

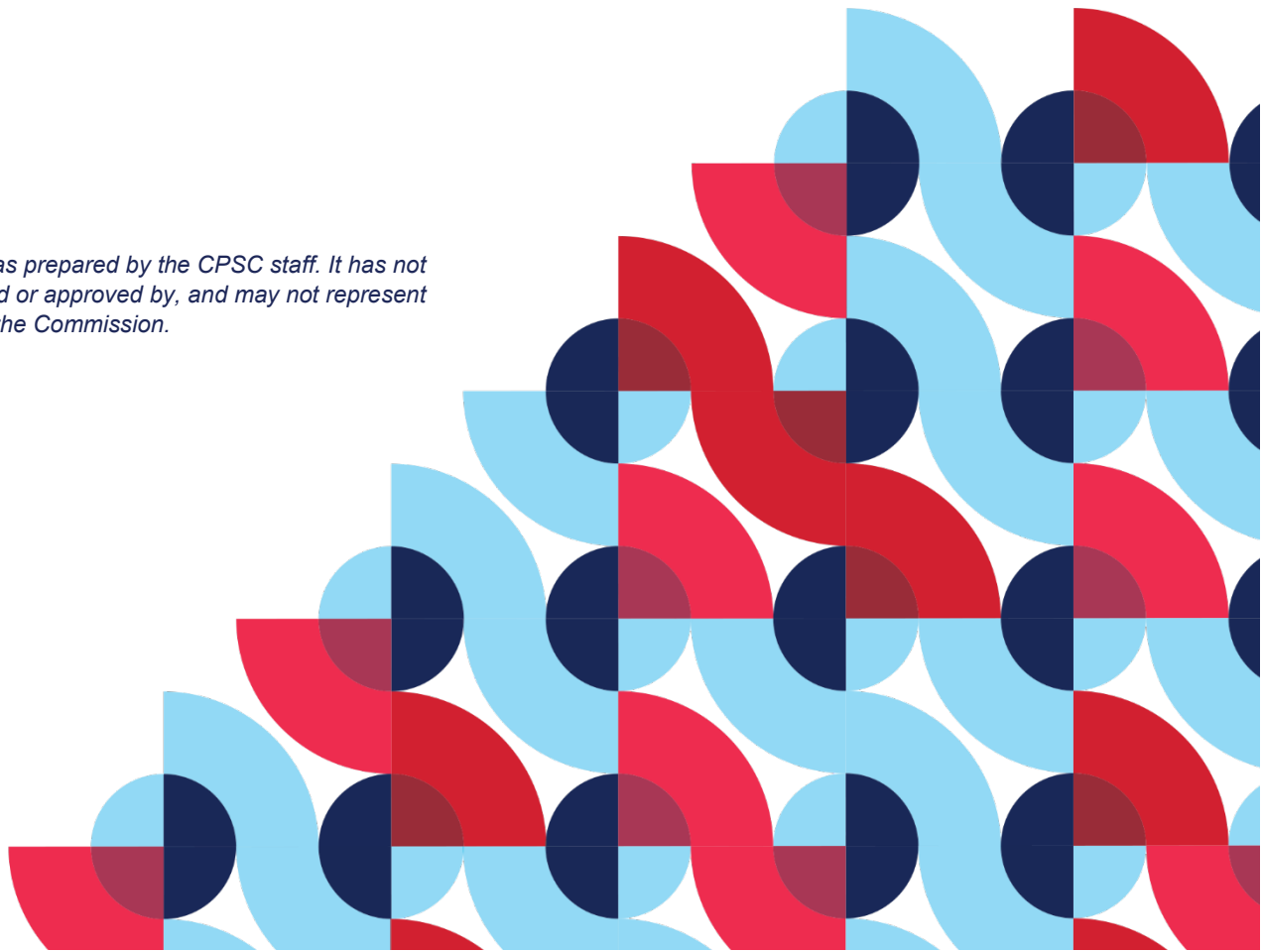


United States  
**Consumer Product Safety Commission**

# eFiling Quick Start Guide

July 2024

*This report was prepared by the CPSC staff. It has not been reviewed or approved by, and may not represent the views of, the Commission.*



