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UNITED STATES  
CONSUMER  
PRODUCT  
SAFETY  
COMMISSION

DIRECTIVES SYSTEM

ORDER

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9010.24

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July 12, 1995

IN-DEPTH INVESTIGATIONS MANUAL

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EPIDEMIOLOGY SUPPORT ACTIVITIES

1. **PURPOSE.** This directive provides instructions for conducting investigations of accidents involving consumer products.

2. **SCOPE.** The manual is for use by all Commission investigators and representatives who conduct accident investigations or supervise the performance of this activity.

3. **REFERENCE.**

- a. Consumer Product Safety Act, 15 U.S.C. 2051.
- b. Federal Hazardous Substances Act, 15 U.S.C. 1261.
- c. Flammable Fabrics Act, 15 U.S.C. 1191.
- d. Refrigerator Safety Act, 15 U.S.C. 1211.
- e. Poison Prevention Packaging Act of 1970, 15 U.S.C. 1471.
- f. Paperwork Reduction Act, 44 U.S.C. 3501.
- g. Privacy Act, 5 U.S.C. 552a.
- h. Commission Order 9010.36, Domestic Sample Collection.
- i. Commissioner Order 9010.70, Flammable Fabrics Act.
- j. Commission Order 9010.40, Substantial Hazards in Consumer Products.
- k. Commission Order 9010.28, Processing of Consumer Product Incident Reports.

4. Commission staff who conduct accident investigations or supervise the performance of this activity should follow the procedures in this manual. Copies of the manual are available from the Directorate for Epidemiology.

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Bertram R. Cottine  
Executive Director

## CHAPTER I. GENERAL

### 1. **PURPOSE**

The purpose for this manual is to identify for field investigators the procedures and reporting techniques required to effectively provide the Consumer Product Safety Commission with data used to develop Commission projects. The goal in providing this manual is to facilitate accurate and timely reporting of investigations assigned to support on-going initiatives by the Commission.

### 2. **BACKGROUND**

A. Consumer Product Safety Act. The Consumer Product Safety Act (CPSA) was signed into law in 1972. It grew out of a recommendation by the National Commission on Product Safety and out of public and Congressional concern over the thousands of injuries and deaths each year that were associated with consumer products.

B. Consumer Product Safety Commission. The CPSA established an independent Federal regulatory agency, the Consumer Product Safety Commission (CPSC), to address this concern. The Commission, which became operational in 1973, is required to:

- (1) Protect the public against unreasonable risks of injury associated with consumer products.
- (2) Assist consumers in evaluating the comparative safety of consumer products.
- (3) Develop uniform safety standards for consumer products.
- (4) Promote research and investigation into the causes and prevention of product-related deaths, illnesses, and injuries.

C. The Directorate for Epidemiology and Health Sciences. The Directorate for Epidemiology and Health Sciences (EH) is responsible for the collection, investigation, analysis, and dissemination of product-related injury information. Its mission includes functions provided for in such acts as the Consumer Product Safety Act, the Federal Hazardous Substances Act, the Flammable Fabrics Act, the Refrigerator Safety Act, and the Poison Prevention Packaging Act.

D. Incident Surveillance System. In order to monitor incidents involving consumer products, Epidemiology operates several incident surveillance systems composed of reporting sources located throughout the country including:

- (1) NEISS. The National Electronic Injury Surveillance System (NEISS) consists of statistically selected hospitals that report consumer product-related emergency room injury visits to the CPSC daily. NEISS data is continuously monitored by program analysts and statisticians. Summary reports and analyses are provided to CPSC analysts in the Commission, industry, health personnel, and other interested parties or groups.
- (2) Non-NEISS. Additional incident information is collected from sources outside NEISS. These sources include news media reports, consumer complaints, death certificates, trade information, and Medical Examiner and Coroner reports. These incident reports provide additional supporting data for Commission analysts and statisticians to use when conducting studies of consumer product-related injuries or incidents. In addition these reports are used by Compliance officers in CCA to identify defective consumer products.

E. Incident Investigation System. Both NEISS and non-NEISS surveillance data must be supplemented by conducting follow-up investigations using the epidemiologic approach. These investigations, through the comprehensive review of the incident sequence, and the human and environmental factors, provide the specific details required to evaluate product involvement. The data thus gathered help the CPSC in achieving a greater understanding of the incident or hazards, including:

- o The interaction between the product, the person, and the environment.
- o Information on the product(s) involved at the time of the incident.
- o Associated behavioral patterns and design characteristics related to product usage.
- o Information on the victim and/or user of the product at the time of the incident.

### 3. OBJECTIVES

The overall objective of this order is to provide specific instructions for conducting high-quality incident investigations. The investigation data will provide the foundation from which regulations, standards, educational programs, recalls and corrective actions, and recommended programs for state-and-local agencies can evolve. To assist you in this vital task, this order:

- A. Defines investigator responsibilities for those performing incident investigations--- on-site or by telephone.
- B. Outlines procedures for the preparation of comprehensive, product-related investigation reports.
- C. Provides investigation guidelines for use in conducting comprehensive investigations.

### 4. DEFINITIONS

Definitions of terms concerning consumer product-related incidents follow:

- A. Consumer Product. **CONSUMER PRODUCT** means any article or component of an article which is customarily produced or distributed for sale to or for the personal use, consumption, or enjoyment of consumers in a residential, school, recreational or other environment. It does not include a product intended for commercial or industrial use, unless it is sold to or used by consumers more than occasionally.
- B. Non-Consumer Products. The term Consumer Product excludes certain products covered by laws enforced by other regulatory agencies. However, the CPSC does enter into formal agreements with other Federal agencies to collect information on non-consumer products, and in these situations the CPSC and other agencies may assemble information through NEISS and other sources which is of particular interest to the other agencies. **Only in these instances should information be gathered on the following items:**
  - (1) Alcoholic Beverages, Tobacco Products, Firearms, and Ammunition. Those products are subject to regulations administered by the Treasury Department and therefore, subject to their rules and regulations.
  - (2) Motor Vehicles and Motor Vehicle Equipment. CPSC does not have jurisdiction over incidents in which a **licensed** motor vehicle is the **sole**

contributor to the incident. However, if a motor vehicle is not licensed (e.g. all-terrain vehicle) or a second "consumer type" product such as a bicycle is involved in the incident, then CPSC may be interested and an incident investigation may be conducted covering that product and the circumstances surrounding the incident. Licensed motor vehicles are subject to regulations administered by the Department of Transportation. NOTE: Infant car seats are only in our jurisdiction if the car seat was not in a motor vehicle.

- (3) Economic Poisons. Pesticides and other related products are subject to regulations enforced by the U.S. Environmental Protection Agency (EPA). These products would include all insecticides, fungicides, herbicides, and rodenticide. Some specific items are mothballs, sanitizers, fumigants, and other such substances intended for use in and around the home as plant or animal poisons, regulators, defoliants, or desiccants.
- (4) Boats and Related Equipment. Boats, jet skis, and equipment used in or around water such as life preservers and ski belts, are subject to the Federal Boat Safety Act of 1971, which is enforced by the Coast Guard.
- (5) Foods, Medical Devices, Cosmetics, and Drugs. These substances (except those packaged in containers subject to the Poison Prevention Packaging Act) are subject to regulations administered by the Food and Drug Administration (FDA). The CPSC has jurisdiction over the container of products required to be packaged in child resistant closures, and over mechanics/risks or injury from packaging.
- (6) Aircraft and Aircraft Components. These products, including hang gliders and ultra light aircraft, are regulated by the Federal Aviation Administration.
- (7) Occupational Incidents. Incidents which occur to an employee in the work place are regulated by the Occupational Safety and Health Administration (OSHA). However, if the employee was using a consumer product, we would be interested in the case.
- (8) Electronic Product Radiation. Even if the article is a consumer product (e.g. a microwave oven) a radiation risk would be outside the scope of the CPSC jurisdiction.

C. Incident Investigations. There are five classifications for categorizing incident investigations. Table 1-1 on page I-5 denotes

the five different types of categories applicable to investigative techniques and the corresponding chapter addressing the categories in this manual.

**TABLE 1-1 INCIDENT INVESTIGATION CLASSIFICATION CATEGORIES**

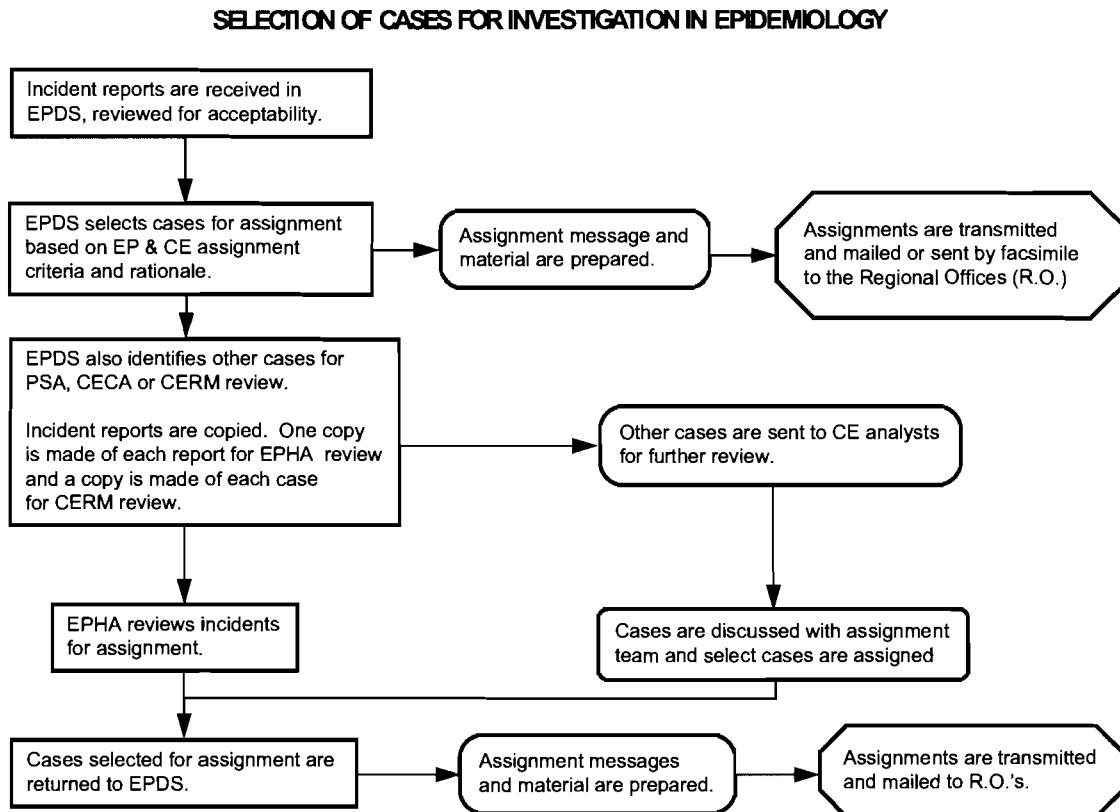
TYPE OF INVESTIGATION	CLASSIFICATION	CHAPTER
Telephone Investigation	Information is obtained by telephone. Similar format to an on-site with the collection of in-depth information or a brief questionnaire used to collect less detailed information.	5
On-Site Investigation	Investigator visits the incident site, recreating the incident scene and documenting accordingly. Should include incident scenario, product use, and data on environmental and behavioral factors related to the incident.	6
Screening Investigation	An investigator was able to contact a knowledgeable party, but discovered that the product involved is not a consumer product (e.g., farm tractor rather than riding mower) or that the incident was a deliberate act such as arson.	8
Other Investigation	Information is obtained by the investigator by visiting with the medical examiner or local officials (police, fire dept., etc.) to discuss the incident and obtain copies of select documents, but <b>did not</b> conduct a site visit at the site where the incident occurred.	8
Terminated Investigation	Investigation may be terminated due to the inability to contact a knowledgeable party or a refusal.	8



## CHAPTER II. CASE SELECTION AND ASSIGNMENT

**1. CASE SELECTION.** The incidents assigned to the field for investigation come from a variety of reporting sources, including NEISS, consumers, news media, Medical Examiners, State Health Departments (death certificates), trade associations, and other sources that report incidents to the Commission. The source document flow chart below diagrams the process of how incidents are assigned for investigation. High priority investigations short cut this process.

