



United States
Consumer Product Safety Commission

eFiling Voluntary Stage Overview

Participant Training

September 04, 2024

Disclaimer: This presentation was prepared by CPSC Staff and may not necessarily reflect the views of the Commission.





AGENDA

- 1 eFiling Program Roadmap**
View the phased approach roadmap for eFiling
- 2 eFiling Voluntary Stage Goal**
Understand the eFiling voluntary stage goal
- 3 eFiling Program Introduction**
Define eFiling & understand the benefits of eFiling product certificates
- 4 eFiling Roles & Responsibilities**
Learn the trade partners involved and their responsibilities
- 5 eFiling Implementation Best Practices**
Learn best practices for successful eFiling implementation
- 6 eFiling Voluntary Stage Participation**
Learn how to participate in the eFiling voluntary stage
- 7 eFiling Resources**
Know where to look for eFiling resource documents
- 8 eFiling Support Services**
Know who to reach out to

eFiling Program Roadmap



PHASE 1 Alpha Pilot

PGA Message Set and
Product Registry Testing
8 Participants

2016 – Completed



PHASE 2 Beta Pilot

IT development and
participant testing
Over 35 Participants

Fall 2023 –
Summer 2024

- ✓ 37 participants
- ✓ 111 Full PGA Message Sets
- ✓ 3,670 Reference Message Sets
- ✓ 480 Disclaims
- ✓ 5,523 Certificates



PHASE 3 Final Rulemaking

Host voluntary stage for
continued testing and integrate
eFiling rule changes

2024

We are here!
Voluntary Stage



PHASE 4 Full Implementation

Rollout of final eFiling
requirements

2025



Expanded Participation and Continued Testing of eFiling

- An opportunity for importers and their trade partners to gain access to the CPSC Product Registry and begin testing the eFiling process
- Will begin in soon
- Enroll up to 2,000 additional importers and their trade partners
- CPSC is accepting registration requests via a waitlist



What is eFiling?

3 What is eFiling?



eFiling is a CPSC initiative under which importers of regulated consumer products will electronically file (eFile) data elements from a certificate of compliance with U.S. Customs and Border Protection (CBP), via a Partner Government Agency (PGA) Message Set.

eFiling – CPSC’s Modern Approach for Filing Certificate Data



Data stored electronically in the secure CPSC Product Registry



Multiple options for electronically filing a PGA Message Set before a shipment arrives

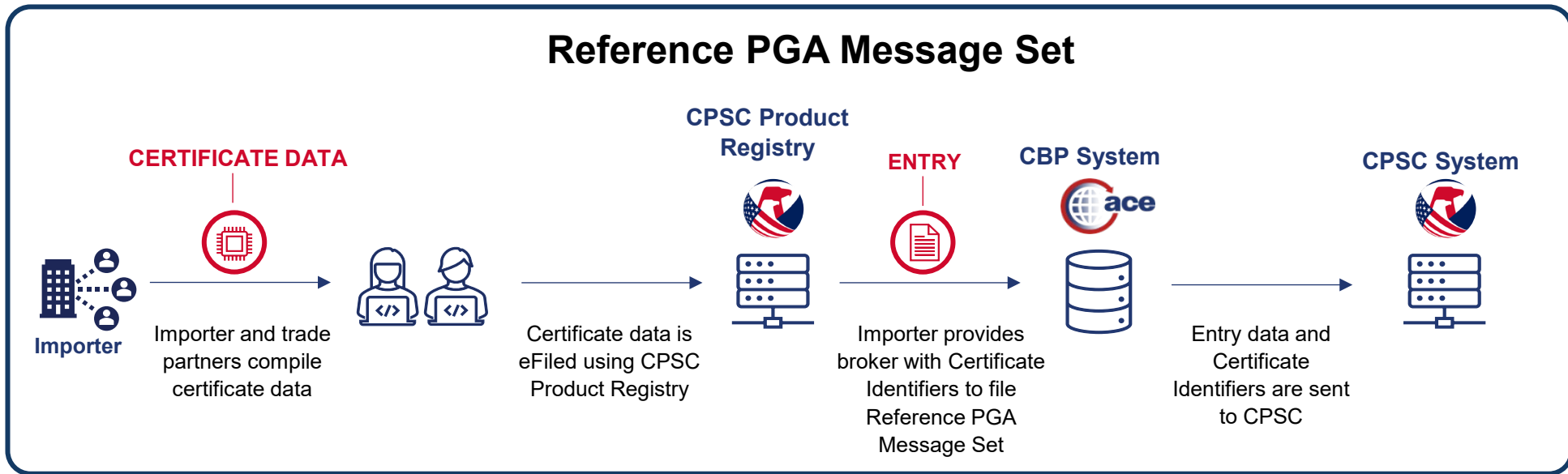


Real-time data capture and streamlined processes for Trade



Easier compliance with CPSC’s certification requirements

3 Why eFiling?



Projected Benefits

- Reduced hold times
- Fewer exams
- Reduced costs to the importer
- Fewer holds to check for certificates
- Greater focus on higher risk products
- Reduction in risk score