# Table of Contents

<b>1</b>	<b>Introduction</b> .....	<b>3</b>
<b>2</b>	<b>eFiling 101</b> .....	<b>4</b>
2.1	Why eFiling?.....	4
2.2	How do you eFile Product Certificates? .....	5
2.3	Who is Responsible for Product Certification? .....	7
2.4	What are the Requirements for Product Certification? .....	7
2.5	What Must be Included in a Product Certificate? .....	8
<b>3</b>	<b>eFiling Roles and Responsibilities</b> .....	<b>9</b>
<b>4</b>	<b>Implementation Best Practices</b> .....	<b>10</b>
4.1	eFiling Implementation Stages.....	11
<b>5</b>	<b>CPSC Support Services</b> .....	<b>16</b>

# 1 Introduction

The purpose of this eFiling Quick Start Guide is to support importers and their trade partners through the beginning stages of eFiling implementation. After reviewing this guide and following the best practices, importers and their trade partners will be able to better understand eFiling and the Product Registry, minimize risks, optimize resources required to comply with the expected eFiling requirements, facilitate collaboration, and gain confidence throughout the early-stage adoption process.

The eFiling Quick Start Guide:

- Explains the eFiling initiative and product certification requirements;
- Provides guidance on common questions and challenges new participants may encounter;
- Offers implementation tips and best practices based on feedback CPSC has received to date; and
- Supports importers and their trade partners through the transition to eFiling with guidance, actionable next steps, and information on support services.

**NOTE:** CPSC understands that each organization’s needs and approaches to data management are unique. The guidance provided in this document should not be considered as “one-size-fits-all,” and we encourage importers to reach out directly to CPSC with any questions or concerns.

## 2 eFiling 101

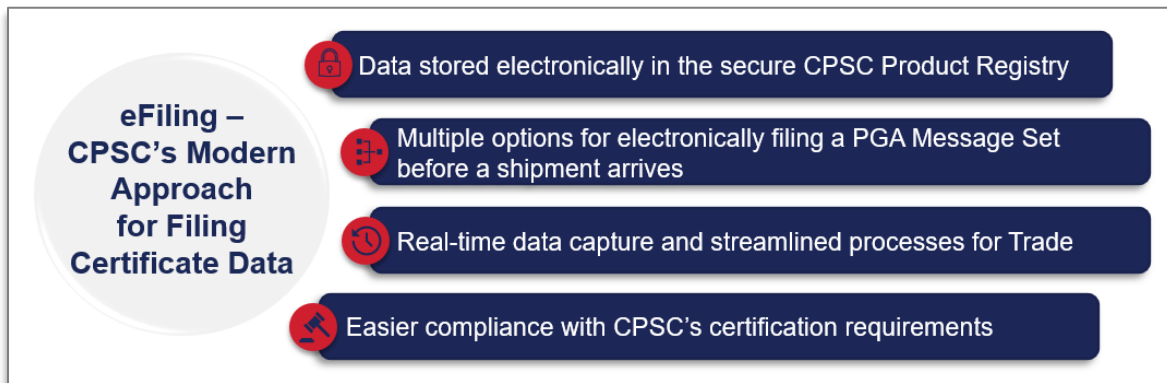
eFiling is a CPSC initiative for importers of regulated consumer products to electronically file (eFile) data elements from a certificate of compliance with the U.S. Customs and Border Protection (CBP), via a Partner Government Agency (PGA) Message Set.

CPSC staff anticipates that full implementation of eFiling will occur in or around 2025. eFiling is changing how importers manage product certificate data, *not* which products *require* a certificate (a requirement in place since 2008). Any consumer product that is subject to a CPSC rule, ban, standard, or regulation will continue to require a Certificate of Compliance, which will be eFiled at the time of entry.

**NOTE:** CPSC eFiling only applies to *imported* regulated consumer products. Manufacturers who manufacture domestically are not required to eFile product certificates for products produced in the United States.

### 2.1 Why eFiling?

eFiling will allow CPSC to process import shipments more efficiently and increase focus on higher risk products. Not only will the eFiling initiative help to support CPSC's focused targeting efforts, but it also provides trade with an improved, standardized process for electronically filing product certificates.