**FIGURE 2-1 SELECTION PROCESS OF CASES FOR INVESTIGATION**



- A. Investigations Initiated by Epidemiology. All incident reports received by headquarters and Regional Office units, are forwarded to the Directorate for Epidemiology and Health Sciences (EH) and are reviewed daily by assignment coordinators. Cases that involve a product or a hazard that is of current interest to the Commission are immediately identified and assigned to the appropriate Regional Office\contractor for further investigation. Cases of interest, but not covered by existing assignment criteria are identified by the assignment coordinator in EHDS and shared with appropriate Commission analysts, statisticians and compliance staff. Cases selected for investigation by these project/program managers are returned to the assignment coordinator within EH for assignment. Finally, a copy of all non-NEISS incident reports, including those not targeted for follow-up investigation, are forwarded to statisticians and analysts in Epidemiology for final review and/or action.

The NEISS related incidents selected for investigation are initially assigned to investigators working in or for the Directorate for Epidemiology and Health Sciences. The EHDS investigator will conduct an appropriate telephone investigation to obtain details on the incident. These telephone investigations are reviewed by the analyst and if further follow-up of a report (e.g. on-site visit) is desired, and the respondent is cooperative the case is reassigned to an appropriate field office for additional action.

Non-NEISS related incidents (e.g. news clips, consumer complaints, etc.) selected for investigation usually contain more information on the incident than NEISS cases. This additional information, plus the fact that the victim's identification is usually public information, allows EHDS to assign these cases directly to the field staff for follow-up investigation.

The assignment coordinator also develops investigation instructions (message), which are attached to the incident report. The follow-up instructions are based on investigation criteria and rationale provided by the statistician responsible for that program area. This assignment message includes the category ID to which the assignment will be credited, the name of the statistician requesting the investigation, a statement concerning the type of information desired, the name of the person(s) to contact, the product investigation guidelines to follow, the category I.D. and other specific guidance.

- B. Investigation Initiated by the Regional Office. Incidents identified in

the field are to be reviewed by the field staff promptly and checked against assignment criteria provided by the Directorate for Epidemiology and Health Sciences and other headquarters units for assignment purposes.

The assignment task number must be placed on the source document (e.g. news clip) before the document is sent to Epidemiology for processing and review. If the Regional Office fails to place this number on the document, there is a good chance that the case will also be selected by headquarters staff for assignment resulting in duplication.

- C. Investigations Initiated by Compliance. Requests for the investigation of incidents are frequently initiated by the Directorate for Compliance. These assignments are based on incident reports referred to Compliance by Epidemiology, the field staff, the Hotline and other sources. The selected cases are directed to Epidemiology's assignment coordinator for assignment.

Epidemiology's assignment coordinator also screens all incident reports received by the Directorate for cases of interest to Compliance (CCA and CRM). If an incident report appears to involve a defective or unreasonably hazardous product, or meets other compliance follow-up criteria, the case will be discussed with compliance representatives. If selected, the case is assigned for investigation using Section 15 tasking numbers, category I.D. (e.g., SECT15) and investigation instructions.

## **2. ASSIGNMENT SHEET IDENTIFICATION.**

An example of an incident investigation request form is shown in Appendix II-A-2. This form highlights the elements pertaining to the investigation being assigned. When a case meets the criteria for an investigation, it is assigned using a task number and category identification number that identifies the Regional Office that is investigating the case, the Directorate for which the case is being investigated, and the product/program area to which the investigation is to be charged. An example of this number would be: 941201HNE4033. This number indicates that the case was initiated for Epidemiology by the Eastern Region (HNE) on December 1, 1994 (941201). (The tenth character [4] may be used by the R.O.) The last three digits (033), indicate that it is the 33rd case to be assigned by New York this fiscal year. Appendix II-A-1 identifies the types of task numbers assigned throughout the Commission. A category I.D. of TLNN09 would indicate that the case was initiated under the TL (tool category), it is a Non-Neiss Case (NN), and it is the ninth product in the TL category. (A

category I.D. has been assigned to each product category for which assignments are made)

If the assignment contains restricted data or requires special handling procedures for some other reason, the assignment message will inform the investigator of this requirement under the person(s) to contact section. For example, the assignment message will state "DO NOT CONTACT NEXT-OF-KIN".

The investigation guidelines for each product area are attached to this Directive and should be used as guidance on these cases, unless otherwise instructed. When other directions are received, they will be included in the assignment message. **Investigators are encouraged to contact the appropriate analyst directly when there are questions about what is expected.**

Assignment information is entered into the computer base by an EHDS team representative for case tracking and monitoring purposes. All cases include a hard copy of the assignment, plus any background information (e.g. telephone investigations report) on the case is promptly mailed to the R.O. so that the investigator has the necessary information to conduct a complete and comprehensive investigation.

### **3. IDENTIFYING INVESTIGATIONS WITH RESTRICTED DOCUMENTS.**

Many investigations assigned require that the victim's confidentiality not be revealed. For example when assigning death certificates, medical examiners and coroners reports the EHDS team representative will identify on the incident investigation report form if next-of-kin can be contacted. If it is not indicated, please call your representative to determine what contact should or should not be made.

## APPENDIX II-A-1 TYPE OF TASK NUMBER ASSIGNED

OFFICE INITIATING ASSIGNMENT	CLASSIFICATION	TYPE OF TASK NUMBER ASSIGNED
Epidemiology (EH)	Assigned based on established assignment criteria or study needs. These investigations are assigned to collect information on generic type hazards.	HCC HBB HAA
CCA Section 15	Assigned to collect information to assist Compliance staff in identifying whether a defect exists and whether that defect presents a substantial product hazard. Data will also be used in determining if a corrective action is required.	CCC CBB CAA
CRM Regulatory Products	These follow-up investigations are assigned to collect information on incidents that involve a consumer product that is subject to a standard or other regulation for which CPSC is responsible.	CER
Regional Office	Regional Offices (R.O.) assign cases based on criteria provided by EH statisticians.	HNE HWE HCN
NEISS	EH often assigns NEISS cases that are of particular interest to an EHHA analyst. An example of such a study would be baby walkers.	HEP
NEISS-Compliance	EH assigns NEISS cases for investigation, based on criteria that compliance has identified. An example of such an would be 5-gallon bucket incidents.	CEP
Regional Office involving a Compliance issue	Regional Offices assign cases based on criteria provided by CE compliance officers and Section 15 compliance officers that are of current interest to the Commission.	CNE CWE CCN

## APPENDIX II-A-2 INCIDENT INVESTIGATION REQUEST FORM

INCIDENT INVESTIGATION REQUEST FORM	
<b>DOCUMENT NUMBER:</b> X3B0393A1	
<b>DATE OF INCIDENT:</b> 941115	<b>CATID:</b> ELNN071995
<b>FOLLOW-UP REQUESTED:</b> ANALYSIS (X)	<b>HAZARD</b> SECT 15 ( )
<b>TYPE FOLLOW-UP:</b>	<b>TELEPHONE ( )</b> <b>ON-SITE (X)</b>
<b>HEADQUARTERS CONTACT:</b>	Kim Long 504-0470 (x1269)
<b>ASSIGNMENT MESSAGE:</b> Determine if the heat tape is an Underwriters Laboratories (UL) or Canadian Standards Association (CSA) listed shielded heat tape, or if the heat tape was protected by a ground fault circuit interrupter (GFCI), then proceed with the investigation. Find out whether a sample of the heat tape is available. If so, collect the piece of heat tape as a sample if possible. The data record sheet which was developed in conjunction with the guidelines should be used in the investigation.	
<b>PERSON(S) TO CONTACT:</b> Local Officials	DO NOT
<b>CONTACT NEXT-OF-KIN</b>	
<b>GUIDELINES:</b> 11 - Heat Tape - Use Data Record Sheet	
<b>TASKNUMBER:</b> 941201HAA1301	<b>Date:</b> 12/1/94
<b>ASSIGNED TO:</b> FOER	<b>Requested by:</b> EASQ
CPSC Form 324A (10/93)	

**DOCUMENT NUMBER:** A unique identifying number placed on the surveillance document when the document is first received by the Commission.

**CATID:** The category identification, is associated with the hazards being investigated. (e.g. ELNN071995, represents heat tape incidents)

**HEADQUARTERS CONTACT:** The contact person at headquarters who is most knowledgeable on the product and can clarify what is expected from the investigator.

**ASSIGNMENT MESSAGE:** Outlines what the analyst hopes to obtain from the investigation.

**PERSON(S) TO CONTACT:** Investigators are not limited to the contacts noted. This area also designates if the assignment requires special handling due to restricted data.

**GUIDELINES:** Identifies additional guidance that provides instructions the investigator may use in obtaining the requested information.

**TASK NUMBER:** On cases selected for follow-up, the assignment coordinator assigns a task number that includes the date the case was assigned, the Directorate initiating the assignment, the priority, the Regional Office receiving the assignment, and a unique number for the case. An example of a recent task number would be 941201HAA1301. This number indicates the case was assigned on December 1, 1994, for Epidemiology (H), is top priority (AA), was assigned to the Eastern Region (1) and is the 301st case assigned so far in FY-95. For other Directorate codes, priorities and Regional office code see Table 3-1 on page III-2.

**ASSIGNED TO:** This code denotes the regional office conducting the investigation. FOER-Eastern Region, FOCR-Central Region, and FOWR-Western Region.

## **CHAPTER III. RECEIPT OF ASSIGNMENTS**

### **1. ACKNOWLEDGING ASSIGNMENTS.**

Investigation assignments are to be promptly acknowledged by the office responsible for the investigation of the incident. This process consists of notifying the Directorate for Epidemiology and Health Sciences (EHDS) that (1) an assignment has been received from EHDS or (2) a case has been selected for investigation by the Regional Office.

- A. Headquarters Assignments. Assignments received by the field office from the Directorate for Epidemiology and Health Sciences and Health Sciences are to be acknowledged on a weekly basis. This notification should consist of a weekly fax or electronic mail message listing the assignment number of all assignments received by the office since the previous acknowledgment message. This listing would also include those cases assigned for the Directorate for Compliance, reassigned telephone investigations, cases that are reassigned to states under contract, etc.
- B. Regional Office Initiated Assignments. Assignments initiated by the Regional Office or a Regional Office contractor are also to be reported "acknowledged" on a weekly basis. In addition to the assignment number, report the incident or document number, the category identification, and specific information on the case. (If the cases are being investigated by a state contractor, please indicate on the weekly status sheet by using a Code 7 under the status line.)

These Regional Office initiated assignments are considered part of the allocation of cases provided in the annual work plan and, therefore, must be tracked and accounted for in order to monitor and control the Regional Office work flow. In the future, the acknowledgement of assignments will be automated.

