



## Ballot Vote Sheet

**TO:** The Commission  
Alberta E. Mills, Secretary

**THROUGH:** Matthew A. Campbell, General Counsel  
Brien Lorenze, Executive Director

**FROM:** Daniel R. Vice, Assistant General Counsel, Regulatory Affairs  
David M. DiMatteo, Attorney, Regulatory Affairs

**SUBJECT:** Consumer Product Safety Commission (CPSC) Implementation Plan for OSTP Gold Standard Science (GSS)

**DATE:** August 19, 2025

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**TIME CRITICAL BALLOT VOTE DUE:** August 20, 2025, at Noon

The May 23, 2025, Executive Order (EO) 14303, "Restoring Gold Standard Science", requires each agency to report to the Office of Science and Technology Policy (OSTP) and post actions that are being initiated in response to the OSTP Implementation Guidance within 60 days of issuance, i.e., by August 22, 2025. On June 23, 2025, OSTP issued "Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities" to provide guidance to agencies on how to comply with EO 14303. Staff is submitting the attached "Consumer Product Safety Commission (CPSC) Implementation Plan for OSTP Gold Standard Science (GSS)" that outlines how the CPSC aligns with EO 14303 and the OSTP guidance for Gold Standard Science issued in June 2025. The implementation plan assesses current practices based on the CPSC Scientific Integrity Policy (February 2024) and identifies gaps, enhancements, and tools to uphold the highest standards of scientific quality and integrity. The Commission has designated this as a time critical ballot vote, pursuant to section V of the Commission's Decision-Making Procedures.

Please indicate your vote on the following options:

- I. Approve the attached "Consumer Product Safety Commission (CPSC) Implementation Plan for OSTP Gold Standard Science (GSS)", as drafted.

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(Signature)

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(Date)

- II. Approve the attached "Consumer Product Safety Commission (CPSC) Implementation Plan for OSTP Gold Standard Science (GSS)", with the following changes.

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(Signature)

\_\_\_\_\_  
(Date)

- III. Do not approve the attached "Consumer Product Safety Commission (CPSC) Implementation Plan for OSTP Gold Standard Science (GSS)".

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

- IV. Take other action specified below.

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(Signature)

\_\_\_\_\_  
(Date)

Attached: Consumer Product Safety Commission (CPSC) Implementation Plan for OSTP Gold Standard Science (GSS)



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# Consumer Product Safety Commission (CPSC) Implementation Plan for OSTP Gold Standard Science (GSS)

## 1. Purpose

This implementation plan outlines how the U.S. Consumer Product Safety Commission (CPSC) aligns with the Office of Science and Technology Policy (OSTP) Guidance for Gold Standard Science (GSS) issued in June 2025. It assesses current practices based on the CPSC Scientific Integrity Policy (February 2024) and identifies gaps, enhancements, and tools to uphold the highest standards of scientific quality and integrity.

## 2. Addressing the Tenets of Gold Standard Science

Tenet	CPSC Status	Gaps	Recommendations
Reproducible	CPSC uses valid scientific methods and maintains data integrity.	No formal requirement for publishing detailed protocols or raw data.	Amend guidance including <a href="#">Plan to Increase Access to Results of CPSC-Funded Scientific Research</a> to mandate method documentation and public data sharing.
Transparent	Supports open communication and public access to scientific information.	Requires clarification on uniform standards for dataset/code sharing	Amend guidance including <a href="#">Plan to Increase Access to Results of CPSC-Funded Scientific Research</a> to mandate method documentation and public data sharing..
Communicate Error and Uncertainty	Staff expected to represent findings accurately.	No structured reporting of error margins or uncertainty.	Train staff in uncertainty quantification and visual reporting.
Collaborative & Interdisciplinary	Encourages inter-office communication and external scientific engagement.	Formal processes for interdisciplinary team formation not developed for all applications.	Document inter-agency and inter-office activities, initiative protocols and digital workspaces, if not current.



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Tenet	CPSC Status	Gaps	Recommendations
Skeptical of Findings	Promotes dissenting opinions and peer critique.	No formal process for adversarial collaborations or replication.	Fund replication studies and adversarial designs where applicable.
Structured for Falsifiability	Encourages rigor and honest reporting.	No pre-registration of protocols or falsifiability standards.	Introduce protocol registration for internal research.
Unbiased Peer Review	Peer review required, with conflict-of-interest checks.	Policy lacking for Non-Information Quality Act reviews.	Augment <a href="#">Information Quality Act Guidelines</a> for analysis/research not subject to Information Quality Act
Acceptance of Negative Results	Promotes accuracy and correction of the scientific record.	No incentives or dedicated channels for negative/null results.	Create a publication/reporting outlet for negative findings.
Free from Conflicts of Interest (COI)	Strong COI policies and oversight in place.	None significant.	Maintain current approach and reinforce with periodic training.

## 3. Development of Metrics and Evaluation Mechanisms

To track adherence to the GSS tenets and ensure continuous improvement, the following standardized metrics will be introduced:

Tenet	Sample Metric
Reproducibility	% of projects with complete methods archived
Transparency	% of datasets available in open formats
Uncertainty	% of reports including statistical error margins
Collaboration	# of cross-directorate or interagency projects
Skepticism	# of replication studies completed
Falsifiability	% of centralized, pre-registered research protocols
Peer Review	% of projects undergoing independent review



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Tenet	Sample Metric
Negative Results	# of null results published or archived
Conflict of Interest	# of disclosures filed/resolved annually

The Agency will add these to the Operating Plan and will collect, review, and report on these metrics annually.

## 4. Use of Technology

CPSC will utilize a range of technology to support implementation and reduce administrative burden. In particular, CPSC will augment use of the National Library of Medicine, the National Technical Information Service and CPSC's website to disseminate the information required and will explore and pilot AI tools to further support this effort.

All tools will be piloted under Agency oversight and comply with privacy and federal cybersecurity standards.

## 5. Training and Capacity Building

- All relevant staff will receive biennial training on the GSS tenets.
- New modules on uncertainty communication, pre-registration, and open science practices will be developed.
- All relevant staff will receive training on new technology capabilities.

## 6. Reporting and Continuous Improvement

- Initial GSS compliance report due to OSTP by August 22, 2025.
- Annual reports to follow on September 1, highlighting progress, metrics, and updates.
- Scientific Integrity Committee (SIC) will evaluate implementation effectiveness and revise plans as needed.



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## 7. Conclusion

CPSC is well-positioned to implement the OSTP Gold Standard Science guidance. While current policies demonstrate strong alignment, strategic updates and targeted improvements will ensure full compliance and elevate scientific credibility. This plan affirms CPSC's commitment to integrity, transparency, and evidence-based decision-making in the public interest.