



U.S. CONSUMER PRODUCT SAFETY COMMISSION

4330 EAST WEST HIGHWAY
BETHESDA, MARYLAND 20814-4408

Record of Commission Action
Commissioners Voting by Ballot*

Commissioners Voting: Acting Chairman Robert S. Adler
Commissioner Elliot F. Kaye
Commissioner Dana Baiocco
Commissioner Peter A. Feldman

ITEM:

Revised CPSC Information Quality Guidelines
(Briefing package dated February 12, 2020)

DECISION:

The Commission voted (3-0-1) to approve the Revised CPSC Information Quality Guidelines (IQGs) and post them to CPSC's website, as drafted. Acting Chairman Adler, Commissioners Kaye and Feldman voted to approve the revised CPSC Information Quality Guidelines (IQGs). Commissioner Feldman filed a statement with his vote; see attachment. Commissioner Baiocco abstained from the vote.

The Information Quality Act (section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2002 (Pub. Law No. 106-554)) required the Office of Management and Budget (OMB) to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies." Pursuant to OMB's guidelines, the Commission issued IQGs in October 2002, and posted them on CPSC's website. On April 24, 2019, OMB updated its guidance regarding these guidelines, and clarified the guidance on June 3, 2019, directing agencies to make certain updates to their information quality guidelines and procedures.

For the Commission:

A handwritten signature in cursive script, appearing to read "Alberta E. Mills".

Alberta E. Mills
Secretary

*Ballot vote due Monday, February 24, 2020
(Commissioner Feldman extended the vote due date from February 19, 2020)

Attachment: Statement by Commissioner Feldman



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION

4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

COMMISSIONER PETER A. FELDMAN

**STATEMENT OF COMMISSIONER PETER A. FELDMAN REGARDING REVISION
OF CPSC'S INFORMATION QUALITY GUIDELINES**

February 24, 2020

Today the Consumer Product Safety Commission (CPSC) voted to approve important updates to the implementation of its Information Quality Guidelines (IQGs), consistent with the updates listed in OMB Memorandum M-19-15, *Improving Implementation of the Information Quality Act* (Apr. 24, 2019) ("OMB Memorandum"). As the OMB Memorandum notes, the additional guidance is needed to address changes in the information landscape and to incorporate best practices developed over time. These updates are designed to ensure the reliable, high quality information that CPSC needs to make prudent decisions while executing its safety mission. Moreover, embracing a basic standard of quality in the agency's information dissemination policies will both increase taxpayer return on federal investment and spur private sector innovation.

In the revised CPSC IQGs, CPSC states its commitment to complying with the Information Quality Act and to implementing the updates listed in the OMB Memorandum. While CPSC has revised only certain provisions of the agency's IQGs in response to the OMB Memorandum, I am assured that CPSC has implemented, or plans to implement, the remaining OMB updates at the program level rather than addressing them through revisions. Accordingly, I understand that the CPSC will incorporate the following updates at the program level:

- When conducting peer review, CPSC will ask reviewers to evaluate the objectivity of the underlying data and the sensitivity of the agency's conclusions to analytic assumptions.
- When influential information that has been peer reviewed changes significantly (*e.g.*, as a result of the peer reviewer comments, additional agency analysis, or further consideration), CPSC will conduct a second peer review.
- When making information originally collected or developed by other Federal agencies available to the public in a cross-agency dissemination, CPSC will clearly communicate to the public the quality of the information it contributes.
- CPSC will provide the public with sufficient documentation about each dataset released to allow data users to determine the fitness of the data for the purpose for which third parties may consider using it. Robust practices may include developing a standard template or framework that provides data users with the relevant information. Safeguarding privacy and confidentiality is vital in the context of open data.

- CPSC will consider the potential for using existing data sources from both inside and outside the agency for statistical and research purposes, while protecting privacy and confidentiality.
- When designing or improving data collection systems, CPSC will actively solicit comment from relevant staff about potential downstream uses. CPSC will describe such uses in the Information Collection Request submitted to OMB for review under the Paperwork Reduction Act.
- If CPSC is considering secondary analysis of data that includes personally identifiable information, the agency will coordinate with its Senior Agency Official for Privacy to meet all privacy requirements and manage privacy risks.
- CPSC will develop procedures for clearly documenting and communicating the quality of administrative data that have the potential to be used for statistical purposes.
- Consistent with the Office of Science and Technology Policy's 2010 Memorandum for the Heads of Executive Departments and Agencies: Scientific Integrity, CPSC will ensure that influential information is communicated transparently and will include a clear explication of underlying assumptions, accurate contextualization of uncertainties, and a description of the probabilities associated with both optimistic and pessimistic projections, including best-case and worst-case scenarios.
- When CPSC has performed an analysis using a specialized set of computer code, the computer code used to process it will be made available to the public for further analysis, if consistent with applicable law and policy.
- CPSC will ensure that when using non-government sources to create influential information, it communicates to the public sufficient information on the characteristics of the data and analysis, including its scope (e.g., temporal or demographic), generation protocols, and any other information necessary to allow the public to reproduce the agency's conclusions.
- While prioritizing increased access to data and analytical frameworks used to generate influential information, CPSC will ensure compliance with statutory, regulatory, and policy requirements for protections of data security, privacy and confidentiality, proprietary data, and the confidentiality of business information.
- CPSC will explore methods that provide wider access to datasets while reducing the risk of improper disclosures of PII. Tiered access offers promising ways to make data widely available while protecting privacy. Implementation of such methods will be consistent with principles for ethical governance, which include employing sound data security practices, protecting individual privacy, maintaining promised confidentiality, and ensuring appropriate access and use.

- Before releasing responses to a request for correction, CPSC will complete all appropriate internal review, and share the draft response with OMB for its assessment of compliance with OMB guidance.