

# CPSC eFiling Data Elements

## Advanced Evidence Mapping Guide

For U.S. importers who need more than a field list: legal identities, factory facts, six date clocks, testing relationships, exclusions, record custody, and release controls.

ADVANCED OPERATIONAL FIELD GUIDE - JULY 2026

Full article: [polandoc.com/cpsc-efiling-data-elements/](https://polandoc.com/cpsc-efiling-data-elements/)

Free guides: [polandoc.com/cpsc-efiling-downloadable-guides/](https://polandoc.com/cpsc-efiling-downloadable-guides/)

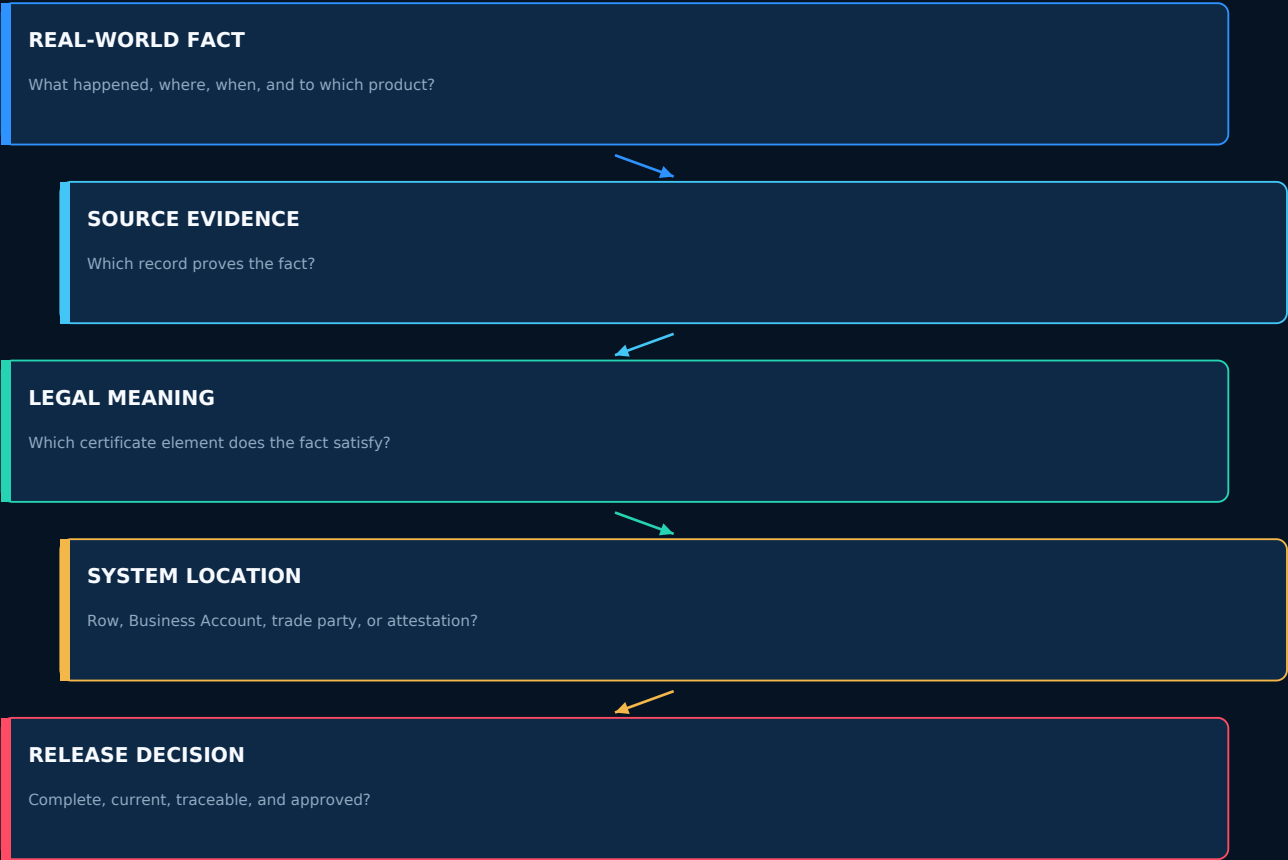
Registry Intelligence: [polandoc.com/](https://polandoc.com/)



START HERE

# A data element is a claim, not a cell

A row can pass structural validation while identifying the wrong factory, wrong testing evidence, or wrong legal actor.



