



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



Report of Investigation into Employment of Relatives at the CPSC

December 18, 2025

26-ROI-01



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.



December 18, 2025

TO: Peter A. Feldman, Acting Chairman

FROM: Christopher W. Dentel, Inspector General

SUBJECT: Report of Investigation into Employment of Relatives at the CPSC

The Consumer Product Safety Commission (CPSC) has long been subject to allegations of nepotism. For example, at various times in the past, the agency has had its Deputy Executive Director, the senior career civil servant in the agency, marry a subordinate. The subordinate continued to work at the agency, with her now husband as her second level supervisor. In the Office of Compliance, the positions of the Director and Deputy Director, the only two members of the Senior Executive Service in that office, were long held by siblings. Similarly, there have been allegations of favoritism towards the children of management officials in the selection of interns.

At the urging of this office, in 2007 the agency adopted a policy, documented in Directives System Order No. 0990 *Personnel Processes – Employment of Relatives*, that was supposed to address this problem. It called for avoiding situations that would create even the appearance that relatives could give each other preferential treatment. Its primary enforcement mechanism was the requirement that potential violations of the policy be formally assessed by the Offices of General Counsel and Human Resources Management and a written determination made regarding whether a violation of the policy had occurred and what corrective action to take.

In the course of the investigation detailed in the attached report, we determined that the CPSC had never implemented the Employment of Relatives directive. As a result, despite there having been numerous relatives (married couples, parent and child, etc.) working together at the CPSC since the adoption of the directive, there was no record that the CPSC had ever conducted the formal written determinations required by the Employment of Relatives directive.

The attached report of investigation contains two recommendations. When implemented, these recommendations will significantly improve the CPSC's ability to address issues related to the employment of relatives.



EXECUTIVE SUMMARY

Report of Investigation into Employment of Relatives at the CPSC

December 18, 2025

OBJECTIVE We received an anonymous hotline complaint in January 2025 asking the Office of Inspector General (OIG) to investigate a conflict of interest involving two senior CPSC officials at the Consumer Product Safety Commission (CPSC). The complainant alleged that one management-level CPSC official ("Subject 1") makes decisions that negatively impacts their own office in order to boost the performance metrics of their spouse's ("Subject 2") office. The complainant further alleged that Subject 2's mismanagement of their own office has gone unchecked. We referred the allegations of mismanagement of the CPSC office to CPSC management and accepted all other allegations for investigation. We investigated the following issues:

1. Whether the CPSC had an effective policy on the employment of relatives that it fully implemented.
2. Whether the marriage of two senior-level CPSC officials violated CPSC policy.

BACKGROUND The Inspector General Act of 1978, as amended, charges Offices of Inspectors General to conduct investigations relating to the programs and operations of their agencies and to recommend policies designed to promote economy,

efficiency, and effectiveness of said programs and operations.

This investigation covers the employment of relatives at the CPSC since the enactment of the current directive on the employment of relatives in March 2007.

ASSESSMENT Over the course of this investigation, based on all available evidence, the OIG determined by a preponderance of the evidence that:

1. The CPSC did not utilize Directive 0990, Personnel Practices – Employment of Relatives to determine impropriety of workplace relationships among CPSC employees and contractors.
2. Although the marriage of two senior CPSC officials created the perception of impropriety, we found insufficient evidence to substantiate that the subjects misused their positions.

RECOMMENDATION This report makes two actionable recommendations. When implemented, these recommendations should significantly improve the accountability of the CPSC's workforce and support the agency's commitment to its mission.

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ABBREVIATIONS AND SHORT TITLES

Term	Definition
CPSC	U.S. Consumer Product Safety Commission
Employment of Relatives Directive	Directives System Order No. 0990 <i>Personnel Processes – Employment of Relatives</i>
OIG	Office of Inspector General



REQUEST FOR INVESTIGATION

In January 2025, the Office of Inspector General (OIG) received a hotline complaint from an anonymous individual (“complainant”) alleging an ongoing and significant conflict of interest due to the marital relationship between two senior-level U. S. Consumer Product Safety Commission (CPSC) officials. The complainant alleged that one management-level CPSC official (“Subject 1”) makes decisions that negatively impacts their own office in order to boost the performance metrics of their spouse (“Subject 2”). The complainant further alleged that Subject 1 serves the interest of their spouse’s office at the expense of the mission of their own office and that Subject 2’s mismanagement of their own office has gone unchecked with key issues and broader systemic problems persisting without resolution. The complainant also alleged there has been no meaningful intervention on this mismanagement to higher level CPSC officials. We referred the allegations of mismanagement of the CPSC office to CPSC management and accepted all other allegations for investigation.

