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

Audit of the CPSC's Pre-Dissemination Review of Scientific Information

June 2, 2026

26-A-03

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.

June 2, 2026

TO: Peter A. Feldman, Acting Chairman

FROM: Christopher W. Dentel, Inspector General CHRISTOPHER DENTEL Digitally signed by CHRISTOPHER DENTEL Date: 2026.06.02 10:45:30 -04'00'

SUBJECT: Audit of the CPSC's Pre-Dissemination Review of Scientific Information

This report contains the results of our assessment of the effectiveness of the Consumer Product Safety Commission's (CPSC) internal control over the pre-dissemination review (PDR) of scientific information, and the CPSC's compliance with relevant laws and regulations regarding the PDR of scientific information. We conducted this audit in accordance with Government Auditing Standards. We determined that the CPSC had inadequate policies and procedures for identifying the type of influential information that might require peer review and inadequate internal controls over the PDR process in general.

Recent changes at the agency indicate that the CPSC is now committed to ensuring that federally funded research is transparent, rigorous, and impactful, and that federal decisions are informed by the most credible, reliable, and impartial scientific evidence available.

Current agency management generally concurred with our findings and recommendations and have reported that they have already taken initial corrective action regarding some of the issues raised in our report.

Thank you for the courtesy and cooperation extended to my staff during the audit. Please feel free to contact me if you or your staff have any questions or concerns.

EXECUTIVE SUMMARY

Audit of the CPSC's Pre-Dissemination Review of Scientific Information

June 2, 2026

OBJECTIVE The objectives of this audit were to assess whether the U.S. Consumer Product Safety Commission (CPSC) has effective controls over the pre-dissemination review (PDR) of scientific information, and the CPSC's compliance with relevant laws and regulations regarding the PDR of scientific information.

BACKGROUND To fulfill its statutory mission, the CPSC routinely conducts scientific assessments which contribute to the formulation and enhancement of voluntary standards and mandatory regulations. These assessments are disseminated to the public and can be the principal basis for a decision by a federal decision-maker. The CPSC is therefore required to comply with the Information Quality Act, passed by congress in 2000. The Information Quality Act mandates that federal agencies ensure the quality, objectivity, utility, and integrity of all information released to the public. For further guidance, the Office of Management and Budget (OMB) issued the *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies*, effective February 2002, requiring agencies to implement PDR processes to substantiate information quality and reliability. OMB has periodically updated guidance for this process, including OMB Memorandum (M)-05-03, *Final Information Quality Bulletin for Peer Review* and M-19-15, *Improving Implementation of the Information Quality Act* (M-19-15).

RESULTS The Office of Inspector General found that the agency policies and procedures for PDR were inadequate to ensure the CPSC appropriately identifies influential information in compliance with M-19-15, which requires agencies to conduct peer reviews on influential information. Additional internal control failures such as the failure to conduct risk assessments that cover compliance with the Information Quality Act as well as perform monitoring activities over the PDR process exacerbated the issue. These failures increase the risk that the CPSC will rely on flawed data or fail to consider all opinions in its rulemaking process. This may result in successful challenges under the Administrative Procedures Act as well as related reputational loss.

Furthermore, internal control failures with its information system allowed for information product owners to sign off as a reviewer of their own work product. The system allowed for inappropriate access and privileges for certain system users. Moreover, the agency lacked appropriate monitoring activities for its information system. Again, these internal control failures increase the risk that the CPSC will rely on flawed data. The failure to enforce least privilege in the agency information system has ancillary ethical risks such as potential inappropriate access by system users to non-public information.

RECOMMENDATIONS This report makes eight actionable recommendations. When implemented, these recommendations should significantly improve the CPSC's internal controls and compliance with OMB guidance for conducting PDR.

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ACRONYMS

ACRONYM	MEANING
AED	Assistant or Associate Executive Director
CPSC	U.S. Consumer Product Safety Commission
CPSC Guidelines	*Information Quality Guidelines*
Directive 1450.2	CPSC Directive 1450.2, Clearance Procedures for Providing Information to the Public
EXRR	Office of Risk Reduction
FY	Fiscal Year
GAO	General Accounting Office
M	Memorandum
M-05-03	*Final Information Quality Bulletin for Peer Review*
M-19-15	*Improving Implementation of the Information Quality Act*
Mannen Study	*Biomechanical Analysis of Inclined Sleep*
OGC	Office of General Counsel
OIG	Office of Inspector General
OMB	Office of Management and Budget
OMB Guidelines	*Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies*
PDR	Pre-dissemination review

OBJECTIVES

The objectives of this audit were to assess whether the U.S. Consumer Product Safety Commission (CPSC) has effective controls over the pre-dissemination review of scientific information, and the CPSC's compliance with relevant laws and regulations regarding the pre-dissemination review (PDR) of scientific information.

