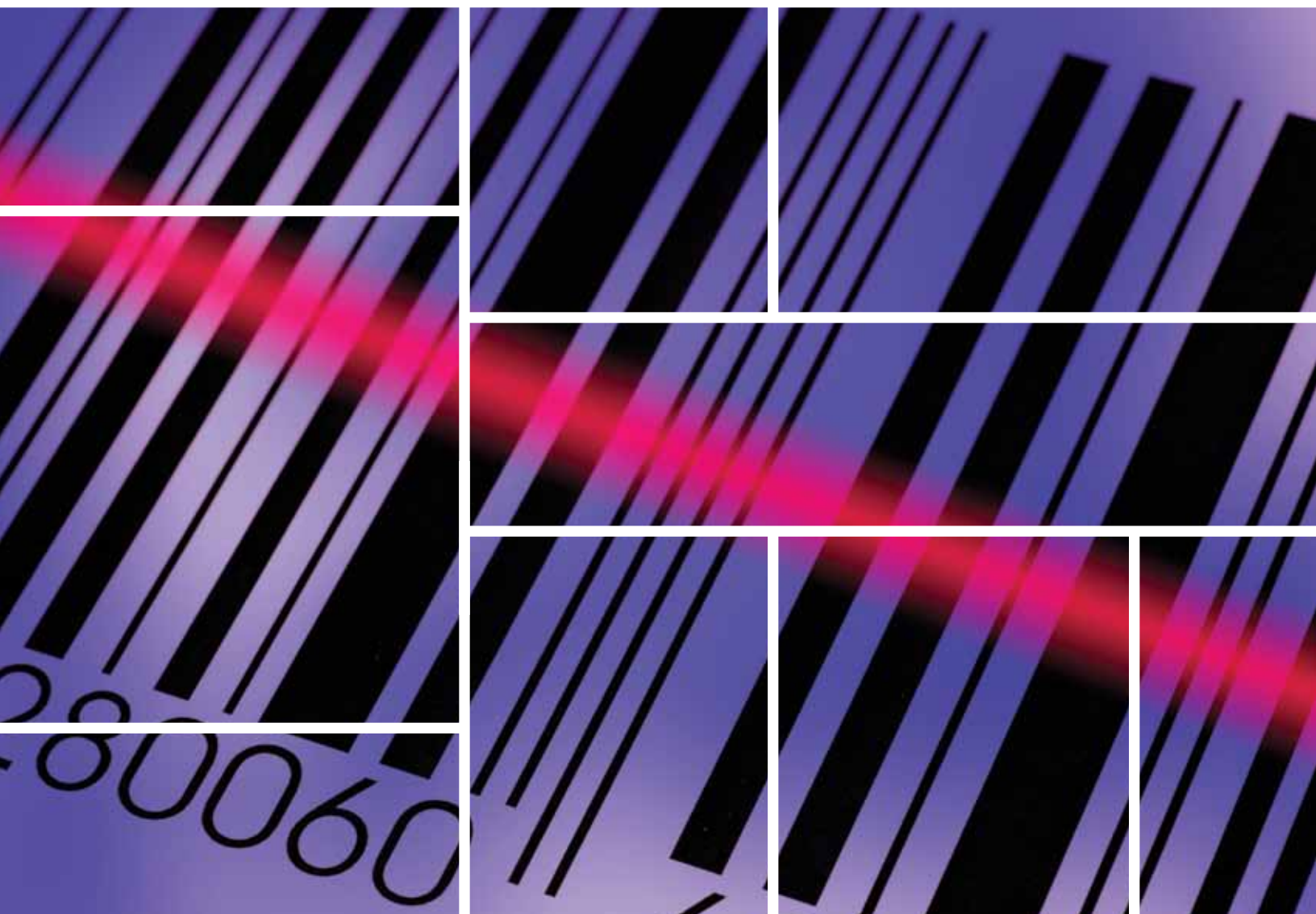


2011-2016 | U.S. CONSUMER PRODUCT SAFETY COMMISSION

# STRATEGIC PLAN



**PROTECTING THE PUBLIC** against unreasonable risks of injury from consumer products through education, safety standards activities, regulation, and enforcement.



## EXECUTIVE SUMMARY

### MISSION

Protecting the public against unreasonable risks of injury from consumer products through education, safety standards activities, regulation, and enforcement.

### VISION

The CPSC is the recognized global leader in consumer product safety.

### GOALS

#### **Goal 1: Leadership in Safety**

Take a leadership role in identifying and addressing the most pressing consumer product safety priorities and mobilizing action by our partners.

#### **Goal 2: Commitment to Prevention**

Engage public and private sector stakeholders to build safety into consumer products.

#### **Goal 3: Rigorous Hazard Identification**

Ensure timely and accurate detection of consumer product safety risks to inform agency priorities.

#### **Goal 4: Decisive Response**

Use the CPSC's full range of authorities to quickly remove hazards from the marketplace.

#### **Goal 5: Raising Awareness**

Promote a public understanding of product risks and CPSC capabilities.



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# MESSAGE FROM THE CHAIRMAN

I am proud to present the United States (U.S.) Consumer Product Safety Commission's (CPSC) 2011-2016 Strategic Plan.

This strategic plan marks the beginning of a remarkable journey to prepare our organization for a more proactive leadership role as we help keep people safe from consumer product hazards.

- For the first time in nearly 24 years we have a full complement of commissioners and their staff, prepared and ready to execute our mission.
- In 2008, the CPSC was granted extensive new regulatory authorities and mandates to improve consumer product safety through the Consumer Product Safety Improvement Act (CPSIA).
- We are developing new tools and building new capabilities, such as a new public information database and a world-class testing laboratory—both of which will help us identify risks more quickly and keep consumers safe.

Our recently completed strategic planning process principally was intended to help align new resources with agency priorities to meet the tremendous challenges we face moving into the twenty-first century. As globalization and technological advances expand the range of products on the market, the risks and opportunities associated with these advancements make the challenge of overseeing and regulating the thousands of product types all the more complex. Some risks include the growth of global supply chains that assemble products across a vast web of interconnected geographies, the difficulty of identifying product

hazards among hundreds of thousands of containers entering our ports, and the new ways in which the public receives information through the Internet and other media sources. These and other new challenges are only likely to grow during the next five years.

To aid the agency in our efforts to address these emerging challenges, Congress provided the CPSC with important new authorities through the CPSIA. This legislation empowers our agency at U.S. ports; directs that longstanding voluntary standards be turned into mandatory standards for various children's products; increases civil penalty amounts and enhances criminal penalty authorities; requires testing and certification of children's products; establishes the lowest lead limits for children's products in the world; and spurred the creation of our first foreign office in Beijing. As an example of our commitment to being better prepared



and informed about the range of threats we now face, our public database, [www.SaferProducts.gov](http://www.SaferProducts.gov), launches next year and will provide consumers and manufacturers with unprecedented access to information about safety concerns and identified consumer product hazards, thus marking the start of an era of consumer-driven hazard monitoring.

**OUR PUBLIC DATABASE, [WWW.SAFERPRODUCTS.GOV](http://WWW.SAFERPRODUCTS.GOV), LAUNCHES NEXT YEAR AND WILL PROVIDE CONSUMERS AND MANUFACTURERS WITH UNPRECEDENTED ACCESS TO INFORMATION ABOUT SAFETY CONCERNS AND IDENTIFIED CONSUMER PRODUCT HAZARDS, THUS MARKING THE START OF AN ERA OF CONSUMER-DRIVEN HAZARD MONITORING.**

In order to fulfill our new mandates and to address emerging threats to consumer safety more quickly, the CPSC has developed a strategic plan that reflects our commitment to proactively reducing consumer product hazards, and we will refine and update this plan in coming years to meet the changing environment of the consumer product arena. This plan is the result of a six-month strategic planning process during which a wide range of internal and external CPSC stakeholders provided comments and participated in the development of the plan. CPSC staff, consumer organizations, industry associations, and partner agencies at the federal and state levels have all contributed to the strategic plan. Many of these stakeholders stressed the importance of the CPSC being the recognized leader in the community of consumer safety practitioners. We also heard from many about the need for the CPSC to be able to recognize emerging hazards quickly and to respond decisively and predictably to remove those hazards from the marketplace. Stakeholders also commented on the desire for the CPSC to form partnerships with others to prevent hazards from emerging earlier in the product life cycle. We engaged

these stakeholders not only to understand their thinking about the challenges and opportunities facing our agency, but also because we, as a smaller agency, will need to partner with each of them to implement fully this strategic plan.

I would like to thank all those who offered their time and insights during the development of our long-term strategy. I would also like to express my gratitude to the CPSC employees who tirelessly dedicate their talents and energy to our important mission each day. It is an honor to serve as the Chairman, and I look forward to working with each of you in the coming months and years as we implement the strategies outlined here.

Very truly yours,

A handwritten signature in black ink that reads "Inez M. Tenenbaum". The signature is written in a cursive, flowing style.

**Inez M. Tenenbaum, Chairman**  
*U.S. Consumer Product Safety Commission*



## INTRODUCTION

### WHAT IS THE CPSC?

The CPSC is an independent federal regulatory agency that protects the public against unreasonable risks of injury or death from consumer products.

The CPSC has jurisdiction over thousands of types of consumer products used in and around the home, outdoors, in the workplace, and in schools—including everything from children's toys to portable gas generators and toasters. While the Commission's regulatory purview is quite broad, a number of product categories fall outside of the CPSC's jurisdiction.<sup>1</sup>

The CPSC accomplishes its consumer protection mandate and strives to ensure that consumer products are free of unreasonable safety hazards through the following core activities:

- facilitating the development of effective voluntary standards with a broad range of stakeholders including consumers, industry, and other representatives;
- issuing and enforcing mandatory standards or banning consumer products if no feasible standard will adequately protect the public;

- initiating the recall or corrective action of products that pose potential risk for serious injury or death;
- conducting research on potential consumer product hazards;
- informing and educating consumers through the news media and social media, state and local governments, private organizations, and responses to consumer inquiries; and
- encouraging industry to implement globally recognized best practices needed to ensure the manufacture of safe consumer products.