### **2. ASSIGNMENT PRIORITY.**

The Regional Office staff must promptly process and assign the investigation requests. With each day's delay, valuable data is lost, respondents forget details, evidence and products are destroyed or altered, and knowledgeable parties leave the area of the incident. On special investigations, you may be expected to return the investigation report to CPSC in a shorter time than those identified in Table 3-1. The time frame for each priority case will be given upon initiation of the survey and when the assignment is made. The third letter in the thirteen digit task number reflects the

priority code and the turn around time expected for an assignment. The following diagram outlines the suggested priority timetable.

**TABLE 3-1 ASSIGNMENT PRIORITIES**

Priority Code	Description of Priorities	Estimated Time
A	Urgent Priority- Reserved for cases of exceptionally high visibility and importance (e.g. life threatening defects, cases involving a Commission action).	Immediate
B	High Priority- Reserved for cases of special interest such as those under special study or where corrective action is being considered.	One Week
C	Regular Priority-This level is for the standard request. Complete as quickly as practical.	Three Weeks

**NOTE: High priority (AA) cases will first be faxed to the Regional office.**



## **CHAPTER IV. CONTACT AND INTRODUCTION**

### **1. CONTACT PREPARATION.**

Before you initiate contact with a victim or knowledgeable party and attempt to obtain information, review the assignment and any guideline or information that is available on the product or hazard that is involved.

In addition review the criteria and rationale provided by Epidemiology on the reason a product or hazard is being investigated in that fiscal year. This information is provided to give field investigators a little history on the Commission's position on the hazard, the reason for the data need and what action the Commission is planning in this area. Become familiar with the accomplishments of the Commission and use these as motivation tools.

For all except the most routine assignments or if the investigator does not understand some aspect of the assignment, contact person (e.g. Compliance Officer or your Epidemiology Representative) on the assignment message before beginning the investigation (see Appendix 4-B-1 for a listing of the Epidemiology analysts and Compliance Officers (Appendix 4-B-2) responsible for the various hazards areas).

### **2. INITIAL CONTACT**

It is essential that you, as the investigator, speak with the incident victim or most knowledgeable party whenever practical to obtain the most specific and reliable data possible. Establish a good rapport with the victim, the victim's relatives, or others being interviewed. This rapport, the atmosphere of trust and cooperation, begins with the first contact. It is recommended that in the initial phone call, the title "investigator" not be used. The term "investigator" is generally associated with law enforcement and may cause the respondent to be apprehensive about participating in the investigation. One suggestion would be to use the full title "product safety investigator". However, you should be prepared to show your investigator credentials when you visit the person.

- A. Contacting the Most Knowledgeable Respondents. When a respondent is reached, try to speak to the victim, guardian or most knowledgeable party. If the most knowledgeable person is not immediately available, obtain as much basic information from the respondent as is practicable, keeping in mind that you do not want to interview an informant who is a minor, (under 18) without permission. If specific information cannot be obtained from this respondent, try to determine who the most knowledgeable party is, when he/she will be available and where he or she can be reached.

- B. Contacting Respondents During the Evening and Weekend Hours. If you cannot contact the victim or other knowledgeable party by telephone during regular working hours, try to reach them during evening hours and on weekends. We suggest several calls between 6 P.M. and 9 P.M. during the week and several calls between 10 A. M. and 9 P.M. on the weekends.
- C. Contacting the Difficult-to-Reach Respondents by Mail. Before terminating an investigation because you cannot contact a knowledgeable party, confirm the accuracy of the address and telephone number by whatever means possible, such as a cross index directory, or postal records. If you have an address but no telephone number, send the victim a registered letter requesting their cooperation (See Figure 4-B-3). If still unsuccessful, report the situation to your supervisor so that he/she can arrange whatever additional steps may be appropriate, such as visiting the address while in the area on other business.
- D. Point-of-Contact for Death Certificates by Region. This chart identifies each state's requirements for contacting next-of-kin and local officials. Appendix IV-B-4 should be referred to before each death certificate investigation. EHDS analysts will contact each state for permission before assigning death certificates to the field. Some priority assignments are sent to the field before permission is obtained so the field investigator may start interviewing other contacts.

### 3. INTRODUCTION

Familiarity with the subject matter is an important aspect of any interview, including the introduction. Deliver your opening comments in a straight forward, positive manner. Make the introduction to-the-point, practice the delivery and speak clearly. If necessary, write the introduction and use it when making the call. Don't read it word for word unless you can make the delivery sound normal. Use the introduction to identify yourself and your affiliation (CPSC), and to confirm the surveillance information on the assignment sheet.

The following introduction is suitable for a telephone interview involving either a NEISS or a non-NEISS investigation:

***"Mr. Johnson, I'm with the U.S. Consumer Product Safety Commission. We are studying incidents involving Consumer Products and according to (source), you injured your leg while using a lawn mower; is that correct? (If respondent agrees, continue.) We are particularly interested in incidents associated with lawn mowers. By studying the events that led to incidents, like you've experienced, we hope to identify hazards that can be changed, and reduce the number of injuries associated with mowers. Will you please take a few minutes and tell me how you were injured?"***

If immediate cooperation is not obtained, some motivational statements may be useful. Explain that the interview will take "approximately how long" and that the information provided is extremely important in assisting the Commission in it's effort to reduce injuries associated with (product). Assure the respondent that the information provided is confidential and that his or her name and address are not included in the report unless he/she authorizes its release. (The release of victim ID pertains only to non-NEISS investigations.) Due to reasons of confidentiality NEISS victim identification is never released.

The transition is now complete and your purpose has been defined. At this point the respondent will usually provide a brief description of the incident. Ask appropriate questions until you have obtained the requested information. When you have collected the requested data, go back over the respondent's answers to ensure that you have accurately recorded the description of the incident and answers provided. If an on-site is necessary, explain the purpose of the visit and attempt to schedule a time for the visit that will be convenient for both parties. Make sure that the information to be collected or documented during the on-site (e.g., product information) will be retained by the respondent and made available during the on-site.

With few exceptions, each NEISS related incident assigned to the field for an on-site visit will have been investigated by EHDS via the telephone. NEISS telephone investigations will not be reassigned to the field unless the respondent has agreed to be re-contracted by CPSC. Once again, if immediate cooperation is not obtained during your initial contact, some motivational statements may be required.

The following three different mood variables of a respondent can affect the interview:

- a. Apprehensive
- b. Neutral
- c. Cooperative

Often, people contacted about an interview are neutral or lean towards being uncooperative. People called by strangers are likely to go into the "salesman's syndrome" and be initially uncooperative. What you say in the introduction and transition phase of an interview is critical in moving the respondent to the cooperative mood. People may use barriers to dissuade you. This should be expected and countered with logical motivational information. Maximize the positive!

If a respondent remains uncooperative you might provide motivation by briefly mentioning products that have been modified as a result of the Commission's studies(e.g., cribs, chain saws, riding mowers, ATV's, baby walkers, etc.)

#### **4. REFUSALS**

If a victim or knowledgeable party refuses to cooperate, search out other sources such as local officials, product dealers, power company investigators, insurance agents etc. If a victim is adamant in his/her refusal to cooperate, do not attempt to gather information from other family members unless otherwise instructed. However, it is appropriate to obtain whatever information local officials or other investigating agencies may have on the incident.

#### **APPENDIX IV-B-1. ANALYSTS RESPONSIBLE FOR EPIDEMIOLOGY ASSIGNMENTS.**

The following is a list of staff assignments by product/hazard area, all analysts can be reached by dialing (301) 504-0539 and the listed extension.

<b><u>PRODUCT/HAZARD</u></b>	<b><u>ANALYST</u></b>	<b><u>BACK-UP</u></b>
<b>1. Fire/burn cases,</b> General & upholstered furniture	Sheila Kelly (X1267)	Chuck Nicholls (X1270)
Fireworks & Ranges	Linda Smith (X1275)	Chuck Nicholls (X1270)
Gas appliances (except ranges)	Bill Rowe (1271)	Chuck Nicholls (X1270)
Cigarettes & Sleepwear	Terry Kissinger (X1268)	Chuck Nicholls (X1270)
<b>2. Chemical hazards</b> <b>PPPA</b> (safety packaging)	Terry Kissinger (X1268)	Chuck Nicholls (X1270)
<b>Other chemicals</b> (indoor air quality lead, glycol ethers, charcoal, etc.)	Lenny Schachter (X1273)	Chuck Nicholls (X1270)
<b>3. Sports, toys and nursery products</b> (Bike helmets, cribs/beds, baby walkers, buckets, playground equipment, etc.)	Sue Cassidy (X1260)	Debbie Tinsworth (X1276)
<b>4. Household structures</b> (CO hazards/detectors, stairs, swimming pools, etc.)	Kim Long (X1269)	Chuck Nicholls (X1270)

<b>5. Powered Equipment,</b> (mowers, chain saws, garage doors, etc.)	Prowpit Adler (X1257)	Chuck Nicholls (X1270)
<b>ATVS</b>	Jo David (X1262)	Rod Holcomb (X1266)
<b>6. Electrical hazards,</b> (GFCI's, wiring, ladders, heat tapes, lights, appliances, etc.)	Kim Long (X1269)	Chuck Nicholls (X1270)
<b>7. Infant Suffocation,</b> (pillows, cushions, comforters, blankets, sheepskins, etc.)	NJ Scheers (X1274)	Bob Frye (X1264)
<b>8. Emerging/New Hazards</b>	Nancy Rytina (X1272)	Art McDonald (X1249)
<b>9. IDI Assignment Team</b>	Joyce Coonley (X1239)	Art McDonald (X1249)

## **APPENDIX IV-B-2 ANALYSTS RESPONSIBLE FOR CCA ASSIGNMENTS.**

The following is a list of staff assignments by product area within the Division. All can be reached on (301) 504-0468, and the extension listed. Questions on individual product area assignments should be referred to Marc Schoem, ext 1365 or Cathy Downs, ext 1359.

<b>CATEGORY</b>	<b>CONTACT</b>	<b>BACK-UP</b>
<b>HOUSEHOLD ACCESSORIES</b> involving mechanical hazards, chemical hazards, non-electric	Judy Hayes X1335 Catherine Cumberland X1364	J. Shumlansky X1366
<b>GAS FIRED PRODUCTS AND ACCESSORIES</b> involving fire and carbon monoxide hazards	Larry Hershman X1356 John Fitch X1220	Dave Johnson X1357
<b>POWER AND NON POWERED TOOLS AND EQUIPMENT</b> involving mechanical hazards/guard failures	John Shumlansky X1366	John Fitch X1220
<b>INSTITUTIONAL PRODUCTS</b> involving mechanical hazards/tip over hazards	Judy Hayes X1355	Jean Kennedy X1360
<b>ELECTRICAL ENERGY AND WIRING SYSTEMS</b> involving fire and shock hazards	Renae Rauchschtalbe X1358	J. Shumlansky X1366
<b>ELECTRICAL DEVICES OR PRODUCTS</b> involving fire and shock hazards	Renae Rauchschtalbe X1362	Catherine Cumberland X1364
<b>FIRE AND BURN/LIQUID AND SOLID FUELS</b> involving mechanical and fire hazards	David Johnson X1357	L. Hershman X1356

**INFANT PRODUCTS AND  
HAZARDS TO INFANTS**

(3 and under)involving  
mechanical, laceration,  
amputation, asphyxiation,  
choking and aspiration  
hazards non-electric

Terri Rogers  
X1363  
Zulma Soto  
X1361

R. Rauchschalbe  
X1362

**JUVENILE PRODUCTS**

(OVER 3 YRS)involving  
mechanical, suffocation  
Zulma Soto  
and projectile hazards  
X1361

Jean Kennedy  
X1360

Terri Rogers  
X1363

**NON-CHILDREN PRODUCTS  
HAZARDOUS TO CHILDREN**

involving mechanical  
hazards/drowning hazards

Renae Rauchschalbe  
X1362  
John Shumlansky  
X1366

Judy Hayes  
X1355

**RECREATIONAL PRODUCTS/  
SPORTS PRODUCTS**

mechanical hazards

Jay Demarco  
X1353  
John Fitch  
X1220

J. Shumlansky  
X1366

**IDI WEEKLY REVIEW TEAM**

Cathy Downs  
X1359

**PRODUCT SAFETY  
ASSESSMENT (TECHNICAL  
REVIEW)**

Marc Schoem  
X1365

Cathy Downs  
X1359



## APPENDIX IV-B-3 VICTIM LETTER SAMPLE

July 10, 1995

Ms. Jane Doe  
7 Any Street  
Washington D.C. 20016

Dear Ms. Doe:

The U.S. Consumer Product Safety Commission is studying injuries associated with (product). As part of this study, we contact individuals who were injured while using this product to determine how the product was involved in the incident. This information assists us in better understanding the situation so that corrective action can be taken, if appropriate.