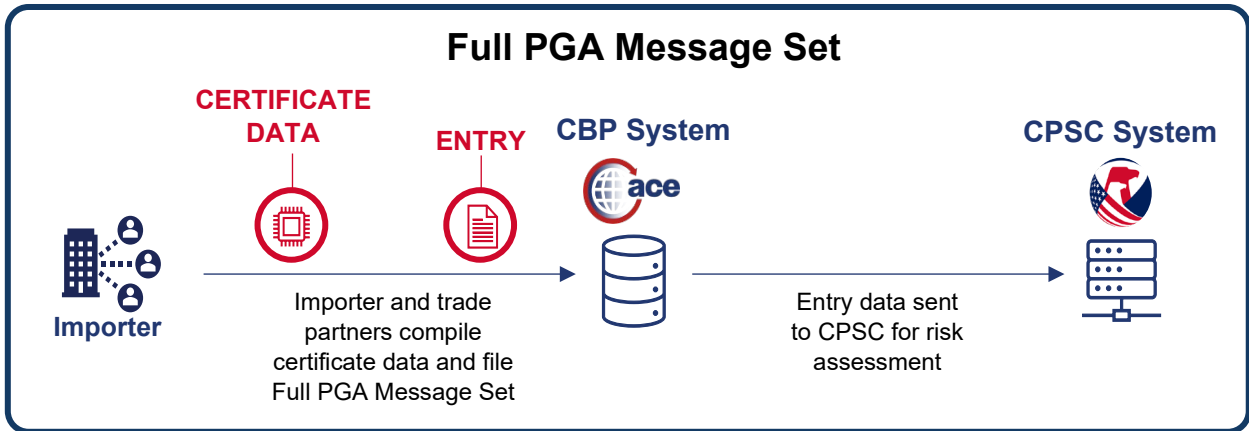
CPSC's eFiling initiative is projected to have key benefits for the trade industry, including:

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

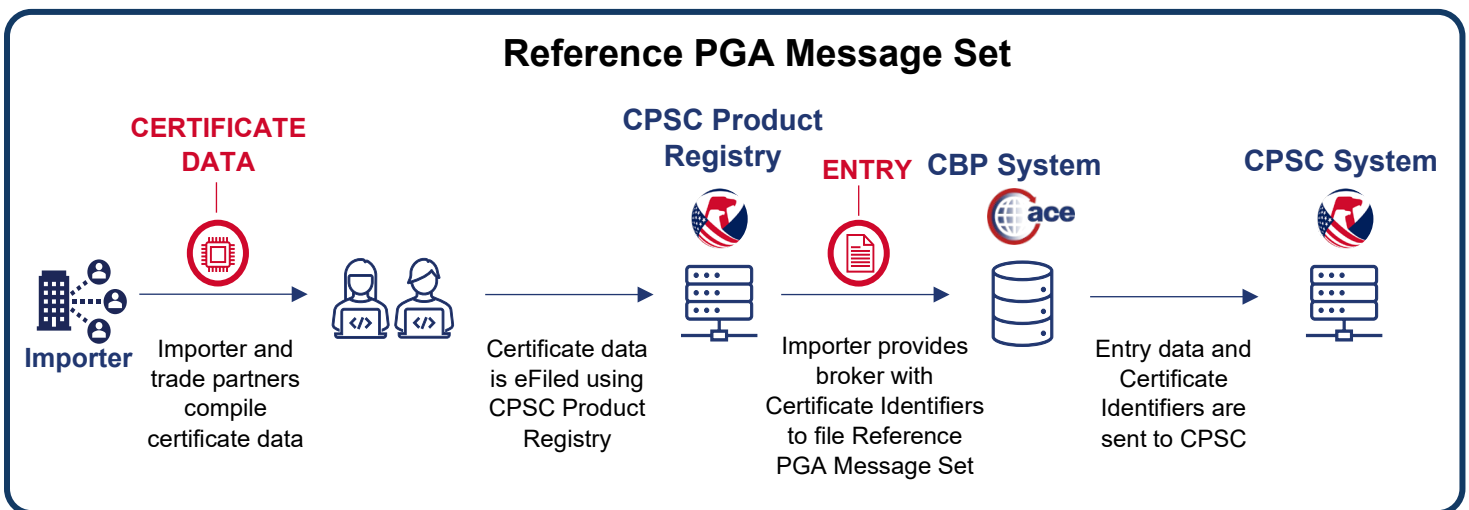
## 2.2 How do you eFile Product Certificates?

