



Office of Inspector General

U.S. Consumer Product Safety Commission

# Audit of the CPSC's Office of Communications Management's Strategic Goals

February 19, 2021

Report 21-A-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.

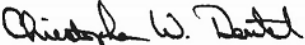
Strive to continually improve the quality and usefulness of our products.

Work together to address government-wide issues.



February 19, 2021

TO: Robert S. Adler, Acting Chairman  
Elliot F. Kaye, Commissioner  
Dana Baiocco, Commissioner  
Peter A. Feldman, Commissioner

FROM: Christopher W. Dentel, Inspector General 

SUBJECT: Audit of the CPSC's Office of Communications Management's Strategic Goals

I am pleased to present this report containing the results of our Audit of the U.S. Consumer Product Safety Commission's (CPSC) Office of Communications Management's (OCM) Strategic Goals.

We conducted this audit in accordance with Generally Accepted Government Auditing Standards. The first objective of this audit was to assess OCM's methodology for developing key performance measures, implementing the resulting strategic initiatives, and reporting on the results of the effectiveness of those strategic initiatives. The second objective was to assess OCM's internal controls over the dissemination of consumer product safety information and collaboration with stakeholders. We noted that OCM met or exceeded their performance measure targets. However, we identified several areas where OCM's internal controls over its performance reporting could be improved and where improvements could be made regarding data confidentiality, integrity, accessibility, and reporting. Finally, we found that OCM's message effectiveness was not being adequately evaluated.

In our report, we make eleven recommendations. When implemented these recommendations will improve data quality and reliability. In the next 30 calendar days, in accordance with the Office of Management and Budget's Circular A-50, *Audit Follow-up*, the CPSC is required to provide me with management's Corrective Action Plan describing the specific actions they anticipate taking to implement each recommendation. Thank you for the courtesy and cooperation extended to my staff during this audit.



## Audit of the CPSC's OCM's Strategic Goals Summary

**February 19, 2021**

<p><b>Objectives</b></p> <p>This audit had two objectives. The first objective was to assess Office of Communications Management's (OCM) methodology for developing key performance measures, implementing the strategic initiatives, and reporting on the results of the effectiveness of those strategic initiatives. The second objective was to assess OCM's internal controls over the dissemination of consumer product safety information and collaboration with stakeholders.</p> <p><b>Background</b></p> <p>Program goals and objectives are reported in accordance with the requirements of the GPRA [Government Performance and Results Act] Modernization Act of 2010 (GPRA) which amends the Government Performance and Results Act of 1993 and was designed to improve program management throughout the federal government. Each agency is required to develop a five-year strategic plan outlining its mission, long-term goals for the agency's major functions, performance measures, and reporting results. All federal agencies must have specific annual performance measures with specific annual targets. GPRA also requires that each agency prepare an Annual Performance Plan covering every program outlined in their budget.</p> <p>The U.S. Consumer Product Safety Commission's (CPSC) Strategic Plan establishes four strategic goals. OCM is responsible for strategic goal number four, "Communicate useful information quickly and effectively to better inform decisions."</p> <p>The report addresses:</p> <p><b>CPSC strategic goal #4:</b> <i>Communication</i></p> <p><b>Office of Inspector General Management Challenge #1:</b> <i>Internal Control System</i></p>	<p><b>Results</b></p> <p>We reviewed the "Key Performance Measure Actual Results" reported in the Annual Performance Reports for fiscal years 2018 and 2019. We verified the numbers reported against the supporting documentation provided by OCM. While we noted that OCM met or exceeded their targets, we identified several areas where OCM's internal controls over its performance reporting could be improved.</p> <p>The standard operating procedures (SOP) developed to track the key performance measures within OCM did not adequately document the relevant processes from end-to-end. Additionally, there were instances where SOPs were outdated. Further, there was insufficient communication within OCM and inadequate documentation of decision making. Specifically, based on our analysis there appeared to be a disconnection between daily staff activities, management activities, the strategic goals, and their effect on the agency mission. We also identified issues with data confidentiality, integrity, accessibility, and reporting. Finally, we noted minimal implementation of tools to improve or measure message usefulness.</p> <p><b>Recommendation</b></p> <p>Management concurred with the eleven recommendations made in this report. When implemented, these recommendations will improve communicating, tracking, calculating, reporting, and evaluating key performance results. Taken as a whole, these recommendations will also improve the data quality and reliability of the performance results that the CPSC reports to Congress and the American people.</p>
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## Abbreviations and Short Titles