We would appreciate further information regarding the injury which you suffered on (date of incident). I would like to examine the (product) at your convenience. Please call me (telephone number), or fill out the bottom of this letter, and return it to me in the attached pre-paid self addressed envelope as soon as possible.

If the product involved in this incident is still available, I would appreciate your holding it, along with any accompanying labeling, instructions, and packaging, until my visit.

Thank you for your cooperation.

Sincerely,

Attachment(s)

-----I will be able to discuss my  
incident/injury with you. Please call me between the hours of     and     . My  
telephone number is \_\_\_\_\_.

\_\_\_\_\_  
(signature)

#### APPENDIX IV-B-4 DEATH CERTIFICATES BY STATE

STATES WITHOUT RESTRICTIONS NOTE: Contacting Next-of-Kin, Local Officials may be done without permission from state	STATES REQUIRING PERMISSION WITH STATE BEFORE CONTACTING LOCAL OFFICIALS OR NEXT-OF-KIN	STATES REQUIRING PERMISSION TO CONTACT LOCAL OFFICIALS ONLY, NEXT-OF-KIN CONTACT IS NOT PERMITTED	STATES ALLOWING NO CONTACT WITH NEXT-OF-KIN OR LOCAL OFFICIALS	STATES ALLOWING CONTACT WITH LOCAL OFFICIALS ONLY
Alabama Alaska Connecticut Georgia Hawaii Iowa Kentucky Maine Massachusetts Minnesota Mississippi Missouri New Hampshire New Jersey New York State Ohio Rhode Island Tennessee West Virginia Wisconsin	California Florida Idaho Illinois Michigan Nebraska Oregon Texas Utah Vermont	Colorado Delaware Indiana North Carolina Oklahoma South Carolina Virginia	Kansas North Dakota	Arizona Arkansas District of Columbia Louisiana Maryland Montana Nevada New Mexico New York City Pennsylvania South Dakota Washington Wyoming

NOTE: EHDS Analysts will obtain permission for EH/CE assigned cases. High priority cases may be faxed to the field before permission is obtained, so the investigator may begin the investigation.

## **CHAPTER V. TELEPHONE INTERVIEWING PROCEDURES**

### **1. CONDUCTING AN IN-DEPTH TELEPHONE INVESTIGATION**

If an in-depth telephone follow-up is appropriate, use the pre-incident, incident, post-incident, and product information line of questioning. If a guideline has been developed for that product area, it should be referred to before the investigation is started. Sometimes a questionnaire has been created for the telephone interview, in those cases follow the questionnaire format. Major points to be addressed in each area are as follows:

#### **A. Pre-Incident.**

- (1) Victim's general activity prior to the incident.
- (2) Victim's familiarity with the product (e.g. number of times used).
- (3) Victim's physical condition (e.g. eyeglasses) and emotional state (e.g. angry, tired, etc.) before the incident, including the use of alcohol and drugs.
- (4) Environmental conditions, including light, noise, moisture, weather, ventilation, etc.

#### **B. Incident.**

- (1) Victim's activity at the moment of the incident.
- (2) Victim's position in relation to the product at the time of the incident.
- (3) If victim had used the product before, what was different this time, including any unusual circumstances such as distractions, environmental conditions, etc.
- (4) Description of incident, including causal factors and resulting injuries, if any.

#### **C. Post Incident.**

- (1) Victim's actions following the incident.
- (2) Medical treatment, including extent and severity of injury, if any incurred and medical test results, if applicable.
- (3) Handling of the product following the incident.
- (4) Any changes in procedures or practices following the incident.
- (5) Tests on product or environment.

#### D. Product Information.

- (1) Identification of product, including brand name, model number, serial number, place purchased and age. (If an ATV is involved please include the Vehicle Identification Number (VIN) whenever it is available.)
- (2) Condition of product before and after incident, including any modifications.
- (3) Presence or absence of safety devices.
- (4) Warning labels, operating instruction, etc.
- (5) Disposition of product.

## **2. TELEPHONE QUESTIONNAIRE FOLLOW-UP**

\_\_\_\_\_If a telephone questionnaire or data record sheet is to be completed, attempt to obtain answers to as many questions as possible. Each question should be asked of the respondent in the same manner as stated in the questionnaire. Report the response in the space provided using the respondent's actual words whenever possible. Also include qualifying terms used by the respondent such as "I think...", "It could have been...", "It was probably....", "I was told that..." If multiple respondents are involved, clearly identify the respondent for each statement.

In some instances, the respondent will provide the investigator with answers to the questions before the question is asked. In these instances, the question should still be asked again, but in an altered manner. For example, if the respondent stated during the initial discussion: "I was riding an XYZ vehicle...", you could ask a question later, pertaining to the type of vehicle as follows: "You indicated earlier that you were riding an XYZ vehicle, is that correct?"

If the respondent should abruptly terminate the discussion, information provided by him earlier in the interview may be used to answer questions that had not yet been asked. Do not use information from the surveillance source or document unless the source document is an official report (i.e. death certificate, Medical examiners, fire or police reports) to answer questions in the questionnaire or data record.

If the questionnaire does not provide sufficient space for the response, use additional sheets, or report the information in a summary narrative that should accompany all questionnaires/data records. The space provided for answers should not in any way cause the investigator to limit the amount of detail that he would otherwise report on the incident.

## **CHAPTER VI. ON-SITE INVESTIGATIONS**

### **1. SCHEDULING AN ON-SITE INVESTIGATION**

After identifying yourself and the purpose of the call, the investigator should ask a series of questions about the incident based on the surveillance information that accompanied the assignment. The response to these questions should confirm the accuracy of the surveillance data, and allow the investigator to make a decision regarding the level of follow-up.

Determine if the product is available for examination. If so, inform the respondent that you would like to conduct an on-site investigation to examine the product and reconstruct the incident situation. Schedule a time that is convenient to both the respondent and you. Ask the respondent to retain the product and any evidence of the incident until the scheduled on-site. The respondent should also be requested to locate any literature related to the product such as the owners manual, assembly instructions, repair receipts, even packaging/labeling.

If the on-site is scheduled several weeks in advance, the investigator should confirm the appointment a few days before the scheduled visit.

### **2. INTRODUCTION TO AN ON-SITE**

First, explain to the victim or respondent the importance of an ON-SITE visit, emphasizing the value of collecting detailed information and documenting the incident situation. If the respondent realizes and appreciates the need for this visit, he/she will be more specific, more tolerant and provide more assistance in gathering the incident information.

### **3. COLLECTION OF DATA**

Have the respondent briefly describe the incident in his/her own words. This description will give you a general understanding of the incident situation. However, do not let the respondent go into detail at this time. Try to control the discussion so that you can collect the data in an organized manner and minimize repetitive information from the respondent.

After you have a general understanding of the incident situation, let the respondent know that you would like to break the incident down into the same categories followed in a telephone investigation. This information will let the respondent know how you will be covering the incident and should provide for more precise answers.

Next, ask the respondent to show you the incident scene. You will want to collect as much of the information at the actual scene of the incident as possible.

- A. Pre-Incident. The pre-incident sequence establishes the relationship between the victim, the product, and the environment just prior to the incident. It sets the stage by describing all circumstances that combined to produce the incident. The pre-incident sequence includes information describing:

- (1) Victim's activities prior to the incident.
- (2) Victim's familiarity with the proper operation of the product.
- (3) Number of times the victim had performed this particular operation.
- (4) Safety precautions that the victim may have taken prior to the incident.
- (5) Victim's awareness of the potential hazard prior to the incident.
- (6) Victim's physical condition, including the need for glasses, hearing aid, or other devices.
- (7) Victim's emotional state including the consumption of alcohol, drugs, etc; the involvement of fatigue, etc.
- (8) Environmental and related factors, such as lighting, surface friction, spacing of furniture, location (indoors or outdoors), weather conditions, terrain, visibility, obstacles, etc.

B. Incident. The incident sequence is a very specific, sequential account of all relevant factors at the precise time the incident occurred. This section includes information describing the following:

- (1) The victim's exact movements and activities at the time of the incident.
- (2) The relative position of the product and the operator.
- (3) Unusual circumstances which may have contributed to the incident (distractions, environment, etc.).
- (4) Operating procedures being followed at the time of the incident.
- (5) Type and source of energy transfer that caused the incident (thermal, mechanical, electrical, etc.).

This information can be easily collected by having the respondent re-create the incident situation. The victim's position in relation to the product(s) should be closely observed and documented.

C. Post-Incident. The post-incident sequence is a description of the events immediately following the incident. This section includes information describing the following:

- (1) Action of the victim and/or any by-standers immediately after the incident.
- (2) First aid and/or emergency medical treatment that was administered.

- (3) Severity of the injury including any permanent impairment that may have resulted.
- (4) Demographic and injury data for persons other than the most seriously injured victim.
- (5) Subsequent action taken to prevent this type of incident from occurring again.

This section should also include information from additional sources such as fire and police reports, results of legal actions, etc.

D. Product Information. Product information describes any and all data available on or about the product. Be certain to identify all manufacturers when a product contains components identified as coming from multiple manufacturers. If a product defect is suspected, identify the defect in the report, try to contact retailers who may have sold the same product (i.e. model number) and ask about other complaints received from other consumers. This section includes:

- (1) Brand name and, if available, the name and address of the manufacturer.
- (2) The model number and serial number.
- (3) The principal dimensions of the product.
- (4) Materials used in the construction of the product, and their condition, age, and disposition.
- (5) Operating or cautionary instructions presently on or included with the product.
- (6) Controls and/or safety devices on the product or included with it, and any removal, altering or modification of these devices.
- (7) Repairs, modifications, and general condition of the product prior to and immediately after the incident, including information from the repair services or retailer. (If the repair shop has information about similar problems, include this data in a separate inspection report, referencing the IDI, to CCA, and send a copy along with the completed IDI to EHDS).
- (8) Source from which the product was purchased, borrowed, or rented.

E. Standards Information. This section should contain information on any mandatory or voluntary standard that applies to the product(s) or hazard(s). This would include:

- (1) A reference to the standard being addressed.
- (2) Specific information found in the operating manual or literature that reference a standard.

- (3) Specific information on or attached to the product or components that pertain to a standard, including references to testing requirements, etc.
- (4) The name of the certifying agency, if the product is alleged to meet some safety standard or to have a certificate of compliance with a performance or safety standard, such as Underwriters' Laboratories.
- (5) If certified, did the certificate influence the consumer's selection and purchase of the product, and did the presence of the certificate influence his use of the product?