The CPSC's regulatory authority extends to manufacturers, retailers, importers, and distributors of consumer products regardless of their size, number of employees, or revenue. The CPSC does not endorse or recommend specific brands of products. Instead, the agency works to promote a safe consumer product marketplace in ways that range from training manufacturers and importers on compliance with the CPSC's principles of product safety to developing robust performance standards.

<sup>1</sup> Product categories such as automobiles and boats; alcohol, tobacco, and firearms; food and drugs; and pesticides, cosmetics, and medical devices are regulated by other federal agencies.

### HISTORY OF THE CPSC

In 1970, a national study<sup>2</sup> found that existing federal legislation on product safety was fragmented—the existing legislative framework addressed a range of products that was too narrow, regulatory statutes for consumer product safety were disconnected, and the existing regulatory approach produced ineffective sanctions. The study also found that legal remedies concentrated on obtaining compensation after injuries from consumer products had occurred, rather than preventing injuries from occurring in the first place.

In response, Congress enacted the Consumer Product Safety Act (CPSA) in 1972, which established the CPSC as an independent regulatory agency headed by five commissioners. Since then, the CPSC's work to ensure the safety of consumer products has greatly contributed to a significant decline in the rate of deaths and injuries from consumer products over the past four decades.

One of the major milestones in the CPSC's recent history was the enactment of the Consumer Product Safety Improvement Act (CPSIA), which became law on August 14, 2008. The purpose of the CPSIA legislation was “to establish consumer product safety standards and other safety requirements for children's products and to reauthorize and modernize the Consumer Product Safety Commission.” Through the CPSIA, Congress equipped the CPSC with new capabilities and resources to protect consumers and their families. Since enactment of the CPSIA, the CPSC increased its staffing levels, escalated its public awareness efforts, and reinvigorated itself as a force for improving consumer product safety. For a more detailed description of the CPSIA, see “Legislative Mandates” in the following section.

<sup>2</sup> United States National Commission on Consumer Product Safety, Final Report presented to the President and Congress, 1970.

### THE CPSC'S LEGISLATIVE MANDATES

In 1972, the CPSA created the CPSC and established the agency's role as a federal body that can identify and act on a wide range of consumer product hazards. As an agency with federal jurisdiction, the CPSC was able to meet the pressing need for increased consumer product safety regulation across state lines during the 1970s and 1980s, when interstate commerce was expanding rapidly. In light of more recent developments, such as increased import volumes, the rise of Internet sales, and globalized supply chains, the CPSC's priorities—to provide outreach and technical assistance to domestic and foreign stakeholders; facilitate the development of voluntary standards and undertake mandatory rulemaking where consistent with statutory authority; issue recalls; and impose civil penalties—are more important than ever.

In addition to its legislative mandates under the CPSA, the CPSC is charged with administering six additional laws, each governing specific areas of consumer product safety:

- **Flammable Fabrics Act (1953)**  
Authorizes the CPSC to issue mandatory standards restricting the flammability of fabrics used to manufacture clothing items. In 1967, Congress expanded the Act to cover the additional categories of interior furnishings and nonfabric raw materials used to manufacture furnishings and apparel.
- **Refrigerator Safety Act (1956)**  
Requires all refrigerators to be equipped with a device that enables the door to be opened from the inside in the event of accidental entrapment.
- **Federal Hazardous Substances Act (1960)**  
States that any product that is toxic, corrosive, flammable, pressure-generating, an irritant, or a strong sensitizer must bear cautionary labeling to alert customers to

the hazard presented. In 1966, the Act was amended to ban any children's product containing a hazardous substance that a child could access. In 1969, the Act was expanded to allow for the ban or regulation of products that are so hazardous that cautionary labeling alone would be insufficient to protect the public from harm.

- **Poison Prevention Packaging Act (1970)**  
Designed to protect children under five from poisonings and deaths that could occur when they open containers of hazardous products and ingest the contents. It requires that a number of household substances be enclosed in containers difficult for children under the age of five to open within a reasonable amount of time.
- **Children's Gasoline Burn Prevention Act (2008)**  
Mandates standards-compliant child-resistant closures on portable gasoline containers.
- **Virginia Graeme Baker Pool and Spa Safety Act (2008)**  
Designed to prevent the hidden hazard of drain entrapments and eviscerations in pools and spas. It requires that all public pools and spas have standards-compliant drain covers installed, as well as additional anti-entrapment systems when there is a single main drain other than an unblockable drain.

### The CPSIA

A string of high-profile product recalls in 2007 and 2008—in particular, numerous recalls involving lead paint in children's toys, powerful magnets falling out of toys, and dangerous cribs—brought renewed attention to the issue of consumer product safety. In response, the 110th U.S. Congress enacted Public Law 110-314, the CPSIA, which updated and expanded the original CPSA and expanded the CPSC's regulatory mandate.

Some of the major provisions of the CPSIA include:

- creating a publicly searchable Web-based database of reports of injury, illness or death, or risks of injury, illness, or death associated with consumer products;
- mandating that the CPSC issue mandatory federal safety standards for durable infant nursery products;
- setting new, stringent limits on lead in the paint of consumer products and on the lead content in the substrate of children's products;
- requiring third-party testing and certification of certain children's products to improve compliance;
- authorizing more direct engagement with foreign consumer product safety agencies;
- conferring greater powers to order mandatory recalls as necessary to protect the public;
- prohibiting the sale or resale of recalled products;
- requiring tracking labels on children's products;
- significantly increasing maximum civil penalties for violators of CPSC laws and enhancing criminal penalty provisions; and
- establishing whistleblower protections for employees of manufacturers, retailers, distributors, and private labelers.

In addition to the safety provisions listed above, the CPSIA legislation also authorized CPSC funding that nearly doubled the pre-CPSIA level, marking a turnaround in a decades-long decline in the agency's annual operating budget and number of assigned staff. The CPSIA restored the Commission to its originally authorized size of five commissioners and allowed for the expansion of the range and depth of its product safety expertise.

### THE CPSC ORGANIZATION

The CPSC is an independent regulatory agency created by Congress. Five commissioners are appointed by the President with the advice and consent of the Senate for staggered seven-year terms and are responsible for setting the Commission's policy.<sup>3</sup> The President appoints one of the commissioners as Chairman. Subject to advice and consent of the Senate, the Chairman serves as the principal executive officer. The CPSC's current Chairman, Inez Tenenbaum, took office in June 2009. The CPSC currently employs more than 500 staff.

### STAKEHOLDER COORDINATION

The CPSC identifies and acts on consumer product hazards that occur at international, national, state, and local levels. In order to accomplish this unique role, the CPSC engages a wide variety of stakeholders and partners. The CPSC engages representatives from these stakeholder groups to gain their perspectives and insights into consumer product safety issues, to identify ways that the agency can improve the services it delivers, and to communicate key consumer product safety messages.

### Consumers

The CPSC's primary stakeholder group is consumers. Protecting them from unreasonable risk of injury or death from consumer product safety hazards is at the heart of the CPSC's mission. Moreover, the CPSC's hazard detection and identification efforts rely heavily on incident reports and other data provided directly by consumers. In March 2011, hazard reporting by consumers will become simpler and more transparent when the CPSC launches its public database, which will allow individuals to more easily identify and report consumer product hazards. The CPSC interacts with consumer

advocacy groups that work to address specific product safety hazards and also those that advocate for particular populations, such as parents' groups or physicians' associations.

### Industry

Some of the CPSC's immediate stakeholders include manufacturers, importers, distributors, and retailers of consumer products. The CPSC conducts much of its work with industry through manufacturers' associations and other trade groups. The CPSC works with industry throughout the chain of commerce to accelerate the implementation of globally recognized best practices that help ensure the manufacture and distribution of safe consumer products.

### Congress and Federal Agencies

The CPSC engages a wide range of U.S. government partners. Congress provides guidance and oversight of the CPSC's work through a variety of mechanisms, including passage of product safety legislation, congressional inquiries into specific issues, and assessment reports produced through congressional bodies such as the Government Accountability Office (GAO). The CPSC also works closely with a range of federal agencies such as the Customs and Border Protection (CBP), the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), the Food and Drug Administration (FDA), the Environmental Protection Agency (EPA), and the National Highway Traffic Safety Administration (NHTSA).

### State Governments

State officials are also important partners for the CPSC, and the agency has historically recognized the role that state and local governments play in protecting the health and safety of consumers. Balancing the mission of the agency with legitimate prerogatives of

<sup>3</sup> The Act requires that no more than three commissioners be affiliated with the same political party.



the states, the Commission has developed a cooperative approach with the states, which includes commissioning qualified employees of state or local agencies as officers of the CPSC for the purpose of conducting investigations and inspections. It provides states with model legislation and standards for consideration and makes federal standards and regulations available as they are developed so that possible effects on state and local government regulations can be considered by the CPSC and states. In addition, the CPSC contracts with several states to perform functions in areas such as compliance, information and education, and injury surveillance. The agency works in cooperation with the offices of the states' attorneys general to collaborate on enforcing state and federal regulations for consumer product safety where possible and coordinate responses to large-scale safety hazards. The CPSC maintains continuous communications with national organizations and civic associations of government employees, such as the National Association of State Fire Marshals (NASFM) and the Safe States Alliance, and involves representatives of these organizations in the CPSC's planning process.

### International Stakeholders

Increasingly, international cooperation is the means by which consumers are protected from hazardous and noncompliant consumer products since a product that cannot be sold legally anywhere in the world is much less likely to be manufactured.