Importers are required to transmit Message Set data into CBP's Automated Commercial Environment (ACE) system at the time of entry. With the full implementation of eFiling, there will be two options to accomplish this:

- Full PGA Message Set:** The importer provides their broker with the full product certificate for the imported product and the broker files it in the CPSC PGA Message Set. This is recommended if the importer imports a *limited number* of regulated consumer products or *does not repeatedly import* the same product.



- Reference PGA Message Set:** The importer pre-enters the certificate data into the CPSC Product Registry (developed and maintained by CPSC) and then provides their broker with certificate identifiers to be filed in the PGA Message Set. The certificate identifiers are the Certifier ID, Product ID, and Version ID. This option is preferable if the importer *repeatedly imports* regulated consumer products covered by the same product certificates. By using the Product Registry, the importer can leverage manual or bulk upload features to file product certificate data in a streamlined and accelerated manner.



The CPSC Product Registry serves as a stand-alone central data repository for importers' product certificate data and does not communicate with CBP's ACE system. Once a product certificate is entered and certified in the Product Registry, importers must communicate the product's three **Certificate Identifiers** to their broker, so that the Reference PGA Message Set can accurately reference the applicable product certificate in the Product Registry. See below for more information on the Certificate Identifiers required for a Reference PGA Message Set.

Certificate Identifier	Description	Example
<p><b>Certifier ID</b>  <i>A unique identifier created by the importer that is ultimately responsible for certifying the product certificates</i></p>	<ul style="list-style-type: none"> <li>The Certifier ID ensures that the correct importer is linked to the certificate of compliance that is filed in the Product Registry.</li> <li>CPSC advises that importers use a simple, alphanumeric, easily identifiable version of their company name that fits within the 23-character limit.</li> <li>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.</li> </ul>	<p>An importer named ABC Co. imports regulated consumer products. When creating their Business Account in the Product Registry, they created  <b>Certifier ID: ABCCo</b></p>
<p><b>Product ID</b>  <i>A unique identifier for the product that is being certified</i></p>	<ul style="list-style-type: none"> <li>The Product ID can be one of seven possible ID types: GTIN, SKU, UPC, Model Number, Serial Number, Registered Number, or Alternate ID.</li> </ul>	<p>Importer ABC Co. imports a product with the Product SKU of A1234567. Their Product ID is then created as  <b>Product ID: A1234567</b></p>
<p><b>Version ID</b>  <i>A unique identifier for the specific version of product certificate in the Product Registry</i></p>	<ul style="list-style-type: none"> <li>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</li> <li>The Version ID is unique to the Primary Product ID.</li> <li>A new Version ID must be created in any of the following scenarios: <ul style="list-style-type: none"> <li>An existing product certificate requires an update based on factors such as testing compliance renewal</li> <li>A new batch of the same product (with the same Product ID) that has a <a href="#">material change</a> when compared to the original product batch, such as <ul style="list-style-type: none"> <li>a change to the product design</li> <li>a change to the manufacturing process</li> <li>a change to the source of the component parts for the product</li> </ul> </li> <li>A new batch of the same product (with the same Product ID) manufactured at different facilities and/or tested at different labs</li> <li>Edits to a certified product certificate are required after the editing grace period has ended</li> </ul> </li> </ul>	<p>Importer ABC Co. entered their first product certificate for Product ID: A1234567 using  <b>Version ID: V1</b></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 <b>Version ID: V2</b></p>

Certificate Identifier	Description	Example
	<ul style="list-style-type: none"> <li>○ A completed and certified product certificate requires edits but has already been used in a PGA Message Set within the editing grace period</li> </ul>	

### 2.3 Who is Responsible for Product Certification?

**Importers** are ultimately responsible for product certification.

Both importers and their trade partners should have a clear understanding of which standards need to be met. All trade parties involved in producing and testing must know which mandatory standards apply to the products they are importing. Trade partners can certify on behalf of the importer, if granted user permissions to do so.

