



UNITED STATES
 CONSUMER PRODUCT SAFETY COMMISSION
 WASHINGTON, DC 20207

Memorandum

DATE: JUN 9 2003

TO: Commission
 Todd Stevenson, Secretary

FROM: W.H. DuRoss, III, General Counsel *W.D.*
 Melissa V. Hampshire, Attorney, OGC *M.V.H.*

SUBJECT: Proposal to Move the Clearinghouse from EXHR/EP to OS

BALLOT VOTE: Due JUN 17 2003

The Office of Hazard Identification and Reduction proposes to move the Information Clearinghouse from EXHR/Directorate for Epidemiology to the Office of the Secretary (OS). The Information Clearinghouse and OS share similar functions and resources. All the relevant offices and divisions concur with this move. The Executive Director concurs with EXHR's recommendation. Pursuant to a 1987 General Policy of the Commission, a vote is not required for reorganization involving a division. Nevertheless, the proposed division move is being forwarded for Commission approval. Relevant materials are attached.

Please indicate your vote:

- Approve moving the Information Clearinghouse from EXHR/Directorate for Epidemiology to OS.

 (Signature)

 (Date)

- Do not approve moving the Information Clearinghouse from EXHR/Directorate for Epidemiology to OS.

 (Signature)

 (Date)

Attachments

CPSA & EIR Cleared
 6/9/03
 No Material
 Products Identified
 Proposed by
 Firm Name

NOTE: This document has not been processed.
 CPSC Hotline: 1-800-638-CPSC(2772) ★ CPSC's Web Site: <http://www.cpsc.gov> or accepted by the Commission.
 Initial *W.D.* Date 6/9/03



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Memorandum

Date: JUN 9 2003

TO : Hal Stratton, Chairman
Thomas H. Moore, Commissioner
Mary Sheila Gall, Commissioner

FROM : Patricia Semple *PS*
Executive Director

SUBJECT : Proposal to Move Clearinghouse from EXHR/EP to OS

Attached is a recommendation by the Office of Hazard Identification and Reduction (EXHR) to move the Information Clearinghouse from EXHR/Directorate for Epidemiology to the Office of the Secretary (OS). The proposed change recognizes the similarities in the types of work done by the two groups and allows for sharing of resources between the two groups. All parties involved support the realignment including the AED for Epidemiology and the Director of OS. I agree with the EXHR proposal and, with the approval of the Commission, intend to implement it no sooner than 10 days from the date of the Commission approval.

I am notifying you of this reorganization pursuant to the Commission's November 30, 1976 policy statement. Because this realignment pertains to divisions, a Commission vote is not required. However, as I believe it to be preferable here, I am forwarding this proposal with a ballot vote sheet for Commission approval.

Attachment

Cc

Jacqueline Elder, EXHR
Susan Ahmed, EP
Ann deTemple, IC
Todd Stevenson, OS



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WASHINGTON, DC 20207

Memorandum

Date: May 12, 2003

TO : Patricia Semple
Executive Director

FROM : Jacqueline Elder *je*
Assistant Executive Director, EXHR

SUBJECT : Proposal to Move the Clearinghouse from EXHR/EP to OS

Attached is a recommendation from the Directorate for Epidemiology (EP) to move the Information Clearinghouse to the Office of the Secretary (OS). The proposed change is consistent with the evaluation report done by the Office of Planning and Evaluation in November 2001. Including the Clearinghouse in OS recognizes the similarities in the types of work done by the two groups and provides opportunities to share resources. I agree with the EP proposal.

Attachment



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

Memorandum

Date: May 12, 2003

TO : Jacqueline Elder
Assistant Executive Director, EXHR

FROM : Sue Ahmed, Ph. D. *SA*
Associate Executive Director, EP

SUBJECT : Request to Move the Clearinghouse from EP to OS

In July 2001, in the process of reorganizing the Office of Information Services (EXIS), the Information Clearinghouse (IC) was moved from EXIS to the Directorate for Epidemiology in EXHR. Based on an evaluation done by the Office of Planning and Evaluation (OPE) in November 2001, it was determined that the Clearinghouse did not fit well within EXIS since it did not have commonality with the core IS functions. Two alternative placements were considered, the Directorate for Epidemiology within EXHR and the Office of the Secretary (OS). The Clearinghouse does have commonalities with each of these groups. Each had its advantages as laid out in the OPE report. A decision was made to move the Clearinghouse to the Directorate for Epidemiology.