BACKGROUND

The CPSC is an independent federal regulatory agency with a public health and safety mission: protecting the public from unreasonable risks of injury or deaths associated with consumer products. In an effort to meet its mission, the CPSC regularly performs scientific assessments to help develop and improve voluntary standards and mandatory regulations. These assessments support the CPSC's mission of protecting the American people from unreasonable risks of injury associated with consumer products. These assessments are typically disseminated to the public and thus they must meet the requirements of the Information Quality Act.

Congress passed the Information Quality Act into law in 2000, requiring the Office of Management and Budget (OMB) to promulgate guidance to agencies ensuring the quality, objectivity, utility, and integrity of information disseminated by federal agencies. Subsequently, OMB published *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies* (OMB Guidelines), with an effective date in February 2002. Agencies were tasked with developing an OMB-compliant process to substantiate the quality of information before it is disseminated to the public or used for decision-making, henceforth referred to as PDR.

Federal Guidance

Building on the requirements of the OMB Guidelines, OMB issued Memorandum (M)-05-03, *Final Information Quality Bulletin for Peer Review* (M-05-03) in December 2004. M-05-03 established minimum standards for peer review of scientific information. It also requires agencies to perform peer review prior to dissemination for "influential"

and "highly influential" scientific information that could have significant impacts on public policy or the economy. Peer review standards require:

- reviewers be qualified specialists in the relevant field
- reviews be independent and free from conflicts of interest
- process be transparent, with documentation of methods, findings, and reviewer comments

M-05-03 defined "influential" scientific information as "information the agency reasonably can determine will have or does have a clear and substantial impact on important public policies or private sector decisions." OMB initially gave federal agencies significant leeway in determining what information the agency considers to have a substantial impact on important public policies or private sector decisions.

Additionally, OMB defined "highly influential" scientific information as a scientific assessment that either has a potential impact of $500 million or more in any one year on either the public or private sector, or is considered novel, controversial, precedent setting, or has significant interagency interest. OMB clarified that the $500 million economic impact is to be considered on either the cost or the benefit of a particular regulation based on the scientific assessment.

On April 24, 2019, OMB issued M-19-15, *Improving Implementation of the Information Quality Act* (M-19-15). M-19-15 includes a section regarding PDR of information; it instructed agencies to assess the fitness for purpose of information before publication, and to establish a higher quality standard for information deemed as "influential." Further, M-19-15 refined the definition of "influential" information in the context of a policy decision as a scientific assessment that is a principal basis for a decision by a federal decision maker; such that "the same decision would be difficult to reach in that information's absence" or the decision would lose scientific underpinnings absent the scientific assessment.

CPSC Guidance

To meet initial OMB Guidelines, the CPSC issued its *Information Quality Guidelines* (CPSC Guidelines) in October 2002. The CPSC Guidelines were later revised to comply with M-19-15. The CPSC Guidelines cover PDR, as required, and describe the agency's process as follows:

Technically qualified staff review information products before disseminating them to ensure their quality. Products that are considered more technically complex may also be reviewed by independent experts to provide additional perspective. The level of review before dissemination depends on the characteristics of the product and established CPSC review procedures. (See 15 U.S.C. § 2055(b)(6) and CPSC Directives.)

Revised in April 2003, the CPSC Directive 1450.2, *Clearance Procedures for Providing Information to the Public* (Directive 1450.2), governs the agency's PDR. According to the directive, no information shall be disclosed to the public until the information product receives "careful review and written approval of the information to be disclosed by each Assistant or Associate Executive Director (AED) (or delegate) whose area of responsibility is involved in the disclosure." Per the directive, all information must receive technical, editorial, policy, and legal clearance before the information product may be published.

