



August 23, 2024

Lori Moore-Merrell, DrPH
U.S. Fire Administrator
U.S. Fire Administration

Dear Dr. Moore-Merrell,

I appreciate the efforts that the U.S. Fire Administration (USFA) has taken to work together with the U.S. Consumer Product Safety Commission (CPSC) on fire hazards and enjoyed the opportunity to talk last June. One of the activities of mutual interest is development of the National Emergency Response Information System (NERIS) to replace the National Fire Incident Reporting System (NFIRS) database. My staff was heartened by the information you and your staff provided regarding the changes being made and I wanted to pass along some additional comments for your consideration.

CPSC relies on inclusion of product-related information in NERIS and NFIRS to inform product safety decisions related to fire sources (such as lighters and appliances) and items first ignited (such as furniture). Therefore, it is important to our agency's mission that changes in NERIS will not significantly limit the ability to identify consumer product-related fire hazards.

Over the last couple of months our staff have participated in several conversations with the staff at the Fire Safety Research Institute (FSRI) about NERIS. On August 5, 2024, FSRI released the Phase II NERIS draft schemas, which included the modules particular to consumer products.¹ CPSC staff have reviewed the draft schemas and overall believe these schemas would enable CPSC to fulfill our mission, but our staff do have some comments and suggestions, which are attached.

I appreciate the time you have given to CPSC and look forward to a continued strong relationship between our agencies. Your team should please contact Duane Boniface (dboniface@cpsc.gov), the Assistant Executive Director of the CPSC Office of Hazard Identification and Reduction, to further any technical discussions on NERIS, battery-powered devices, wildfires, or any other consumer product-related issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexander D. Hoehn-Saric".

Alexander Hoehn-Saric
Chair
U.S. Consumer Product Safety Commission

CC: Duane Boniface (CPSC), Evrim Bunn (USFA), Steve Kerber (FSRI), Thomas Jenkins (FSRI)

¹ <https://github.com/ulfsri/neris-framework>



CPSC Staff's Suggestions and Comments to FSRI Phase II Draft Schemas:

CPSC staff believes that the National Electronic Injury Surveillance System (NEISS)² manual³ should be used as an initial conceptual design for the consumer product-related codes in NERIS. CPSC staff does not expect that all products listed in the NEISS manual will need to be included in NERIS and are willing to undertake a collaborative effort to choose which products to include. Similarly, CPSC could consider any products added to NERIS in future updates to the NEISS manual. This could create a consistent product list used by CPSC, USFA, and other organizations in analyzing product incidents.

CPSC staff suggests that a new mandatory field be associated to the product input. This field would capture how the product was involved in the incident. Specifically, whether the product was an ignition or heat source, contributed to the flame or fire spread, was a carbon monoxide source, or had some other hazard such as mechanical or noxious gas. Staff understands the logic that product attributes such as the product manufacturer, description, and model number are optional fields, but the product's contribution to the incident must be captured. Often, knowing that a product was involved is not enough in the incident evaluation, so CPSC staff recommends adding this field as a mandatory field when the product is entered, as it is a crucial piece of information. By adding this mandatory field, CPSC staff and other stakeholders could continue identifying ignition sources, products first ignited, and other key attributes of product involvement in fires. As the current schema stands, it is not clear to CPSC staff how critical products like candles, cigarettes, upholstered furniture, mattresses, clothing, etc., which are involved in a large number of serious fires, would be captured other than in the narrative field. If they can only be captured in the narrative field, CPSC staff are concerned that this could hamper the ability to assess these hazards.

The "incident analysis" contains several modules of interest to CPSC staff: the core_mod_analysis (core analysis), mod_structure_fire (structure fire), mod_outdoor_fire (outdoor fire), and mod_battery_incident (battery incident). The core analysis, structure fire, and battery incident modules all include fields for product information, but the outdoor fire module does not. CPSC staff suggests that all four of these modules should reference the same list of products, see our note on NEISS. Consumer products such as grills, firepits, and lawn furniture are often involved in outdoor fires; capturing this product information can be crucial in fully understanding outdoor fires. Therefore, CPSC staff suggests that the same product information be captured within each module.

A fifth module, mod_transportation_fire, appears to focus on highway vehicles but should be expanded to include off-highway vehicles and micromobility products. Both off-highway

² <https://www.cpsc.gov/Research--Statistics/NEISS-Injury-Data>

³ <https://www.cpsc.gov/s3fs-public/January-2024-NEISS-CPSC-only-Coding-Manual.pdf>



vehicles and micromobility products have had recent fire-related issues.⁴ While the product list may be different for this module than the other modules mentioned, CPSC staff suggests this could be an appropriate way to capture incidents with these types of products. Together with the battery incident module, these two modules could help provide further incident details in two areas CPSC staff identified in our general comments.

CPSC staff suggests that the product field in all the modules be mandatory for completion of the report. If no product was involved, the coder should enter a predetermined code specifying that.

Finally, CPSC staff suggests that the human factors field in the structure fire module should be included in all the “incident analysis” modules. Human factors are a frequent consideration in all fires, not just structure fires. Child play, smoking, illegal drug use, legal drug use, alcohol use, unattended or unsupervised person, are all examples of human factors that could apply to many different incidents. Including human factors in all modules will make identifying some of these factors, such as child play, easier in NERIS than with NFIRS.

⁴ <https://www.cpsc.gov/content/2023-Report-of-Deaths-and-Injuries-Involving-Off-Highway-Vehicles-with-More-than-Two-Wheels>