The Clearinghouse has continued to function well within Epidemiology. However, it has become clear that there is not as much commonality between the two groups as originally thought. The Clearinghouse was originally in the Directorate for Epidemiology (from the 1970s to 1995) at a time when operations were largely "paper-oriented," prior to the development of the comprehensive systems for electronically accessing data that exist today. With the introduction of these new systems, there is less consistent contact between Clearinghouse staff and other staff within Epidemiology. In addition, the nature of the work done by the Clearinghouse technical information specialists is quite different from that done by the staff in the other two divisions in Epidemiology.

As outlined below, there are several clear commonalities between the Clearinghouse and the Office of the Secretary which would be beneficial to both groups if the two were merged.

- As offices performing similar support work, the Clearinghouse and OS could borrow or exchange staff if needed.
- OS and the Clearinghouse have similar staff needs/issues and can draw on each other's experience for training and problem resolution.
- A cross-training or job exchange program could be offered for those who want additional job variety.

- OS is a large user of agency records and the Clearinghouse Archives Technician works closely with OS staff who borrow records.
- The 6(b) notification that is part of the Clearinghouse manufacturer mailing process is an OS responsibility that in recent years has been supported by the Clearinghouse.
- OS and the Clearinghouse have tracking data that can be combined and shared and they could take advantage of pooled EXIS resources.
- The groups are located on the same floor.

Thus, it appears that merging the Clearinghouse with the Office of the Secretary will provide both savings of time and opportunities for shared resources.



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Memorandum

Date: May 25, 2001

TO: Thomas Murr, Jr., Acting Executive Director

THROUGH: N. J. Scheers, Director, Office of Planning and Evaluation *NJS*

FROM: Arlene C. Clyburn-Miller, Operations Research Analyst, Office of Planning and Evaluation *ACM*

SUBJECT: Clearinghouse Evaluation

Attached is an evaluation of the Clearinghouse with our recommendation of where it best fits organizationally within the Commission. The report also contains comments on the Draft Report from those that were interviewed.

If there are any questions, please contact Arlene C. Clyburn-Miller at ext. 2190.

Clearinghouse Evaluation

Arlene C. Clyburn-Miller, M.S.
Office of Planning and Evaluation
May 2001

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Introduction

In creating the U.S. Consumer Product Safety Commission in 1973, Congress emphasized the importance of widespread sharing of information by the agency. The Consumer Product Safety Act states that the Commission shall maintain an Injury Information Clearinghouse. The Clearinghouse disseminates statistics and information relating to the prevention of death and injury associated with consumer products. Each year the Clearinghouse responds to almost 4,000 requests for information from the American public, such as consumer groups, manufacturers and industry associations, media, educators, researchers, and attorneys. To provide this information, the Clearinghouse searches CPSC's computerized data sources including the National Electronic Injury Surveillance System (NEISS), Death Certificate File, In-Depth Investigation File, and Injury/Potential Injury Incident File. In addition to responding to requests from the public, the Clearinghouse also annually mails 7,000 consumer complaints or reported incidents for confirmation to complainants, 6,000 reported incidents and investigation reports to manufacturers, and administers the library and records management functions for the Commission.

The purpose of this study is to evaluate the function of the National Injury Information Clearinghouse and where it fits best functionally in the Commission. This study does not look at the best fit of the library or records management functions that the Clearinghouse currently administers. The Clearinghouse is currently in the Office of Information Services, which provides the agency with Information Technology support including network administration, hardware and software user support, application development, and telecommunication services. The office also administers the Hotline, which also provides information to the public.

The Clearinghouse works very closely with the Directorate for Epidemiology in the Office of Hazard Identification and Reduction (HIR) and the Freedom of Information Office in the Office of the Secretary. Epidemiology collects, performs quality checks on, and interprets the data that the Clearinghouse disseminates. The directorate serves as a technical advisor to the Clearinghouse on injury data and has done some previous training on the data for Clearinghouse personnel. Some requestors are also referred to this directorate to help them understand the context of the information or if they have further questions. The Freedom of Information (FOI) Office also responds to requests for information through the Freedom of Information Act. This covers all information, with some exceptions, that is in the Commission. If the FOI office does not have the information, the office requests it from another office within the Commission, such as the Clearinghouse for injury data. The FOI office is also the only office that can receive fees for the searching, reviewing, and reproducing of requested documents.

