

U.S. CONSUMER PRODUCT SAFETY COMMISSION DRAFT INFORMATION QUALITY GUIDELINES

The U.S. Office of Management and Budget (OMB) has issued government-wide information quality guidelines under Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001. The OMB guidelines have been prepared to ensure and maximize the quality, utility, objectivity, and integrity of information disseminated by federal agencies. These guidelines direct all Federal agencies to implement their own implementing guidelines by October 1, 2002. In response to the OMB directive, the U.S. Consumer Product Safety Commission (CPSC) has prepared these guidelines to provide procedures to ensure the quality of its information products.

CPSC works to save lives and keep families safe by reducing the risk of injuries and deaths associated with consumer products. CPSC does this by:

- Developing voluntary standards with industry;
- Obtaining the recall of products or arranging for their repair;
- Issuing and enforcing mandatory standards or banning consumer products if no feasible standard would adequately protect the public;
- Conducting research on potential product hazards; and
- Informing and educating consumers through the media, state and local governments, private organizations, and by responding to consumer inquiries.

In meeting its mission CPSC disseminates information in a number of ways, including:

- Press releases and video news releases
- Publications
- Product safety alerts
- Special technical reports
- Advisory opinions
- Regulatory guidance letters

This information is used by the media, the public as well as by other government agencies, to reduce the risk of product-related death and injuries. Businesses use the information to assure that products they manufacture or import comply with the requirements of applicable regulations and to discharge the various obligations that the laws the Commission administers impose on firms.

Under the OMB information guidelines three aspects of quality must be considered: utility, objectivity, and integrity. In addition, for influential data, standards of transparency and reproducibility must be met. Each of these aspects of quality is described below.

Utility

Utility involves the usefulness and availability of the information to its intended audience. Utility is achieved by continuously monitoring information and developing new information sources or by revising existing information collection methods, models, and

information products where appropriate.

CPSC efforts to ensure the usefulness of information include:

- Internal analyses and review of information requirements and products
- Discussions with policy-makers and analysts at all levels of government
- Consultations with data providers and data users
- Preparation of "plain English" guides and summaries of information

CPSC efforts to ensure the availability of information include:

- Participation in industry-sponsored and government-sponsored meetings, conferences and workshops
- Exploring and implementing multiple vehicles with which to disseminate information
- Providing expanded Web site access to publicly available information

Objectivity

Objectivity involves a focus on ensuring that information is accurate, reliable, and unbiased and that information products are presented in an accurate, clear, complete, and unbiased manner. Objectivity is achieved by using reliable data sources and sound analytical techniques, by having information products prepared by qualified people using proven methods, and by carefully reviewing the content of all information products.

- Use of reliable data sources

CPSC is a data-driven agency and bases its decisions on the data it collects to assess the causes and scope of product-related injuries and deaths. Many of the information products disseminated by CPSC are created using information in death, injury and compliance action databases. These databases contain information used to perform standards effectiveness studies, special investigation studies, emerging hazard evaluation and other technical analyses. CPSC conducts ongoing internal quality assurance reviews of information in its database systems. These reviews include checks for accuracy, completeness, and consistency to ensure high quality. Often these databases contain information from external sources. Data and procedures are reviewed to ensure that data from external sources are properly transferred into the database.

When analysis requires using samples from databases, CPSC employs statistically acceptable methods to design and select the samples. Data samples are designed and compiled by staff knowledgeable about the content, structure, and limitations of the administrative data files employed. In addition, those staff members maintain working relations with agency personnel who create, update, and maintain those files to ensure that their understanding of files is current and complete. When information products require administrative files linked to external data sources, CPSC employs sound procedures for extracting and linking data from external sources based on a thorough understanding of the relevant components of the data

sources.

Occasionally CPSC conducts surveys of product use, customer satisfaction, and service quality. CPSC employs and documents accepted professional standards and practices for all survey activities, including sample frame development, sample design, questionnaire design and testing, data collection, analysis of sampling and coverage errors, imputation of missing data, weighting, and variance estimation. CPSC surveys follow guidelines and policies set forth in the Paperwork Reduction Act and other regulations related to the conduct of government surveys.

