

April 28, 2025

**Office of the Secretary
Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814
Via: www.regulations.gov**

Comments of Consumer Federation of America to the U.S. Consumer Product Safety Commission on Notice for Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Electronic Injury Surveillance System and Follow-up Activities for Product Related Injuries, Docket No. CPSC-2009-0102

Consumer Federation of America (CFA)¹ submits the following comments to the U.S. Consumer Product Safety Commission (referred to hereafter as CPSC or Commission) in connection to the above-referenced matter.

The National Electronic Injury Surveillance System or NEISS is a primary tool for the CPSC to safeguard the American public against unreasonable risk of injury or death associated with consumer products. Recent news regard the end of the Centers for Disease Control’s (CDC) NEISS-All Injury Program (NEISS-AIP) because of recent CDC budget and staff cuts is deeply concerning.² At this time, more than ever, the CPSC requires a strong NEISS to continue its evidence-based, lifesaving work.

- 1. Whether the collection of information described the public notice necessary for the proper performance of the Commission’s functions, including whether the information would have practical utility.**

¹ CFA is an association of nonprofit consumer organizations established in 1968 to advance the consumer interest through research, advocacy, and education. *See* <https://consumerfed.org/>.

² Reuters, “Exclusive: US consumer safety agency to stop collecting swaths of data after CDC cuts” (April 16, 2025) retrieved online: <https://www.reuters.com/business/healthcare-pharmaceuticals/us-consumer-safety-agency-stop-collecting-swaths-data-after-cdc-cuts-2025-04-16/>.



The collection of NEISS data is necessary for the CPSC to fulfill its statutory responsibilities, and it provides substantial practical utility. The data enables timely, data-driven actions that protect consumers, guide priorities, and inform public health initiatives. Without NEISS, the CPSC would lack the foundational evidence needed to identify hazards, justify interventions, and evaluate the effectiveness of its safety programs. The system also allows for follow-back investigations, where more detailed information about injury circumstances can be gathered, supporting root cause analysis and prevention strategies.

NEISS data have been instrumental in identifying high-risk products and informing the development of safety standards, recalls, and public education campaigns that have demonstrably reduced injuries and deaths. It also serves as a model for injury surveillance worldwide, offering a cost-effective alternative to conducting independent special surveys for product hazards.

2. Whether the quality, utility, and clarity of the information to be collected could be enhanced.

While NEISS is a vital tool for consumer safety, its impact can be significantly strengthened by addressing current gaps in data quality, utility, and clarity. Specifically, NEISS would benefit from upgrades to its data collection and management systems, including user-centric design improvements, enhanced preventative controls, and real-time oversight. Implementing these enhancements will ensure that NEISS data remains a trusted, actionable resource for protecting the public from product-related injuries.

NEISS has historically lacked a robust data governance framework, leading to issues such as data entry errors, incomplete records, and inconsistent adherence to quality standards. Error rates in data entry have at times exceeded acceptable thresholds, and lag times between treatment and reporting have not consistently met performance standards.³ The absence of required data fields (e.g., missing dates of birth) undermines the reliability of age-specific injury analyses, which are vital for protecting vulnerable populations like children.

Further, training for medical coders has not always been sufficient to ensure accurate and consistent data entry.⁴ Coders have sometimes been instructed to make assumptions about

³ Office of Inspector General, CPSC, “Review of National Electronic Injury Surveillance System Data” (November 9, 2022) retrieved online: <https://www.oversight.gov/sites/default/files/documents/reports/2020-11/Review%20of%20the%20National%20Electronic%20Injury%20Surveillance%20System%20Data%20FINAL.pdf>.

⁴ *Id.*



products involved in injuries, which can introduce inaccuracies.⁵ Finally, incorporating emerging technologies, such as artificial intelligence, could help automate quality checks and flag inconsistencies or missing information more efficiently.

3. Whether the burden imposed by the collection of information could be minimized by use of automated, electronic or other technological collection techniques, or other forms of information technology.

There are several opportunities for automation and other technology. Recent projects have shown that machine learning algorithms can automate the coding of unstructured text fields, such as injury descriptions.⁶ Further, NEISS already uses software that edits and validates data, but further automation could streamline the process more.⁷ Automation and other technology would not only free up hospital staff, but it would also reduce the burden on NEISS administrators. Importantly for the American public, automation and other technology would allow for quicker data availability so that real-time data would allow the CPSC to more quickly identify emerging hazards and respond.

NEISS is an important tool in the Commission’s lifesaving work. In order for the CPSC to continue this work protecting the American public from unreasonable risk of injury or death associated with consumer products, NEISS must remain a strong injury surveillance and data collection tool.

Respectfully Submitted,

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⁵ *Id.*

⁶ NIOSH, “Using Machine Learning to Code Occupation Surveillance Data: A Cooperative Effort between NIOSH and the Harvard computer Society – Tech for Social Good Program” retrieved online: <https://blogs.cdc.gov/niosh-science-blog/2021/08/19/machine-learning-t4sg/>.

⁷ CPSC, “NEISS Frequently Asked Questions” retrieved online: <https://www.cpsc.gov/Research--Statistics/NEISS-Injury-Data/Neiss-Frequently-Asked-Questions>.