The Commission works with partners in the Western Hemisphere, especially Canada and Mexico; with the European Union at both the central and member-state levels; with key supplier countries, particularly China; and with the emerging exporting countries in East Asia. With developed consumer markets, the focus is on cooperation with government product safety agencies on requirements and common concerns about conformity assurance from supplier countries. This cooperation occurs on a bilateral basis and in international venues such as the International Consumer Product Safety Caucus (ICPSC) and the Organization for Economic Cooperation and Development (OECD). With supplier countries, the emphasis is on outreach and capacity building to ensure that products are manufactured to meet U.S. safety requirements. This includes cooperation with their national product safety authorities and in-country training for their suppliers, working with other partners whenever possible. The CPSC also provides English and foreign language text, video, and interactive training for foreign suppliers via Web-based materials.

### PARTNERSHIP WITH THE CUSTOMS AND BORDER PROTECTION

In 2008, the CPSC increased its coordination with the CBP to strengthen the oversight of imported consumer products by creating a new Import Surveillance Division. This division marks the first permanent, full-time presence of CPSC investigators at key U.S. ports of entry. The effort involved increasing the number of staff colocated with the CBP at U.S. ports of entry, implementing memoranda of understanding (MOUs) designed to enhance information sharing, and jointly inspecting importers and manufacturers of consumer products under the CPSC's jurisdiction.



The CPSC was also invited by the CBP to participate in the Commercial Targeting and Analysis Center (CTAC), a collaborative center for agencies to share targeting resources, analysis, and expertise to achieve the common mission of protecting consumers from unsafe imports. In addition to the CBP and the CPSC, the government agencies represented at CTAC include the FDA and the U.S. Department of Agriculture's Food Safety Inspection Service. This initiative allows the CPSC to access manifest entry data collected by the CBP and to target shipments prior to entry into commerce.

The CPSC is also a participating government agency in the Automated Commercial Environment/International Trade Data System initiative, which will provide a single portal for the trade members to file documentation related to imported products. It will also streamline processing of those shipments by pertinent U.S. government agencies.

The Importer Self Assessment Product Safety Pilot Program is a partnership among the CBP, the CPSC, and importers to ensure product safety compliance. It is based on a voluntary approach that provides meaningful benefits for importers who demonstrate readiness to assume

responsibilities for managing and monitoring their own product safety compliance.

By strengthening cooperative ties with the CBP through collocation, updated MOUs, and joint enforcement programs, the agencies have successfully prevented various harmful consumer products including toys, children's jewelry, all-terrain vehicles (ATVs), mattresses, fireworks, and lighters from entering U.S. commerce.

### Strategic Planning

There are many domestic and global trends that influence consumer product safety and CPSC operations. These external drivers include changes in consumer needs, legislative mandates, technological advancements, and socio-economic trends (see Figure 1). Because these trends change over time, the CPSC must periodically review its organizational strategy and update its strategic plan to ensure that it is doing all it can to protect consumers from unreasonable risks of injury from consumer products.

To ensure that the CPSC can continue to implement the provisions of the CPSIA and its other legislative mandates in an effective manner, meet the Government Performance and Results Act (GPRA) requirement to periodically update its strategy, and be responsive to the global consumer product environment's changing realities, the agency launched a comprehensive strategic planning initiative.

The research and planning steps the CPSC undertook to prepare the 2011-2016 Strategic Plan included:

- a comprehensive review of documents pertinent to the strategic planning process including legislative mandates and guidance, federal agency reports, and assessments of socio-economic trends affecting the consumer product environment;

- interviews and focus groups with 76 internal and external stakeholders to obtain feedback on the CPSC's successes and how the agency can improve in the future (these individuals and groups included a diverse cross-section of stakeholders: consumer organizations, industry associations, the CPSC headquarters staff, the CPSC field staff, other federal agencies, and states' attorneys general);
- a strategic visioning session and objective-writing workshops for CPSC leadership and senior managers to explore feedback received from internal and external stakeholders;
- action planning sessions for CPSC leadership to identify immediate and longer-term action steps that will allow the agency to realize its stated goals and objectives; and
- performance management workshops in which CPSC managers formulated performance measures and indicators for tracking agency progress towards each of its goals.

Figure 1: Key Drivers of the CPSC's Strategic Plan







## MISSION, VISION, GOALS, AND OBJECTIVES

The 2011–2016 Strategic Plan lays out an approach to execute the broad mission to help keep people safe and prevent hazardous consumer products from entering the marketplace.

The enduring purpose of the agency is articulated in the mission statement. The CPSC's vision provides an inspirational ideal for staff and stakeholders to work toward over the next five years. This vision evokes an agency recognized for the leadership role it must play in the future to lead and support all who seek to improve consumer product safety.

To enable the mission and vision, the CPSC developed five strategic goals to guide the activities and outcomes it delivers to the American public. These goals combine well established successes in the CPSC's existing operations with new initiatives that enhance the CPSC's ability to meet challenges and advance consumer product safety in an increasingly globalized and networked world.

Within each goal, a range of programmatic objectives outline the actions the agency must carry out to accomplish and measure progress against each strategic goal.

### MISSION

Protecting the public against unreasonable risks of injury from consumer products through education, safety standards activities, regulation, and enforcement.

### VISION

The CPSC is the recognized global leader in consumer product safety.

### GOALS

The CPSC's 2011–2016 goals are:

**Goal 1: Leadership in Safety**

Take a leadership role in identifying and addressing the most pressing consumer product safety priorities and mobilizing action by our partners.

**Goal 2: Commitment to Prevention**

Engage public and private sector stakeholders to build safety into consumer products.

**Goal 3: Rigorous Hazard Identification**

Ensure timely and accurate detection of consumer product safety risks to inform agency priorities.

**Goal 4: Decisive Response**

Use the CPSC's full range of authorities to quickly remove hazards from the marketplace.

**Goal 5: Raising Awareness**

Promote a public understanding of product risks and CPSC capabilities.

The following pages present each goal in detail.



## GOAL 1: LEADERSHIP IN SAFETY

Take a leadership role in identifying and addressing the most pressing consumer product safety priorities and mobilizing action by our partners.

**Goal Context:** As international trade expands and supply chains become more global—making available an ever-growing number of consumer products that feature an increasingly wide spectrum of technologies and materials—the potential for new safety hazards will continue to grow. Regulatory agencies, standards organizations, and consumer and industry groups worldwide are working to address consumer product safety across multiple geographies and priorities.

- In 2008, over 35 million people in the U.S. sought medical attention for injuries related to, although not necessarily caused by, consumer products.
- Over the past five years, the CPSC handled an average of 473 product recalls annually, involving 116 million recalled items from around the world.
- In the U.S. and around the world, it is estimated that there are hundreds of traditional and non-traditional standards development bodies comprised of subject matter experts who address technical requirements of product safety standards within their area of expertise.

### Leadership in Safety

The CPSC will be at the forefront of advancing the agenda for consumer product safety. Working with key global and domestic stakeholders, the CPSC will mitigate the most pressing product safety hazards by effectively determining the actions necessary to address these priorities and clearly establishing accountability for progress.

### Objectives

- **1.1** Determine the most critical<sup>4</sup> consumer product hazards and issues to define the Commission's annual priorities consistent with the agency's regulatory requirements.
- **1.2** Create and strengthen partnerships with domestic and international stakeholders aimed at improving product safety throughout the supply chain.

- **1.3** Collaborate with partners ranging from state and federal authorities, colleges and universities, and other stakeholders to expand the CPSC's effectiveness and reach.
- **1.4** Work towards harmonizing global consumer product standards or developing similar mechanisms to enhance product safety.
- **1.5** Promote and recognize innovation and advancements in consumer product safety.
- **1.6** Attract, retain, and collaborate with leading experts to address consumer product hazards.

### Why This Strategy Will Work

By establishing a clearly defined leadership agenda that lays out the CPSC's priorities for addressing consumer product safety hazards and mobilizing domestic and international stakeholders, the Commission can target its limited resources and collaborate with partners to improve product safety.

<sup>4</sup> Determination of the most critical consumer product hazards will be based on the criteria currently used to establish the Commission's annual priorities: frequency and severity of injuries, addressability of injuries, chronic illness and future injuries, cost/benefit, unforeseen nature of the risk, vulnerability of the population at risk, and the probability of exposure to the hazard.

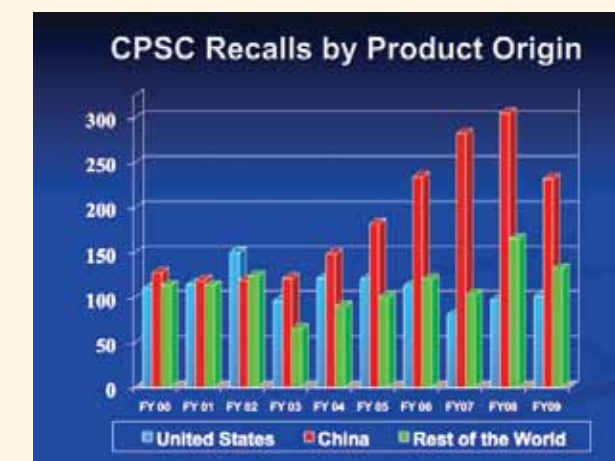
## GLOBALIZATION OF THE SUPPLY CHAIN

The CPSC's work to monitor the universe of consumer products for safety hazards and dangerous defects requires an increasingly global focus. The value of U.S. imports under the CPSC's jurisdiction has skyrocketed in recent years, reaching about \$639 billion in 2008.<sup>5</sup> The value of all U.S. imports of consumer products from China and Hong Kong more than quadrupled from 1997 to 2008, accounting for the largest component of the overall increase in imports. Moreover, four out of five consumer product recalls involve imported products, making imports a critical focus area for the CPSC. With over \$1.5 billion in container import shipments entering the U.S. each day—received by over 800,000 importers and entering through 300 different ports—monitoring the quality of all imported consumer products is an extremely challenging task.<sup>6</sup>

In addition to the increasing volume of imports, equally daunting is the complexity of global supply chains. One recent study<sup>7</sup> found that 10 leading European brands relied on 522 production locations in more than 30 cities, across 24 countries. Today, a single product can contain safety-critical components provided by between 10 and 100 different suppliers, making the task of promoting product safety at each stage of the supply chain increasingly difficult. New product tracking technologies, international cooperation on conformity testing and standards, and closer cooperation with the CBP are critical initiatives in addressing the growing complexity and risk entailed with additional global sources of production.