**CONTROL PRINCIPLE: validate the meaning and evidence of each value before validating its format.**

QUESTION 01

# Which certificate elements are outside the CSV row?

Row-level completeness is not certificate completeness. Some legally relevant facts come from account context and the certification action.

ROW

**Product facts**  
Product identity, rules, manufacture, testing, laboratory relationships, exclusions, and records-contact category.

ACCOUNT

**Certifier context**  
Business Account information identifies the importer and supports the Certifier ID used for eFiling and broker handoff.

ACTION

**Attestation**  
The authorized certifying user makes the attestation when certificates are certified or certified during bulk import.

**HIDDEN FAILURE**  
An accurate row can still produce an unreliable certificate if the Business Account identity is outdated, the wrong account is used, or certification authority is not controlled.

- Audit certificate data at three levels: row, account, and attestation event.
- Record which authorized user certified the version and when the action occurred.

DO NOT USE A CSV COMPLETENESS CHECK AS A SUBSTITUTE FOR CERTIFICATE COMPLETENESS.

QUESTION 02

# Which four identities must never be collapsed?

The same company may perform several roles, but each data element must still describe the role the regulation asks for.

**CERTIFIER**

**Importer for a foreign-manufactured finished product**

Account identity and legal responsibility

**FACTORY**

**Finished-product manufacturer and actual production place**

Manufacturer trade-party facts

**TESTING PLACE**

**Each laboratory or other testing party relied upon**

Lab identity, place, rules, reports

**RECORDS CUSTODIAN**

**Individual or staffed position maintaining records**

POC plus internal retrieval route

**ROLE COLLISION TEST**

Ask: if this address changed but the other three did not, would the certificate fact change? If yes, the records represent different roles and must not share one master-data field.

**SEMANTIC RULE: IDENTICAL ORGANIZATION DOES NOT MEAN IDENTICAL CERTIFICATE ELEMENT.**

QUESTION 03

# Who is the certifier when several companies touch the product?

Factory, brand owner, seller, consultant, and broker participation does not automatically transfer the importer's legal role.



## RESPONSIBILITY DOES NOT MOVE

Another party may enter certificate data or certify on behalf of the finished product certifier. The certifier remains responsible for validity, accuracy, completeness, and availability.

- Do not copy the manufacturer into certifier records merely because it created the test package.
- Do not assume that the brand owner is the certifier when another entity is the importer of record.
- Document delegation separately: who prepared, reviewed, certified, transmitted, and can retrieve the evidence.
- If importer identity or role is unclear, resolve it before creating the certificate record or broker Reference key.

**ACCOUNTABILITY RULE: DATA ENTRY CAN BE DELEGATED; CERTIFIER RESPONSIBILITY CANNOT.**

Sources: 16 CFR 1110.7 and 1110.15 [1]

QUESTION 04

# What does Place of Manufacture actually mean?

The field describes where the finished product was manufactured or finally assembled, not where the commercial relationship is managed.

USE

Production location

Identify the manufacturer and the actual place where the covered finished product was made. The required detail includes geographic and contact information.

- Finished-product factory
- Final assembly facility
- Specific site when one company has multiple locations

DO NOT USE

Commercial address

A headquarters, sourcing office, importer, or payment address is not a substitute unless it is also the actual manufacturing place.

- Supplier headquarters
- Importer office
- Billing or sales address

SAME CITY, MULTIPLE SITES

CPSC guidance says to identify the factory by street address when the same manufacturer operates more than one location in the same city. Maintain site-level factory master data.

