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CPSC's EQUITY ACTION PLAN

Executive Summary

The U.S. Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death associated with the use of the thousands of types of consumer products under the agency's jurisdiction. The agency provides information about nationwide recalls of harmful consumer products and recommendations for avoiding death and serious injuries throughout the year.

Injury statistics show racial disparities in injury rates and deaths caused by carbon monoxide poisoning, residential fires, and drowning in pools and spas among minority families. This Equity Action Plan outlines CPSC's efforts to address these disparities in injuries and deaths with targeted interventions and to identify whether data shows that disparities exist with respect to other hazards. The Plan has several key pillars: agency-wide training, public education, improvements in the quality of our data, hiring new staff members, standards development (both voluntary and mandatory), demographically informed, targeted enforcement actions, and research projects to learn more about underserved communities.

Summary of Action Plan

CPSC is committed to updating and adapting our campaigns to engage with communities that need our safety messages the most. CPSC's response is evolving in an iterative process. We will seek public comment on this Plan through a public forum (details to be determined) to be held in the spring of 2022.

The main pillars of our plan include agency-wide staff training about equity, public education about hazards, improvements in the quality of our data about injuries, hiring a new staff member with expertise in underserved communities, standards development (both voluntary and mandatory) to prevent hazards, new demographically informed, targeted enforcement and investigation actions, outreach to impacted communities to gather information and feedback, and new research to learn more about underserved communities. The entire agency will be involved in these projects to enhance staff's knowledge, skills, and abilities for assessing equity issues, including equity in agency planning, and interacting with diverse audiences.

The following efforts will help to develop an agency culture that regularly evaluates outcomes with equity in mind. Staff will create a written framework of official CPSC agency practices for appropriately reaching diverse audiences. Key CPSC staff will receive a virtual multicultural marketing training tailored to the agency's goals, key messages, and audiences. CPSC will form an internal Racial Equity Advisory Council with staff from across program offices, to



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provide ongoing guidance about various external-facing multicultural outreach efforts. Paid injury prevention messages will be sent to organizations that specifically reach diverse audiences, to target affected groups. An extensive review of existing safety education campaign visuals and messages across subjects will identify changes CPSC should make to ensure that our educational campaigns are more culturally authentic and accessible. CPSC's communications team along with staff in the Division of Field Operations will increase public awareness and assess the needs of consumers in rural areas, who may have difficulty receiving our safety messages due to lack of access and broadband.

Field Operations will expand partnerships to increase outreach activities to health care organizations, safety groups, state and local governments, and other bodies that promote safety and reach underserved communities. CPSC will provide agency resources to underserved communities by identifying effective methods to reach targeted audiences to improve safety behaviors and outcomes. CPSC's Consumer Ombudsman will target programs that provide direct access to consumers. Ongoing reviews of injury reports will help the agency to create, edit, and target interventions over a broad range of communities, and then adjust activities, where needed, for greater impact on underserved communities that vary regionally. The CPSC provides professional language translation and interpretation services for public stakeholders with limited English proficiency and provides reasonable accommodations for individuals with disabilities.

Disparities in injury rates within affected communities should decrease over time with a combination of more effective public information, targeted enforcement, and standards development.

Summary of Early Accomplishments

Please highlight any equity-related achievements or successes (e.g., innovative stakeholder engagement, notable changes in policies or operations, new partnerships, etc.) since EO 13985 was released on January 20, 2021.

CPSC contracts with an outside public relations (PR) agency to receive guidance on cultural sensitivities concerning CPSC safety campaign outreach efforts for the agency's existing and new safety campaigns. Regarding civil rights issues, the agency offers interpretation services to accompany our verbal communications, and our key online educational materials have been translated into several foreign languages for consumers with limited English proficiency. Beginning in 2022, our public meetings will provide closed captioning and sign language interpreters.



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CPSC's policies support procurement of products and services from diverse suppliers. In fact, CPSC awarded 28 percent of its contract dollars for research and services to small, disadvantaged businesses (SDB) in FY 2021, exceeding the 15 percent OMB target.

Equity Action Plan

Please clearly identify three to five actions that your agency plans to undertake and list them in order of priority; provide evidence-based reasoning for selection; and outline high-level elements of implementation. (Actions should address the institutional resources available to offices responsible for advancing civil rights pursuant to Section 5(d) and procurement and contracting pursuant to Section 7(a) of EO 13985, but may also focus on other significant priorities identified by the agency regardless of whether they were included in the agency's equity assessment.)