3 Certificate Identifiers

ENTRY



Importer provides
broker with Certificate
Identifiers to file
Reference PGA
Message Set

Certifier ID

A unique identifier created by the importer that is ultimately responsible for certifying the product certificates

Product ID

A unique identifier for the product that is being certified

Version ID

A unique identifier for the specific version of product certificate in the Product Registry

Certificate Identifier	Description	Example
<p>Certifier ID A unique identifier created by the importer that is ultimately responsible for certifying the product certificates</p>	<ul style="list-style-type: none"> • The Certifier ID ensures that the correct importer is linked to the certificate of compliance that is filed in the Product Registry. • CPSC advises that importers use a simple, alphanumeric, easily identifiable version of their company name that fits within the 23-character limit. • Although spaces and special characters may be used, CPSC advises not to use them for ease of submitting the certifier ID into the Reference Message Set. 	<p>An importer named ABC Co. imports regulated consumer products. When creating their Business Account in the Product Registry, they created Certifier ID: ABCCo</p>

Certificate Identifier	Description	Example
<p>Product ID A unique identifier for the product that is being certified</p>	<ul style="list-style-type: none">The Product ID can be one of seven possible ID types: GTIN, SKU, UPC, Model Number, Serial Number, Registered Number, or Alternate ID.	<p>Importer ABC Co. imports a product with the Product SKU of A1234567. Their Product ID is then created as Product ID: A1234567</p>

Certificate Identifier	Description	Example
<p>Version ID A unique identifier for the specific version of product certificate in the Product Registry</p>	<ul style="list-style-type: none"> The Version ID is an alphanumeric ID that your team can easily track and sequentially increment as you add and update product certificates in the Product Registry The Version ID is unique to the Primary Product ID. A new Version ID must be created in any of the scenarios as listed in the eFiling Quick Start Guide. <ul style="list-style-type: none"> Example: An existing product certificate requires an update based on factors such as testing compliance renewal 	<p>Importer ABC Co. entered their first product certificate for Product ID: A1234567 using Version ID: V1</p> <p>They need to make an update to the certificate now that they have conducted annual retesting. In the Product Registry, they update the information using Version ID: V2</p>

What Must be Certified?

Products must be certified if they are...



Subject to a consumer product safety rule, ban, similar rule, standard, or regulation;



Imported for consumption or warehousing;



Or distributed in commerce.

Note: De minimis shipments are included in eFiling.



Importers are responsible for certification.



Both importers and their trade partners should have a clear understanding of which standards need to be met.



All trade parties must know which mandatory standards apply to the products they are importing.

Required Certificate of Compliance Data Elements



Product ID

Identification of the finished product



Citation Codes

Each consumer product safety rule to which the finished product has been certified



Manufactured Date

Date when the finished product was manufactured



Manufactured Location

Place where the finished product was manufactured, produced, or assembled, including the (1) name; (2) full address; and (3) contact information of the manufacturing party



Product Test Date

Date when the finished product was most recently tested for compliance



Test Lab

Party(ies) used for testing a certificate per 16 CFR Part 1110, including (1) name, (2) full address, and (3) contact information of testing entity



Point of Contact

Contact information for the party maintaining records of test results, including (1) name, (2) full address, and (3) contact information

eFiling Roles and Responsibilities

While **importers** are ultimately responsible for product certification, each trade partner plays a critical role in the flow of information throughout the eFiling process.