APR	Annual Performance Report
CPSC	U.S. Consumer Product Safety Commission
FY	Fiscal Year
FMPB	Office of Budget, Planning, and Evaluation
GPRA	GPRA [Government Performance and Results Act] Modernization Act of 2010
Green Book	<i>Standards for Internal Control in the Federal Government</i>
OCM	Office of Communications Management
OIG	Office of Inspector General
SOP	Standard Operating Procedures

## Objective

This audit had two objectives. The first objective of the audit was to assess Office of Communications Management's (OCM) methodology for developing key performance measures, implementing the strategic initiatives, and reporting on the results of the effectiveness of those strategic initiatives. The second objective was to assess OCM's internal controls over the dissemination of consumer product safety information and collaboration with stakeholders.

## Background

The U.S. Consumer Product Safety Commission's (CPSC) mission is to keep consumers safe. The CPSC Strategic Plan<sup>1</sup> communicates the agency's approach to achieve its mission of keeping consumers safe through the following strategic goals:

1. Cultivate the most effective workforce.
2. Prevent hazardous products from reaching consumers.
3. Respond quickly to address hazardous consumer products both in the marketplace and with consumers.
4. Communicate useful information quickly and effectively to better inform decisions.

OCM is responsible for strategic goal four. The OCM strategic objectives which support its strategic goal include:

- 4.1 Improve usefulness and availability of consumer product safety information
- 4.2 Increase dissemination of useful consumer product safety information
- 4.3 Increase and enhance collaboration with stakeholders

OCM coordinates with the Office of Budget, Planning, and Evaluation (FMPB) to identify, measure, and report on its strategic objectives.

Program goals and objectives are reported in accordance with the requirements of the GPRA [Government Performance and Results Act] Modernization Act of 2010<sup>2</sup> (GPRA) which amends the Government Performance and Results Act of 1993 which was designed to improve program management throughout the federal government. Each agency is required to develop a five-year strategic plan outlining its mission, long-term goals for the agency's major functions, performance measures, and reporting results. All federal agencies must have specific annual performance measures with specific

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<sup>1</sup> U.S. Consumer Product Safety Commission Strategic Plan 2018 – 2022. [https://www.cpsc.gov/s3fs-public/CPSC\\_2018-2022\\_Strategic\\_Plan.pdf](https://www.cpsc.gov/s3fs-public/CPSC_2018-2022_Strategic_Plan.pdf)

<sup>2</sup> GPRA Modernization Act of 2010. <https://www.congress.gov/111/plaws/publ352/PLAW-111publ352.pdf>

annual targets. Each year agencies prepare an Annual Performance Plan for every program outlined in their budget to comply with GPRA requirements.

All CPSC key performance measures are developed collaboratively between FMPB and program offices. Once key performance measures are identified, FMPB reviews the measures and targets, then works with program offices to further refine the language used to define the measures. The measures are then included in the Operating Plan and the Performance Budget Request to Congress prior to the start of the fiscal year (FY). Each report goes through a clearance process for CPSC management approval. Program office directors certify to the completeness, accuracy, and reliability of results at the end of the year. A verification and validation review of year-end performance results for key measures is also conducted by FMPB.

Once this verification process is complete, FMPB reports the results in the Agency Financial Report and the Annual Performance Report (APR). The CPSC prepares an APR no later than March 31<sup>st</sup> of each year to update Congress and the American people on its progress toward meeting CPSC's strategic goals. The CPSC publishes its strategic plan on its website.



# Findings

We reviewed the Key Performance Measure Actual Results reported in the APR for FY 2018 and FY 2019. We verified the numbers reported against the supporting documentation provided by OCM and assessed the internal controls over the reporting process. While we noted that OCM met or exceeded their targets, we identified several findings indicating that the program could be improved. We noted that key performance measures focused on quantifying the numbers of communications made and the number of days required to complete tasks. Less emphasis was placed on reporting on and analyzing the quality and reach of OCM's messaging, and whether the messaging reached the consumers that would most benefit from it.