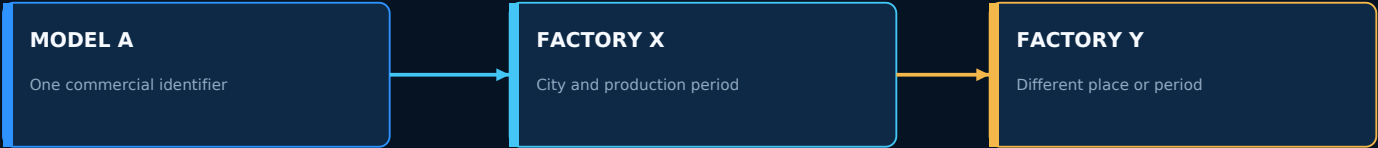
FACTORY CONTROL: TRACE THE FIELD TO THE PRODUCTION RECORD, NOT THE PURCHASE ORDER HEADER.

Sources: 16 CFR 1110.11(a)(5); CPSC Children's Product Certificate guidance [1][6]

QUESTION 05

# One model, multiple factories: one record or several?

The published CSV row carries one manufacturer record, while the certificate must identify the actual manufacturing place for the covered product.



**DO NOT FORCE A UNIVERSAL ANSWER**

CPSC's public materials do not provide one blanket multi-factory rule for every product configuration. A single record that names only one site may misstate products made at the other site.

01

**SEGMENT**  
 Identify factory, period, lot, and evidence for each population

02

**COMPARE**  
 Check whether certificate facts and testing basis are identical

03

**DECIDE**  
 Use separate records or versions when one record cannot be accurate

04

**ESCALATE**  
 Seek CPSC guidance if the coverage decision remains uncertain

**RELEASE RULE: ONE CERTIFICATE RECORD MUST NOT CONCEAL A DIFFERENT MANUFACTURING PLACE.**

QUESTION 06

# Which of the six clocks belongs in each field?

Date errors often survive validation because every value looks like a date even when it represents the wrong event.

|                                                                                                                                                                          |                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p><b>MANUFACTURE DATE</b><br/>Minimum month and year; beginning of a run over days</p> |  <p><b>PRODUCTION START</b><br/>Optional operational boundary for the covered run</p>          |
|  <p><b>PRODUCTION END</b><br/>Optional closing boundary for the covered run</p>          |  <p><b>LAST TEST DATE</b><br/>Most recent testing date supporting the certificate</p>          |
|  <p><b>CERTIFICATE CREATED</b><br/>Starts the five-year retention clock</p>              |  <p><b>ENTRY / IMPORT</b><br/>Customs event; not a substitute for manufacture or test date</p> |

**NEVER derive Manufacture Date or Last Test Date from the entry date merely because it is the only complete date in the import file.**

**DATE LINEAGE: STORE THE EVENT NAME WITH THE DATE, NOT ONLY THE DATE VALUE.**

Sources: 16 CFR 1110.11(a)(5)-(6), 1110.17; CSV Upload Guide v3 [1][4]



QUESTION 07

# How should a manufacturing run be represented?

The minimum manufacture date can describe when a run began, but the certificate still needs a defensible product and lot coverage boundary.



## WHAT THE RULE ALLOWS

For a manufacturing run extending over several days, the certificate may use the initial date of manufacture. CPSC CPC guidance also permits one certificate to cover multiple batches or lots when the product is materially unchanged and due care is exercised.

- Use lot, batch, or production-period data to prove which units the certificate covers.
- Reassess coverage when factory, material, design, rule, test basis, or supplier changes.
- Do not use shipment date as a proxy for the start or end of the manufacturing run.

