



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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STATEMENT OF COMMISSIONER NANCY NORD ON
THE PROPOSED REORGANIZATION OF
THE U.S. CONSUMER PRODUCT SAFETY COMMISSION

July 29, 2011

I do not believe that the proposed agency reorganization is well-advised and I cannot support it. Contrary to the briefing memo, the proposed reorganization is certainly not “minor” as it has been styled. It makes an important change to agency operations. While I have a number of concerns about the proposal, two are highlighted here.

My first concern is the proposal removing the Import Surveillance Division from the Office of Compliance and establishing it as a stand-alone operation, independent of the Office of Compliance. The Import Surveillance Division was established in 2008 to provide focused compliance resources to the issue of unsafe imports. The Division has grown significantly since it was established and this reflects the important role that import surveillance plays in our compliance activities. Vigilance at our ports and vigilance in the marketplace are two sides of the same compliance coin. I have not heard any persuasive rationale for this move other than recognition of the fact that import surveillance is a fast growing function of the agency. While this is true, import surveillance is still totally a compliance function. I question how removing it from the supervision of the Office of Compliance will do anything other than create the potential for internal confusion, inconsistent decision making and inefficiency.

I also question the need for creating a second deputy position to assist the agency executive director. This adds another layer of management between our important program offices, especially the Office of Compliance, and the leadership of the agency. This top-heavy management direction does not reflect the fact that the agency’s budget is shrinking, not growing. I would prefer to see the agency add compliance officers, scientists and technicians, rather than add another layer of management.