**Table 1: OCM Strategic Objectives**

Strategic Objectives		Key Performance Measure
4.1	Improve usefulness and availability of consumer product safety information	2018KM4.1.01 Percentage of positive responses about usefulness of information received from CPSC communication channels
		2018/2019KM4.1.02 Number of engagements with CPSC safety messaging on social media channels by stakeholders (in thousands)
4.2	Increase dissemination of useful consumer product safety information	2018/2019KM4.2.01 Number of impressions of CPSC safety messages (in millions)
		2018/2019KM4.2.02 Average number of business days between establishment of first draft and issuance of recall press release for the timeliest 90% of recall press releases
4.3	Increase and enhance collaboration with stakeholders	2018/2019KM4.3.01 Number of collaboration activities initiated with stakeholder groups

Source: Office of Inspector General (OIG) Summary of CPSC Data

## Finding 1: OCM Lacks Sufficient Internal Communication Regarding Strategic Goals

Principle 14, *Communicate Internally*, of the 17 principles articulated in the Government Accountability Office's, *Standards for Internal Control in the Federal Government* (Green Book), discusses the importance of effective communication within an organization. The Green Book notes that internal communications are necessary to help an organization achieve its objectives.

High performing organizations have a well-articulated mission, the strategic goals to achieve the mission, and a performance management system that aligns with these goals to show employees how their performance can contribute to overall organizational results. Additionally, leadership makes every effort to ensure the plans and goals are seamlessly communicated and clearly understood. To high performing organizations, not only the “how” is important but the “why.” Most high-performing organizations have sustained leadership and share the following characteristics: high levels of accountability; navigate change well; and are highly focused on objectives, proper mechanisms, and standard operating procedures (SOPs).

Within OCM, we found that:

- Strategic objectives were not sufficiently communicated within OCM. We observed a disconnection between the mission of the office, and daily activities performed by OCM staff. We noted OCM staff could not demonstrate a deeper understanding of the strategic goals process beyond their specific role. They were also not able to articulate the meaning of some of the key performance measures or the specific targets.
- Key performance measures, such as 2018/2019KM4.3.01, number of collaboration activities initiated with stakeholder groups, were discontinued through CPSC Commission vote without clear documentation of the reason for discontinuing the measure. This resulted in there being no key performance measure for strategic objective 4.3.<sup>3</sup>
- Overall, we noted that OCM was not able to sufficiently articulate how their work as a whole, and the office fits into the overall mission of the agency. Specifically, based on our analysis there appeared to be a disconnection between daily staff activities, management activities, the strategic goals, and their effect on the agency mission.

OCM has not made broader communications related to performance goals within its office and within the agency a priority.

The CPSC is not in compliance with federal requirements or commission directives. The CPSC is at greater risk of inaccurate reporting and incorrect processes performed. For example, the CPSC reported incorrect results in the APR to Congress (see finding 3 for examples). Additionally, the CPSC strategic goals are at risk of not fulfilling their purpose to contribute to realizing the CPSC’s vision, and achieving the agency’s mission.

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<sup>3</sup> The measure was discontinued in October 2019, immediately after the end of the audit period. <https://www.youtube.com/watch?v=-9zPsJZlmes>

We recommend CPSC management:

1. Communicate with staff on the relationship between the strategic goals and the day-to-day processes in place to achieve those goals. This communication should include discussion of the strategic goals process end-to-end.
2. Fully document and implement procedures for the process of discontinuing key performance measures, the reason for discontinuation, and intentions concerning future key performance measures.

## **Finding 2: OCM Lacks Adequate Control Activities Related to Goal Measurement Processes**

Green Book, Principle 10, *Design Control Activities*, requires management to design control activities in response to the entity's objectives and risks to achieve an effective internal control system. Control activities are the policies, procedures, techniques, and mechanisms that enforce management's directives to achieve the entity's objectives and address related risks. Management communicates to personnel the policies and procedures so that personnel can implement the control activities for their assigned responsibilities and delegates authority to achieve the entity's objectives.

CPSC Directive Order 0690.2, July 7, 1998, Revised April 30, 2003, *Management Accountability and Control*, states:

management controls, in the broadest sense, include the plan of organization, methods and procedures adopted by management to ensure that its goals are met. Management controls include processes for planning, organizing, directing, and controlling program operations.