**COVERAGE CONTROL: A DATE WITHOUT A PRODUCT POPULATION BOUNDARY IS NOT ENOUGH.**

Sources: 16 CFR 1110.11(a)(5); CPSC CPC and CPC FAQ [1][6][7]

QUESTION 08

# Why is a unique ID not enough to identify the product?

Current certificate rules require at least one unique identifier plus a description sufficient to match the certificate to the finished product.



- Describe the certifiable finished product, not a marketing category or an entire catalog family.
- Do not hide materially different designs, safety features, materials, or evidence behind one family identifier.
- Use an identifier available on product or commercial documents so the shipment and certificate can be reconciled.
- One eFiled certificate describes one product, even if one traditional paper CPC could list several products.

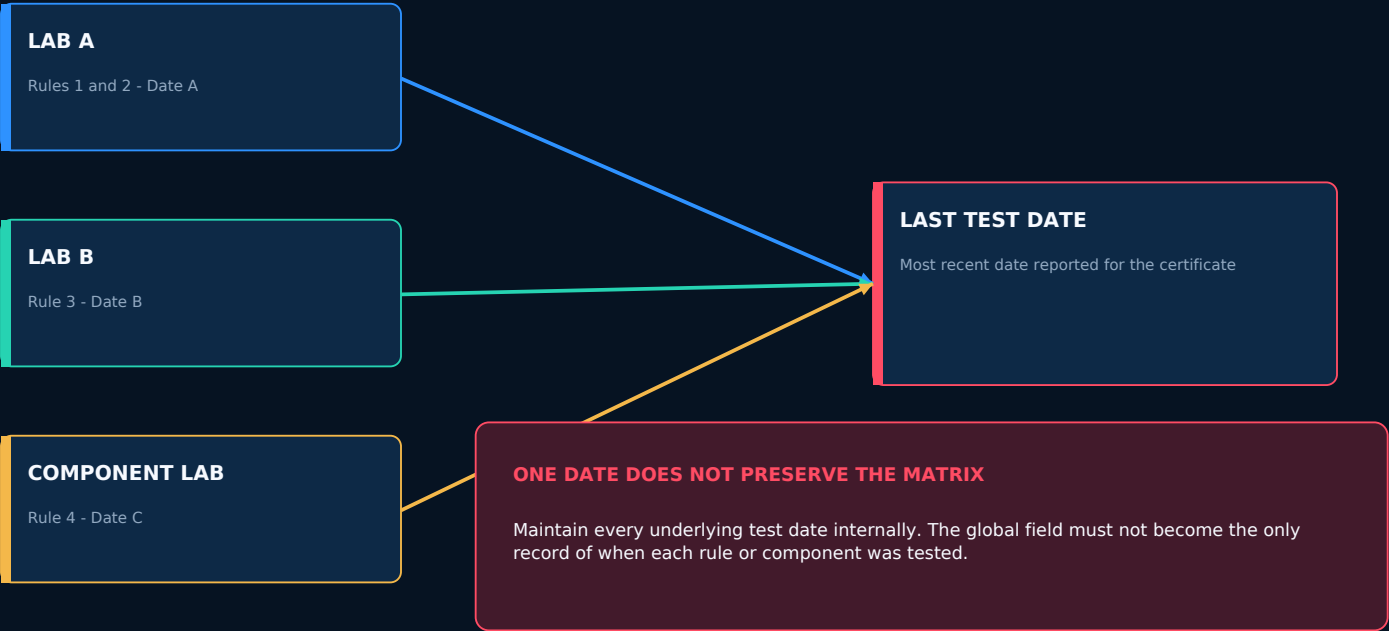
**MATCHABILITY TEST: COULD AN INDEPENDENT REVIEWER SELECT THE COVERED PRODUCT WITHOUT GUESSING?**

Sources: 16 CFR 1110.11(a)(1), 1110.13(a); CPSC eFiling FAQ [1][5]

QUESTION 09

# What does one Last Test Date mean when evidence is complex?

The Product Registry exposes one overall date, but the supporting evidence may contain several labs, components, rules, reports, and test dates.