For each action, please include:

Barrier to Equitable Outcome(s) Action Plan #1

Outreach to Address Higher Injury Rates among Black Americans

Describe the barrier you are trying to address.

CPSC data show Black Americans are at higher risk of death from generator-related *carbon monoxide poisoning, pool and spa drowning, and residential fires.*

Specify the program, policy, or regulation that contributes to this barrier.

We have not identified any barriers related to programs, policies, or regulations. Although we have identified racial disparities in injury rates, we are still researching the causes of these disparities.

Indicate which populations are most impacted by this barrier.

Black Americans



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List the evidence indicating that this barrier meaningfully impacts full and equal participation.

Black Americans accounted for 22 percent of generator-related CO deaths between 2009 and 2019. That's nearly double the Black American population of the United States, which is estimated to be 13 percent. Black American children ages 5-19 years old drown in swimming pools at rates 5.5 times higher than white children the same age. Ten times more Black children ages 11-12 years old drown in swimming pools than white children of the same age. According to CPSC's latest Residential Fire Loss Estimates report, Black Americans represent 13 percent of the U.S. population; however, they make up 24 percent of the home fire deaths and 27 percent of the injuries. Research across all races shows that Black Americans have the highest rate of deaths and injuries due to fires—nearly twice the overall death rate, and more than twice the overall injury rate.

Action and Intended Impact on Barrier

Describe the actions the agency will take to eliminate/reduce the barrier.

Carbon Monoxide Poisoning:

Our year-round CO-Hurricane & Severe Weather Safety Campaign targets minority communities in areas that are prone to severe weather and/or severe power outages, through media, organic digital/Web, and social media. In addition, CPSC conducts state outreach, contacting every state's environmental health department to obtain information on how and where to reach underserved populations. Field Operations staff seeks data sources at the state level that provide information on CO injuries. State-specific data will help CPSC target audiences and consumer needs, along with determining the best methods to share information. Field Operations staff and the Office of Communications will conduct outreach for rural communities that may have difficulty receiving our safety messages.

Pool and Spa Drowning:

Pool Safely, a year-round safety education campaign, targets minority communities through earned media, digital/web, social media, events, and grassroots outreach via a network of more than 1,200 campaign collaborators in communities across the country. Community outreach, via regional and national collaborations, will be expanded to focus on Black, Hispanic, and Native American communities. Throughout the year, CPSC's national media outreach will include Black and Hispanic, and Native American media outlets. Curated messages for CPSC's participation in the National Drowning Prevention Water Safety Conference will be transmitted in April 2022. The agency's website will receive updates of content and images from Office of Communications (OCM) staff. Pool Safely's existing public service announcement (PSA), which targets states and minority (Black, Hispanic) communities, will be promoted by OCM with the



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goal of increasing combined views across existing campaign social media accounts and our YouTube channel. The CPSC's Pool Safety campaign will be evaluated by OCM staff across digital platforms and public search engines. This analysis will segment results to help CPSC gain insight into the effect of its messaging on underserved communities. Additional CPSC news releases and targeted social media will highlight this issue and reach Black, Hispanic, and Native Americans.

Residential Fires:

Additional CPSC news releases and targeted social media will highlight this issue and reach out to Black Americans. Field Operations staff will contact fire departments to share CPSC safety messages across the nation, including our fire safety toolkit, which provides fire safety messages for multigenerational households, where grandparents, grandchildren, and adult children live together. The toolkit is intended for use by consumers, the fire safety community, state and local officials, and health educators. Field Operations staff also collaborates with state and local organizations through fire safety summits, where CPSC staff participates in roundtable discussions and shares resources.

Why did you prioritize these actions?

These hazard patterns are supported by our most recent epidemiological analyses. Public education is one of our agency's main services to the public. Therefore, these actions represent the agency's most likely strategy to achieve meaningful education of the public. Similar campaigns the agency undertook have yielded positive results in the past.

Indicate how the actions are expected to result in reducing or eliminating the barrier to equitable outcomes. If not identified above, please indicate what evidence supports this connection.

Protecting consumers from unreasonable risks of injury or death requires ongoing and consistent education. This requires repeating basic safety messages where the target audiences live and work, using methods they find credible. In marketing more broadly, research finds that people are more likely to engage with a brand, when they see people who look like them are represented in the brand's communications (Iterable, 2021 Consumer Psychology Poll, May 2021).



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Tracking Progress

Describe what factors you will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above in the near- to mid-term (2-4 years out).