### 2.4 What are the Requirements for Product Certification?


The eFiling initiative does not change the applicable consumer product safety *requirements* for a given product or shipment, but rather creates a *process* by which the product certificate is filed and provided to CPSC and CBP. CPSC provides various resources to support importers in understanding what testing and certification requirements apply to their imported consumer products.

Products must be certified if they are...

- ✓ Finished products;
- ✓ Subject to a consumer product safety rule, ban, similar rule, standard, or regulation;
- ✓ Imported for consumption or warehousing; or
- ✓ Distributed in commerce

**Note:** There is no *de minimis* exemption for eFiling. Therefore, any product requiring certification must have an eFiled certificate, regardless of the value of the imported shipment.

**Visit these hyperlinks to learn more:**

Topic	Hyperlinks 
Testing and Certification Guidance	<a href="#">Testing &amp; Certification</a>
Regulatory Robot	<a href="#">Safer Products Start Here!</a>
Children's Products	<a href="#">Children's Product Certificate</a>
General Use Products	<a href="#">General Certificate of Conformity</a>
Material Change	<a href="#">Material Change Testing</a>

## 2.5 What Must be Included in a Product Certificate?

When eFiling product certificates, importers must provide seven data elements to complete a Certificate of Compliance, as specified in [16 CFR 1110](#).

### 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

For **Full PGA Message Sets**, all seven data elements are filed directly in the Full PGA Message Set and submitted into CBP's ACE system.

For **Reference PGA Message Sets**, the seven data elements are entered into the CPSC Product Registry. Once the product certificate is certified and stored in the Product Registry, it can then be filed repeatedly in a Reference PGA Message Set with its applicable Certificate Identifiers (Certifier ID, Product ID, and Version ID).



### 3 eFiling Roles and Responsibilities

The eFiling initiative may change the way importers communicate product certificate data between their trade partners. Each trade partner plays a critical role in the flow of information throughout the eFiling process. See below for CPSC’s suggested roles and responsibilities for importers and their trade partners.

**NOTE:** While the importer is ultimately responsible for certifying and eFiling their product certificate data, trade partners may act of behalf of the importer for certain eFiling tasks such as certification in the Product Registry and filing Message Sets into the ACE system, if granted appropriate user permissions.

Stakeholder Role	Key Responsibilities
<p><b>Importer</b>  <i>Manage and oversee flow of data and eFiling process to prepare for entry</i></p>	<ul style="list-style-type: none"> <li>Engage and communicate with trade partners to provide awareness and guidance on eFiling</li> <li>Implement updated business processes to support new eFiling roles to include Compliance and Customs teams, if applicable</li> <li>Oversee system integration planning and execution</li> <li>Identify the CPSC regulated products that fall within the scope of eFiling</li> <li>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</li> </ul>
<p><b>Broker</b>  <i>Collaborate, communicate, and file certificate data on behalf of importer</i></p>	<ul style="list-style-type: none"> <li>Work with importer to identify CPSC regulated products that need to be eFiled</li> <li>Establish data flow with importer to ensure all data elements for Message Set are communicated timely and accurately</li> <li>Track shipments through the supply chain to ensure shipment data is ready to file at time of entry</li> <li>File Full PGA Message Set or Reference PGA Message Set at time of entry</li> <li>Communicate with importer client(s) to ensure collaborative efforts across entire eFiling business process to include status updates, risk mitigation, and shipment tracking</li> </ul>
<p><b>Testing Laboratory</b>  <i>Gather, test, and transmit test report information</i></p>	<ul style="list-style-type: none"> <li>Gather data requirements for test report from importer</li> <li>Identify products and corresponding citations per CPSC regulations</li> <li>Collaborate with importer and broker to establish a data transfer protocol</li> <li>Execute data transfer for all applicable test report details</li> </ul>
<p><b>Manufacturer</b>  <i>Provide all manufacturing details for applicable products subject to CPSC regulation</i></p>	<ul style="list-style-type: none"> <li>Gather data requirements for manufacturing information from importer</li> <li>Collaborate with importer and broker to establish a data transfer protocol</li> <li>Execute data transfer of manufacturer details for all applicable products identified</li> <li>Ensure manufacturer information is provided accurately and updated as necessary</li> </ul>