Discuss any information regarding a standard (or testing requirements) or certification that may have been referenced in the labeling on the product or in the operating manuals or in other material accompanying the product. If no indication of an applicable standard is found, include a statement to that effect in this section.

#### **4. COMPLETION OF BODY CHART**

A body chart **may** be included as part of the report to provide a graphic depiction of an injury. Be certain to show the injury on as many views of the body diagram as needed. If a death report is collected while conducting an investigation and a diagram already exists, then a body chart is not necessary. In many of the investigations requested, there was no injury, and therefore a diagram may not be necessary. (Copies may be made of Appendix 6-C-1).

On this form:

- A. Complete the "location of injury" and "case number" sections at the top of the body chart.
- B. Indicate the location of the injury or injuries on the body diagram. Label the area indicated with the diagnosis.
- C. Indicate burn injuries by covering the body areas involved with the appropriate markings, as shown in the key.
- D. Use the space between body positions to sketch a close-up of the body part involved to show details of the injury.
- E. Complete a separate body chart for each victim in a multiple-victim incident. Position the charts in decreasing order of the severity of injury. Label the charts "Victim 1," "Victim 2," etc.



## 5. PHOTOGRAPHS

Photographs should be taken on all **on-site** investigations. Include several photos of the product and the environment. If possible, include photos showing the relationship between the position of the victim and the position of the product at the time of injury.

Be certain that the photographs illustrate the following:

- (1) The size of the product, by enclosing a ruler or object of known size, such as a CPSC photo identification card.
- (2) A close-up of any part of the product that is the suspected cause of the incident or source of the injury.
- (3) Overall views of the product from different angles.
- (4) Identification nameplates and/or markings, warnings and cautionary labels.
- (5) The location (environment) where the incident occurred.
- (6) The relationship between the victim and the product, if possible, by having the victim/witness reconstruct the incident situation, providing a reconstruction is not hazardous. (Do not include the victim's face or any identifying features in the photograph.)
- (7) Each photograph should be labeled and numbered according to the sequence of events.

A set of prints and negatives should be attached to the original report sent to Epidemiology, a set of prints attached to the copy retained in the Regional Office and, if a potential product hazard or standard violation is found, a set of prints should be attached to the copy sent directly to Compliance, for a total of 3 sets of prints . ***Do not send xerox copies.***

## 6. DIAGRAMS

Prepare diagrams whenever practicable. Well prepared diagrams with accurate dimensions and measurements help clarify the relationships between victim, product and environment, and help establish relationships between points of interest at the scene of the incident. (Diagrams also provide valuable information when photographs are not possible.) Be certain to discuss all diagrams in your narrative and to put the identifying assignment number on each diagram.

## 7. ADDITIONAL INFORMATION SOURCES

If the assignment involves an incident where a local agency (e.g. fire department, police, gas/electric utility or medical examiner) conducted an on-site investigation, contact that agency. Locate the individual who conducted the investigation and discuss the incident with him. Also, obtain

a copy of his report and any photographs or other documentation that he may have prepared or obtained. Finally, if a product has a potential product defect, contact the repair service and/or retailer, if involved for information on the problem(s) associated with the product in question or on like products. ***If these sources refuse to cooperate, COMPLIANCE may want to issue a subpoena.***

If the case involved a fire and most of the fire department evidence is destroyed, including the product, try to determine the insurance company who had the coverage on the building. Contact the agent for information on the causal factors. They usually make a concerted effort to determine cause (product) so they can subrogate the claim if possible. In many instances, the agency may have obtained specific product identification and causal information.

***Reports and documents obtained from additional information sources should not be purged of victim identities. EPIC is responsible for purging victim ID from all documents before releasing the investigation reports.***

Information collected from additional sources on incidents associated with similar products should be sent to Section 15 in memo form and not made part of the investigation report. A copy should be made of all memos sent to Compliance and sent to EHDS as an attachment.

## **8. PRODUCT SPECIFIC GUIDELINES**

Approximately 110 product specific guidelines have been developed to assist the investigator in collecting key information. The investigator should always check the appendices for a guideline on the product implicated in the incident that has been assigned for investigation. Whenever available, the guideline should be used to obtain the incident data. If a product specific guideline is not available, a guideline on a related product or the "general" guidelines discussed earlier in this chapter (pre-incident, incident, post incident, product approach) should be used to obtain the incident data.

If additional information is needed to understand the operation of the product or the hazard, consult Regional Office files, texts, product brochures, catalogs, fact sheets, etc. for the desired information. Also, search out a friend or acquaintance who is familiar with the product. Finally, visit a store or dealer/distributor that handles the product for information on the use and operation of the product. Dealers are usually very helpful in this regard.

If the guideline or other information available does not adequately address your questions or concerns, contact the EH analyst or CCA/CRM compliance officer responsible for that product area and discuss the situation with him/her. (See Appendix 4-B-1 and 4-B-2).

## **9. SAMPLE COLLECTION FOR EVALUATION AND ANALYSIS**

In some cases it may be beneficial for CPSC to test, inspect, measure or examine the product involved in the incident. When this situation occurs, collect the product as a sample based

on the information in the assignment messages or in the investigation criteria and rationales.

A. Conditions for Collection. Collect the product and send it to the Sample Custodian, c/o the appropriate analyst. If the following conditions are met, it's requested:

- (1) The owner voluntarily agrees to provide the product for testing.
- (2) The cost of the product sample does not exceed \$150.00 for Regional Offices. If the item is to cost more than \$50.00 the investigator should contact the supervisor to determine if sufficient sample funds are available.
- (3) The condition of the product is the same as it was at the time of the incident and this fact can be documented.

B. Conditions for Contacting Headquarters. If the product does not meet the criteria outlined above, but the investigator believes it should be sampled, or it meets the above criteria but the investigator believes it should not be collected, he should contact the analyst referenced in the assignment message or in the investigation criteria and rationales before taking action. Epidemiology/Compliance staff will coordinate a review of the situation to decide whether and how to proceed. If Headquarters decides against laboratory testing, proceed with the investigation as usual.

C. Sample Documentation. If a sample is to be collected, proceed as follows:

- (1) Refer to Order 9010.36, Domestic Sample Collection, for procedures when collecting a sample. Issue a Receipt for Sample and offer payment for the product.
- (2) Inform the consumer that the product will not be returned to the owner (unless specific arrangements are made to do so), and that the product may or may not be tested.
- (3) Include the task number of the case in block 5 of CPSC Form 166.
- (4) Attach a copy of the Sample Collection Report to the investigation report.
- (5) Include the sample number and a description of the sample in the investigation report under product information.
- (6) Indicate the sample number in box 22 on the Form 182 (Figure 1, Chapter VII).

#### **10. AUTHORIZATION FOR RELEASE OF NAME (ON-SITE)**

This item should be approached differently during an on-site than during a telephone follow-up. Therefore, we suggest the following approach in connection with an on-site investigation.

- A. Incident Reports Received Without Restrictions. If the case was identified through a news clip, consumer complaint or a governmental referral, ask the respondent if the CPSC may disclose his name to the manufacturer of the involved product and to others requesting information on that product. Explain that CPSC shares this information with the manufacturer so that they become aware of these injuries and the investigation findings. In some cases, the manufacturers would like to re-contact the victim for additional information and, therefore need the victim's name and address.

If the victim does not object to the disclosure of his/her name, (excluding NEISS investigations) prepare an "Authorization for Release of Name" Form (See Appendix VI-C-2). Check the box indicating this authorization and have the respondent sign his/her name and date the document on the lines provided. The investigator should provide a copy of the form with the respondent (either by mailing or providing a duplicate copy). When completing the Epidemiologic Investigation Report Form (CPSC Form 182), check the appropriate box in Item 23 and include the signed permission document with the investigation report as an attachment. Do not purge the respondent's identification from the document.

If the respondent does not permit the release of his/her name, so indicate on the CPSC Form 182 and do not include his/her identity in the narrative section of the investigation report. However, do not purge victim I.D. that is in the attached documents (e.g. assignment sheet, official records, etc.)

- B. Incident Reports Received With Restrictions. If the case was identified through NEISS, a death certificate, or medical examiner/coroner's report (MECAP), the victim's information must not be included in the reports. We have a contractual agreement with the states and some medical examiners indicating that we will use the victim's identity only to collect information on the incident and that after this action has been completed, the victim's identity will be excised from all public records. Thus, there is no need to request permission to include their identity in the investigation report.

## **11. AUTHORIZATION TO RELEASE NAME (TELEPHONE).**

If the investigation was limited to a telephone interview, and did not involve restricted information, ask the respondent for permission to disclose his/her identity. If he/she gives you verbal permission to do so, check the box on the Form 182 indicating this authorization. Also indicate "by telephone" in the appropriate box. Do not attempt to obtain this permission in writing.

## **12. CONFIDENTIALITY**

Assure all respondents, except for public officials, that unless they authorized the release of their name, their identities will remain confidential and will not appear in the investigation report. Under the Privacy Act of 1974, investigators are prohibited from disclosing the names of

respondents and are subject to civil suit for any damages which occur as a result of willful or intentional action which violates any individuals rights under the Privacy Act.

# APPENDIX VI-C-1 BODY DIAGRAM

LOCATION OF INJURY		CASE NUMBER
BODY DIAGRAM	Left	
	Back	
	Front	
	Right	
		<p>KEY FOR BURN CASES</p> <p>1° BURN</p> <p>2° BURN</p> <p>3° BURN</p>

CPSC FORM NO. 102

## APPENDIX VI-C-2 RELEASE OF CONSUMER IDENTIFICATION

### U. S. CONSUMER PRODUCT SAFETY COMMISSION

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#### AUTHORIZATION FOR RELEASE OF NAME

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Thank you for assisting us in collecting information on a potential product safety problem. The Consumer Product Safety Commission depends on concerned people to share product safety information with us. We maintain a record of this information, and use it to assist us in identifying and resolving product safety problems.

We routinely forward this information to manufacturers and distributors to inform them of the involvement of their product in an incident situation. We also give the information to others requesting information about specific products or hazards. Manufacturers may need the individual's name so that they can obtain additional information on the product or incident situation.

Would you please indicate on the bottom of this page whether you will allow us to disclose your name. If you request that your name remain confidential, we will of course, honor that request. After you have indicated your preference, please sign your name and date the document on the lines provided.

---

YES

---

NO

---

(Signature)

---

(Date)

## CHAPTER VII. SUBMITTING THE INVESTIGATION REPORTS

The incident information collected during these investigations will be reported on or attached to a CPSC Form 182 and sent to Epidemiology for use and distribution.

**1. COMPLETING CPSC FORM 182.** This form (see Figure 7-1) is to be completed whenever the investigator collects any significant information beyond that provided in the originating assignment document. This includes information collected during either telephone or on-site investigations.

Since the information is shared with so many, and is the basis for Commission action, it should be clear, concise and presented in a professional manner. Therefore, we recommend that all reports be neatly typed, be free of errors and grammatically correct.

- A Form Entries. The following instructions review in detail each entry on the Incident Investigation Report form. Each item detailed below is numbered to correspond with the appropriate item on the form.
- (1) Task Number. This block is for the 13-digit task number that appeared on the assignment.
  - (2) Investigator Identification. This block is for the investigator's (or contractor's) 4 digit I.D. number.
  - (3) Office Number. This number identifies the office/contractor responsible for the investigation. Enter the 3-digit numerical code assigned to your Regional Office or contractor.
  - (4) Date of Incident. Enter the date the incident occurred using a year-month-day order. If the exact date is unknown, at least enter the year of occurrence. If multiple incidents occurred, use the date (year) of the first incident.
  - (5) Date Initiated. Enter the date that you first attempted to contact the victim or a person knowledgeable about the incident. Use a year-month-day order.
  - (6) Synopsis. Provide a brief scenario of the incident including age, sex of the victim, location at the time of incident should be included in this section. Also, any treatment received and what the final diagnosis was if known.
  - (7) Incident Location. Enter the place where the incident occurred and its appropriate code. Be as specific as possible, such as kitchen, school workshop, public playground, farmyard, etc. (Codes for these locations are attached as Appendix VII-D-2).
  - (8) City. Enter the name of the city where the incident occurred. If it occurred in a rural area, enter the name of the city used in the mailing address for that location.