According to the CPSC's Guidelines, the "CPSC recognizes the importance of peer review before disseminating influential information," and "conducts such peer reviews in accordance with [M-05-03]." In an effort to identify influential information subject to peer review, the CPSC Guidelines provide the following types of information which could be "influential," including:

- *Risk assessments for economically significant rulemakings;*
- *Regulatory analyses for economically significant rulemakings; and*
- *Certain staff and contractor technical reports related to engineering, health science, or hazard analysis issues that potentially have impacts on important public policies and private sector decisions, such as changes in voluntary standards.*

CPSC Process

The Office of Inspector General (OIG) interviewed key staff members involved with PDR to understand how a scientific information product is approved for clearance. Prior to the PDR process, agency staff either produce a scientific information product (e.g. a technical report, briefing package, etc.) in-house, or monitor the contractor that produces the

information product. After agency staff or contractors complete the scientific information product, it is internally reviewed by a technical team (e.g. supervisory review within the health sciences directorate). The amount of team review necessary depends on the information product and is a matter of professional judgement.

Once the team review is completed, the scientific information product enters what senior management officials have described as the start of the PDR process. All information products that come out of the Office of Risk Reduction (EXRR) go through the "AED Review Workflow" which is functionally the PDR workflow. The "owner" (typically the author, project manager, or Contracting Officer's Representative in charge of the contract) of the information product uploads the product into the agency's Clearance Application Site, which is an automated workflow process. Once uploaded, the owner selects the EXRR "AED Review Workflow." This sends the information product to the assigned reviewers, which are the AEDs for Economics, Health Sciences, Engineering, Epidemiology, and Laboratory Sciences; the Deputy Assistant Executive Director of EXRR; AED of EXRR; and the Assistant General Counsel for Regulatory Affairs.

Typically, these individuals have five business days to review the product, however, interviewees noted larger information products like commission briefing packages typically allow for longer review periods. Reviewers have the option to approve or reject the product, as well as the option to leave comments that must be addressed by the owner before the reviewer approves the product. If review comments are made that the owner of the information product does not feel are appropriate, the owner and commentor meet to come to a resolution.

The purpose of the AED Review Workflow is to provide a technical review of the quality of the information product, specifically its utility, objectivity, and integrity. The technical reviewers also review the product for any personally identifiable information or improper disclosure of confidential business information. The technical reviewers all stated that they have no written guidance as to how to perform their technical reviews or what key aspects they should be evaluating, rather they rely on their on-the-job training and professional judgement.

Once comments are addressed and have been approved by all assigned "AED Review Workflow" reviewers, the information product goes through

a second workflow process titled "Agency Clearance." This process works the same as the AED Review Workflow process, but different reviewers are assigned—these include: the Executive Director, the Deputy Executive Director for Operations, the General Counsel, the AED of EXRR, and the Director of Communications.

FINDINGS

Inadequate Policies and Procedures for Identifying Influential Information

The Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government* states that management should design and implement control activities, which are the policies, procedures and techniques that enforce management's directives to achieve the entity's objectives and address related risk. One of the agency's objectives is to provide the public with scientific information of the highest integrity. To accomplish this, the CPSC should comply with OMB's requirements for identifying influential information.

M-19-15 states that agencies should revisit the parameters for identifying influential information as well as update their policies and procedures for PDR to provide a rigorous process for determining whether types of information not specifically listed in the agencies guidelines qualify as "influential."

The CPSC's Guidelines define "influential information" as information that "does or will have a clear and substantial impact on important public policies or important private sector decisions." However, while the CPSC lists three types of information the agency produces that "could be" influential, the agency does not identify which types of information "are" influential or how to determine what qualifies as "influential."

Key staff members involved with PDR stated that the CPSC did not have a specific, documented process for determining if a scientific information product is "influential" and would require peer review. With no written guidance on the matter, the staff members stated that they rely on professional judgement and advice from the Office of General Counsel (OGC). A representative from OGC is typically included in all phases of projects that lead to scientific reports and is tasked with assessing whether a scientific information product would require peer review early in the process.

The CPSC uses the term "economically significant" and "important public policy" to define what "could be 'influential'." According to agency senior management officials:

> *CPSC determines whether a rule is economically significant when the rules' economic analyses (e.g., Regulatory Analysis, Regulatory Flexibility Analysis) are being conducted, and throughout its internal reviews of the rule.*[1]

Further, the CPSC follows the 1993 Executive Order 12866 – *Regulatory Planning and Review* – which states that a significant regulatory action is likely to result in a rule that may "[h]ave an annual effect on the economy of $100 million or more.'" This threshold for "economically significant" also aligns with the Congressional Review Act's $100 million threshold to determine whether a rule is considered a "major rule."