A shift is underway in the countries that generate the greatest volumes of global trade. Over the last five years, the rapidly industrializing nations of India and Thailand joined other developing nations such as China, Mexico, Brazil, and Malaysia on

the list of the world's top 25 exporters.<sup>8</sup> Countries fortunate enough to benefit from explosive growth in export volumes also face the challenge of implementing quality control systems that can keep pace with production. Where those systems are lacking, and where domestic regulation is not effective, product safety can suffer. The CPSC uses its authority to encourage importers to ensure that their suppliers implement those practices necessary to develop safe products. It also provides training and guidance to foreign manufacturers to help them meet U.S. product safety requirements. One of the ways the CPSC is



reducing the number of unsafe imported products entering the U.S. marketplace is by strengthening its bilateral and multilateral relationships with foreign regulators and manufacturers. According to the *Organization for Economic Cooperation and Development's (OECD) 2008 Report on Consumer Product Safety*, bilateral engagements successfully facilitate the exchange of information on consumer product safety issues and serve as a mechanism for coordinated actions against unsafe products. Similarly, multilateral consumer product safety engagement encourages the sharing of lessons learned among a broader group of nations to improve the effectiveness of product safety oversight.

<sup>5</sup> Calculated by the CPSC's Directorate for Economic Analysis calculations based on U.S. International Trade Commission data.

<sup>6</sup> *Interagency Working Group on Import Safety Action Plan for Import Safety: A Report to the President*. November 2007.

<sup>7</sup> Marcello Manca, Vice President & General Manager, UL Environment Inc. *The European Product Safety System and the Supply Chain*. Organization for Economic Cooperation and Development (OECD) Conference on Corporate Responsibility on July 15, 2009; page 9.

<sup>8</sup> *Central Intelligence Agency World Factbook 2009 and World Factbook 2004*.



## GOAL 2: COMMITMENT TO PREVENTION

Engage public and private sector stakeholders to build safety into consumer products.

**Goal Context:** The number of products available to U.S. consumers has grown, and many products now come directly from trading partners outside of the country. The challenge is that the majority of consumer product hazards and safety defects arise in very early stages of the supply chain, including product design and the selection and use of raw materials. Additionally, given the range of products that domestic and international regulatory agencies face, enforcement activities alone are unlikely to preclude preventable product hazards from occurring.

- During the first half of 2010, the CPSC screened over 4,100 import samples at U.S. ports of entry.
- In 2009, the CPSC collected over 1,500 import samples for testing in CPSC laboratories.
- From 1998 to 2007, consumer products imported into the U.S. from China (including Hong Kong) nearly quadrupled to constitute about 42 percent of all imported consumer goods.<sup>9</sup>

### Commitment to Prevention

The CPSC will protect consumers by promoting the production of safe products and the development and implementation of safety standards. This will enable industry compliance with safety standards at various stages of consumer product development and distribution. By encouraging industry leaders and foreign safety agencies to focus on safety early in the global supply chain, the CPSC will help prevent hazards from entering consumer markets.

### Objectives

- **2.1** Minimize hazardous defects early in the manufacturing process through increased participation in voluntary standards activities.
- **2.2** Improve the safety of consumer products by issuing mandatory standards, where necessary and consistent with statutory authority, in response to identified product hazards.
- **2.3** Facilitate the development of safer products by training industry stakeholders on the CPSC regulatory requirements and hazard identification best practices.

- **2.4** Develop programs that provide incentives for manufacturers and importers to implement preventive actions that enable the safety of their products.
- **2.5** Engage foreign product safety regulators and foreign manufacturers to reduce the production of unsafe consumer products that may enter the U.S. market.

### Why This Strategy Will Work

Preventing hazards from entering the marketplace is one of the most effective ways that the CPSC can protect consumers. The CPSC participates in the development of new safety standards, creates regulations, educates manufacturers on those safety requirements so that safety is built into consumer products. The CPSC has made significant progress toward successfully creating stronger mandatory standards pursuant to the CPSIA and will continue additional rulemaking as appropriate. The CPSC will also continue working with the consumer product community to create voluntary standards and will use a combination of training and incentive programs to assist and encourage industry to build safer consumer products.

<sup>9</sup> Government Accountability Office (GAO), *Better Information and Planning Would Strengthen CPSC's Oversight of Imported Products*. GAO 09-803, August 2009.

## SAFETY STANDARDS

Consumer product safety standards play a vital role in protecting the public from hazardous products. By working to establish safety standards for consumer product manufacturers, the CPSC can “raise the bar” for industry and prevent hazards from ever reaching the marketplace.

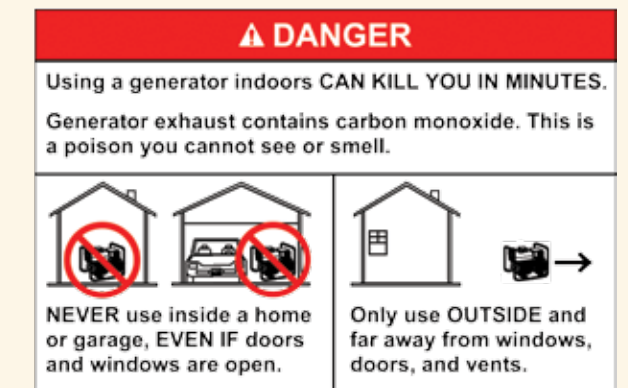
Consumer product safety standards fall into two categories: voluntary standards and mandatory standards.

### Voluntary Standards

In general, the CPSC's statutory authority requires it to rely on voluntary standards to build safety into consumer products if the Commission determines that compliance with a voluntary standard is likely to result in the elimination or adequate reduction of the risk of injury identified and that there will be substantial compliance with the voluntary standard. Voluntary standards for consumer products are developed based on consensus within voluntary Standards Development Organizations (SDOs) that are composed of industry, agency, and consumer representatives. While the CPSC has no direct regulatory authority to enforce adherence to these standards, many industry partners make efforts to comply with the standards because they represent an agreement among industry and other SDO members. When CPSC staff members identify the need for a voluntary standard, they submit a recommendation to an SDO based on consumer product incident data and analysis of that data. Typically, an SDO organizes a group to perform a technical assessment and prepares a draft standard for public comment. During this comment period, the CPSC staff provides expert advice, technical assistance, and clarifying analyses. After evaluating and incorporating public comment on the proposal, the group developing the standards provisions votes on the final voluntary standard (the CPSC does not vote on the standard). Once the voluntary standard is approved, it usually becomes the recognized norm for that industry group and product type.

### Mandatory Standards

Mandatory standards are federal rules, set by statute or regulation, that usually define the required performance standards consumer products must meet, or warnings consumer products must have, to be sold in the U.S. The CPSC may create a mandatory standard when it determines that compliance with a voluntary standard would not eliminate or adequately reduce a risk of injury, or it is unlikely that there will be substantial compliance with a voluntary



standard. The Commission may also promulgate a mandatory ban of hazardous products when it determines that no feasible voluntary or mandatory standard would adequately protect the public from an unreasonable risk of injury. In some cases the Commission, by law, considers whether a specific voluntary consumer product safety standard should become a mandatory standard. If the CPSC determines that a mandatory standard or ban is necessary, the Commission uses a highly participatory process to create the standard or ban by soliciting comments from consumers, industry groups, government partners, and any other interested stakeholders. When a mandatory standard is promulgated by the CPSC, it applies across the entire chain of distribution, including manufacturers, distributors, and retailers. Mandatory standards are enforceable by the CPSC, allowing the agency to stop at the ports products that do not meet federal requirements and to seek civil or criminal penalties for violations of the mandatory standard.



## GOAL 3: RIGOROUS HAZARD IDENTIFICATION

Ensure timely and accurate detection of consumer product safety risks to inform agency priorities.

**Goal Context:** Information on injuries, deaths, and other consumer product safety incidents comes from a wide range of sources including consumers and consumer groups, hospitals and clinics, and industry. This diversity of information providers makes it challenging to monitor, standardize, and compare safety data to track known hazards and to identify new ones. The 2011 launch of the CPSIA-mandated public database ([www.SaferProducts.gov](http://www.SaferProducts.gov)) will create new opportunities and challenges for data management as will the growing need to collect data about the used/resale markets for consumer products.

- On average, the CPSC collects more than 360,000 National Electronic Injury Surveillance System (NEISS) reports, 8,000 death certificates, and more than 23,000 manufacturer and retailer reports on product safety concerns each year.
- In 2009, the CPSC received about 15,000 incident reports from the [www.cpsc.gov](http://www.cpsc.gov) Web site and the Hotline.
- Each year, the CPSC receives numerous formal congressional inquiries, as well as hundreds of other consumer, media, and federal and state inquiries related to product hazards that have been identified.

### Rigorous Hazard Identification

The CPSC must quickly and accurately determine which hazards represent the greatest risks to consumer safety. Using a systematic and transparent framework, based in science, to assess and track hazard data in a consistent manner, the CPSC will proactively detect safety threats for the thousands of product types under its jurisdiction. Using reliable data, the CPSC will continuously identify hazards that represent the greatest addressable risks to guide the agency's efforts and resources.