CPSC information products may also include data produced or maintained by other U.S. government agencies or other private organizations. All such information is assessed by CPSC prior to its use. However, the standards and policies applied to the information generated by CPSC cannot be applied to external information sources.

- Use of sound analytic techniques

CPSC analytical reports are prepared using a variety of analytical techniques including simple tabulations with descriptive summary statistics and multivariate statistical methods. For example, these reports can include integrating injury and incident information with laboratory testing and analysis, assessment of human exposure to various risks, and correlation of human behavior and risk. Analytical techniques are reviewed by qualified staff for their appropriateness to the data and the analysis being conducted and are clearly identified in reports.

CPSC also conducts economic studies, developing injury cost projections to estimate potential benefits associated with CPSC actions. These projections are based on standard techniques and utilize the most relevant and up-to-date information available.

CPSC occasionally utilizes models to conduct engineering analyses and forecast product injury information. Most models utilized by CPSC have been developed by CPSC staff or by CPSC contractors under direction from CPSC. When CPSC uses a proprietary model from another organization, CPSC undertakes an analysis of the model to ensure its appropriateness before including the model results as part of a CPSC information product. CPSC models have detailed documentation describing the goals and objectives of the model, the data sources being used and the methodologies and assumptions employed. CPSC models are based on best judgments of current and future behavioral relationships and methods of projection. The models are periodically updated to reflect input from internal and external reviews and research findings on behavioral relationships. Any updates are documented.

- Preparation of information products

CPSC information products are based on internal data and analyses, surveys,

models, and external information sources. Appropriate procedures are used in all steps of the information product preparation process. Documentation available with CPSC information products is designed to improve understanding of the information so that users may assess the suitability of the information for their needs. Reports are prepared by staff using a variety of sound analytical techniques ranging from simple tabulations and descriptive summary statistics to multivariate statistical methods and econometric models. Staff members preparing analytic reports and policy studies are knowledgeable in their use of relevant administrative data files, external data sources, and projections from simulation models.

- Review prior to dissemination

Information products are reviewed by technically qualified staff prior to dissemination to ensure their quality. Products that are considered to be more technically complex may also be reviewed by independent expert reviewers to provide additional perspective and expertise. The level of review an information product is subjected to prior to dissemination is determined by the characteristics of the product and CPSC-established review procedures. (See 15 U.S.C. 2055(b)(6) and CPSC Directive 1450.2.) Analytical techniques are clearly described and data sources are identified in reports. When analyses are based on projections from models, the assumptions used to produce the projections are identified, as well as the rationale for the assumptions used and the impact of using alternative assumptions. By statute, if the information disseminated by CPSC publicly identifies the manufacturer of a product, CPSC provides the manufacturer with the opportunity to comment on the accuracy of the information.

- Policy for correcting errors and revising previously disseminated information

CPSC's information may be revised after initial dissemination to reflect more complete information, corrections or other changes. CPSC information products identify information that is preliminary and expected to be revised as well as revisions made to information previously disseminated.

Integrity

Integrity, as used in the OMB quality guidelines, refers to the security of information from unauthorized access or revision to ensure that the information is not compromised through corruption or falsification. CPSC is highly protective of the confidentiality of information it holds through its policies and practices.

To ensure the integrity of its administrative information, CPSC will employ rigorous controls that have been identified as representing sound security practices. CPSC has in place programs and policies for securing its resources as required by the Government Information Security Reform Act (P.L. 106-398, title X, subtitle G). Those security procedures address all major components of information security and apply to all CPSC operating components. In addition, CPSC is subject to statutory requirements to protect the sensitive information it gathers and maintains on individuals. Those requirements are

contained in the following documents:

- Privacy Act of 1974
- Freedom of Information Act
- Computer Security Act of 1987
- Office of Management and Budget (OMB) Circulars A-123, A-127, and A-130
- Government Information Security Reform Act
- Federal Managers' Financial Integrity Act (FMFIA) of 1982

Transparency and Reproducibility

OMB's guidelines state that information disseminated by Federal agencies is considered "influential" if it does or will have a clear and substantial impact on important public policies or important private sector decisions. OMB's guidelines require that agencies disseminating influential information must have quality guidelines that include a high degree of transparency about data and methods to facilitate reproducibility of such information. "Reproducibility" as set forth in the OMB guidelines' means that the information is capable of being substantially reproduced, subject to an acceptable degree of imprecision.