- Recalculate the most recent supporting date whenever the evidence set changes.
- Do not substitute report issue date, upload date, purchase date, or entry date for a test date.
- Keep the report-level dates needed to explain why the global value is correct.

**EVIDENCE RULE: THE GLOBAL DATE IS A SUMMARY; THE LAB-LEVEL RECORD IS THE PROOF.**

Sources: 16 CFR 1110.11(a)(6); Product Registry User Guide v3; CSV Upload Guide v3 [1][2][4]

QUESTION 10

# How should labs, rules, reports, and components be joined?

A flat list of labs and a flat list of citations cannot prove which evidence supports which regulatory requirement.

| EVIDENCE ROW | LAB / PLACE     | APPLICABLE RULE | REPORT         | SCOPE     |
|--------------|-----------------|-----------------|----------------|-----------|
| 01           | Accepted Lab A  | 16 CFR rule A   | Report 100     | Finished  |
| 02           | Accepted Lab A  | 16 CFR rule B   | Report 100     | Finished  |
| 03           | Lab B           | 16 CFR rule C   | Report 205     | Component |
| 04           | Exclusion basis | 16 CFR rule D   | Exclusion code | Finished  |

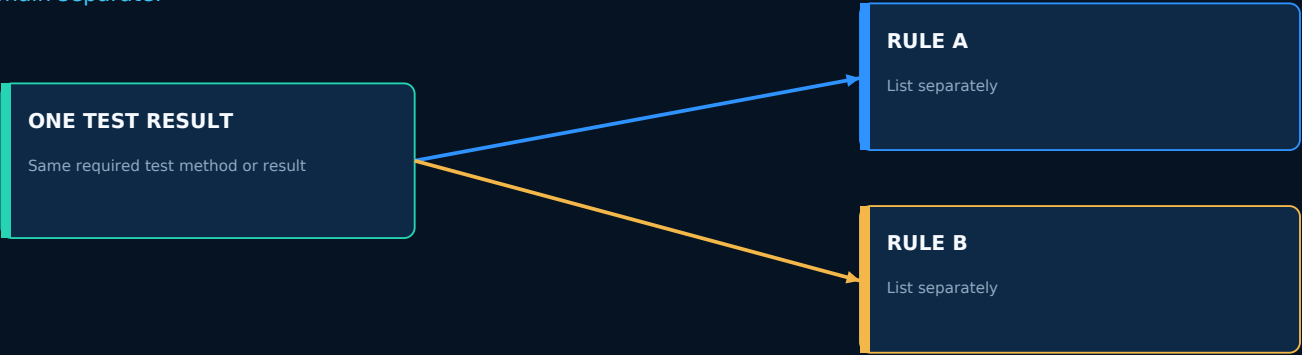
CPSC states that each laboratory must be associated with the specific rules it tested and that all testing relied upon for the finished-product certification must be recorded.

JOIN CONTROL: ONE ROW PER EVIDENCE RELATIONSHIP IN THE INTERNAL CROSSWALK.

QUESTION 11

# Can one test support several rules without duplicate testing?

Yes in a narrow circumstance: the same test requirement may be incorporated into more than one applicable rule. The citations still remain separate.



**NO DUPLICATE TEST DOES NOT MEAN NO DUPLICATE CITATION**

Every applicable rule, ban, standard, or regulation must still be identified separately on the certificate.

- Document why the same test satisfies each listed rule; do not rely on similarity of citation titles.
- Keep the test report and regulatory analysis connected to every rule it supports.
- Do not remove an applicable citation merely to avoid a duplicate-looking row in the data model.
- If the rules require different test conditions or scopes, separate evidence is still necessary.