**FIGURE 1- FORM 182**

1. TASK NUMBER -----		2. INVESTIGATOR'S ID -----		<b>EPIDEMIOLOGIC INVESTIGATION REPORT</b>
3. OFFICE CODE -----	4. DATE OF ACCIDENT -----	5. DATE INITIATED -----		
6. SYNOPSIS OF ACCIDENT OR COMPLAINT _____ _____ _____ _____ _____				
7. LOCATION (Home, School, etc.) -----		8. CITY -----		9. STATE -----
10A. FIRST PRODUCT -----		10B. TRADE/BRAND NAME -----		10C. MODEL NUMBER -----
10D. MANUFACTURER NAME AND ADDRESS -----				
11A. SECOND PRODUCT -----		11B. TRADE/BRAND NAME -----		11C. MODEL NUMBER -----
11D. MANUFACTURER NAME AND ADDRESS -----				
12. AGE OF VICTIM -----	13. SEX -----	14. DISPOSITION -----	15. INJURY DIAGNOSIS -----	
16. BODY PART (S) INVOLVED -----	17. RESPONDENT -----	18. TYPE OF INVESTIGATION -----	19. TIME SPENT (OPERATIONAL HOURS) -----	
20. ATTACHMENT(S) -----	21. CASE SOURCE -----		22. SAMPLE COLLECTION NUMBER -----	
23. PERMISSION TO DISCLOSE NAMES (NON NEISS CASES ONLY) YES _____ NO _____				
24. REVIEW DATE -----	25. REVIEWED BY -----		26. REGIONAL OFFICE DIRECTOR -----	
27. DISTRIBUTION -----				

CPSC FORM 182 (REVISED 10/93)

OMB NO. 3041-0029

- (9) State and State Code. Enter the name of the state in which the incident occurred, and insert its appropriate alphabetic code in the space provided. (The alphabetic codes for the states are attached as Appendix VII-D-3.)
- (10A) Product and Product Code. Enter the generic name of the principal product involved in the incident, such as (a) bicycle, plate glass window, or baby walker. Enter the NEISS code for the product involved in the space provided. Use the NEISS coding manual to identify these codes.
- (10B) Trade/Brand Name. Provide basic information on the trade or brand name of the product, excluding address of the manufacturer, in the space provided.
- (10C) Model Number. Include the model number when available, in this space. (By including information on the model in the cover sheet, it is entered into the computer and can be used by Compliance, etc. for locating cases of interest.)
- (10D) Manufacturer's Address. Provide the manufacturer's name and address if known in the space provided.
- (11A Product and Product Code, Trade/Brand Name, Model Number, Manufacturer and Address.  
-11D) (Complete exactly as noted in 10A-D).

If more than two products are involved, place an asterisk behind the number and include the information on the additional product(s) in the narrative, including age and condition, and whether it was examined.

- (12) Victim's Age. Enter the age of the victim. Code in months(preceded by the number 2) if victim is less than 2 years old. Code in years if victim is 2 years old or more.If multiple victims are involved, place an asterisk in box 12, and include age on the first victim in box 12 and the other victims in the narrative in report. (i.e. age, sex, injury, disposition).

201=	less than 8 weeks	045=	45 years
206 =	6 months	078=	78 years
218=	18 months	102=	102 years
002=	2 years	000=	not recorded
022=	22 years		

- (13) Victim's Sex. Place the appropriate number from the NEISS Coding Manual in the block provided to identify the victim's sex. For no victim cases, use Code 0.

Male = 1  
Female =2  
Not stated = 0

(14) Victim's Disposition. Describe the victim's disposition at the time of treatment in one or two words (e.g. hospitalized). Locate the appropriate code on the attached list and enter it in the block provided (see Appendix VII-D-4). If the party was not injured, write "no injury" on the line provided and insert a "0" in the block.

- (a) If an individual is injured while using a consumer product, he is a victim - whether or not he received medical treatment. An example might be an incident involving a 3 year old male child who fell from his high chair, but only bruised his head (did not receive any medical treatment).

Age of Victim ..... (003)  
 Sex ..... (1)  
 Disposition "Examined but not treated" ..... (1)  
 Injury diagnosis "Bruises" ..... (53)  
 Body part "Head" ..... (75)

- (b) If the high chair collapsed, but the 3 year old child in the chair was not injured, we still have an incident situation; and since an individual was directly involved in the incident and could have been injured, we have a victim. These cases should be coded as follows:

Age of victim ..... (003)  
 Sex ..... (1)  
 Disposition "No Injury" ..... (0)  
 Injury diagnosis "No Injury" ..... (70)  
 Body part "No injury" ..... (99)

- (c) If the high chair did not collapse but a mother reported that her son's high chair had lost a bolt and was in danger of collapsing, we have a possible victim in that an incident occurred by placing an individual in a possible incident situation. Therefore, we would code the victim elements the same as we did in the incident in which the chair collapsed but did not injure the child. The case would be coded as follows:

Age of victim ..... (003)  
 Sex ..... (1)  
 Disposition "No Injury" ..... (0)  
 Injury Diagnosis "No Injury" ..... (70)  
 Body part "No Injury" ..... (99)

- (d) If a mother reports that a high chair she examined may be hazardous because it appears to be unstable, there is no victim. This is merely a complainant's opinion and does not necessarily reflect an incident situation. In these reports, we would code the victim elements as follows:

Age of victim . . . . .	(000)
Sex . . . . .	(0)
Disposition "No Injury" . . . . .	(0)
Injury Diagnosis "No Injury" . . . . .	(70)
Body Part "No Injury" . . . . .	(99)

In summary, there must be a product related incident resulting in an injury or in an individual being placed in a possible incident situation, in order to have a victim.

- (15) Diagnosis. Enter a one to two word description of the most serious injury or suspected injury in the space provided. Be as specific as possible using a combination of words such as 3rd degree burn, 2" laceration, compound fracture, etc. Enter the two-digit NEISS code for the injury diagnosis in the two blocks following the injury description. Add an asterisk for multiple injuries and discuss in narrative. If the party was not injured, write "no injury" on the line provided and insert 70 in the blocks. See Appendix VII-D-4.
- (16) Body Part. List the body part most seriously injured or subjected to injury during the incident situation. Enter the NEISS Body Part code in the blocks provided. Add an asterisk for injuries to more than one body part and discuss in narrative. In a no injury situation, use Code 99. If body part is not stated, use Code 87. Body part codes are listed in Appendix VII-D-5.
- (17) Respondent. Identify the individual who provided the most important information in the space provided. Do not identify them by name but rather by association such as mother, neighbor, fire marshall, etc. Enter the appropriate code in the following block. (Codes for respondents are attached as Appendix VII-D-6.)
- (18) Type of investigation. Place the number in the block which most closely describes the type of investigation performed.
 

On-Site Investigations- Use Code (1)

Telephone Investigations - Use Code (2)

Other - Use Code (3)
- (19) Time Spent on Investigation. Enter the number of operations hours, to the nearest half-hour, expended on this investigation. This would include time spent preparing for the investigation, conducting the investigation and preparing the report. It does not include travel, clerical or supervisory time expended on the case.
- (20) Attachment(s). Use the attachment codes noted in Appendix VII-C-6.
- (21) Case Source. Describe the case source in one or two words on the line provided. Be as specific as possible, such as consumer complaint (C.C.), news article, NEISS, etc. Insert the appropriate code in the following block (see Appendix VII-D-6).

- (22) Sample Collection Number. Enter the sample collection number if a sample was collected. If more than one product sample was collected enter additional numbers under the product identification area of the report.
- (23) Release of Victim I.D. Check the appropriate response indicating whether or not the respondent agreed to the release of his or her identity.
- (24) Review Date. Enter the date the case was reviewed.
- (25) Reviewed by. Enter the reviewer's four digit identification in the blocks provided.
- (26) Regional Office Director. Signature block for the Regional Office Director to use on all cases he/she reviewed.
- (27) Distribution. Designate all departments who receive a copy of the report.

## **2. NARRATIVE**

In the narrative, relate clearly and concisely the chronological sequence of events associated with the incident. Include specific factors concerning the interaction between the victim, the product, and the incident environment that may have a relationship to the incident itself. In the event you are assigned to perform an in-depth investigation of a "no-injury" incident, look for and relate the POTENTIAL hazards associated with operating that product.

The narrative must present fact(s) objectively. Do not include your personal opinions or comments, but you can include your observations if you identify them as such.

The narrative should be arranged in a chronological order (e.g. pre-incident, incident, post incident). As you may recall, we recommended that you investigate the incident in this order. In Chapters V and VI the format for submitting telephone and on-site investigations should be followed. Thus, your notes should already be arranged so that your narrative can include the appropriate information.

## **3. ATTACHMENTS.**

- A. Death Related Incidents. For incidents resulting in deaths, you should include a copy of the police report and/or the coroner's/medical examiner's report with the in-depth investigation report. Most deaths are investigated by the police to determine if foul play was involved.
- B. Serious Injury Related Incidents. A verbal description of the actual injury is normally obtained directly from the victim or eye witness during the investigation. However, if documentation on the extent, type or location of the injury is needed, the investigator needs to review and copy medical records. The hospital or attending physician may require a signed release from the patient before releasing these records. CPSC Form 170, Authorization for Medical Records

Disclosure, is used for this purpose (see Appendix VII-D-7). Complete this form and have the victim or guardian sign it during the interview. The investigator can act as a witness and sign in the designated space. Section 25(c) of the CPSA insures that the physician's identify will remain confidential. If appropriate, inform the physician of this provision.

- C. Fire Related Incidents. For serious fires that involve a product of interest, a fire report is to be obtained and submitted with the investigation report. This record provides the opinion/conclusion of an expert and carries considerable weight in determining causal agents.

Also when a product of interest is involved in a fire and the debris may have been removed, attempt to contact the insurance agent to obtain copies of insurance forms which may reveal information on product ID and evaluation findings.

- D. Source Documents. Attach a copy of the source document that provided the basic information for the assignment. This record will assist the analyst in his/her review of the data, particularly on reports containing limited data.
- E. Missing Documents. When investigation reports are received before all the attachments have been received, they are statused as "I" (Incomplete). If these attachments are not received within a reasonable amount of time, a "Status of Missing Document" Form should be submitted to EHDS. (See Appendix VII-D-1)

#### 4. PHOTOGRAPHS

Include any photographs that were taken of the product and scene, including those taken by other investigating officials. Photos taken by local officials are extremely valuable in that they were usually taken immediately after the incident and provide details on the incident that are no longer available.

- A. Preparation. Identify each photograph with the task number, unless the complete task number is visible in the photograph itself. Mount the photographs on plain white paper using transparent tape or glue (do not use staples). Photographs should not overlap. Include a short caption beneath each photograph.
- B. Submission.
- (I) Provide EHDS with one complete set of photographs and the negatives for each investigation report. Attach the photographs to the report in the following order;
    - (a) Set of photographs.
    - (b) A sealed envelope, identified with the task number, containing the negatives mounted on report-size paper.

