



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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STATEMENT OF COMMISSIONER DANA BAIOTTO

Communications (n). The imparting or exchanging of information or news. The successful conveying or sharing of ideas or feelings.<sup>1</sup>

The definition of “communications” raises some basic inquiries vis-à-vis the U.S. Consumer Product Safety Commission, e.g., What information or news does the Agency intend to impart or exchange? To or with whom? In what manner? At what time? What are the goals? No one at CPSC has been able answer these questions to my satisfaction or articulate for me what the Agency’s communications strategies, goals, and objectives are generally, or specifically for FY2021.

Currently, a communications team of CPSC employees, fondly known internally as “OCM” exercises *carte blanche* control over most CPSC publications, its informational and promotional campaigns, and the official Agency websites. Ironically, the CPSC website does not include a description of OCM – or at least one I could easily locate. There is, however, a link and phone number for “media inquiries” that dials presumably into the OCM office. Near that link is a short list of employees with corresponding responsibilities for “Safety and Policy Issue Areas,” none of which has been presented to the Commission for approval or adoption since I joined the Commission in 2018. In fact, no Communications or PR Plan has been brought before the Commission for approval or vote during that time. Nor has there been any public hearing to explore or determine specifically what policy decisions, messages, or informational campaigns should be implemented.

Some consumers, however, have challenged CPSC website content (or lack thereof) during other hearings and some consumers have voiced to individual Commissioner offices objections regarding CPSC’s social media campaign featuring mythical creatures created *ad hoc* by an OCM staff member (also without Commission approval or notice). Still others have complained about outdated and ineffective messaging. Personally, I object to seeing unilateral policy decisions disguised as “safety or informational messages.” Most of these challenges, objections, and complaints remain unresolved - excused and explained away by some form of the “this is what the Agency has always done” mantra.

There have been many discussions at the Commission level and with senior management and staff about these issues over the last two years. There certainly is a wide range of opinions regarding the Agency’s messaging goals and strategies. But, no consensus. There are few established metrics

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<sup>1</sup> New Oxford American Dictionary.

that assess whether CPSC's repeat campaigns are effective and I have seen no substantive reports that analyze whether new safety campaigns should be implemented and to what extent.

There is also an absence of strategy to promote the Agency's accomplishments or to make it a more recognizable federal agency. What a shame. CPSC does important work and has accomplished many things that benefit the public. It has so many resources for public use. But, each time someone asks what CPSC is or does – and it happens more frequently than it should - it is a confirmation that the Agency is not reaching the American consumer.

As part of the FY 2021 Op Plan, I proposed an amendment that would require OCM to prepare and submit to the Commission for approval a written Communications Plan setting forth proposed media strategies for the Agency along with the projected Campaigns for FY 2021. A Communications Plan would, at the very least, require OCM to define its planned messaging, identify the target audience(s), outline how and when relevant information would be distributed, include recommendations for using social media influencers, analyze related costs, and so on. A Communications Plan is not a shiny new concept. It is a fundamental one in the Communications field. In fact, a simple Internet search for "Communications Plan" provides countless (and free) templates by which anyone can craft one.

It is amateurish to reject the need for a Communications Plan here simply because one was not required from OCM (or the Agency's outside PR firm) in the past. Similarly, it is incomprehensible to reject the call for Commission approval. The Commission has an absolute right - indeed a duty - to approve and oversee activities conducted by its most outward facing directorate.

Without this amendment, the FY2021 Op Plan is incomplete.