The SOPs developed to direct the tasks needed to complete key performance measures within OCM did not adequately document the relevant processes from start to finish. Specifically, we identified the following:

- There were instances where SOPs were outdated. OCM does not maintain the previous versions of their SOPs. So while the scope of the audit is FY 2018 and FY 2019, the SOPs provided were from varying time periods, including FY 2020.
- The SOPs in most, if not all, instances do not outline the review and approval process for each task, the processes are not documented end-to-end.
- The SOPs were not complete. Roles are not clearly documented, stating who performs each step, who does and does not have access to systems and trackers, and who has been designated authority to perform functions.

- The recall press release process involves the Office of Compliance and Field Operations, however, there are no implementing procedures between the two offices detailing the process.
- There is no documentation that the SOPs were ever reviewed and approved by those delegated the authority to finalize and implement SOPs.

OCM did not prioritize the review and development of SOPs. Because of this lack of review, OCM was not aware that their processes were not appropriately documented.

Without adequate control activities, OCM did not have reasonable assurance that their SOPs were up-to-date and provided staff with effective guidance to complete their work. Thus, OCM cannot ensure that processes are performed consistently. This may adversely affect OCM's ability to achieve its key performance measure targets and could unnecessarily delay the release/gathering of information on consumer safety.

We recommend CPSC management:

3. Fully document and implement procedures covering the processes related to performing the activities necessary to achieve OCM's key performance measure targets.
4. Update the CPSC policies as necessary to reflect any new procedures.
5. Develop and implement procedures to maintain, retain, and update OCM program documents, at least annually.

### **Finding 3: Lack of Data Integrity in the Reporting Process**

Green Book, Principle 13, *Use Quality Information*, requires that management use quality information to achieve and document completion of its objectives.

Management should obtain relevant data from reliable sources and confirm that it is free from error. Data is processed so that it is quality information. Control objectives for maintaining information quality include confidentiality, integrity, and accessibility. Confidentiality means that data, reports, and other outputs are safeguarded against unauthorized access. Integrity means that information is safeguarded against improper modification or destruction, which includes ensuring information's nonrepudiation and authenticity. Availability means that data, reports, and other relevant information are readily available to users when needed.

One of the CPSC's cross-cutting priorities in its current Strategic Plan is access to useful and accurate data. Collection, management, and analysis of high-quality data are essential to achieving the CPSC's strategic goals and fulfilling the agency's mission.

We identified issues with OCM's internal controls over the reporting on the measures related to consumer product safety information, specifically, data confidentiality, integrity, accessibility, and reporting. We identified the following:

- Management stated that they regularly review all data reported, however, this process is not documented.
- Key Performance Measure Actual Results were reported inaccurately in the APR. There were multiple instances where the number reported was not supported.
- The spreadsheets utilized to track, calculate, and report the Key Performance Measure Actual Results are at risk of compromise due to a lack of security. The information in these spreadsheets was not adequately safeguarded against inadvertent manipulation. Multiple CPSC employees had access to the spreadsheets through the CPSC SharePoint site or G drive and it is not always clear who has entered which information.
- The spreadsheets utilized to track, calculate, and report the Key Performance Measure Actual Results are at a greater risk of inaccuracies due to the volume of manual entries.
- The spreadsheet is overly complex and was not created within OCM. Ownership lies partly with FMPB.

This happened because OCM management did not have ownership of the reporting tools, there were incomplete SOPs regarding the data collection process, a lack of adequate security related to the spreadsheets and the data entry process, and an inadequate review of the data before it was published.

As a result, the CPSC inaccurately reported the Key Performance Measure Actual Results in the APR, which indicates progress toward Strategic Goals and Strategic Objectives identified in the CPSC's Strategic Plan. For FY 2018, we noted key measure 2018KM4.2.01, Number of impressions<sup>4</sup> of CPSC safety messages, was reported in the Annual Performance Report as 7,597.8. Through the supporting documentation we determined the total should be 7,579. Though reported incorrectly, this outcome still exceeds the target goal of 4,430 for FY 2018. CPSC management and Congress relied on inaccurate information to assess agency progress towards its goals.

We recommend CPSC management:

6. Fully document and implement procedures for compiling, calculating, and reporting data in the Annual Performance Report.

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<sup>4</sup> Impressions are the total number of times social media browsers have been showed your content. Impressions are different than reach because it doesn't count people who click or engage with your content, just those who are exposed to it.