Methodology

We conducted interviews with the heads of the following offices: the Clearinghouse, the Freedom of Information Office, the Office of Hazard Identification and Reduction, the Office of Information Services, and the Division of Hazard and Injury Data Systems. The questions asked were to ascertain the activities of the respective offices; the overlap, if any, with the Clearinghouse and the other offices; and the efficiencies or problems with a possible relocation within the Commission of the Clearinghouse function.

Findings

1. The Clearinghouse function does not have commonality with the core Information Technology functions within the Office of Information Services. The Clearinghouse primarily provides injury information by searching agency databases. Other offices also use agency databases to do their respective work.
2. The Clearinghouse and the Freedom of Information Office are closely interconnected in the following processes:
 - In 2000, 273 requests that originated in the FOI Office were for injury information that had to be sent to the Clearinghouse and 755 requests went from the Clearinghouse to the FOI Office for fees or information covered under the FOIA.
 - The Clearinghouse sends a letter to manufacturers about their products that have been named in an incident or investigation. The letter also asks for comment on the accuracy of the report and replaces the FOI Office notification unless the manufacturer requests further notification. If there is a later FOIA request for this information, the FOI Office must take their response into account.
 - The Clearinghouse sends a copy of a product complaint to the complainant. If, and only if, the complainant responds and confirms the incident, it can later be used to respond to a FOIA request.
3. The Clearinghouse and the Division of Hazard and Injury Data Systems (Data Systems) are also closely interconnected.
 - Data Systems collects, performs quality control on, and interprets the injury data that the Clearinghouse processes and disseminates.
 - Data Systems serves as the technical advisor for the injury data. They train Clearinghouse personnel and answer further questions that requestors may have about the data.
 - The Clearinghouse provides injury data to Data Systems that is in hard copy and has yet to be stored electronically.

4. If the Clearinghouse were to be administered within either the FOI Office or HIR, it would still need to continue its interconnectivity with the other office.
5. All of the respondents agreed that the Clearinghouse function was not a good fit within the Office of Information Services. Four of the five respondents stated that it would be a good fit under HIR and the other respondent was unsure. Two respondents stated it was a good fit with the FOI office and one was unsure. The Director of the Clearinghouse stated it would be a good fit within either office, the FOI Officer and the HIR and Data Systems managers stated it would fit best under HIR.
 - The benefits given by four respondents in favor of merging under HIR were that
 - the Clearinghouse is really an Injury Information Office and logically fits in HIR since the data originates there;
 - the Clearinghouse previously worked well in HIR and would be better able to do its job from a technical standpoint;
 - the data quality of the responses would be improved because of staff attendance at joint meetings and receiving up-to-date information about the implications of the data (e.g. rules and caveats);
 - there would be opportunities for exchange of personnel for personal growth such as details, reassignments, or special projects.
 - The benefits given by one respondent in favor of merging with the FOI office was that they would work together more cooperatively in the same group with the same leader and common goals. Merging with the FOI office would also minimize the back and forth between the offices and facilitate the sharing of databases and other information.

Recommendation

The Office of Planning and Evaluation recommends that the Clearinghouse be administered within HIR in the Directorate of Epidemiology. The FOI office or Epidemiology Directorate would both be good places to have the Clearinghouse function for different reasons: the Clearinghouse function fits well with the FOI office from a process point-of-view and fits well with Epidemiology from a technical standpoint. Our recommendation to have Epidemiology administer the Clearinghouse is based on two reasons: (1) there is a potential for improved data quality and (2) the managers interviewed in the Clearinghouse and HIR agree it is a good fit there.

APPENDIX A

Comments on Draft Clearinghouse Evaluation

We sent a copy of the draft Clearinghouse Evaluation to the respondents for their comments on the accuracy of the report. Although the comments gave us further information, we do not believe that they merit a change in our recommendation. The comments received were as follows:

- “The only comment I would like to make is that in the [Introduction] where you mention that the FOI office is the only office that can process fees, you may want to add that the FOI office is also the only that is delegated or authorized to review public release materials to make the legal decisions regarding the application of the [requirements of the FOI and Consumer Product Safety Acts].”
- “You may want to discuss in the Introduction that prior to the Clearinghouse being moved to Information Services when it was first created that it (the Clearinghouse) has been in Epidemiology since the beginning of the Commission.”
- “I read the report and everything looked accurate and reasonable.”
- “We have no comments to offer on your draft report. Based upon your analysis, I agree with your recommendations.”
- “I found nothing significant that would call for a rewrite except the use of the term "merging" on page 4 to refer to the way in which the Clearinghouse would make its move to another Office or Directorate. "Merging" may imply a loss of the division's own identity.”