We will track trends in the racial disparities in annual reports of injuries to see if our messaging is having an impact across the targeted communities. We will monitor, track, and report on traditional media and social media coverage for mentions of these three hazards. Where possible, the report will indicate coverage that is specific to minority populations, particularly Black, Hispanic, and Native Americans.

Indicate what success might ultimately look like in the long-term (5-8 years out).

Long-term success will be manifested by an overall reduction of racial disparities in injuries and deaths associated with CO poisoning, fires, and drownings, with a steeper reduction in minority populations such that the racial disparities are diminished.

Accountability

Describe how the agency will hold itself accountable to implementing this action. Consider potential internal and external mechanisms (e.g., aligning with the Agency Strategic Plan and/or other public-facing documents, embedding equity-related goals in performance plans, holding virtual town halls, etc.) and how and when the agency will communicate progress to stakeholders.

These actions will be aligned with CPSC's Strategic Plan. Equity-related goals will be embedded in the relevant agency performance plans.

Barrier to Equitable Outcome(s) Action Plan #2

Improving Data Quality

Describe the barrier you are trying to address.

A fiscal year 2021 report noted gaps in CPSC's incident data on race and income, *i.e.*, many people fail to include this information in their reports to the agency. Our data could be improved to include more information of this type, which could potentially lead to discovering other disparities in injury rates.



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Specify the program, policy, or regulation that contributes to this barrier.

CPSC cannot compel consumers to report race, so we expect missing data.

Indicate which populations are most impacted by this barrier.

Black and Hispanic consumers are known to be affected, but improving the quality of our data could potentially touch any demographic group.

List the evidence indicating that this barrier meaningfully impacts full and equal participation.

A lack of racial data hinders the identification of disparities. Without better data, we might misdirect resources, which can lead to inefficiency and ineffectiveness in the agency's efforts to achieve equity among underserved groups.

Action and Intended Impact on Barrier

Describe the actions the agency will take to eliminate/reduce the barrier.

To facilitate data improvement efforts, the Office of Hazard Identification and Reduction (EXHR) is hiring a Diversity Risk Manager to lead analysis of underserved communities, and we will also hire two new statisticians in the Division of Epidemiology. CPSC is considering other roles and positions in the agency to facilitate agency actions to eliminate racial disparities in injury rates.

Additionally, EXHR contracted with a data analytics firm to explore advanced statistical methods to account for unreported race data, or to "impute" the missing data. Other federal agencies facing similar missing data problems used such methods successfully. EXHR will also expand the characterization of injury rate disparities within annual product category reports using these new methods.

Why did you prioritize these actions?

Imputing missing data is a cost-effective investment that can allow analyses to be performed on existing data, rather than having to wait for new data to accumulate over time. Trends in consumer product safety typically need at least 5 years of data to be apparent in the type of reports we receive.

Indicate how the actions are expected to result in reducing or eliminating the barrier to equitable outcomes. If not identified above, please indicate what evidence supports this connection.

For injury-prevention science, the first step is to identify who is getting hurt, how, when, and why. Our injury reports are critical to every action the agency takes.



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Tracking Progress

Describe what factors you will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above in the near- to mid-term (2-4 years out).

Reductions in injury rate disparities in the regions and populations we target should be evident in a about 5 years.

Indicate what success might ultimately look like in the long-term (5-8 years out).

Success would be a statistically significant decrease in racial or other demographic disparities.

Accountability

Describe how the agency will hold itself accountable to implementing this action. Consider potential internal and external mechanisms (e.g., aligning with the Agency Strategic Plan and/or other public-facing documents, embedding equity-related goals in performance plans, holding virtual town halls, etc.) and how and when the agency will communicate progress to stakeholders.

These actions will be aligned with CPSC's Strategic Plan. Equity-related goals will be embedded in the relevant agency performance plans.

Barrier to Equitable Outcome(s) Action Plan #3

Standards and Research

Describe the barrier you are trying to address.

The large amount of unreported racial data has impeded staff from analyzing hazard patterns demographically. By investing in and improving our data collection, we will be able to better understand the disparities and how to redress them, while improving safety for all populations. To facilitate greater understanding of the causes and implications of racial disparities in injury rates, more research is needed. CPSC plans to leverage the insights from the enhanced data to identify and target research into specific interventions for areas of inequity.

Staff proposes to conduct focus group research that includes native Spanish-speakers to review existing CPSC Community Outreach resources, to provide suggestions to shape new communication materials for Spanish speakers.



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Specify the program, policy, or regulation that contributes to this barrier.