7. Coordinate with the Office of Budget, Planning, and Evaluation to develop control activities to improve data confidentiality, integrity, availability, and reporting. Specifically, develop and utilize a reporting tool which includes adequate data security, or leverage the data security features that already exist in Excel. Create or incorporate into existing standard operating procedures the control activities that were developed.
8. Create and or enhance policies and procedures to include an adequate review of the spreadsheets.

#### **Finding 4: Inadequate Measures of Message Effectiveness**

Green Book, Principle 13, *Use Quality Information*, states that management should use quality information to achieve its objectives. Management should periodically evaluate the entity's methods of communication so that the organization has the appropriate tools to communicate quality information throughout and outside of the entity. Management should consider appropriate methods when communicating with a broad audience.

Many communications may be sent to consumers, but they are not effective unless the audience receives them, consumes them, understands them, and (if applicable) provides the requested response. Organizations need to consider the following as they create a communications plan:

- What are your communications goals?
- Who is the target audience?
- When and how frequently do you plan to communicate?

High-performing organizations routinely use tools to measure the effectiveness of their communications. Organizations should question whether they were able to reach their target audience and if their audience understands the message.

We reviewed the OCM key performance measures and related performance goals and strategic initiatives in FY 2018-2019 for information on communication effectiveness. There is only one strategic objective, 4.1, improve usefulness and availability of consumer product safety information, which references measuring usefulness. In the FY 2018 and FY 2019 Performance Budget Requests to Congress the CPSC noted that they intended to implement evaluation tools to measure message usefulness and assess the utility of the CPSC safety messages using best practices from federal and private sectors. Though we did identify some actions taken by OCM to improve the usefulness of their messaging, we noted minimal implementation of tools which would in fact improve or measure message usefulness.

Implementation of communication evaluation tools was not a priority in OCM. Lack of dissemination of more useful consumer product safety information hurts the CPSC's

efforts to keep consumers safe, and weakens collaborations with stakeholder groups, including other government agencies and nonprofit organizations.

We recommend CPSC management:

9. Continue planned efforts to identify and implement tools to improve message usefulness and measure message effectiveness.
10. Implement a risk assessment process to determine where to focus efforts in terms of usefulness and improving message effectiveness.
11. Review, at least annually, data from communication effectiveness tools, and adjust communication strategies based on the data analysis.

## Consolidated list of recommendations

We recommend CPSC management:

1. Communicate with staff on the relationship between the strategic goals and the day-to-day processes in place to achieve those goals. This communication should include discussion of the strategic goals process end-to-end.
2. Fully document and implement procedures for the process of discontinuing key performance measures, the reason for discontinuation, and intentions concerning future key performance measures.
3. Fully document and implement procedures covering the processes related to performing the activities necessary to achieve OCM's key performance measure targets.
4. Update the CPSC policies as necessary to reflect any new procedures.
5. Develop and implement procedures to maintain, retain, and update OCM program documents, at least annually.
6. Fully document and implement procedures for compiling, calculating, and reporting data in the Annual Performance Report.
7. Coordinate with the Office of Budget, Planning, and Evaluation to develop control activities to improve data confidentiality, integrity, availability, and reporting. Specifically, develop and utilize a reporting tool which includes adequate data security, or leverage the data security features that already exist in Excel. Create or incorporate into existing standard operating procedures the control activities that were developed.
8. Create and or enhance policies and procedures to include an adequate review of the spreadsheets.
9. Continue planned efforts to identify and implement tools to improve message usefulness and measure message effectiveness.
10. Implement a risk assessment process to determine where to focus efforts in terms of usefulness and improving message effectiveness.
11. Review, at least annually, data from communication effectiveness tools, and adjust communication strategies based on the data analysis.



## Appendix A: Scope and Methodology

### Scope

The scope of this audit is strategic goals key performance measure data reported in the CPSC Agency Performance Reports, and any applicable procedures, certifications, documentation, and controls utilized to implement the reporting process for FY 2018 and FY 2019. Fieldwork for this audit was performed from March through June 2020 both virtually and at the CPSC headquarters in Bethesda, Maryland. Throughout the audit, auditors were aware of the possibility or existence of fraud, waste, or abuse in the program under review.

We did not conduct an independent review of the overall system of internal control. However, we determined that several components and principles were significant to the audit objectives. Therefore, we developed procedures to assess the design, implementation, and operating effectiveness of the internal controls to the extent necessary to address the audit objective. See Appendix B for further details on internal controls.