### Objectives

- **3.1** Improve the quality and comprehensiveness of crucial product hazard data.
- **3.2** Reduce the time it takes to identify hazard trends by improving the collection and assessment of hazard data.
- **3.3** Establish a transparent, risk-based methodology to consistently identify and prioritize hazards to be addressed.
- **3.4** Expand import surveillance efforts to reduce entry of unsafe products at U.S. ports.

- **3.5** Scan the marketplace regularly to determine whether previously identified significant hazards exist in similar products.
- **3.6** Increase surveillance of used and resale consumer products to identify and remove recalled products and substantial product hazards.

### Why This Strategy Will Work

The ability to effectively obtain, organize, and analyze information is critical to the timely detection of potential consumer product hazards. The CPSC is making significant investments in information technology (IT) to enhance and streamline hazard detection processes. The Consumer Product Safety Risk Management System (CPSRMS) will simplify how consumers, industry, health officials, and others report safety incidents while standardizing how relevant data is captured to enable expanded and expedited collection and analysis by the CPSC. The CPSC is also modernizing its IT systems and processes to improve its complex analytics capabilities. Additionally, expanding efforts to share critical information with federal agencies such as the CBP's Commercial Targeting and Analysis Center (CTAC) will foster more comprehensive hazard identification capabilities.

## PUBLIC DATABASE

The CPSC's public database, [www.SaferProducts.gov](http://www.SaferProducts.gov), is one of the agency's most ambitious new initiatives. Scheduled for launch in March 2011, the database will allow consumers and others to submit reports of harm in a Web-based, publicly searchable format to the CPSC.

The database will be designed with the needs of multiple types of users in mind. Creation of the database is being guided by a series of public hearings, focus groups, joint workshops with CPSC staff, and a rulemaking to determine how consumers, manufacturers, and consumer advocates expect to use the database and how they think it should work. The new database will make it easier for consumers, health officials, and any other member of the public to report safety incidents and to also view publicly reported incident information that the CPSC has collected from database users.

For example, when a user logs into the database to report an injury, he or she will be prompted to enter product information into the system to determine whether the product in question falls under the CPSC's jurisdiction. If so, the user will be offered a range of methods to submit the report, including e-mail, phone, postal mail, or directly via the Web. Submitted reports will capture information provided by users, such as the details of the incident; the nature of the injury or risk of injury; and product information including the manufacturer.

Users who choose to submit through [www.SaferProducts.gov](http://www.SaferProducts.gov) will have an opportunity to review, save, and print their report during the submission process. The manufacturer associated with any given report will also receive a copy of the report and they may submit comments on the report which will also be posted to the public database. As more reports are added to the system, the

searchable database will allow the public to determine whether products they already own, or are considering buying, are associated with safety hazards. The database will also provide manufacturers with real-time notification of incidents involving their products.

Implementation of the public database represents a new approach to consumer product safety in which consumers will play an important role in assisting the CPSC to identify problematic consumer products early through transparent collaboration and two-way information sharing. The new approach increases the Commission's focus on preventive efforts by more quickly identifying consumer product hazards and making safety-related information readily available to consumers.





## GOAL 4: DECISIVE RESPONSE

Use the CPSC's full range of authorities to quickly remove hazards from the marketplace.

**Goal Context:** The longer a hazardous product remains on store shelves and in homes, the greater the potential for that hazard to cause injuries and deaths. Moreover, both industry and consumer groups demand that response and enforcement efforts be predictable and carried out in a consistent manner. The passage of the CPSIA legislation expanded the CPSC's rulemaking and regulatory authorities, but also increased the number of enforcement functions the agency must now carry out.

- In the U.S., over 500,000 retail firms sell consumer products.
- On average, the CPSC addresses 900 violations of consumer product safety rules each year.
- In 2009, the CPSC negotiated \$9.8 million in civil penalties through out-of-court settlements.

### Decisive Response

Once hazardous products have been identified, the CPSC will take action to protect consumers, remove the products from the marketplace, and hold violators accountable. To do this, the CPSC will determine the level of risk posed by the product hazard and select the appropriate course of action and commensurate level of resources to address the risk.

### Objectives

- **4.1** Expand the CPSC's ability to conduct a full range of inspections to monitor for noncompliant and defective products.
- **4.2** Use a risk-based methodology to prioritize the CPSC's targeted response to addressable product hazards.
- **4.3** Increase the effectiveness and speed of recalls of noncompliant and defective products.
- **4.4** Reduce the time it takes to inform consumers and other stakeholders of newly identified hazards and the appropriate actions to take.
- **4.5** Hold violators accountable for hazardous consumer products on the market by utilizing enforcement authorities.

### Why This Strategy Will Work

In order to quickly remove hazards from the marketplace, the CPSC will more expediently apply the right resources to address priority hazards. By developing a transparent, rigorous, risk-based methodology, the CPSC will have a consensus-based tool for prioritizing its responses to those risks. By aligning its timely response operations to prioritized product hazards, the CPSC will be able to take effective action on the most pressing consumer product hazards.

## SAFE SLEEP CAMPAIGN

To protect the most vulnerable users of consumer products—children and infants—the CPSC launched the Safe Sleep Campaign in 2010 to achieve several aims. First, the campaign seeks to remove recalled and dangerous nursery products from homes. Second, it promotes widespread adoption of next-generation juvenile products. Third, it works to educate parents and caregivers about the most effective ways to make a nursery safe.



One of the campaign's major successes is the Safe Sleep Environment Team. This multidisciplinary team of experts from the CPSC's compliance, engineering, health sciences, epidemiology, legal, and public affairs divisions was created to coordinate all crib, bassinet, and play yard recalls and more rigorously apply the CPSC's Early Warning System to the issue of safe child sleep. The Early Warning System utilizes multidisciplinary teams of subject matter experts (SMEs) to assemble and evaluate consumer product injury and death data collected from multiple sources. SMEs meet weekly to review all safety incidents from the prior week that involve cribs, bassinets, or child play yards. The team identifies key hazard scenarios, modes of product failure, and incident patterns, and, when possible, the team also obtains samples of the product in question.

Other elements of the Safe Sleep Campaign include:

- initiating a national safe sleep awareness campaign through videos and educational materials for new parents that discusses soft bedding hazards and sleep product recalls, and
- analyzing the effectiveness of repair kits to determine the best way to help consumers respond to juvenile product recalls.

As part of the Safe Sleep Campaign the CPSC leads efforts to develop new performance standards for cribs in cooperation with ASTM International. The aim of this endeavor is to ensure that parents of any age or financial status can have full confidence in the safety of their children's cribs. In June 2010, ASTM International announced that the crib performance standards had been approved as voluntary standards, and in July 2010, the CPSC voted to approve the standards as proposed mandatory federal standards.

## COMPLIANCE AND ENFORCEMENT RESPONSE

The CPSC takes a multifaceted approach to addressing incidents and injuries. Field staff investigates reports of incidents and injuries; conducts inspections of manufacturers, importers, and retailers; and identifies potential regulatory violations and product defects that could harm the public. The CPSC also responds to industry-generated reports and directs its technical staff to determine which of the possible violations and defects warrant corrective action. Industry has an opportunity to streamline the recall process by participating in the Fast Track Recall Program<sup>10</sup> to immediately remove hazardous products from the marketplace.

Between 2008 and 2010, CPSC staff responded to nearly 1,400 reports filed by industry for potentially unsafe products. Staff also conducted nearly 1,400 recalls of defective and violative products subject to CPSC regulatory requirements affecting over 400 million consumer products. Additionally, nearly 2,600 regulatory violations were identified and corrected, and nearly 750 Fast Track recalls were conducted. These actions reduced injuries and saved lives.

<sup>10</sup> If a company suspects a product could be hazardous, the company must report it to the CPSC and may propose a plan for Fast Track recall. If the CPSC staff considers the firm's plan satisfactory and finds no other cause for concern in its review, it approves the plan and works with the firm to expedite the recall to begin within 20 days of the initial report to the CPSC. This saves the government and company time and money, and removes dangerous products from the marketplace faster.



## GOAL 5: RAISING AWARENESS

Promote a public understanding of product risks and CPSC capabilities.

**Goal Context:** Consumers, advocates, industry, and partner government agencies each desire useful and timely information about consumer product safety issues in order to make informed choices. However, these audiences have different information needs, and each responds best to different methods of communicating information. With the rapid increase in the use of social media and Web-based communications, the options for conveying consumer product safety information continue to grow.

- Each year, the CPSC must inform the public of hundreds of new product safety issues.
- By 2050, the population of the U.S. is forecast to reach 438 million, with nonnative English speaking immigrants accounting for the majority of that growth.<sup>11</sup>
- From 2005 to 2009, CPSC Web site traffic increased 200 percent; its safety blog received 1,000 views per day on average in June 2010; its Twitter messages received 6.3 million views in March 2010; and its YouTube Crib Safety video received 4,500 views the first day it was broadcast in June 2010.

### Raising Awareness

The CPSC will use a wide array of communication channels and strategies to provide the public with timely and targeted information about safety issues and CPSC capabilities. This information will empower consumers to make informed choices about the products they purchase and how to safely use them, to be aware of hazardous products in the market, and to act quickly if they own a recalled product. Additionally, the information will make industry aware of the hazards they must address to maintain safe products.

### Objectives

- **5.1** Increase awareness of the CPSC to ensure the public knows where to turn for information on consumer product safety, where to report hazardous incidents, and knows about the enforcement capabilities used to address product dangers.
- **5.2** Provide stakeholders with easily accessible, timely, and useful safety information on consumer product hazards.

