



## **U.S. Consumer Product Safety Commission OFFICE OF INSPECTOR GENERAL**



# **Trafficking Victims Prevention and Protection Reauthorization Act of 2022**

April 30, 2025

25-O-04





## **VISION STATEMENT**

We are agents of positive change striving for continuous improvements in our agency's management and program operations, as well as within the Office of Inspector General.

## **STATEMENT OF PRINCIPLES**

We will:

Work with the Commission and the Congress to improve program management.

Maximize the positive impact and ensure the independence and objectivity of our audits, investigations, and other reviews.

Use our investigations and other reviews to increase government integrity and recommend improved systems to prevent fraud, waste, and abuse.

Be innovative, question existing procedures, and suggest improvements.

Build relationships with program managers based on a shared commitment to improving program operations and effectiveness.

Strive to continually improve the quality and usefulness of our products.

Work together to address government-wide issues.



April 30, 2025

TO: Peter A. Feldman, Acting Chairman  
Alexander D. Hoehn-Saric, Commissioner  
Richard L. Trumka Jr., Commissioner  
Mary T. Boyle, Commissioner  
Douglas Dziak, Commissioner

FROM: Christopher W. Dentel, Inspector General

SUBJECT: Trafficking Victims Prevention and Protection Reauthorization Act of 2022

I am pleased to present this annual report to Congress regarding the U.S. Consumer Product Safety Commission's (CPSC) efforts to prevent and protect trafficking victims in 2024 in accordance with the Trafficking Victims Prevention and Protection Reauthorization Act of 2022. The Office of Inspector General (OIG) is required to, in consultation with the head of the agency, submit an annual report to Congress, which shall be publicly accessible containing the following information:

(1) the number of suspected violations reported:	0
(2) the number of investigations:	0
(3) the status and outcomes of such investigations:	NA <sup>1</sup>

The OIG is also required to report on any recommended actions to improve the programs and operations of the CPSC regarding the implementation of the Trafficking Victims Prevention and Protection Reauthorization Act of 2022. This annual report is based on information provided directly by the agency and has not been prepared in accordance with government audit standards.

This is the second year that the CPSC has been required to report on compliance with the Trafficking Victims Prevention and Protection Reauthorization Act of 2022. Several new reporting requirements requiring action by the agency took effect in July 2024. Specifically, the CPSC is now required to incorporate a module on human trafficking into its menu of topics to

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<sup>1</sup> As no suspected violations were reported, there were no investigations initiated. As a result, there is nothing to report regarding the status of investigations.

be covered in its annual ethics training and to incorporate a module on human trafficking into its staff training requirements. Such staff training must teach employees how to prevent, identify, and report trafficking of persons. The CPSC is also required to incorporate anti-trafficking provisions into its Code of Conduct, to require employees to sign acknowledgement of the Code of Conduct, to file said acknowledgement in the file of the employee, to inform employees that a violation of the Code of Conduct should lead to disciplinary action, and to inform all candidates for employment of the existence of said anti-trafficking provisions in the Code of Conduct.

The CPSC's implementation of the requirements of this act are detailed in the chart below.

Summary of Trafficking Victims Prevention and  
Protection Reauthorization Act of 2022 Compliance for CY 2024

Item No.	Criteria	Compliant
1	Human trafficking added to menu of topics to be covered in annual ethics training.	Yes
2	Incorporate a module on human trafficking into staff training requirements that teaches employees how to prevent, identify, and report trafficking in persons.	Yes
3	Incorporate anti-trafficking provisions into the Code of Conduct.	Yes
4	Require employees to sign acknowledgement of the Code of Conduct.	Yes
5	File employee acknowledgement of the Code of Conduct in the file of the employee.	Yes
6	A violation of the Code of Conduct should lead to disciplinary action.	Yes
7	Inform all candidates for employment of the existence of said anti-trafficking provisions in the Code of Conduct.	No

Source: Prepared by OIG based on agency information.

The agency is compliant in all provisions of the Trafficking Victims Prevention and Protection Reauthorization Act of 2022, except for the requirement that "the head of each agency should inform all candidates for employment about the anti-trafficking provisions in the Code of Conduct of the agency."<sup>2</sup> Instead of informing all candidates about the CPSC's Code of Conduct anti-trafficking provisions as required, the agency only informs successful candidates when they arrive for orientation. This does not comply with the law. In their response, management asserts that they are in compliance with the requirement that they "inform all candidates for employment about the

<sup>2</sup> See Trafficking Victims Prevention and Protection Reauthorization Act of 2022, Pub. L. 117-348, §122(b)(4), 136 Stat. 6211, 6217 (2023).

anti-trafficking provisions in the Code of Conduct." They base this assertion on their interpretation of the term "candidates for employment" to include only "individuals who have successfully passed the suitability process but are not yet employees of the agency." No documentation was provided regarding when or by whom this determination was made or where it is recorded.