- (2) A set of photographs (not photographic copies) should be attached to the copy of the report sent to Compliance.
- (3) An identical set of photographs should be attached to the file copy of the report retained by the investigating office. If a substantial product hazard is involved or suspected, the Regional Office where the manufacturer is located (home office) should also receive a set of photographs. A copy of the complete report and photos should also be provided to CCA. If a substantial product hazard is not indicated, photocopies of the photographs should be attached to the home office's copy of the report.

**APPENDIX VII-D-1**

**Task No:** \_\_\_\_\_

**STATUS OF MISSING DOCUMENT**

**The purpose of this record is to notify the reader that the following document (s), which is/are missing from this report, will not be collected.**

- 1.** \_\_\_\_\_
- 2.** \_\_\_\_\_
- 3.** \_\_\_\_\_

**The investigator indicates in the report that he/she requested a copy of the above listed document(s), but the document(s) was/were not yet available when the investigation report was completed. The investigator intended to forward the document(s) for attachment to this report when the requested material was obtained.**

**The investigator has made numerous attempts, since the original request, to collect a copy of the requested document(s) but has not been successful. Because of the problems associated with the collection of this material and our limited investigation resources, no additional efforts will be made to collect the missing document(s) .**

**Date:** \_\_\_\_\_

**Investigator No:** \_\_\_\_\_

**Regional Office:** \_\_\_\_\_

**Supervisor No:** \_\_\_\_\_



## APPENDIX VII-D-2 LOCATION CODES

INCIDENT LOCATION	<u>CODE</u>
HOME, APARTMENT, (INDOORS INCLUDING FARM HOUSE) . . . . .	10
HOME, OR APARTMENT YARD, PLAY YARD, GARDEN, SIDEWALK OR DRIVEWAY . . . .	11
HOME OR APARTMENT GARAGE OR STORAGE SHED . . . . .	12
HOME OR APARTMENT, N.O.S. . . . .	14
FARM OUTBUILDING; BARN SILO, SHED, ETC. . . . .	20
FARM FIELD, WOODED LOT, FORESTED AREA . . . . .	21
FARM, N.O.S. . . . .	22
STREET, GRAVEL ROAD, HIGHWAY . . . . .	40
MOTEL, HOTEL, REST HOME, NURSING HOME . . . . .	51
PUBLIC LOCATION, N.O.S. . . . .	58
OTHER PUBLIC LOCATION . . . . .	59
MOBILE HOMES, INCLUDING AREA IN OR AROUND UNIT . . . . .	06
COMMERCIAL, INDUSTRIAL LOCATION, INCLUDING OFFICE BUILDING . . . . .	50
SCHOOL, INDOORS AND SCHOOL YARD . . . . .	52
GYMNASIUM, INDOOR SPORTS AREA . . . . .	53
OUTDOOR REC. AREA, PLAYGROUND, SPORTS FIELD, COMMUNITY POOL . . . . .	54
BODY OF WATER, OUTDOOR, . . . . .	55
NATURE AREA, CAMPING AREA, WOODLAND . . . . .	57
SWIMMING POOL . . . . .	56
NOT STATED OR UNKNOWN . . . . .	00

\*\*NOTE: In the future, various groups of product codes will be combined under a new code. An addendum will be forwarded to the field when the change takes effect.

**APPENDIX VII-D-3 STATE CODES**

AL-ALABAMA	LA-LOUISIANA	OK-OKLAHOMA
AK-ALASKA	ME-MAINE	OR-OREGON
AZ-ARIZONA	MD-MARYLAND	PA-PENNSYLVANIA
AR-ARKANSAS	MA-MASSACHUSETTS	PR-PUERTO RICO
CA-CALIFORNIA	MI-MICHIGAN	RI-RHODE ISLAND
CO-COLORADO	MN-MINNESOTA	SC-SOUTH CAROLINA
CT-CONNECTICUT	MS-MISSISSIPPI	SD-SOUTH DAKOTA
DE-DELAWARE	MO-MISSOURI	TN-TENNESSEE
DC-WASHINGTON, D.C.	MT-MONTANA	TX-TEXAS
FL-FLORIDA	NE-NEBRASKA	UT-UTAH
GA-GEORGIA	NV-NEVADA	VT-VERMONT
HI-HAWAII	NH-NEW HAMPSHIRE	VA-VIRGINIA
ID-IDAHO	NJ-NEW JERSEY	VI-VIRGIN ISLANDS
IL-ILLINOIS	NM-NEW MEXICO	WA-WASHINGTON
IN-INDIANA	NY-NEW YORK	WV-WEST VIRGINIA
IA-IOWA	NC-NORTH CAROLINA	WI-WISCONSIN
KS-KANSAS	ND-NORTH DAKOTA	WY-WYOMING
KY-KENTUCKY	OH-OHIO	AA-NOT STATED

## APPENDIX VII-D-4 CODES FOR FORM 182

### ITEM 14 DISPOSITION

NO INJURY / NO TREATMENT . . . . .	0
TREATED AND RELEASED OR EXAMINED BUT NOT TREATED AT A MEDICAL FACILITY . . . . .	1
TREATED AND TRANSFERRED TO ANOTHER HOSPITAL . . . . .	2
FIRST AID RECEIVED AT HOME . . . . .	3
TREATED AND ADMITTED FOR HOSPITALIZATION . . . . .	4
OPEN . . . . .	5
OPEN . . . . .	6
OPEN . . . . .	7
FATALITIES, INCLUDING DOA, DIED IN ER, EXPIRED IN HOSPITAL, ETC. . . . .	8
UNKNOWN, NOT STATED, ETC. . . . .	9

### ITEM 15 INJURY DIAGNOSIS

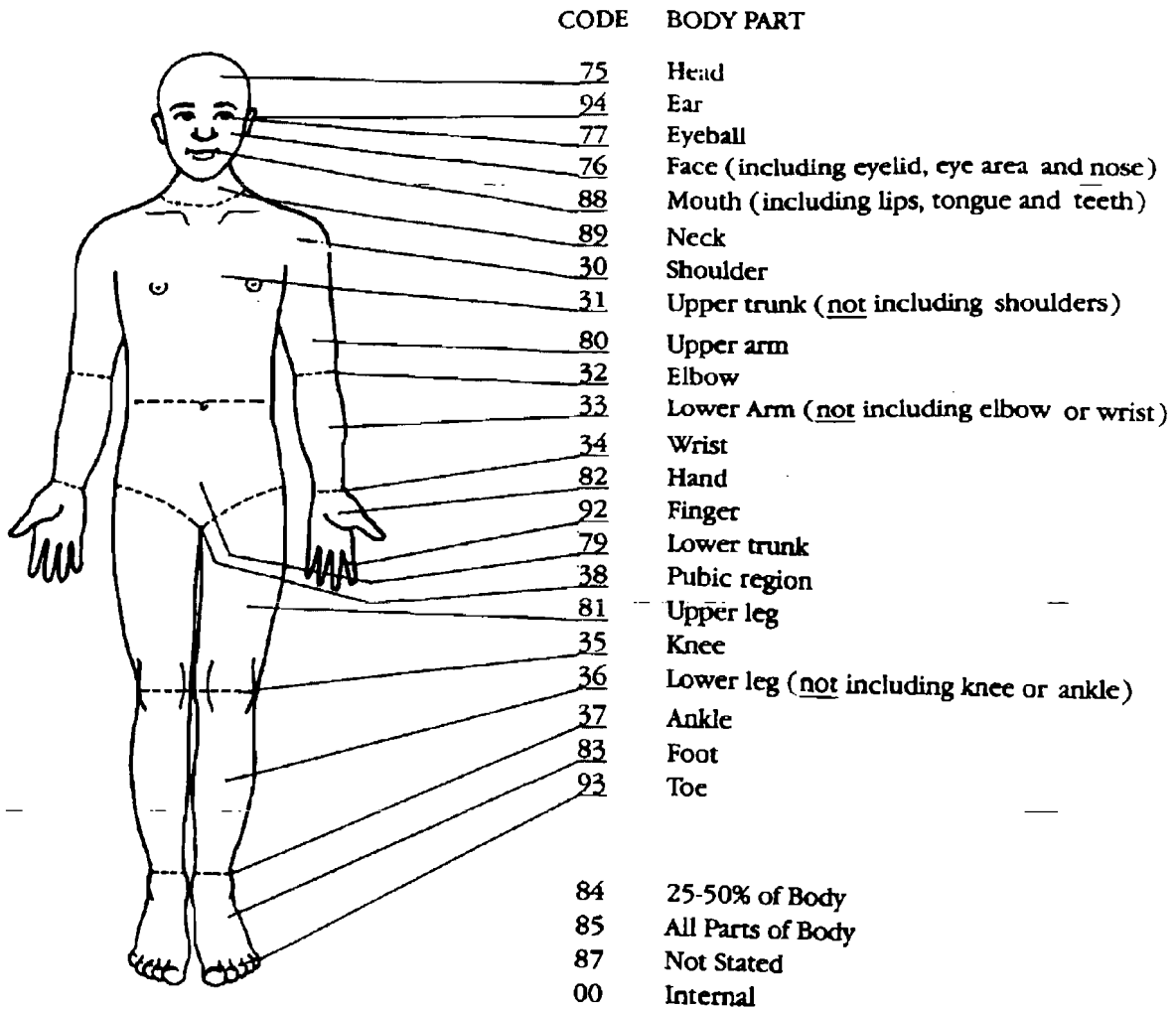
AMPUTATION . . . . .	50
*ANOXIA . . . . .	65
^ASPIRATED FOREIGN OBJECT . . . . .	42
AVULSION . . . . .	72
BURNS (SCALD FROM HOT LIQUIDS OR STEAM) . . . . .	48
BURNS, THERMAL (FROM FLAMES OR HOT SURFACE) . . . . .	51
BURNS, CHEMICAL (CAUSTICS, ETC.) . . . . .	49
BURNS, RADIATION (INCLUDES ALL CELL DAMAGE BY ULTRAVIOLET, X-RAYS, MICROWAVES, LASER BEAMS, RADIOACTIVE MATERIAL, ETC. . . . .	73
BURNS, ELECTRICAL . . . . .	46
BURNS, NOT SPECIFIED . . . . .	47
CONCUSSIONS . . . . .	52
CONTUSIONS, ABRASIONS . . . . .	53
CRUSHING . . . . .	54
DENTAL INJURY . . . . .	60
DERMATITIS, CONJUNCTIVITIS . . . . .	74
DISLOCATION . . . . .	55
*ELECTRIC SHOCK . . . . .	67
FOREIGN BODY . . . . .	56
FRACTURE . . . . .	57
HEMATOMA . . . . .	58
HEMORRHAGE . . . . .	66
^INGESTED FOREIGN OBJECT . . . . .	41
INTERNAL ORGAN INJURY . . . . .	62
LACERATION . . . . .	59
NERVE DAMAGE . . . . .	61
*POISONING . . . . .	68
PUNCTURE . . . . .	63
STRAIN OR SPRAIN . . . . .	64
*SUBMERSION (INCLUDING DROWNING) . . . . .	69
OTHER . . . . .	71
NOT STATED . . . . .	70

\*CODE 85 SHOULD ALWAYS BE USED FOR BODY PART

^CODE 00 SHOULD ALWAYS BE USED FOR BODY PART

APPENDIX VII-D-5

ITEM 16 BODY PART INVOLVED



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**APPENDIX-VII-D-6**

**ITEM 17 RESPONDENT**

NOT STATED OR UNKNOWN . . . . .	0
VICTIM OR COMPLAINANT . . . . .	1
EYEWITNESS . . . . .	2
SECOND-HAND INFORMATION ONLY . . . . .	3