### Methodology

To accomplish the objectives, we:

- reviewed applicable laws and regulations
- referenced commercial sources of best practices and criteria
- reviewed Government Accountability Office's *Standards of Internal Control in the Federal Government*
- reviewed GPRA
- interviewed the CPSC personnel responsible for program management and oversight to gain an understanding of the program
- reviewed internal controls, including CPSC directives and standard operating procedures
- reviewed supporting documentation against data reported in the FY 2018 and FY 2019 Agency Performance Reports

We conducted this audit in accordance with 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 Control Results 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 effective internal controls for both financial and non-financial programs. Internal control is a process used by management to help a program achieve its goals. There are five internal control components and 17 principles.

We assessed internal controls to satisfy the audit objectives. Our assessment included internal control components and principles of the Standards for Internal Control in the Federal Government. As part of the OIG audit, all internal control principles and components determined to be significant to the audit objectives are noted in the table below along with a determination of whether or not those internal controls are designed, implemented, and operating effectively.

**Table 2: Results of Internal Control Review**

Principle	Internal Control Components and Principles	Pass	Fail	Not Applicable or Not Significant to the audit objectives
<i>Control Environment</i>				
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
<i>Risk Assessment</i>				
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	
<i>Control Activities</i>				
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	
<i>Information and Communication</i>				
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
<i>Monitoring.</i>				
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	
Source: CPSC OIG analysis based on interviews and document reviews.				

## Appendix C: Agency Response

The OIG presented agency management with the draft report on February 5, 2021.

### Management Response to OIG Audit of the CPSC's OCM's Strategic Goals

Management appreciates the opportunity to respond to the findings of the OIG Audit of OCM.

#### Finding 1

Management concurs generally that OCM internal communications regarding strategic goals can always be improved. CPSC is taking steps to improve understanding concerning OCM objectives and performance measurements through a strategic planning process that has been underway since November 2020 and is scheduled for completion in the coming weeks. That process has identified several key strategic goals for OCM, including strengthening effectiveness through streamlined decision-making, enabling team engagement and performance through role clarity and definition, and activating consumer safety through enhanced campaign strategies. By implementing the steps of the strategic plan, OCM will better ensure that resources are properly allocated to maximize impact toward CPSC's mission.

#### Finding 2

Management concurs generally that OCM needs to refine its control activities related to goal measurement processes. Improving activities related to goal measurement processes is an area of improvement discussed at length within the new OCM strategic plan document. To address this finding specifically and to improve control over goal measurement processes, OCM will consider: rescoping positions and investing in specialized support where needed, investing in enhanced capabilities to build core capabilities and digital fluency to deliver mission-critical activities, and enhancing the learning and engagement culture to foster greater connection and performance. This focus on learning and engagement will also serve to strengthen internal communication with regard to strategic goals, as discussed in Finding 1.

#### Finding 3

Management recognizes that OCM's internal controls over data would benefit from a greater focus. One of the recommendations of the OCM strategic planning process goes directly to this issue, and will be considered should the Commission dedicate funding for enhanced digital leadership in FY 2022.

#### Finding 4

Management—and indeed communications professionals and academics—concur measuring effectiveness in public health communications is extremely difficult. Measuring the success of public health communications—specifically, assessing whether consumer behavior has changed *as a result of those communications* and not some other input—is an endeavor of the highest importance and utmost difficulty. OCM has recently shifted from measuring impressions (“did they see it?”) to measuring engagements (“did they do anything as a result of seeing it?”). The shift to an emphasis on engagements enables a deeper understanding of campaign impact and enhances metrics, optimizes workflow, and improves audience outreach. Part of this effort will include the incorporation of behavioral science in campaign development, and the use of additional measurement data to analyze campaign effectiveness. Management believes that

working collaboratively with the Consumer Ombudsman presents an additional opportunity to more effectively target and then measure effectiveness within vulnerable communities and other target populations. With additional resources, OCM could perform even more of this important measurement function, including pre-campaign planning and post-campaign analysis using focus groups, micro-targeting to amplify reach within target audiences, and building out internal capabilities for targeted messaging and measurement thereof.

# CONTACT US

If you want to confidentially report or discuss any instance of fraud, waste, abuse, misconduct, or mismanagement involving CPSC's programs and operations, please contact the CPSC Office of Inspector General.



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## Write:

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Bethesda MD 20814