- **5.3** Deploy targeted outreach campaigns for priority hazards and vulnerable communities.
- **5.4** Increase access to consumer product safety information for industry and small businesses.

### Why This Strategy Will Work

Raising awareness is crucial to empowering consumers to make informed safety choices. The CPSC has had success in educating the public through increased use of social media to communicate safety messages and through targeted campaigns such as “Safe Sleep” and “Pool Safely” that aim to reach the most vulnerable populations affected by certain product hazards. Because of the CPSC’s previous efforts in social media and other information distribution and engagement methods, visits to the CPSC Web site increased to approximately 40 million in 2009, and the CPSC launched “CPSC 2.0” in 2009 to expand its reach via Web-based communications. More detailed targeting of awareness outreach efforts will increase the number of consumers reached by the CPSC and improve their ability to make informed decisions.

<sup>11</sup> Jeffrey S. Passel and D’Vera Cohn. *U.S. Population Projections: 2005–2050*. Pew Research Center, 11 February 2008.

## COMMUNICATION

### Social Media

“CPSC 2.0,” the agency’s social media initiative, was launched in September 2009 as a key initiative of Chairman Tenenbaum’s effort to increase the number of consumers who know about the CPSC and who respond to safety information. Whitehouse.gov, along with numerous blogs and other traditional media sources, highlighted the rollout of the initiative on the OnSafety blog, the @OnSafety Twitter account, a YouTube channel, a recall widget, and a Flickr page. The CPSC instantly delivers recall information to consumers through its @OnSafety account, with more than 4,000 followers and an overall reach of five to seven million people for large recalls. The YouTube account, [www.youtube.com/USCPSC](http://www.youtube.com/USCPSC), includes demonstration videos, advice for consumers, speeches from the Chairman, and recall information. Internet videos are a unique way for consumers to instantly see and learn about harmful products that may spur them to act immediately if they own a recalled product. The CPSC’s blog, [www.cpsc.gov/onsafety/](http://www.cpsc.gov/onsafety/), is becoming popular with consumers who are looking for a different perspective on a recall announcement or safety campaign—a perspective that is tailored to answering their questions or concerns about how to keep their family safe. The recall widget is a vital tool that spreads the agency’s recall information to millions of consumers who operate or visit blogs. This low-cost, high-impact new media initiative was recently expanded to include a recall application.

### Neighborhood Safety Network (NSN)

The CPSC created the NSN for organizations to distribute critical safety information to consumers who might otherwise not receive it. More than 4,000 individuals and organizations from around the world share lifesaving safety information with neighbors, communities, friends, and family who may not be aware of the hazards that exist in and around the home. NSN members are well respected in their community and can deliver safety messages directly to their constituents. Members include tribal leaders, fire departments, Safe Kids coalitions, health care providers, elected officials, and Blue Cross/Blue Shield subscribers. For example, the South

Carolina Department of Disabilities and Special Needs forwards information to more than 50 providers who deliver services to children with disabilities so they can assist in spreading messages to keep children safe. Organizations in the network receive messages from the CPSC about crib safety, choking hazards, helmet use, hazards that affect the elderly, ATV safety, and breaking news about recalls, among other items. The CPSC has a variety of free publications, posters, and checklists that are provided to members in an electronic tool kit to help communities and consumers create their own safety programs.

### Minority Outreach

The CPSC is committed to a better understanding of whether particular racial or ethnic groups are disproportionately affected by product-related hazards, with an emphasis on child death rates associated with drowning, strangulation or suffocation in bed, and poisoning. Due to past data limitations, however, the CPSC has not analyzed potential disparities relating to consumer products under its jurisdiction. The CPSC is currently working to leverage its own information, and that collected by other federal agencies, hospitals under contract with the CPSC, and others, to better identify, to reduce, or to eliminate any such disparities. Further, the CPSC endeavors to increase and improve consumer information efforts targeted to minority and underserved communities, and to measure the impact of its efforts. On a grassroots level, the CPSC organized a minority outreach team in 2010 that developed materials and participated in community events in several cities. Additional events are being planned, and partnerships with minority media, grassroots organizations, universities, colleges, and state and local governments already have been established. These activities and collaborative partnerships are designed specifically to increase awareness about four critical safety hazards that affect consumers in the home: safe sleep environment, poison prevention, pool and spa safety, and TV and furniture tip-over prevention.



## NEXT STEPS: IMPLEMENTATION OF THE STRATEGIC PLAN

The 2011–2016 Strategic Plan lays the foundation for the CPSC's planning, budgeting, and performance management for the next five years. By creating a long-term plan and aligning agency operations to support this plan, the CPSC will be better prepared to make important programmatic and administrative decisions. The CPSC engaged in a series of action planning sessions and metric development processes to execute the plan.

### Performance Measures

The CPSC's next task is to implement the strategic plan. As a part of the planning process, the agency identified specific performance measures to support the accomplishment of the strategic goals on an annual basis. The CPSC developed a thorough inventory of the existing performance measures and compared those measures to the new strategic goals and objectives to determine what new performance measures are needed. Next, the CPSC convened working groups to identify actions and new performance measures for each of the strategic goals and corresponding objectives to demonstrate the results of its programs and activities. Over the next year, the CPSC will develop baselines for the performance measures, and revise the objectives and performance

measures as needed. As the CPSC aligns its performance measures to the new long-term goals and objectives presented in this plan, the performance against key agency measures will be reported in the Performance and Accountability Report (PAR) each year and will guide the preparation of future budget submissions.

### Strategic Plan Updates

While this strategic plan adopts a long-term perspective, the CPSC will periodically assess the progress and refine the goals and objectives in this plan every three years or less in accordance with the GPRA to meet the needs of the changing consumer product safety environment.

## APPENDIX A: MISSION, VISION, GOALS, AND OBJECTIVES

### MISSION

Protecting the public against unreasonable risks of injury from consumer products through education, safety standards activities, regulation, and enforcement.

### VISION

The CPSC is the recognized global leader in consumer product safety.

### GOALS AND OBJECTIVES

Goal 1: Leadership in Safety	Goal 2: Commitment to Prevention	Goal 3: Rigorous Hazard Identification	Goal 4: Decisive Response	Goal 5: Raising Awareness
<p><b>1.1</b> Determine the most critical consumer product hazards and issues to define the Commission's annual priorities consistent with the agency's regulatory requirements.</p> <p><b>1.2</b> Create and strengthen partnerships with stakeholders aimed at improving product safety throughout the supply chain.</p> <p><b>1.3</b> Collaborate with partners ranging from state and federal authorities, colleges and universities, and other stakeholders to expand the CPSC's effectiveness and reach.</p> <p><b>1.4</b> Work towards harmonizing global consumer product standards or developing similar mechanisms to enhance product safety.</p> <p><b>1.5</b> Promote and recognize innovation and advancements in consumer product safety.</p> <p><b>1.6</b> Attract, retain, and collaborate with leading experts to address consumer product hazards.</p>	<p><b>2.1</b> Minimize hazardous defects early in the manufacturing process through increased participation in voluntary standards activities.</p> <p><b>2.2</b> Improve the safety of consumer products by issuing mandatory standards, where necessary and consistent with statutory authority, in response to identified product hazards.</p> <p><b>2.3</b> Facilitate the development of safer products by training industry stakeholders on the CPSC regulatory requirements and hazard identification best practices.</p> <p><b>2.4</b> Develop programs that provide incentives for manufacturers and importers to implement preventive actions that enable the safety of their products.</p> <p><b>2.5</b> Engage foreign product safety regulators and foreign manufacturers to reduce the production of unsafe consumer products that may enter the U.S. market.</p>	<p><b>3.1</b> Improve the quality and comprehensiveness of crucial product hazard data.</p> <p><b>3.2</b> Reduce the time it takes to identify hazard trends by improving the collection and assessment of hazard data.</p> <p><b>3.3</b> Establish a transparent, risk-based methodology to consistently identify and prioritize hazards to be addressed.</p> <p><b>3.4</b> Expand import surveillance efforts to reduce entry of unsafe products at U.S. ports.</p> <p><b>3.5</b> Scan the marketplace regularly to determine whether previously identified significant hazards exist in similar products.</p> <p><b>3.6</b> Increase surveillance of used and resale consumer products to identify and remove recalled products and substantial product hazards.</p>	<p><b>4.1</b> Expand the CPSC's ability to conduct a full range of inspections to monitor for noncompliant and defective products.</p> <p><b>4.2</b> Use a risk-based methodology to prioritize the CPSC's targeted response to addressable product hazards.</p> <p><b>4.3</b> Increase the effectiveness and speed of recalls of noncompliant and defective products.</p> <p><b>4.4</b> Reduce the time it takes to inform consumers and other stakeholders of newly identified hazards and the appropriate actions to take.</p> <p><b>4.5</b> Hold violators accountable for hazardous consumer products on the market by utilizing enforcement authorities.</p>	<p><b>5.1</b> Increase awareness of the CPSC to ensure the public knows where to turn for information on consumer product safety, where to report hazardous incidents, and knows about the enforcement capabilities used to address product dangers.</p> <p><b>5.2</b> Provide stakeholders with easily accessible, timely, and useful safety information on consumer product hazards.</p> <p><b>5.3</b> Deploy targeted outreach campaigns for priority hazards and vulnerable communities.</p> <p><b>5.4</b> Increase access to consumer product safety information for industry and small businesses.</p>



## APPENDIX B: STRATEGIES AND MEANS

The CPSC's new strategic plan sets the direction of the Commission over the next five years and forms the basis for allocating resources. It provides a particular focus on transparency and openness to those we serve, a renewed focus on education and advocacy for consumers, and fair but firm enforcement of the product safety laws we oversee.