SCOPE AND METHODOLOGY

SCOPE The complaint that led to this investigation concerned a potential conflict of interest involving two senior-level CPSC officials in two CPSC offices whose missions frequently interact. We initially focused on the specific allegations set out in the complaint. Based on what we learned during our initial investigation, we broadened our scope of investigation to include a review of the implementation of the CPSC Directive 0990, *Personnel Processes – Employment of Relatives* (Employment of Relatives Directive), enacted March 1, 2007. We sought additional information on the employment of relatives at the CPSC both in the present and in the past.

METHODOLOGY The OIG interviewed 17 CPSC personnel relevant to the investigation.

The OIG obtained and reviewed:

- a. relevant policies to gain an understanding of the employment of relatives
- b. information on relatives employed by the CPSC
- c. relevant policies and procedures of CPSC offices who employ relatives



BACKGROUND

CPSC

The CPSC is an independent agency created in 1972 by the Consumer Product Safety Act, as amended, with a mission to protect consumers from unreasonable risks of injury or death associated with consumer products under the agency's jurisdiction. These products range from lawn mowers to cigarette lighters to baby strollers, and include items manufactured domestically and outside the United States.

The CPSC is composed of a maximum of five commissioners. The President, with the advice and consent of the Senate, appoints commissioners to seven-year terms and selects one of the commissioners to serve as chairman. The CPSC Chairman is empowered to conduct the executive and administrative functions of the agency, including hiring and firing personnel, delegating duties among other commissioners and staff, and expending appropriations.

CPSC Policy on Employment of Relatives

In March 2007, the CPSC finalized the Directives System Order No. 0990 *Personnel Processes – Employment of Relatives* (Employment of Relatives Directive) in response to issues concerning the employment of relatives at the CPSC. For example, prior to the adoption of this directive, the Deputy Executive Director of the agency was married to someone within his chain of command and the Director and Deputy Director of Compliance, the only two members of the Senior Executive Service in that office, were siblings. The Employment of Relatives Directive established “CPSC policy concerning employment of relatives, including the referral of relatives to other agency staff for purposes of employment.”¹ The directive further states that, to the maximum extent possible, relatives should not be employed under the direction of the same first level supervisor.² It also forbids CPSC officials from assisting relatives from gaining employment, promoting or advocating the promotion of a relative at the CPSC and outlines several instances where relatives cannot, to the maximum extent possible, serve in the CPSC.³

¹ See Employment of Relatives Directive, numbered para. 1, p. 1.

² See *id.* at numbered para. 3, p. 1.

³ See *id.* at numbered para. 7.b, p. 2-3.



Specifically:

7. POLICY.

- a. A CPSC official shall not:
 - (1) appoint, employ, promote or advance any relative to a position at CPSC;
 - (2) advocate a relative's appointment, employment, promotion, or advancement at CPSC; or
 - (3) appoint, employ, promote, or advance a relative of another CPSC official if the official has advocated the relative's appointment, employment, promotion, or advancement.
- b. To the maximum extent possible, relatives will neither serve in nor be appointed, promoted or assigned to, any position in the CPSC if such service, appointment, promotion or assignment will:
 - (1) be disruptive to work, or interfere with the orderly operation of the CPSC mission;
 - (2) possibly cause a loss of confidence in the CPSC, its management, its employees, or the particular employee involved;
 - (3) create the appearance that one related employee could accord preferential treatment to another;
 - (4) necessitate significant official contact or association, including a relative who is not a CPSC employee but is providing contracted services to the CPSC;
 - (5) involve the employees in a supervisor-employee or manager-employee relationship. Such a relationship is not restricted to one involving an employee and his/her immediate supervisor/manager, but includes one involving an employee's higher level supervisors/managers as well, throughout his/her chain of command.⁴

⁴ See Employment of Relatives Directive, numbered para. 7.b, p. 2-3.



Whenever a CPSC employee or supervisor becomes aware of a relative of any CPSC employee or contractor being employed by the CPSC in a manner that might be forbidden by the directive, they must report it in writing to their Assistant Executive Director or Office Director, who reports it to the Executive Director for further action.⁵ The Executive Director, in consultation with the General Counsel and the Director of the Office of Human Resources Management, must determine in writing whether a violation of the directive has occurred and what corrective action to take.⁶ The directive also states that all records of such determinations must be kept by the CPSC's Office of Human Resources.⁷

ISSUES

The Employment of Relatives Directive Was Never Fully Implemented

The CPSC needs a transparent and fully implemented standard of conduct to prevent potential inappropriate employment of relatives that might interfere with the agency's ability to execute its mission. Government standards for internal control instruct agencies to use established standards of conduct to promote integrity and ethical values within the agency⁸ and to periodically review agency policies and procedures for continued relevance and effectiveness in achieving these objectives.⁹ CPSC management established the Employment of Relatives Directive in March 2007 but never fully complied with the directive.

