during ATV rollover.

Detailed Project Descriptions

MY#	Project Title	Amount (in \$000)	Description
2.8	Pool Drowning New Technology Investigation via Challenge.gov	\$300	In 2017, at least 163 children drowned in pools and spas during the summer. The majority of these fatalities resulted from insufficient access control to the pool. Although much has been done to improve standards and codes, these improvements do not apply to existing pools. This project seeks to identify innovative technological solutions to reduce access to swimming pools and to detect children in potential danger. Challenges and prizes have led to breakthrough innovations for the U.S. government for a number of hard-to-solve issues, by inviting scientists, engineers, and entrepreneurs across the United States to apply their talents and creativity to problems they might not otherwise be aware of, or have the opportunity to solve.

Changes to Voluntary Standards Table

Product		FY 2018 Op Plan	FY 2018 Op Plan Revised
Voluntary Standards Activities Related to Existing CPSC Regulations Issued Under the CPSIA, as amended by Pub. L. No. 112-28, and including the Danny Keysar Child Product Safety Notification Act (Section 104 of the CPSIA)			
1	ATVs (All-Terrain Vehicles)	•	•
2	Bassinet/Cradles	•	•
3	Bed Rails (Children's)	•	•
4	Bedside Sleepers	•	•
5	Carriages and Strollers	•	•
6	Child Frame Carriers	•	•
7	Children's Folding (Youth) Chairs and Stools	•	•
8	Commercial Cribs	•	•
9	Full-Size Cribs	•	•
10	Handheld Infant Carriers	•	•
11	Infant Bath Seats	•	•
12	Infant Bath Tubs	•	•
13	Infant Bouncers	•	•
14	Infant Slings (Sling Carriers)	•	•
15	Infant Swings	•	•
16	Infant Walkers	•	•
17	Non-Full-Size Cribs and Play Yards	•	•
18	Portable Hook-on Chairs	•	•
19	Soft Infant and Toddler Carriers	•	•
20	Toddler Beds	•	•
21	Toys	•	•
Voluntary Standards Activities Related to Existing CPSC Regulations			
22	Child-Resistant Packaging	•	•
23	Fireworks	•	•
24	Gasoline Containers, Child Resistance	•	•
25	Swimming Pools/Spas Drain Entrapment	•	•
26	Swimming Pools/Spas Safety Vacuum Relief System	•	•
Voluntary Standards Activities Related to Petitions			
27	Adult Portable Bed Rails	•	•
28	Candles and Candle Accessories	•	•
29	Torch Fuel Containers	•	•
Voluntary Standards Activities Related to Ongoing Rulemakings Under CPSIA, as amended by Pub. L. No. 112-28, and including the Danny Keysar Child Product Safety Notification Act (Section 104 of the CPSIA)			
30	Booster Seats	•	•
31	Changing Tables	•	•
32	Crib Bumpers (Infant Bedding)	•	•
33	Crib Mattresses (include Supplemental and Aftermarket Mattresses)	•	•
34	High Chairs	•	•
35	Infant Gates and Other Enclosures	•	•
36	Infant Inclined Sleep Products	•	•
37	Stationary Activity Centers	•	•
Voluntary Standards Activities Related to Ongoing or Potential Rulemaking Activities			
38	Flame Mitigation Devices (FMDs) on Disposable Fuel Containers (formerly "Flammable Liquids (Material Handling) (now includes Fuel Gels)")	•	•
39	Furnaces (CO Sensors)	•	•
40	Furniture Tip-overs	•	•
41	Portable Fireplaces	•	•
42	Portable Generators	•	•
43	Power Equipment (Table Saws)	•	•
44	Recreational Off-Highway Vehicles (ROVs)	•	•
45	Upholstered Furniture	•	•
46	Window Coverings	•	•

Changes to Voluntary Standards Table

Product		FY 2018 Op Plan	FY 2018 Op Plan Revised
Other Planned Voluntary Standards Activities			
47	Bath Tubs (Adult)	•	•
48	Batteries, Fire (High Energy Density)	•	•
49	Batteries, Ingestion (Button)	•	•
50	Carbon Monoxide (CO) Alarms	•	•
51	Clothes Dryers	•	•
52	Electric Fans		Δ •
53	Flammable Refrigerants	•	•
54	Gas Grills		Δ •
55	Gasoline Containers FMDs	•	•
56	Inflatable Play Devices	•	•
57	Laundry and Dishwasher Packets	•	•
58	LP Gas Outdoor Fire Pit	•	•
59	Methylene Chloride Labeling Task Group under F15	•	Δ
60	Nanotechnology	•	•
61	National Electrical Code	•	•
62	Non-Integral Firearm Locking Devices	•	•
63	Phthalate Testing Methods	•	•
64	Playground Equipment (Home)	•	•
65	Playground Equipment (Public)	•	•
66	Playground Surfacing	•	•
67	Pools, Portable Unprotected (Child Drowning)	•	•
68	Pressure Cookers	•	•
69	Recreational Headgear	•	•
70	Safety Locks and Other Household Child-inaccessibility Devices	•	•
71	Self-balancing Scooters and Light Electric Vehicles	•	•
72	Smoke Alarms	•	•
73	Sports Protective Gear	•	•
74	Spray Polyurethane Foam Insulation	•	•
75	Tents	•	•
76	Trampoline Parks and Adventure Attractions	•	•
77	Washing Machines	•	•
78	Youth-Resistant Firearm Security Containers	•	•
Grand Total		76	77