Each year, annual performance goals are linked to the strategic goals through projects and activities that staff believes will lead to reductions in consumer product-related injuries and deaths. These activities include:

- completing new rules to implement the 2008 CPSIA;
- conducting enforcement activities to ensure compliance with the new requirements resulting from the CPSIA;
- conducting activities to ensure the safety of imported products;
- identifying and analyzing product-related hazards;
- participating in the voluntary standards process or developing mandatory safety standards;
- conducting compliance activities such as recalls, corrective actions, and enforcement of existing regulations;
- alerting the public to safety hazards and informing them about safe practices, with a focus on reaching vulnerable populations; and
- partnering with stakeholders to work cooperatively to reduce product safety hazards.

### Resource Allocation Methodology

Beginning in FY 2011, the CPSC will allocate its resources according to the new strategic goals. The CPSC will estimate the resources allocated by:

- determining direct costs such as salary and contract support for each of the strategic goals;
- estimating costs of any activities that are not directly linked to the strategic goals; and
- distributing proportionally indirect costs, such as administration and space rental, to the direct costs of strategic goals.

### Workforce Skills and Needs

The CPSC employs staff from many highly specialized disciplines who carry out the agency's product safety activities. They include mechanical, electrical, and chemical engineers and human factors specialists who look for design flaws and safety enhancements; physiologists, pharmacologists, chemists, and toxicologists who examine adverse health effects of hazardous substances; epidemiologists and statisticians who analyze injury and death information and estimate risks; and economists who calculate the costs and benefits of Commission actions. The CPSC must compete with other federal agencies and the private sector to attract and retain these highly skilled technical specialists.

The CPSC is committed to recruiting and retaining a talented workforce that is diverse, motivated, and committed to excellence. In order to achieve this goal, the agency is continuously enhancing and strengthening its human capital efforts and measuring its activities to assess whether human capital goals and objectives are met.

Succession planning will be a major focus of the CPSC's human capital initiatives in this strategic plan. This planning is critical for the CPSC to retain and grow its institutional knowledge, due to the high number of employees who are eligible for retirement.

### Technology

The CPSIA requires the Commission to modernize its IT systems and establish a publicly available, searchable database of product safety data. Scheduled for release by March 2011, the new database will change the way the CPSC interacts with the public.

This searchable database will also provide a powerful source of information for the public allowing them to quickly determine whether products they already own, or are considering buying, are associated with safety hazards or recalls, and will allow consumers to play a crucial role in safety by improving the reporting of potential product hazards.

In response to the CPSIA mandate, the CPSC is developing a single, integrated Web-based environment, the Consumer Product Safety Risk Management System (CPSRMS), which changes the way the Commission identifies hazards. The current workflow has many manual, fragmented processes that are time consuming and not as effective or efficient as using technology to accomplish the same tasks. Staff sorts through hundreds of thousands of incident reports each year looking for hazard patterns using siloed databases that must be searched individually and examined manually for duplicative cases.

With new technology, the way the CPSC conducts business will be transformed. The CPSC will have powerful tools to report, analyze, and respond to product hazards. The new predictive data-mining tool will allow the CPSC to compare reported incidents with all prior

incidents electronically, rather than relying on manual searches or institutional memory, and to coordinate these investigations with staff throughout the Commission. This new capability has the potential to uncover more defect patterns for staff to examine, potentially leading to an increase in recalls of defective products, saving more lives, and preventing injuries.

### Accountability

The agency's annual operating plan and its performance appraisal system provide a clear methodology for establishing goals and measuring results. The CPSC's Senior Executive Service (SES) managers are held accountable through an appraisal system that links each strategic goal, objective, and performance metric to each SES "owner" to ensure strategic alignment and measurable results. General Schedule employees are held accountable through performance appraisal elements and standards that incorporate results-based performance measures with a direct link to CPSC's strategic goals.

## APPENDIX C: EXTERNAL RISK FACTORS

External factors and events affect the CPSC's ability to implement this strategic plan. The following external risk factors are presented either as cross-cutting risk factors that could affect all five goals, or as risk factors that primarily affect a particular goal.

### Cross-Cutting External Risk Factor: Resource Levels

The CPSC's ability to successfully execute its strategic plan is dependent on the level of resources allocated to the agency each year. Passage of the CPSIA in 2008 laid out funding authorizations for the CPSC through 2014, representing the agency's first major resource increase in decades. This has paved the way for the CPSC to increase its efforts to protect the public from unreasonable risks of injury from consumer product hazards. However, if those resources are decreased the agency's ability to accomplish this strategic plan may suffer.

**Mitigation Strategies:** While the CPSC cannot fully anticipate changes to its budget, the Commission can structure its annual plans and organizational design to increase operational flexibility. The Commission will focus its strategic plan and annual budgets on programs, as opposed to organizational offices, to facilitate the continuation of its programs in the face of potentially fluctuating resource levels. In addition to these efforts, the CPSC will periodically evaluate new organizational design principles that will enhance the efficiency of CPSC operations.

### External Risk Factor for Goal One: Capability of Partner Organizations

The CPSC's partners may at times face resource constraints or staffing limitations that hamper their full involvement in collaborative efforts with the CPSC. They may also face legal or political restrictions that inhibit their ability to fully engage in the efforts to address consumer product safety issues that the CPSC identifies as priorities.

**Mitigation Strategies:** The CPSC will establish a formal process for reviewing and establishing partnerships. By evaluating the potential risks associated with the partnership prior to providing a formal approval as a recognized partner, the CPSC can lessen the potential disruption to the relationship in the future. The CPSC will also monitor ongoing discussions that could produce effective, mutually beneficial partnering arrangements.

### External Risk Factor for Goal Two: Economic Effects on Domestic Production

The impact of the current recessionary environment and drop in consumer demand could increase pressure on larger U.S. manufacturers to lower overall production costs to maintain profitability. The persistence of the current economic weakness, coupled with import pressure from a growing array of foreign manufacturers that can produce products at a lower cost, could affect overall consumer product quality and safety.

**Mitigation Strategies:** The Commission must work closely with industry to better understand its ability to remain competitive in the face of the economic recession. Enhancing ties with key partners, including states' attorneys general, colleges, and universities will help the CPSC monitor effects stemming from pressures for industry to lower costs. In doing so, the CPSC will be better able to determine which segments of industry are disproportionately affected by these pressures, and target its resources to help prevent any reductions in consumer product safety.

### External Risk Factor for Goal Three: Emerging Technologies

The number of consumer products within the CPSC's jurisdiction is increasing not only in size but also complexity. Technological progress in areas such as advanced materials, nanotechnology, and biotechnology has fundamentally changed raw inputs, assembly, and packaging of consumer products. Because data concerning the impact of these new technologies on public health remains limited, the potential

threat to consumer safety is difficult to predict. For example, the nascent nanotechnology sector has already introduced more than 1,000 products into the marketplace, and more than half of these are consumer products that fall under the CPSC's jurisdiction.<sup>12</sup> If these new products contain significant product hazards, the CPSC may need to shift its focus away from some of the current strategic goals and/or objectives to address unanticipated hazards.

**Mitigation Strategies:** From a consumer safety perspective, the impact of these new technologies is still unknown. The CPSC is collaborating with other federal agencies, as part of the National Nanotechnology Initiative, to support the development of exposure and risk assessments of nanomaterials, and allow for database updates to flag reports of nanotechnology incidents with consumer products. The CPSC will need to continue to monitor these industries closely in order to detect new safety risks as early as possible.

### External Risk Factor for Goal Three: Import Volume

The global financial crisis and recession that began in 2007 led to a contraction in world trade and economic output. However, there are indications that at least some components of output and trade growth may return to their pre-recession levels in the near future. For example, China appears to have already returned to a rate of economic growth that is almost as fast as its pre-recession growth.<sup>13</sup> Growth rates in many emerging economies have surpassed rates in most advanced industrial countries, and low-cost production technologies have increased the production of consumer products in some parts of the globe where safety standards have not traditionally been high.<sup>14</sup> If U.S. imports continue to grow rapidly, there is a greater risk of unsafe products entering the country.<sup>15</sup>

<sup>12</sup> [http://www.nanotechproject.org/process/assets/files/8278/pen\\_submission\\_cpsc.pdf](http://www.nanotechproject.org/process/assets/files/8278/pen_submission_cpsc.pdf)

<sup>13</sup> Joe McDonald. *China's Growth Accelerates to 10.7 Percent in 4Q*. Associated Press, January 20, 2010.

<sup>14</sup> Organization for Economic Cooperation & Development. *Perspectives on Global Development 2010: Shifting Wealth*. June 16, 2010.

<sup>15</sup> The CPSC's Directorate for Economic Analysis calculations based on U.S. International Trade Commission data.

**Mitigation Strategies:** By establishing and implementing a risk-based methodology to identify and prioritize hazards, the CPSC can better determine which imported product shipments to monitor and test. This will allow the CPSC to focus its limited resources to better handle an increased volume of products entering the country while maintaining a high level of quality surveillance and detection efforts at the ports.

### External Risk Factor for Goal Four: Consumer Response to Product Recalls

The CPSC's ability to increase the effectiveness of product recalls is central to its response strategy. Ultimately, the CPSC has little control over what actions consumers take once they are made aware of a given recall. Some consumers may choose to continue to use recalled products or fail to implement repairs to the product if they exist.

**Mitigation Strategies:** The CPSC will make more extensive use of product registration processes, including both traditional and new technology-based approaches, and increase its awareness campaigns to ensure the right information is reaching the right consumers.

### External Risk Factor for Goal Five: Competing Messages From Other Information Providers

The CPSC may encounter difficulties in providing consumers with information about current product hazards, if consumers are also receiving information from other sources. Because there are a large number of consumer advocacy groups, retailers, manufacturers, and organizations that communicate to the public about consumer products, key CPSC product messages could become diluted or misinterpreted.