Based on our interviews, CPSC managers appear to be either unaware of the requirements set out in the Employment of Relatives Directive or unsure of the need to implement them. One senior CPSC management official stated that CPSC managers were only briefed on the directive when it was issued in 2007. When we asked another senior CPSC official about the directive, the official was unsure of the scope of the directive. This same senior CPSC official later stated it was their interpretation that the directive dealt only with the hiring of one's own relatives and was unsure whether it included promotions. This interpretation is incorrect. The directive prohibits relatives

⁵ See *id.* at numbered para. 7.d, p. 3-4.

⁶ See *id.* at numbered para. 7.d-e, p. 3-4.

⁷ See *id.* at numbered para. 7.f, p. 4.

⁸ See Government Accountability Office, *Standards for Internal Control in the Federal Government*, Principle 1.09.

⁹ See *id.* at Principle 12.05.



from working together when certain conditions are met as well as individuals promoting or advocating the promotion of their relatives.

Despite the existence of the Employment of Relatives Directive, we found numerous instances of relatives of CPSC employees and contractors working at the CPSC other than the subjects of the hotline complaint that spurred this investigation. In addition to the subjects of this investigation, we identified at least two other married couples who currently work at the CPSC as well as numerous other individuals who worked at the CPSC as employees or contractors at the same time as their relatives. In addition, there have been children of senior CPSC employees who worked at the CPSC, including summer interns. Nonetheless, senior level human resources staffers reported having no record that the CPSC had ever conducted the formal written determination required by the Employment of Relatives Directive whenever any employee becomes aware that the employment of a relative might be disruptive, cause a loss of confidence in the CPSC, create the appearance of preferential treatment, or necessitate significant official contact. This inaction represents a longstanding and ongoing failure to implement the Employment of Relatives Directive.

The CPSC must ensure that the standard of conduct in place to prevent the inappropriate employment of relatives at the agency is effective and fully utilized by CPSC management. This could be addressed by mandating written determinations on the appropriateness of the employment relationships for all relatives who work at the CPSC, including contractors.

We Recommend:

1. The CPSC implement and provide routine training regarding an improved Employment of Relatives Directive that requires written determinations on the propriety of the workplace relationships of all related persons, employees and contractors, who work at the CPSC.

The Marriage of Two Senior CPSC Officials Created the Perception of a Conflict of Interest

The complainant alleged that the marital relationship between Subject 1 and Subject 2 “created an ongoing and significant conflict of interest.” The complainant alleged that Subject 1 repeatedly made decisions to the detriment of their own office to benefit Subject 2’s office but did not provide any specific examples of these decisions. The



complainant also stated, as a result of Subject 1's improper assistance, Subject 2's mismanagement has gone "unchecked" and allowed Subject 2 to "present a misleadingly positive image." The complainant concluded that this instance of employment of relatives was unacceptable and asked for an investigation into this matter. The OIG found numerous CPSC employees who corroborated the appearance of preferential decision-making between Subject 1 and Subject 2 which should have triggered action by CPSC management in accordance with the Employment of Relatives Directive.¹⁰ However, the OIG was unable to corroborate the complainant's specific allegation of impropriety, that Subject 1 took official action in a manner that was detrimental to their office to improperly support Subject 2. Furthermore, CPSC management did not conduct the analysis required by the Employment of Relatives Directive for Subjects 1 and 2 during the hiring/promotion process and denied the need to do so.

We interviewed a number of supervisory and non-supervisory employees where the two subjects work as part of our investigation into this complaint. Numerous interviewees reported that the CPSC's employment of this married couple has created problems for the CPSC. One CPSC employee stated the marriage created a conflict of interest because Subject 1 helps Subject 2 at the expense of their own office, allowing Subject 2 to run Subject 1's office by proxy. Another CPSC employee complained of challenging interactions with Subjects 1 and 2 regarding changes to Subject 1's office purportedly dictated by Subject 2's office. Several other CPSC employees made similar observations, complaining about Subject 1 favoring Subject 2 by giving more weight to priorities articulated by Subject 2's office. Others related that Subject 1 inappropriately helped Subject 2 and Subject 1 failed to push back on direction issued by Subject 2's office when it would have been in the best interest to their staff to do so. Another CPSC employee noted tension between the two offices led by the married couple and opined that, in the private sector, a company would not allow two offices so closely intertwined to be led by a married couple.