Stakeholder Role	Key Responsibilities
<p><b>Software Developer</b>  <i>Develop, execute, and collaborate to integrate technical solutions</i></p>	<ul style="list-style-type: none"> <li>• Create project plan that considers alignment with eFiling timelines</li> <li>• Lead coordinated integration and development efforts to update systems and align with eFiling requirements</li> <li>• Develop automated technical solutions to enable easier data transfers</li> <li>• Collaborate with all stakeholders to ensure IT architecture is working as expected for successful submission of Message Set data</li> </ul>

## 4 Implementation Best Practices

CPSC received comprehensive feedback from trade on eFiling systems and processes throughout CPSC development, implementation planning, and pilot testing. The feedback throughout the eFiling preparation process has informed the implementation best practices outlined in this guide. The remainder of the guide provides planning and execution best practices for successful eFiling based on common questions, challenges, and solutions that participants have encountered throughout testing. Importers may leverage this information to streamline and organize their implementation planning process.

**Consider these suggested best practices as your business prepares for eFiling:**

✓ ***Define CPSC eFiling requirements early***

Importers are responsible for identifying products subject to CPSC regulation and taking the necessary steps to comply with eFiling requirements. Set clear, measurable, and specific goals that will ensure success prior to full implementation of eFiling in or around 2025. Gain comprehensive understanding of eFiling requirements as early as possible to allow sufficient time to integrate and implement eFiling processes.

✓ ***Establish integrated communication channels***

The success of eFiling implementation will require importers to engage with their trade partners in new ways to comply with the new requirements. It is critical that roles and responsibilities are clearly defined at each step of the process to ensure the successful flow of data from the Product Registry to CBP’s ACE system. Integrated and frequent communication among stakeholders is critical for eFiling as importers and their trade partners work together to comply.

✓ ***Develop technical solutions to enable data flow***

The CPSC Product Registry is a new and optional system for entering and storing product certificate data. As such, previously established systems and processes will need to be updated to accommodate the new system, if it is used. Also, many importers will want to consider automated solutions to manage their high volume of products. CPSC understands that it takes time and resources to build these solutions, so it is highly recommended that importers begin gathering requirements and implementing solutions as soon as possible.

✓ **Consider the level of time, staffing support, and resources required**

It is critical that importers assess their readiness prior to eFiling full implementation to ensure they have enough time and resources. Importers may require more time and resources than expected to ensure all data elements are accurately provided and communicated across all stakeholders.

✓ **Identify the coordinated eFiling model that works for your business**

Each importer's business is different and will therefore have different workflows and standard operating procedures for how they file their product certificate data and transmit a PGA Message Set. It is the responsibility of the importer to make the business decisions that work best for them based on factors such as scale of business, trade partner relationships, technical capabilities, automated versus manual solutions, and current entry filing processes. It is critical that they communicate these decisions to their trade partners and understand the role each of these partners will play in executing the eFiling process.

#### **4.1 eFiling Implementation Stages**

This section outlines the three stages importers will need to navigate to prepare for eFiling full implementation in or around 2025. Be advised that importers should be preparing for eFiling as soon as possible. CPSC understands this initiative may impact businesses as they update their systems and change the way they prepare and file product certificate data. Importers that start preparing for eFiling early will be better equipped to comply with requirements when CPSC begins its planned enforcement. The three stages are as follows:

- **Stage 1: Learn, Define, Communicate**
- **Stage 2: Integration and Development**
- **Stage 3: Implementation and Improvement**

Importers and their trade partners should review the following CPSC-suggested goals and checklists provided for each stage to understand the types of actions and questions they should be asking to prepare for successful eFiling implementation.

### **Stage 1: Learn, Define, Communicate**

This stage involves gaining a deeper understanding of what eFiling is and how businesses will have to adjust to prepare for full implementation. This stage is where a business must collect the information needed from key stakeholders, define specific roles, identify problems and solutions, and figure out what needs to be done prior to eFiling full implementation.