**ITEM 18 TYPE OF INVESTIGATION**

ON-SITE . . . . .	1
TELEPHONE . . . . .	2
OTHER . . . . .	3

**ITEM 20 ATTACHMENT**

PHOTOGRAPH . . . . .	1
DOCUMENTS (FIRE REPORTS, CORONER'S RECORD, ETC.) . . . . .	2
SAMPLE OF PRODUCT (ATTACHED TO REPORT) . . . . .	3
SAMPLE OF PRODUCT (SUBMITTED SEPARATELY) . . . . .	4
OTHER (SUCH AS A QUESTIONNAIRE) . . . . .	5
MULTIPLE ATTACHMENTS . . . . .	9
NO ATTACHMENTS . . . . .	0

**ITEM 21 CASE SOURCE**

NOT STATED, UNKNOWN . . . . .	00
FIRE OR POLICE DEPT. . . . .	01
CITY, COUNTY OR STATE HEALTH DEPT. . . . .	02
NEISS . . . . .	03
RADIO, TV . . . . .	04
NEWSPAPER . . . . .	05
EMERGENCY ROOM OTHER THAN NEISS . . . . .	06
CONSUMER COMPLAINT AND HOT LINE . . . . .	07
DOCTOR'S OFFICE . . . . .	09
PERSONAL CONTACT . . . . .	10
LAW FIRM . . . . .	11
MECAP/CORONER . . . . .	12
OTHER CASE SOURCE . . . . .	13

APPENDIX VII-D-7 MEDICAL RECORDS DISCLOSURE FORM

U.S. CONSUMER PRODUCT SAFETY COMMISSION

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**AUTHORIZATION FOR MEDICAL RECORDS DISCLOSURE**

---

**TO WHOM IT MAY CONCERN:**

You are hereby authorized to furnish the United States Consumer Product Safety Commission all information and copies of any and all records you may have pertaining to (my case)(the case of)

Name

Relationship to you

\_\_\_\_\_  
including, but not limited to, medical history, physical reports, laboratory reports and pathological slides, and X-ray reports and films.

\_\_\_\_\_  
(DATE)

\_\_\_\_\_  
(SIGNATURE)

\_\_\_\_\_  
(WITNESS)

CPSC FORM NO 170

## CHAPTER VIII. TERMINATED REPORTS

**1. COMPLETION OF CPSC FORM 228.** An investigator is to terminate the investigation if, after exhausting all reasonable leads, he/she is unable to obtain any significant information beyond that provided in the original source document. For example, you may be unable to locate or reach a victim or anyone who knows anything about the incident, or the knowledgeable parties may be unwilling or unable to cooperate. In such cases, submit a written explanation of your investigative efforts and your reasons for termination. Use CPSC Form 228, Incident Termination Report (see Figure 8-1).

Instructions for the completion of pertinent blocks on the form are provided below.

### A. Record of Attempts to Contact.

- (1) List attempts to contact the victim/respondent by telephone. Investigators must make at least six separate attempts on three separate days, including attempts to contact the victim or respondent on the weekend and during evening hours.
- (2) Note attempts to visit the victim during travel. If within reasonable travel distance or in an area that is on the travel scheduled for other CPSC work, include a home visit in the travel plan.
- (3) Note the use of a certified letter. Such a letter should request individual(s) (victim, parent, etc.) contact you or provide information in writing (e.g. complete questionnaire). Provide at least 30 days for a response before terminating.
- (4) If a telephone number is available, continue calling until contact is made. Do not terminate the case unless a respondent at that number indicates they do not want to participate in the investigation, you confirm that the number is no longer valid, or you encounter some extenuating circumstance.
- (5) A copy of the terminated case investigation form should be sent to the CE compliance officer if they originated the investigation.

### FIGURE 8-1 TERMINATION REPORT

ACCIDENT INVESTIGATION TERMINATION REPORT																																																							
1. TASK NO. <div style="border: 1px solid black; height: 20px; width: 100%;"></div>						2. TIME EXPENDED <div style="border: 1px solid black; height: 20px; width: 100%;"></div>			3. DATE ASSIGNED MO DAY YR <div style="border: 1px solid black; height: 20px; width: 100%;"></div>																																														
4. HOSPITAL NO. <div style="border: 1px solid black; height: 20px; width: 100%;"></div>				5. RECORD NO. <div style="border: 1px solid black; height: 20px; width: 100%;"></div>				6. AGE <div style="border: 1px solid black; height: 20px; width: 100%;"></div>		7. SEX <div style="border: 1px solid black; height: 20px; width: 100%;"></div>																																													
8. DATE OF TREATMENT MO DAY YR <div style="border: 1px solid black; height: 20px; width: 100%;"></div>			9. INJURY			10. BODY PART			11. DISPOSITION																																														
12. PRODUCT			13. PROJECT NO. <div style="border: 1px solid black; height: 20px; width: 100%;"></div>			14. ORGANIZATION CODE <div style="border: 1px solid black; height: 20px; width: 100%;"></div>			15. INVESTIGATOR ID <div style="border: 1px solid black; height: 20px; width: 100%;"></div>																																														
16. RECORD OF ATTEMPTS TO CONTACT																																																							
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">DATE</th> <th style="width: 15%;">TIME</th> <th style="width: 35%;">METHOD</th> <th style="width: 35%;">RESPONSE</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>												DATE	TIME	METHOD	RESPONSE																																								
DATE	TIME	METHOD	RESPONSE																																																				
17. REASON FOR TERMINATION:																																																							
18. REVIEWED BY:																																																							
ID/DATE <div style="border: 1px solid black; height: 20px; width: 100%;"></div> MO DAY YR <div style="border: 1px solid black; height: 20px; width: 100%;"></div>																																																							



B. Screening Report. An investigation can be screened and reported on a screening report form (Figure 8-2) if:

- (1) The product found to be a causal factor is not a consumer product(e.g. suspected a riding mower but found a farm tractor as the involved product).
- (2) The product is not with the jurisdiction of the Commission, (e.g. arson, assault, etc.)

The product or hazard is significantly different than the one indicated in the source document, but a consumer product is still involved, and it is one that is not included in the criteria and rationales manual. If the investigator has spent considerable time and effort on a case (e.g., collected a significant amount of useful data and/or documents while determining the causal factors associated with an out-of-scope case), he/she should complete an FORM 182 and attach the documents following a brief narrative.

By using a FORM 182, the data collected is added to the investigation file and an official report goes into the Clearinghouse. With a screening report, a paragraph is added to the incident report (e.g. news clip) describing the situation. Nothing is added to the investigation data bank.

C. Abbreviated Report. An investigation can be abbreviated (and reported on a form 182) if:

- (1) The product or hazard is significantly different that the one indicated in the source document, but a consumer product is still involved, and
- (2) It is one that is not included in the criteria and rationales manual. If the investigator has spent considerable time and effort on a case (e.g. collected a significant amount of useful data and/or documents while determining the causal factors associated with an out-of-scope case), he/she should complete a Form 182 and attach the documents following a brief narrative.

**FIGURE 8-2. INCIDENT SCREENING REPORT**

<b>INCIDENT SCREENING REPORT</b>
----------------------------------



**I. INVESTIGATION REPORT REVIEW.** A Regional Office Supervisor is responsible for reviewing each investigation report **before** it leaves the Regional Office. Questions that should be considered during this review include:

- a. Are the assignment message and source document (e.g. news clip) attached?
- b. Were the assignment instructions followed?
- c. Did the investigator utilize current or appropriate techniques in collecting data (e.g. re-creating incident scene)?
- d. Did the investigator make an appropriate effort to determine the causal factors, document the sequence of events, and identify the specific products or components?
- e. Does the report contain the unsubstantiated opinion of the investigator?
- f. Does the report identify as opinion, the unsubstantiated opinion of the person interviewed?
- g. Did the investigator make a concerted effort to obtain specific information on the product, such as age, condition, purpose, use at time of incident and labeling; as well as the availability of an operation's manual, repair records, etc.?
- h. Did the investigator take adequate photographs and measurements, make diagrams when appropriate, and collect supporting evidence when needed?
- i. Did the investigator fully answer all the questions in the guideline or questionnaire?
- j. Is the report neat, well organized and presented in a professional manner? Are numbers quoted in narrative consistent? Is spelling correct?
- k. Are differences between responses from different data sources or respondents recognized and adequately addressed.
- l. Did the investigator interview appropriate individuals who have or may have information on the incident (e.g. police officials and/or medical examiners who visited the scene)?

m. Are all attachments, including photographs, properly identified and appended?

n. Was the respondent(s) asked about the release of his/her identity?

o. Did the investigator obtain appropriate supporting documents, including photographs and reports from local and private officials (e.g. police and fire department investigation records, insurance company reports of analysis, etc.)

Only those investigation reports that favorably address the above questions and contain appropriate information should be accepted and submitted as a completed report. All others should be returned to the investigator for correction or improvement.

**2. DISTRIBUTION OF INVESTIGATION REPORTS CONTAINING NON-RESTRICTIVE DATA.**

The original investigation report is to be sent to EHDS for processing, along with one set of photographs and the negatives. This report will be filed in the Clearinghouse for use by the entire Commission. The negatives are requested so that additional prints of the attached photographs can be obtained quickly and economically. This copy should be sent to:

Consumer Product Safety Commission  
East West Towers Room 606  
Division of Injury Data Systems  
Washington, D.C. 20207  
c/o (R.O. representative)

Compliance assigned investigations should be sent by the field directly to the appropriate compliance officer. Cases originated in the field should be sent directly to the Assistant Director of CCA. Include a complete set of attachments plus a set of prints. (If additional copies of photographs are needed, they can be requested from the Clearinghouse.)

A copy of the report is also to be sent to the Regional Office in whose geographical territory the manufacturer of the product involved in the incident is located. (Follow R.O. Standard Operating Procedures for the handling and distribution of this copy.)

A copy of the report should be retained in your Regional Office file for at least two years. Such a copy has proven to be valuable when the original report is lost in the mail or a page is inadvertently lost or damaged in processing. A complete set of prints should be retained with this copy.

**3. DISTRIBUTION OF INVESTIGATION REPORTS CONTAINING RESTRICTED INFORMATION.**

Investigation reports containing restricted information are to be attached to a FOR OFFICIAL USE ONLY form (Figure 9-1) bearing the task number of the case. The restricted cover will alert headquarters staff that the case is different, and that special processing procedures are to be used.

Copies of the report that are sent to other Regional Offices and/or Compliance should also be attached to a restricted cover.

**4. DISTRIBUTION OF INVESTIGATION REPORTS CONTAINING INFORMATION CONSIDERED CONFIDENTIAL.**

Investigation reports containing information that a respondent or a data provider considers to be confidential or restricted should be attached to a "WARNING" form (Figure 9-2) bearing the task number of the cases. This form will alert CPSC staff of the providers concerns. This case will then be processed in a careful and prudent manner.

**APPENDIX IX-E-1**



**U.S. CONSUMER PRODUCT SAFETY COMMISSION**

**FOR OFFICIAL USE ONLY**

**APPENDIX IX-E-2**

TASK NUMBER \_\_\_\_\_



**U.S. CONSUMER PRODUCT SAFETY COMMISSION**

**WARNING**

**AN INDIVIDUAL/AGENCY WHO PROVIDED  
INFORMATION FOR THIS REPORT CONSIDERS SOME  
OF THE DATA TO BE CONFIDENTIAL OR  
RESTRICTED. PLEASE PROCESS THIS MATERIAL  
IN A CAREFUL AND PRUDENT MANNER.**