Though several CPSC employees were critical of decisions made by Subject 1 and their supervisor that impacted both offices, the OIG could not establish, by a preponderance of the evidence, that Subject 1 made detrimental changes to their office to support Subject 2. Some CPSC employees identified actions by Subject 1 and Subject 1's supervisor as benefiting Subject 2, but these actions had legitimate purposes aside from purportedly benefiting Subject 2 and the actions were approved by several levels of supervisors above Subjects 1 and 2.

¹⁰ See Employment of Relatives Directive, numbered para. 7.b(3).



Furthermore, other CPSC employees interviewed reported no issues posed by the marital relationship. One CPSC employee stated that the two subjects' marital relationship and their interactions are not so egregious that they should not work together. Another CPSC employee stated that Subjects 1 and 2 maintained professional office environments such that it feels like any other office-to-office interaction. A separate CPSC employee stated that the marital relationship was not a problem and reported that the two offices worked well together. Nevertheless, we noted that the majority of staff expressed negative sentiment over the working relationship between Subjects 1 and 2.

It is contrary to CPSC policy for relatives to be employed or promoted at the CPSC if one of several broad conditions are met. Specifically, the Employment of Relatives Directive states:

"...relatives will neither serve in nor be appointed, promoted or assigned to, any position in the CPSC if such service, appointment, promotion or assignment will: (1) be disruptive to work, or interfere with the orderly operation of the CPSC mission; (2) possibly cause a loss of confidence in the CPSC, its management, its employees, or the particular employee involved; (3) create the appearance that one related employee could accord preferential treatment to another; (4) necessitate significant official contact or association..."¹¹

Based on our interviews, in this case there was, at a minimum, the appearance that Subject 1 could afford preferential treatment to Subject 2.

Nonetheless, supervisors of the two subjects and human resources staff admitted to never conducting the analysis required by the Employment of Relatives Directive for Subjects 1 and 2 and denied the need to do so. The supervisor for Subject 1 stated that the married couple demonstrated incredible professionalism and praised their performance but conceded that, by virtue of this hotline complaint, someone must think their marriage is an issue. The supervisor for Subject 2 admitted there was a perception surrounding their marriage and employment at the CPSC was causing an appearance of impropriety.

¹¹ See Employment of Relatives Directive, numbered para. 7.b, p. 2-3.



However, the supervisor for Subject 2 added that no decisions for their offices are made by the subjects without supervisory input, so there could be no preferential treatment or impropriety between the spouses. The Deputy Director for Operations, who oversees both offices, argued that Subjects 1 and 2 are in separate chains of command and do not make decisions for their offices that do not involve their immediate supervisors as proof that their employment at the CPSC was not improper. Subjects 1 and 2 acknowledged that they had significant official contact with one another in the course of their duties, which the OIG observed to be a violation of Section 7.b.4 of the Employment of Relatives Directive. Nevertheless, Subjects 1 and 2 denied that their marriage violated the Employment of Relatives Directive or posed an issue for the CPSC.

Although there were multiple CPSC employees who complained that the marriage between Subjects 1 and 2 created an appearance of impropriety or favoritism, we found no definitive evidence that either Subject misused their position or engaged in specific acts to inappropriately assist their spouse. However, no written determination was ever completed on the issues raised by the marital relationship between Subjects 1 and 2 that would have examined the merits of these allegations and allowed management to institute strategies to mitigate any appearance of impropriety to safeguard both the subjects, their staff, and the mission of the CPSC.

We Recommend:

2. The CPSC complete and retain a written determination as required by the Employment of Relatives Directive for Subjects 1 and 2 and all other familial relationships between employees and employees and contractors.



CONCLUSION

Over the course of this investigation, based on all available evidence, the OIG determined by a preponderance of the evidence that:

1. The CPSC did not utilize its Employment of Relatives Directive which renders it ineffective in determining impropriety of workplace relationships among CPSC employees and contractors.
2. Although the marriage of two senior CPSC officials created the perception of impropriety, we found insufficient evidence to substantiate that the subjects misused their positions.

This report includes two actionable recommendations. When implemented, these recommendations should significantly improve the accountability of the CPSC's workforce and support the agency's commitment to its mission.





For more information on this report please contact us at CPSC-OIG@cpsc.gov

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