Senior management identified eight rulemakings that occurred during the audit period, four proposed rulemakings and four final rulemakings, that were "economically significant." Despite identifying regulatory analyses for economically significant rulemakings as a type of information that could be influential, the agency did not consider any of the regulatory analyses[2] associated with these rulemakings as significant and thus performed no peer reviews for those analyses. One of these eight rulemakings, *Safety Standard for Operating Cords on Custom Window Coverings*, was subsequently vacated by the United States Court of Appeals for the District of Columbia Circuit. The rule was vacated, in part, because the court found the agency performed an erroneous regulatory analysis.[3] While there is no guarantee the case would have been decided in the agency's favor if a peer review had been performed, a robust peer review would have been an important tool to validate the CPSC's regulatory analysis as it "can build consensus among stakeholders and reduce the temptation for courts and legislators to second-guess or overturn agency actions."[4]

In addition to economic impact, the CPSC should consider whether a study represents "important public policy." Senior management stated, "[i]n general, CPSC interprets this as public policy that would significantly change a process or scientifically accepted understanding, and that has been backed with empirical evidence."[5]

[1] Alex Moscoso, Questions for Scientific Integrity Official, April 14, 2025
[2] Regulatory analyses not subject to interagency review under Executive Order 12866 are subject to peer review requirements.
[3] See Window Covering Mfrs. Ass'n v. Consumer Prod. Safety Comm'n, 82 F.4th 1273, 1279 (D.C. Cir. 2023).
[4] M-05-03
[5] Alex Moscoso, Questions for Scientific Integrity Official, April 14, 2025

Furthermore, senior management officials stated that scientific reports that are routine in nature, with typical application of scientific processes and well characterized data sources, typically do not warrant the resources needed for formal external peer review. While this understanding seems appropriate from a scientific discovery perspective, it does not address M-19-15's clarification on "influential" in the context of a policy decision as a scientific assessment that is a principal basis for a decision by a federal decision maker.

During the audit period, the agency did not conduct any peer reviews of scientific information to the standards outlined in M-05-03. In fact, the CPSC has not performed a peer review to OMB standards since 2012. The OIG reviewed a judgmental sample of three scientific assessments which were utilized for three separate proposed or final rulemaking published between Fiscal Year (FY) 2020 and FY 2024: *Biomechanical Analysis of Inclined Sleep*[6] (Mannen Study), *Simulation and Analysis Plan to Evaluate the Impact of CO Mitigation Requirements for Portable Generators,*[7] *and Forces and Postures During Child Climbing Activities.*[8]

Each of the three rulemakings significantly relied on the sampled scientific assessment to determine that the current voluntary safety standards were not adequate. Additionally, for two of the rulemakings, the applicable study was instrumental in the development of performance requirements for the applicable mandatory rule. Based on the above, the agency should have reviewed each of the sampled studies to determine if they met the threshold for "influential" scientific products as defined in M-19-15. However, there is no evidence that the CPSC performed the above referenced analysis.

Notably, in a follow-up question from a Congressional hearing, the Honorable Cathy McMorris Rodgers asked whether the Mannen Study was "influential information," which would necessitate peer review. Then Chair Hoehn-Saric did not directly answer the question but stated that Dr. Mannen's report was "put out for public comment." However, M-05-03 clearly states that the notice-and-comment procedures under the Administrative Procedures Act do not "constitute adequate peer review or 'an alternative' process because it does not assure that **qualified,**

[6] Referenced in CPSC "Safety Standard for Infant Sleep Products," 86 Fed. Reg. 33022
[7] Referenced in CPSC, "Safety Standard for Portable Generators," 88 Fed. Reg. 24346
[8] Referenced in CPSC, "Safety Standard for Clothing Storage Units," 87 Fed. Reg. 72598

impartial specialists in relevant fields have performed a critical evaluation of the agency's draft product (emphasis added)." Thus, the public comment procedures the CPSC utilized under the Administrative Procedures Act did not meet the standards of OMB peer review.

The CPSC lacks appropriate policies and procedures to identify "influential" information. The lack of a repeatable process increases the risk for relying on flawed data or failing to consider contrary expert opinions in its rulemaking process. This may result in successful challenges to rulemakings under the Administrative Procedures Act and related reputational loss.