Importer

Manage and oversee flow of data and the eFiling process to prepare for entry



Broker

Collaborate, communicate, and file certificate data on behalf of importer



Testing Laboratory

Gather, test, and transmit test report information



Manufacturer

Provide all manufacturing details for applicable products subject to CPSC regulations



Software Developer

Develop, execute, and collaborate to integrate technical solutions



Importer

Manage and oversee flow of data and the eFiling process to prepare for entry

- Engage and communicate with trade partners to provide awareness and guidance on eFiling
- Implement updated business processes to support new eFiling roles to include Compliance and Customs teams, if applicable
- Oversee system integration, planning, and execution
- Identify the CPSC regulated products that fall within the scope of eFiling
- Provide management, certification, and oversight on product certificate data flows to ensure successful transmission of Full PGA Message Set or Reference PGA Message Set in CBP ACE



Broker

Collaborate, communicate, and file certificate data on behalf of importer

- Work with importer to identify CPSC regulated products that need to be eFiled
- Establish data flow with importer to ensure all data elements for Message Set are communicated timely and accurately
- Track shipments through the supply chain to ensure shipment data is ready to file at time of entry
- File Full PGA Message Set or Reference PGA Message Set at time of entry
- Communicate with importer client(s) to ensure collaborative efforts across entire eFiling business process to include status updates, risk mitigation, and shipment tracking

4 Testing Laboratory



Testing Laboratory

Gather, test, and transmit test report information

- Gather data requirements for test report from importer
- Identify products and corresponding citations per CPSC regulations
- Collaborate with importer and broker to establish a data transfer protocol
- Execute data transfer for all applicable test report details



Manufacturer

Provide all manufacturing details for applicable products subject to CPSC regulations

- Gather data requirements for manufacturing information from importer
- Collaborate with importer and broker to establish a data transfer protocol
- Execute data transfer of manufacturer details for all applicable products identified
- Ensure manufacturer information is provided accurately and updated as necessary

4 Software Developer



Software Developer

Develop, execute, and collaborate to integrate technical solutions

- Create project plan that considers alignment with eFiling timelines
- Lead coordinated integration and development efforts to update systems and align with eFiling requirements
- Develop automated technical solutions to enable easier data transfers
- Collaborate with all stakeholders to ensure IT architecture is working as expected for successful submission of Message Set data



- Define CPSC eFiling requirements early
Gain comprehensive understanding and set clear, measurable, and specific goals
- Establish integrated communication channels
Set clearly defined roles and responsibilities among stakeholders at each step
- Develop technical solutions to enable data flow
Gather requirements and implement technical solutions as soon as possible
- Consider the level of time, staffing support, and resources required
Assess your readiness to ensure you have enough time and resources
- Identify the coordinated eFiling model that works for your business
Make the business decisions that work best for you and communicate these decisions to your trade partners

eFiling Implementation Best Practices

To prepare for eFiling full implementation in or around 2025, importers are encouraged to navigate through these three stages:



Stage 1: Learn, Define, Communicate – Goals

- Designate an internal eFiling team to gather requirements and build awareness
- Identify products that are subject to CPSC regulation and are therefore impacted by eFiling
- Understand citation, testing exclusion, and disclaim codes that apply to consumer products
- Identify the data requirements for filing certificate data
- Gain a comprehensive understanding of how to use the CPSC Product Registry
- Appoint outreach coordinator(s) responsible for working with stakeholders
- Develop integrated communication channels across all internal and external stakeholder partners
- Understand system readiness and decide whether additional development is required
- Understand data requirements for product certificate data entry via manual or bulk upload including CSV file upload and API integration
- Develop staff and resource competencies to improve eFiling readiness
- Document process timelines to provide clarity on the sequence and duration of activities

Stage 1: Learn, Define, Communicate – Task Checklist

- **Receive eFiling Update Notifications**
 - Subscribe to CPSC's mailing list to receive eFiling updates
- **Learn more about the eFiling Program**
 - Visit the CPSC eFiling webpage
 - Review the eFiling Document Library
 - Identify products subject to CPSC regulation
 - Identify all product certificate data elements for collection
 - Watch CPSC Product Registry training video
 - Study the available resources on the eFiling webpage
- **Inform your importer trade network**
 - Implement formal communications channels with all stakeholders including importers, brokers, laboratories, manufacturers, and software developers
 - Discuss eFiling requirements and specific roles and responsibilities
 - Identify specific points of contacts for continued communications
 - Establish a schedule of communication on a continual basis
 - Work with your software developer to understand Application Programming Interface (API) integration requirements, if applicable

Stage 2: Integration and Development – Goals

- Identify a process flow to communicate all certificate data elements into the Product Registry
- Create data collection systems and processes across all trade partners
- Develop eFiling infrastructure to enable successful data flows from importer to broker
- Test product certificate data entry via manual or bulk upload options into the Product Registry
- Implement process to enable data flow from Product Registry to ACE
- Track and communicate development progress to align with eFiling timeline
- Identify software developers to support development efforts
- Ensure internal and external teams have the skills, capabilities, resources, and knowledge to integrate and develop eFiling systems
- Identify data collection pathway to enable stable and resilient data flow from importer to broker at time of entry for all required certificate data elements
- Document all internal business processes related to system integration
- Work with software developer partner to begin API integration, if applicable