We have identified racial disparities in injury rates, but we are still researching the causes of these disparities. CPSC has limited resources to conduct basic research.

Indicate which populations are most impacted by this barrier.

This action could potentially affect any demographic group.

List the evidence indicating that this barrier meaningfully impacts full and equal participation.

Research and standards development efforts can be tailored to explore equity concerns, so that the subsequent public discourse about injury prevention and consumer product safety may be more fully informed regarding the causes of injuries and the impacts of safety interventions, consensus standards, and agency actions.

Action and Intended Impact on Barrier

Describe the actions the agency will take to eliminate/reduce the barrier.

We are raising the prominence of equity concerns in our discussions of consumer product safety research and standards.

Why did you prioritize these actions?

Research and standards development are critical components in our injury-prevention strategies because they can support safer design and manufacturing of consumer products before they are sold, thereby reducing the need to react to safety problems after injuries have occurred.

Indicate how the actions are expected to result in reducing or eliminating the barrier to equitable outcomes. If not identified above, please indicate what evidence supports this connection.

Research, data collection, and standards are important to the foundation of all CPSC's injury-prevention work. The research informs the standards, and the standards are intended to help prevent injuries. With approximately 50 years of standards development activities involving CPSC staff, we have decades of evidence indicating that consensus standards decrease injuries and can even eliminate some hazards.



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Tracking Progress

Describe what factors you will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above in the near- to mid-term (2-4 years out).

Same as above.

Indicate what success might ultimately look like in the long-term (5-8 years out).

Same as above.

Accountability

Describe how the agency will hold itself accountable to implementing this action. Consider potential internal and external mechanisms (e.g., aligning with the Agency Strategic Plan and/or other public-facing documents, embedding equity-related goals in performance plans, holding virtual town halls, etc.) and how and when the agency will communicate progress to stakeholders.

Same as above.

Barrier to Equitable Outcome(s) Action Plan #4

Targeted Enforcement and Investigations

Describe the barrier you are trying to address.

The Office of Hazard Identification and Reduction (EXHR) and the Office of Compliance and Field Operations (EXC) will collaborate on the demographics of regulatory investigations, by using the insights from “Data Quality” improvements to target EXC investigations and programs to address hazards disproportionately impacting minorities or geographic areas.

Specify the program, policy, or regulation that contributes to this barrier.

Our limited racial and other demographic data have hindered analysis of disparities in our enforcement and investigation programs. Once the previously mentioned “Data Quality” projects are complete, staff will have a better understanding of any potential gaps in enforcement and investigation.



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Indicate which populations are most impacted by this barrier.

This action could potentially affect any demographic group.

List the evidence indicating that this barrier meaningfully impacts full and equal participation.

There is no evidence of gaps in enforcement and investigation currently. However, if such gaps are found later, we can and will address those gaps.

Action and Intended Impact on Barrier

Describe the actions the agency will take to eliminate/reduce the barrier.

Using relevant census zip code data, EXC Field staff will focus in-person surveillance in identified targeted areas, emphasizing sample collection of potentially hazardous items and removal of banned and recalled products. In addition, the Office of Import Surveillance (EXIS) will target low-value, high-risk imported products likely to be sold in geographic areas with low-income and/or underserved populations, based on EXHR's incident analyses of regions experiencing specific hazard patterns.

Why did you prioritize these actions?

CPSC is a small agency with a focused mission. We wanted to include all of our capabilities in the service of decreasing and eliminating racial disparities in injury rates.

Indicate how the actions are expected to result in reducing or eliminating the barrier to equitable outcomes. If not identified above, please indicate what evidence supports this connection.

Enforcement and investigations provide consumers with a marketplace that is as free from noncompliant or illegal consumer products as we can make it. We have nearly 50 years of evidence that enforcement and investigations find and remove hundreds of thousands of noncompliant products from store shelves and homes every year.

Tracking Progress

Describe what factors you will use to determine whether the agency action(s) has eliminated or substantially reduced the barrier to equitable access identified above in the near- to mid-term (2-4 years out).

Reduced injuries, as above.



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Indicate what success might ultimately look like in the long-term (5-8 years out).

Success would be finding a statistically significant decrease in racial disparities, as above.

Accountability

Describe how the agency will hold itself accountable to implementing this action. Consider potential internal and external mechanisms (e.g., aligning with the Agency Strategic Plan and/or other public-facing documents, embedding equity-related goals in performance plans, holding virtual town halls, etc.) and how and when the agency will communicate progress to stakeholders.

Same as above.