We recommend CPSC management:

1. Establish policies and implement procedures that provide specific guidance to program managers for the identification of scientific information products that are influential. These procedures shall include a process for determining whether a scientific information product is a principal basis for a decision by a federal decision maker.
2. Train appropriate employees on the established policies and implement procedures for the identification of scientific information products that are influential.
3. Based on the lack of evidence that such an assessment was previously performed, perform an analysis on rulemakings conducted after the issuance of OMB's M-19-15 and determine if a scientific assessment was the principal basis for a decision by a federal decision maker.
4. Based on the results of the analysis performed for recommendation 3, perform appropriate administrative corrective actions, if necessary.

Inadequate Internal Controls Over PDR Process

Internal control is a process used by management to help an entity achieve its objectives. Management assesses the risks facing the entity as it seeks to achieve its objectives. Control activities are the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system which include the entity's information system. Finally, as internal controls are a

dynamic process that must continually adapt to the risks and changes that the agency faces, it is essential for management to monitor the internal control system to remain aligned with agency objectives and risks.[9]

During the audit, we found the agency did not identify or respond to risks associated with its PDR process. Additionally, agency policies and procedures did not align with compliance requirements and did not have a mechanism for monitoring whether the agency's PDR process was operating as intended.

Further, we found that the information system the agency relied upon for its PDR process allowed for inappropriate access and privileges for certain users as well as allowed for information product owners to sign off as a reviewer of their own work product. Finally, management again did not have adequate monitoring procedures to verify if the information system was operating as intended and remediate any deficiencies identified.

These deficiencies were caused by the CPSC failing to:

- Perform a risk assessment that covered compliance with the Information Quality Act
- Establish written policies and procedures to comply with OMB requirements for PDR[10]
- Perform monitoring activities of the PDR process
- Enforce least privilege for users of the agency's clearance workflow system
- Enforce segregation of duties for reviewers in the agency's clearance workflow system
- Perform monitoring activities of the agency clearance workflow system

The CPSC's failure to perform a risk assessment over the PDR process resulted in poor internal controls over the process. The program's internal controls did not include adequate monitoring procedures. The program's issues with internal control were further exacerbated by the CPSC not properly implementing OMB's updates to M-19-15. The lack of monitoring procedures led to the agency continuing to utilize outdated procedures to perform PDR of scientific information. These issues were

[9] U.S. GAO, *Standards for Internal Control in the Federal Government*
[10] See finding 1*, Inadequate Policies and Procedures for Identifying Influential Information*, for details.

not properly identified through the CPSC's annual statement of assurance process. Interviews with agency staff indicated that, although they were aware of potential issues with the internal controls over the PDR program, they were not empowered to correct these issues. These conditions led to a lack of accountability for the consequences for failures stemming from a culture not valuing internal controls.

The lack of adequate controls over PDR caused the CPSC to not only be non-compliant with OMB requirements, but it also increased the risk of the agency relying on flawed data and failed to consider contrary expert opinions in its rulemaking process. Furthermore, the failure to enforce least privilege in the agency clearance workflow has ancillary ethical risks, such as potential inappropriate access by system users to non-public information.

We recommend CPSC management:

5. Perform a risk assessment that covers compliance with the Information Quality Act.
6. Review account access permission levels in the agency clearance workflow so that only users with a valid business purpose have appropriate access.
7. Establish policies and procedures for monitoring activities of the agency clearance workflow, to include the review of master data, access authorizations, and system access.
8. Establish policies and procedures for monitoring activities for compliance with both OMB and agency-specific policies for performing pre-dissemination review of scientific information.

APPENDIX A – Scope and Methodology

SCOPE

The scope of this audit was the CPSC's pre-dissemination review of scientific information products during the period FY 2020 through FY 2024.