CPSC's staff and contractor technical reports related to engineering, health science, or hazard analysis issues potentially have impacts on important public policies and private sector decisions, such as changes in voluntary standards. Therefore, CPSC's information in these reports should be highly transparent and capable of being reproduced by qualified persons. CPSC strives for a high degree of transparency about information and methods in order to improve understanding and to facilitate reproducibility by qualified third parties. To achieve transparency and reproducibility, CPSC's Guidelines require documentation of systems and models and appropriate explanatory material to accompany disseminated information. Some estimates and projections included in CPSC's information products are not directly reproducible by the public because the underlying data sets used to produce them are confidential. Also, some estimates and projections may not be easily reproducible by third parties due to the complexity and detail of the methods and data. CPSC places great emphasis on its review process to ensure the quality of information disseminated.

CPSC also achieves transparency through wide dissemination of its information. Most reports and other data products are available both as printed and electronic documents. They are announced on the CPSC web site and most electronic versions can be accessed and downloaded directly from the web site.

To ensure reproducibility, CPSC creates archival files of data and model results that are used as input to CPSC information products.

Information Not Subject to CPSC's Information Quality Guidelines

CPSC's Guidelines do not apply to:

- Procedural, operational, policy, and internal manuals prepared for the management and

- operations of the agency that are not primarily intended for public dissemination.
- Information disseminated that explicitly indicates that it was not subjected to CPSC's information quality guidelines.
- Information disseminated by CPSC employees that is not put forth as a CPSC product (e.g., materials presented by an individual at a professional meeting).

CPSC has historically utilized standards, policies, and other operational guidance to ensure the quality of all its activities and has confidence in the quality of information disseminated by CPSC prior to October 1, 2002. However, CPSC did not apply the specifics set forth in these Guidelines to information initially disseminated by CPSC in any form (e.g., printed information, information placed on CPSC's Web site, and any other information disseminated electronically) prior to October 1, 2002.

Administrative Correction Mechanisms

CPSC has established procedures for any person to request correction to information disseminated by CPSC when the information does not comply with the applicable information quality guidelines. A person who believes that information disseminated by CPSC does not adhere to CPSC's information quality guidelines and who would like to request correction of specific information should write to the Office of the Secretary, U.S. Consumer Product Safety Commission, Washington, D.C. 20207, or send an e-mail to cpsc-os.gov, or use the form at <http://www.cpsc.gov/feedback.html>. The Request should be captioned "Information Quality Guidelines" and should provide the following information:

- Information identifying the requestor;
- A description of the information to be corrected;
- Potential adverse impacts from the information identified for correction; and
- A reason that the information should be corrected.

With respect to a correction of CPSC information, CPSC will review the request and determine what action is necessary. If CPSC determines that an error was made, it will determine the appropriate level of concern.

If the requestor is not satisfied with CPSC's final response to the request, the requestor may submit an appeal to the Office of the Executive Director, U.S. Consumer Product Safety Commission, Washington, D.C. 20207.

References

- Office of Management Budget Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies. Final Guidelines. Effective January 3, 2002.
<http://www.whitehouse.gov/omb/fedreg/reproducible>
- *Saving Lives and Keeping Families Safe: 2002 Performance Plan*, U.S. Consumer Product Safety Commission, Operating Plan, January 2002,
<http://www.cpsc.gov/ABOUT/gpra/2002Plan.pdf>.
- *Clearance Procedures for Providing Information to the Public*, U.S. Consumer Product

Safety Commission, Directive 1450.2, September 5, 2001,
<http://www/cpsc.gov/library/1450.2.html>.

- *Public Disclosure of Information*, 15 U.S.C. Sec. 2055, <http://www4.law.cornell.edu/uscode/15/2055.html>