Stage 2: Integration and Development – Task Checklist

- **Develop Business Processes**

- Decide whether your business will proceed with Full PGA Message Set, Reference PGA Message Set, or both to complete the ACE transmission process
- Designate Business Account Administrator from importer's business to create an account in CPSC Product Registry
- Communicate with CPSC your designated initial Business Account Administrator
- Establish your Business Account in CPSC Product Registry
- Decide whether your business will proceed with manual entry or bulk entry via CSV or API
- Identify software developer trade partner for API integration, if applicable
- Reach out to CPSC to obtain Product Registry access for software developer to begin API integration, if applicable
- Invite users from trade partner organizations to begin collaborating and testing in the Product Registry

Stage 2: Integration and Development – Task Checklist (cont'd)

- **Identify Data Collection Requirements**
 - Understand Product Registry user roles and responsibilities
 - Understand specific data elements required from each stakeholder in eFiling process
 - Identify data owners and systems that will collect critical data needed for eFiling
 - Coordinate with data owners and communicate data requirements and timelines
 - Learn Product Registry manual and bulk upload processes
 - Ensure comprehensive understanding of Certificate Identifiers for Reference PGA Message Set
- **Test Product Certificate Data**
 - Establish connected data flow from the importer to the Product Registry to the broker or from importer to broker for transmission into ACE with all required data elements
 - Develop established IT systems to enable data transfers across the entire eFiling ecosystem
 - Enter trade party data into Product Registry to initiate product certificate data entry
 - Compile and format certificate data to prepare for entry into Product Registry or into ACE
 - Begin API testing in Product Registry, if applicable
 - Begin manual entry or bulk entry (CSV upload or API) testing, if applicable

Stage 3: Implementation and Improvement – Goals

- Solidify data entry best practices for manual or bulk upload
- Establish data validation process for certifying product certificates
- Prepare certificate identifiers if filing Reference PGA Message set
- Collaborate with broker to file Full or Reference PGA Message Set into CBP ACE system
- Monitor and improve infrastructure as needed
- Establish clear communication channels between importer and trade partners to ensure necessary data elements are ready for entry filing
- Prepare troubleshooting protocols for technical and/or transmission errors

Stage 3: Implementation and Improvement – Task Checklist

- **Begin eFiling**
 - Transition to full implementation of eFiling product certificate data for transmission into ACE
 - Collaborate within Product Registry Business Account to enter and certify more product certificates in CPSC Product Registry
 - Enter larger volumes of product certificate data as process solidifies
 - Complete API integration, if applicable
- **File PGA Message Set into CBP ACE**
 - Certify completed Certificates of Compliance in CPSC Product Registry if filing Reference PGA Message Sets to prepare for entry
 - Coordinate with broker to communicate Certificate Identifiers for filing Reference PGA Message Set
 - Coordinate with broker to communicate all seven data elements of Certificate of Compliance for Full PGA Message Set
 - File Message Set into ACE system at time of entry

To receive an invitation to establish a Business Account in the Product Registry, **importers** can email eFilingSupport@cpsc.gov with:

1. Company Name
2. Initial Business Account Administrator's Name
3. Initial Business Account Administrator's Email
4. Importer of Record Number(s)
5. Broker Filer Code(s)
6. Type of Products Imported

- Phased invitation schedule: first come, first served
- Leverage eFiling resources to learn about the eFiling process and Product Registry

7 eFiling Resources

CPSC has multiple channels to provide the most current, relevant, and accurate support to enable effective eFiling implementation.



Visit the eFiling webpage at www.CPSC.gov/eFiling
General information about the CPSC eFiling program



[Sign up for the eFiling mailing list](#)
Receive important eFiling updates directly to your inbox



[eFiling Document Library](#)
eFiling Quick Start Guide, Implementation Guide (CATAIR), Product Registry Guide, FAQs, Citation Testing Exclusion Disclaim Guidance, CSV Upload Template, and more...



[CPSC Product Registry Training Videos](#)
Video demonstrations of the CPSC Product Registry functions and features



Contact the support team at
eFilingSupport@CPSC.gov



Email with questions,
feedback, and comments



Ask technical questions for
the IT team



Questions?