Changes to Mandatory Standards Table

Items by Major Categories		FY 2018 Op Plan	FY 2018 Op Plan Revised
CPSIA, as amended by Pub. L. No. 112-28, and including Section 104, the Danny Keysar Child Product Safety Notification Act			
	ATVs – Conspicuity	FR	FR
	ATVs – Other	DA/TR	DA/TR
	Booster Seats	FR	FR
	Changing Tables	FR	FR
	Children’s Folding (Youth) Chairs and Stools	FR	FR
	Consumer Registration Requirement for Crib Bumpers and Crib Mattresses (include Supplemental and Aftermarket)	NPR	NPR
	Crib Bumpers	NPR	NPR
	Crib Mattresses (include Supplemental and Aftermarket)	DA/TR	DA/TR
	Gates and Other Enclosures	NPR	NPR
	High Chairs	FR	FR
	Infant Inclined Sleep Products	FR	FR
	Stationary Activity Centers	NPR	NPR
Rule Review			
	Fireworks	FR	FR
	Lead	DA/TR	DA/TR
Other Ongoing or Potential Rulemaking-Related Activities			
	Adult Portable Bed Rails Petition	BP	BP
	Bedclothes Flammability	DA/TR	DA/TR
	Burden Reduction/Assure Compliance	FR	FR
	F963 Toys	BP, DFR	BP, DFR
	Furniture Tip-over	NPR	Δ ANPR, NPR
	Garage Door Operators	DFR	DFR
	Furnaces (CO Sensors)		Δ DA/TR
	Magnet Sets	DA/TR	DA/TR
	Methylene Chloride Petition	BP	BP
	Organohalogens Petition	DA/TR	DA/TR
	Portable Fireplaces	DA/TR	DA/TR
	Portable Generators	DA/TR	DA/TR
	Substantial Product Hazard List – 15(j) Rule	DA/TR	DA/TR
	Table Saws	DA/TR	DA/TR
	Upholstered Furniture	DA/TR	DA/TR
	Window Coverings	DA/TR	DA/TR
Number of candidates for rulemaking (ANPR, NPR, DFR and FR)		15	16

Changes to Measures and Milestones

#	Office	Measure ID	FY 2018 OP Plan	FY 2018 Op Plan Revised
1	EXHR	2018KM2.1.01	➤ Percentage of consumer product-related incident reports warranting follow-up actions	Same
			➤ Target: TBD	Target: 25%
			Reason for Change: Sufficient baseline data have been collected to establish a target.	
2	EXHR	2018OP13	➤ Number of standards implemented/updated for chronic hazards	Number of voluntary standards with active work to address chronic hazards
			➤ Target: TBD	Target: 4
			Reason for Change: Measure statement restated for clarity. Also, sufficient baseline data have been collected to establish a target.	
3	EXHR	2018OP14	➤ Number of chronic hazard risk assessments completed	Number of contractor reports supporting staff chronic hazard risk
			➤ Target: TBD	Target: 1
			Reason for Change: Measure statement restated for clarity. Also, sufficient baseline data has been collected to establish a target.	
4	EXHR	2018M06	➤ Status report on Behavioral Economics research published	Proposing to delete milestone
			Reason for Change: This item has not been funded, and no funding for it is sought at this time.	
5	EXHR	2018KM2.201	➤ Number of voluntary standards activities in which CPSC actively participates	Same
			➤ Target: 76	Target: 77
			Reason for Change: Reflects the changes recommended in Attachment 2.	
6	EXHR	2018KM2.202	➤ Number of candidates for rulemaking prepared for Commission consideration	Same
			➤ Target: 15	Target: 16
			Reason for Change: Reflects the changes recommended in Attachment 3.	
7	EXIS	2018KM2.2.03	➤ Violation rate of targeted repeat offenders	Percentage of firms that are engaged with a timely establishment inspection after being identified as a repeat offender (2018KM2.2.07)2472
			➤ Target: TBD	Target: Baseline
			Reason for Change: In the current measure, whether a firm violates or complies with CPSC's rules is independent of CPSC's actions, and any trend could	

Changes to Measures and Milestones

#	Office	Measure ID	FY 2018 OP Plan	FY 2018 Op Plan Revised
			not be proven to be a consequence of CPSC's actions. The proposed measure indicates CPSC's timeliness of establishment inspections, which are actionable by the agency. Please note that the Commission approved the proposed measure in the FY 2019 Performance Budget Request.	
8	OCM	2018OP53	➤ Percentage of incoming calls sent to Hotline operators that are answered within 30 seconds	Same
			➤ Target: 85%	Target: 80%
		Reason for Change:	Target adjusted to reflect the percentage in the contract.	
9	EXIP	2018OP39	➤ Number of global campaigns launched	Proposing to delete operating measure
		Reason for Change:	Duplicative of 2018M27: "Participated in the annual OECD global consumer information campaign." Since there is only 1 global campaign it is not appropriate to track with an operating measure.	
10	EXIP	2018M23	➤ Training of foreign-based industry representatives conducted	Proposing to delete milestone
		Reason for Change:	Duplicative of 2018OP36: "Number of training or outreach seminars for foreign-based industry representatives conducted by	
11	EXIP	2018M26	➤ Training for foreign government officials conducted by CPSC staff	Proposing to delete milestone
		Reason for Change:	Duplicative of 2018OP37: "Number of trainings for foreign regulatory agencies conducted by CPSC staff."	