## Goals to consider for this stage:

- 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 in Full PGA Message Set or Reference PGA Message Set
- Gain a comprehensive understanding of how to use the CPSC Product Registry
- Appoint outreach coordinator(s) responsible for working with stakeholders to identify points of contact, communicate requirements, and build relationships across trade partner organizations
- Develop integrated communication channels across all internal and external stakeholder partners to align on objectives, progress, and planning
- Understand current business process and system readiness and decide whether additional development is required
- Understand data requirements for product certificate data entry via manual or bulk upload including Comma Separated Values (CSV) file upload and Application Programming Interface (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 Task Checklist

#### Receive eFiling Update Notifications

- Add your business email to CPSC's mailing list to receive direct notification of the latest eFiling updates

#### Learn more about the eFiling Program

- Visit the CPSC eFiling webpage at [www.cpsc.gov/eFiling](http://www.cpsc.gov/eFiling)
- Review the eFiling Document Library
- Identify products subject to CPSC regulation
- Identify all product certificate data elements for collection
- Watch CPSC Product Registry training modules
- Study the available resources on the webpage to understand the eFiling requirements, processes, and data elements

#### Inform your Importer Trade Network

- Implement formal email communications, meetings, and calls to spread awareness across all internal and external stakeholder channels to include importer, broker, laboratory, manufacturer, and software developer contacts
- 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

This stage involves developing the processes and systems necessary for successful eFiling. Once Stage 1 has been completed, businesses should have a comprehensive understanding of what eFiling means for their business and how they will ensure readiness prior to eFiling full implementation in or around 2025. If an importer decides to use the CPSC Product Registry and file Reference PGA Message Sets, integration and development efforts will be required to accommodate the new system. CPSC developed and will continue to maintain the CPSC Product Registry, but it is ultimately the responsibility of the importer to learn the new system and use it to enable easier and more efficient electronic filings.

### Goals to consider for this stage:

- Identify a process flow to communicate all certificate data elements into the Product Registry (Reference PGA Message Set) or directly in the Full PGA Message Set
- Create data collection systems and processes across all trade partners
- Develop eFiling infrastructure to enable successful data flows from importer to broker (Electronic Data Interchange (EDI) data flow, Product Registry data entry, API integration, etc.)
- Test product certificate data entry via manual or bulk upload (CSV upload, API integration) options into the Product Registry
- Implement process to enable data flow from Product Registry to ACE so that accurate certificate identifiers are provided to broker prior to shipment entry
- Track and communicate development progress to align with eFiling timeline
- Identify software developer trade partners 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, including workflows, procedures, and guidelines.
- Work with software developer partner to begin API integration, if applicable

## Stage 2 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 (if choosing to file Reference PGA Message Sets)
- 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

### 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 (Certifier ID, Product ID, Version ID)

### Test Product Certificate Data

- Establish connected data flow from the importer to the Product Registry to the broker (Reference PGA Message Set) or from importer to broker (Full PGA Message Set) 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 (Reference PGA Message Set) or into ACE (Full PGA Message Set)
- 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

This stage involves implementation of the eFiling process after all teams have been assembled, development efforts have been completed, and the entire eFiling team is ready to begin testing the system with real data. The entire eFiling team across all stakeholders should have a robust understanding of eFiling in the final stage of implementation planning and execution. At this point, all teams should have had substantial technical and non-technical discussions around the eFiling process to understand the steps required to execute successful electronic filing of certificates of compliance.

### Goals to consider for this stage:

- 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 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

## 5 CPSC Support Services

CPSC is committed to supporting trade through the transition to eFiling full implementation. The eFiling webpage at [www.CPSC.gov/eFiling](http://www.CPSC.gov/eFiling) includes a full Document Library with comprehensive learning materials, including:

- **eFiling Implementation Guide (CATAIR)**
- **eFiling Product Registry Guide**
- **Product Registry Training**
- **Product Registry Frequently Asked Questions**
- **Citation, Disclaim, and Testing Exclusion Codes**
- **Citation, Disclaim, and Testing Exclusion Guidance**
- **User Guide for CSV Upload**
- **CSV Upload Template**
- **API Specifications Document**

These resources are meant to help importers and their trade partners learn and understand eFiling systems and processes. While the CPSC eFiling team is available for support, importers and trade partners are ultimately responsible for making the business decisions necessary to comply with eFiling requirements ahead of full implementation.

Email [eFilingSupport@CPSC.gov](mailto:eFilingSupport@CPSC.gov) with additional questions.