We recommend:

The CPSC inform all candidates for employment at the CPSC, not just the successful candidates, of the CPSC's Code of Conduct anti-trafficking provisions as the statute requires.

I wish to thank agency staff for the work done on this important initiative.

If you have any questions, please feel free to contact me directly at [CPSC-OIG@cpsc.gov](mailto:CPSC-OIG@cpsc.gov).

Attachment:

Management Response dated April 25, 2025



# Memorandum

**TO:** Christopher Dentel  
Inspector General  
Office of the Inspector General

**DATE:** April 25, 2025

**FROM:** Ellen Lee  
Acting Human Resources Director  
Office of Human Resources Management

ELLEN LEE

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LEE  
Date: 2025.04.25 16:24:28  
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**SUBJECT:** Management Response to the Draft Report of the CPSC  
Trafficking Victims Prevention and Protection

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This is the response of the U.S. Consumer Product Safety Commission's (CPSC) Management to the CPSC Office of Inspector General's (OIG) draft findings related to the Trafficking Victims Prevention and Protection Reauthorization Act of 2022.

In the report, the findings state the agency is compliant in all provisions of the Trafficking Victims Prevention and Protection Reauthorization Act of 2022, except for the requirement that "the head of each agency should inform all candidates for employment about the anti-trafficking provisions in the Code of Conduct of the agency".

Management would like to clarify CPSC's Office of Human Resources Management's (EXHR) process for providing candidates with the agency's Code of Conduct anti-trafficking provisions as the statute requires.

**OIG Finding 1.** CPSC did not inform all candidates for employment at the CPSC of the agency's Code of Conduct anti-trafficking provisions as the statute requires.

**Response:** EXHR informed all candidates for employment of the agency's Code of Conduct anti-trafficking provisions, and met the requirements of the "Trafficking Victims Prevention and Protection Reauthorization Act of 2022" as detailed below.

The term "candidates for employment" is not defined in any law, regulation, or advisory, including the U.S. Office of Government Ethics' (OGE) memorandum LA-23-04, dated February 16, 2023.

EXHR interprets the term "candidates for employment" to include all individuals who have successfully passed the suitability process but are not yet employees of the agency.



EXHR does not send applicants any forms or documents until after they have successfully completed the suitability process. After an applicant receives a suitability waiver, they become a candidate. At that time, EXHR sends the candidate a copy of the agency's Code of Conduct anti-trafficking provisions in their Entrance on Duty paperwork, which also includes their tentative offer letter and other HR forms. Candidates must review all forms prior to their Entrance on Duty date. Candidates then sign and acknowledge the agency's Code of Conduct in person when they report for duty, and the document is kept in the employee's file.

Neither Public Law 117-348 nor U.S. Office of Government Ethics memorandum LA-23-04 state that an agency must provide its Code of Conduct anti-trafficking provisions to all applicants for employment. Under 5 U.S.C. §§ 3327 and 3330 and 5 CFR part 330 subpart A, the Office of Personnel Management (OPM) dictates what an agency is permitted to include in a vacancy announcement, as further described in the *Delegated Examining Unit Handbook*.<sup>1</sup> OPM also provides required government-wide information to applicants via the Help Center on USAJobs,<sup>2</sup> which also has no mention of agencies' code of conduct human trafficking provisions. Finally, to confirm that CPSC was interpreting the definition of "candidate" in line with other federal agencies, EXHR searched public vacancy announcements on USAJobs and there was no information on agencies' code of conduct or human trafficking in any of the current public announcements for over 25 different federal agencies.

Therefore, the assertion that EXHR is not compliant with the law and only provides "successful candidates" with notice of the agency's code of conduct when they arrive for orientation is incorrect. Based on these reasons, CPSC Management respectfully disagrees with the finding of the draft report.

Management appreciates this opportunity to provide comments on draft report.

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<sup>1</sup> [https://www.opm.gov/policy-data-oversight/hiring-information/competitive-hiring/deo\\_handbook.pdf](https://www.opm.gov/policy-data-oversight/hiring-information/competitive-hiring/deo_handbook.pdf)

<sup>2</sup> [USAJOBS Help Center - How to understand the job announcement](#)



For more information on this report please contact us at [CPSC-OIG@cpsc.gov](mailto:CPSC-OIG@cpsc.gov)

To report fraud, waste, or abuse, mismanagement, or wrongdoing at the CPSC go to  
[OIG.CPSC.GOV](http://OIG.CPSC.GOV) or call (301) 504-7906

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