METHODOLOGY

To accomplish the objectives of this audit, we reviewed and gained an understanding of the following criteria:

- GAO's *Standards for Internal Control in the Federal Government*
- Information Quality Act, December 21, 2000
- OMB, *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies,* February 22, 2002
- OMB M-05-03, *Final Information Quality Bulletin for Peer Review,* December 16, 2004
- OMB M-19-15, *Improving Implementation of the Information Quality Act,* April 24, 2019
- CPSC, *Information Quality Guidelines* (undated)
- CPSC Directive 1450.2, *Clearance Procedures for Providing Information to the Public*, January 16, 2003

We interviewed agency personnel to gain their understanding of the history and current operations of the agency's pre-dissemination review of scientific information. We reviewed the CPSC's policies and procedures for compliance with applicable rules and regulations for same. We reviewed a judgmental sample of three scientific assessments that were utilized for proposed or final rulemaking published between FY 2020 and FY 2024.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

APPENDIX B – Internal Controls Table

The Government Accountability Office, *Standards of Internal Control in the Federal Government*, is the primary criteria used for internal control testing purposes. These criteria are the standard that federal agencies must follow to maintain compliance with Federal Managers Financial Integrity Act. There are 5 internal control components and 17 principles.

We assessed internal controls necessary to satisfy the audit objectives. We assessed the design, implementation, and effectiveness of applicable controls deemed significant to our audit objective(s). See the table below. However, because our review was limited to these internal control components and underlying principles related to our audit objective, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Principle	Internal Control Components and Principles	Pass	Fail	Not Applicable or Not Significant to the Audit Objectives
Control Environment				
1	The oversight body and management should demonstrate a commitment to integrity and ethical values.			X
2	The oversight body should oversee the entity's internal control system.			X
3	Management should establish an organizational structure, assign responsibilities, and delegate authority to achieve the entity's objectives.			X
4	Management should demonstrate a commitment to recruit, develop and retain competent individuals.			X
5	Management should evaluate performance and hold individuals accountable for their internal control responsibilities.			X
Risk Assessment				
6	Management should define objectives clearly to enable the identification of risks and define risk tolerances.		X	
7	Management should identify, analyze and respond to risks related to achieving the defined objectives.		X	
8	Management should consider the potential for fraud when identifying, analyzing and responding to risks.		X	
9	Management should identify, analyze and respond to significant changes that could impact the internal control system.		X	
Control Activities				
10	Management should design control activities to achieve objectives and respond to risks.		X	
11	Management should design the entity's information system and related control activities to achieve objectives and respond to risks.		X	
12	Management should implement control activities through policies.		X	
Information and Communication				
13	Management should use quality information to achieve the entity's objectives.	X		
14	Management should internally communicate the necessary quality information to achieve the entity's objectives.	X		
15	Management should externally communicate the necessary quality information to achieve the entity's objectives.			X
Monitoring				
16	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.		X	
17	Management should remediate identified internal control deficiencies on a timely basis.		X	
Totals		**2**	**9**	**6**

APPENDIX C – Consolidated List of Recommendations

1. Establish policies and implement procedures that provide specific guidance to program managers for the identification of scientific information products that are influential. These procedures shall include a process for determining whether a scientific information product is a principal basis for a decision by a federal decision maker.
2. Train appropriate employees on the established policies and implement procedures for the identification of scientific information products that are influential.
3. Based on the lack of evidence that such an assessment was previously performed, perform an analysis on rulemakings conducted after the issuance of OMB's M-19-15 and determine if a scientific assessment was the principal basis for a decision by a federal decision maker.
4. Based on the results of the analysis performed for recommendation 3, perform appropriate administrative corrective actions, if necessary.
5. Perform a risk assessment that covers compliance with the Information Quality Act.
6. Review account access permission levels in the agency clearance workflow so that only users with a valid business purpose have appropriate access.
7. Establish policies and procedures for monitoring activities of the agency clearance workflow, to include the review of master data, access authorizations, and system access.
8. Establish policies and procedures for monitoring activities for compliance with both OMB and agency-specific policies for performing pre-dissemination review of scientific information.

APPENDIX D – Management Response

From: Ray, DeWane
To: [redacted] Lorenze, Brien; [redacted]
Cc: Dentel, Christopher
Subject: Re: Management Response and Request for Exit Conf. - PDR Audit
Date: Tuesday, May 26, 2026 5:51:04 AM

[redacted]

Management Response

Management concurs with the two findings identified in the Office of Inspector General's report on the Pre-_Dissemination Review (PDR) of Scientific Information. We recognize the importance of consistently identifying influential scientific information and maintaining strong internal controls to support the integrity and reliability of the agency's processes.

We acknowledge the need to improve clarity in our guidelines and strengthen oversight of the PDR process to ensure alignment with applicable requirements and expectations. Management appreciates the OIG's work and will use these findings to support ongoing efforts to enhance the quality and transparency of our scientific information activities.

Thank you
DeWane

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

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

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