**Mitigation Strategies:** Where the CPSC determines that safety messages are not clearly reaching the public, it will increase public awareness campaigns to make sure that appropriate messages are being communicated. The CPSC will also build new networks with other organizations providing information on consumer product safety to ensure consistent messages.

## APPENDIX D: PERFORMANCE MEASUREMENT

The performance measures below were created to track the CPSC's progress against its 2011–2016 Strategic Plan. Over the next few years, the CPSC will develop new programs, bring IT systems online, enhance processes, and implement new capabilities. As this occurs, the CPSC will evaluate its performance measures against these new capabilities to refine the current measures, create new performance measures, and retire existing performance

measures to accurately assess the achievement of desired outcomes.

For the measures below, the CPSC will collect data for one year to develop baselines for its current performance. Based on these findings, the CPSC will define the performance targets to accurately reflect performance trends. After establishing the targets, the CPSC will use the measures to monitor progress against its strategic goals, identify areas for improvement, and inform program and budget decisions.

### GOAL 1: LEADERSHIP IN SAFETY

#### Performance Measure

Decrease the average rate of deaths associated with targeted consumer product hazards.

#### Key Definition

- **Targeted Consumer Product Hazards:** Those hazards recognized by the CPSC as capable of being reasonably reduced or eliminated by CPSC action.

#### Performance Measure

Decrease the average rate of injuries associated with targeted consumer product hazards.

#### Key Definitions

- **Targeted Consumer Product Hazards:** Those hazards recognized by the CPSC as capable of being reasonably reduced or eliminated by CPSC action.
- **Injuries:** Consumer product-related injuries that are treated in hospital emergency departments.

#### Performance Measure

Increase the number of collaborative actions taken with partners.

#### Key Definitions

- **Partners:** Entities with which the CPSC has a working agreement recognized formally by the Office of the Executive Director (OEX).
- **Collaborative Actions:** Efforts that further a joint safety agenda as defined by the CPSC's annual priority list.

### GOAL 2: COMMITMENT TO PREVENTION

#### Performance Measure

Increase the number of industry training sessions conducted about consumer product safety requirements.

#### Key Definitions

- **Training Sessions:** Formal CPSC curricula presented in one of the following formats: classroom/in-person, video conferencing, webinar, or computer based/self-paced.
- **Industry:** Domestic and foreign consumer product manufacturers, importers, retailers, and suppliers.

### GOAL 2: COMMITMENT TO PREVENTION (CONT'D)

#### Performance Measure

Decrease the number of repeat offenders.

#### Key Definition

- **Repeat Offender:** A consumer product manufacturer, importer, retailer or supplier who, having been cited by the CPSC for a consumer product violation in the past, is cited by the CPSC for an additional violation.

### GOAL 3: RIGOROUS HAZARD IDENTIFICATION

#### Performance Measure

Reduce the average time it takes to identify a potential consumer product hazard.

#### Key Definition

- **Time to Identify:** The time from when the CPSC first receives the report of a potential hazard to the time when the Hazard Identification team makes a determination on the disposition of the hazard report.

### GOAL 4: DECISIVE RESPONSE

#### Performance Measure

Reduce the average time it takes to initiate corrective action for a consumer product hazard.

#### Key Definitions

- **Corrective Action:** An action initiated by the CPSC such as safety alerts, recalls, stop sales, and refusal of admission at ports.
- **Time to Initiate:** The time from when the hazard is identified to the time when the CPSC commences corrective action.

### GOAL 5: RAISING AWARENESS

#### Performance Measure

Increase name recognition of the CPSC.

#### Key Definition

- **Name Recognition:** Extent to which the general public identifies the CPSC as the principal federal agency responsible for consumer product safety.

#### Performance Measure

Increase the number of consumers who have acted on a CPSC safety message.

#### Key Definitions

- **Consumer Action:** An action taken by a consumer primarily because of a CPSC message such as checking the recall list, returning/disposing of a recalled product, issuing a complaint, entering information into the public database, implementing a preventive action (e.g., wearing a bicycle helmet), requesting a product repair, or calling the CPSC Hotline for additional information.
- **Safety Message:** A safety communication such as a press release, announcement, interview, publication, bulletin, tweet, blog, or Web posting issued by or on behalf of the CPSC.

## APPENDIX E: PROGRAM EVALUATION

The Government Performance and Results Act (GPRA) requires agencies to evaluate programs to determine their effectiveness in achieving intended goals. The CPSC routinely evaluates its programs to verify that they are producing the desired results identified in its baseline performance measures. In the past, the CPSC's performance evaluations have addressed strategic targets for evaluating trends at both product and hazard levels based on statistical analysis of data on injuries and deaths associated with consumer products, staff expertise, and survey methods. These same procedures will also be used for this new strategic plan.

One type of evaluation, assessment of reductions in consumer-product injuries and deaths, needs further explanation. CPSC plans to use a portfolio approach to these impact evaluations, analyzing any injury or death reductions for specific products in light of Commission actions. The timing for evaluating any reductions, however, depends in part on how long consumers keep specific products. For example, some products, particularly inexpensive ones, have a short product-life. The effect of Commission actions to improve the safety of these products can be evaluated more quickly. Other products have a much longer product life. Evaluations of injury or death reductions in these cases would appropriately be conducted when consumers are expected to have replaced a substantial proportion of older products with safer products. Estimates of this product replacement can be derived from the agency's Product Life Model.

By performing rigorous program evaluation, the CPSC can continue to act as a performance-focused organization that aligns its resources, capabilities, processes, and activities to achieve its mission, vision, and goals. The CPSC embeds this alignment discipline throughout the agency to help foster a performance-focused culture among managers and employees. These future evaluations will help determine if the goal is still relevant given current risks and external factors, the degree to which objectives are still causally relevant to the goal they are assigned, and that the actions taken to achieve the objectives accurately drive expected outcomes.

Over the next five years, the CPSC will conduct independent program evaluations according to the draft schedule shown in Figure 2.

**Figure 2: Draft Program Evaluation Schedule**

Strategic Goal	Topic/Objective	Method	Evaluation Schedule
1	Reduce consumer product-related deaths and injuries	1. Hazard Surveillance tracking systems (NEISS, NFIRS, NCHS) <sup>16</sup> 2. Evaluation of specific products (before/after studies)	1. Annual 2. As appropriate
1	Increase in collaborative actions taken with partners	Survey of partners	Every 2 years
2	Increase training sessions for industry about safety requirements	Logs	Annual
2	Decrease the number of repeat offenders	Compliance surveillance tracking system (IFS) <sup>17</sup>	Annual
3	Improve the timeliness for identifying product hazards	Risk management tracking system	Annual
4	Improve the timeliness of corrective actions	Compliance surveillance tracking system (IFS) <sup>17</sup>	Annual
5	Increase the public's name recognition of CPSC	National survey (or similar data collection method)	Every 2 years
5	Increase consumers' safety actions in response to CPSC information	National survey (or similar data collection method)	Every 2 years

<sup>16</sup> National Electronic Injury Surveillance System (NEISS), National Fire Incident Reporting System (NFIRS), National Center for Health Statistics (NCHS).

<sup>17</sup> Integrated Field System (IFS).

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## APPENDIX F: ACRONYMS

- **ANSI:** American National Standards Institute
- **AQSIQ:** General Administration for Quality Supervision, Inspection, and Quarantine (CPSC counterpart in China)
- **ASTM:** ASTM International, formerly American Society for Testing and Materials
- **ATF:** Bureau of Alcohol, Tobacco, Firearms and Explosives
- **ATS:** Automated Targeting System
- **ATV:** All-Terrain Vehicle
- **CBP:** Customs and Border Protection
- **CPSA:** Consumer Product Safety Act
- **CPSC:** Consumer Product Safety Commission
- **CPSIA:** Consumer Product Safety Improvement Act
- **CPSRMS:** Consumer Product Safety Risk Management System
- **CTAC:** Commercial Targeting and Analysis Center
- **DG ENTR:** Directorate General for Enterprise and Industry (European Union agency for business environment)
- **DG SANCO:** Directorate General for Health and Consumer Affairs (CPSC counterpart in the European Union)
- **EPA:** Environmental Protection Agency
- **EWS:** Early Warning System
- **FDA:** Food and Drug Administration
- **FHSA:** Federal Hazardous Substances Act
- **FTE:** Full-Time Equivalent
- **GAO:** Government Accountability Office
- **GPRA:** Government Performance and Results Act
- **ICPHSO:** International Consumer Product Health and Safety Organization
- **ICPSC:** International Consumer Product Safety Caucus
- **IFS:** Integrated Field System
- **IT:** Information Technology
- **MOU:** Memorandum of Understanding
- **NASFM:** National Association of State Fire Marshals
- **NCHS:** National Center for Health Statistics
- **NEISS:** National Electronic Injury Surveillance System
- **NFIRS:** National Fire Incident Reporting System
- **NHTSA:** National Highway Traffic Safety Administration
- **NSN:** Neighborhood Safety Network
- **OECD:** Organization for Economic Cooperation and Development
- **OEX:** Office of the Executive Director
- **PAR:** Performance and Accountability Report
- **SDO:** Standards Development Organization
- **SES:** Senior Executive Service
- **SME:** Subject Matter Expert
- **U.S.:** United States



[www.cpsc.gov](http://www.cpsc.gov)

U.S. Consumer Product Safety Commission  
4330 East West Highway | Bethesda, MD 20814

**General Information:** (301) 504-7923

**Fax:** (301) 504-0124

**Toll-free Consumer Hotline:** (800) 638-2772, TTY (301) 595-7054

Call to obtain product safety and other agency information and to report unsafe products. Hotline staff may be reached from 8:00 a.m.–5:30 p.m. Eastern Time. Messages may be left any time after these hours. Available 24 hours a day, 7 days a week.