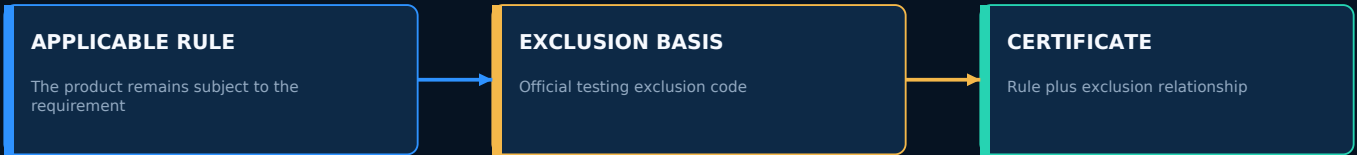
**LEGAL LISTING RULE: TEST ONCE WHERE PERMITTED, BUT LIST EVERY APPLICABLE REQUIREMENT.**

Source: 16 CFR 1110.11(a)(2) and 1110.11(d) [1]

QUESTION 12

# What does a testing exclusion replace - and what remains?

An exclusion changes the test evidence required for a particular regulation. It does not erase the underlying applicable requirement from the certificate.



WHAT CHANGES

For the regulation covered by the exclusion, the certificate identifies the exclusion instead of supplying the testing date and place otherwise required for that regulation. Other applicable rules and their evidence remain unaffected.

- Choose the exclusion from the current official code list and retain the legal analysis supporting its use.
- Do not use an exclusion code as a substitute for product-scope or citation analysis.
- As of July 8, 2026, applicable testing exclusions are required in eFiling.
- Reevaluate exclusions after design, material, age grading, supplier, or rule changes.

**EXCLUSION CONTROL: RECORD THE RULE-EXCLUSION PAIR, NOT AN ORPHAN EXCLUSION CODE.**

Sources: 16 CFR 1110.11(c); CPSC eFiling FAQ; official citation and testing exception code list [1][5][8]

QUESTION 13

# Does a component certificate replace the finished-product filing?

No. Component-part certification is voluntary and can support the evidence chain, but the finished product certifier still owns the finished-product certificate.



## WHAT MUST SURVIVE IN THE DATA MODEL

For every component test relied upon, preserve the component description, supplier or source, finished-product population, laboratory, test date, report, applicable rule, and linkage showing that the tested component is the one used.

- The component certificate itself is not eFiled when the component is imported.
- The Is Component value is only a flag; it does not create traceability by itself.
- Record all component testing actually relied upon to certify the finished product.
- Maintain due-care controls for supplier changes, substitutions, and component identity.

**RELIANCE RULE: COMPONENT EVIDENCE SUPPORTS - IT DOES NOT REPLACE - THE FINISHED CERTIFICATE.**

Sources: 16 CFR 1110.19; 16 CFR Part 1109; CPSC eFiling FAQ [1][9][5]

QUESTION 14

# Is POC Category the same as the records custodian?

The system category identifies a party type. The legal element identifies an individual or a reliably staffed position that maintains the records.

SYSTEM

### POC Category

Importer, Manufacturer, Laboratory, Broker, or Other. Additional identity fields may appear only for the Other selection.

OPERATIONS

### Records custodian

A named individual or staffed position with an escalation route, system access, and authority to retrieve the certificate and supporting records.

### POSITION TITLE CONDITION

A position title may be used only when the position is always staffed and responsive. A generic mailbox without accountable coverage is a weak control.

- Record the primary person, backup person, repository, access method, and escalation deadline internally.
- If a broker or laboratory holds the records, the importer still remains responsible for certificate availability.

CUSTODY TEST: CAN A REAL PERSON RETRIEVE THE CORRECT RECORD AFTER STAFF TURNOVER?



QUESTION 15

# Can the certificate be produced within 24 hours?

For availability to CPSC or CBP, 'immediately' means within 24 hours of a request. Retrieval must be designed before a request arrives.



Run a timed retrieval drill using a shipment selected by someone outside the compliance team. Record the elapsed time and every missing handoff.

**AVAILABILITY CONTROL: A RECORD THAT EXISTS BUT CANNOT BE FOUND IS NOT OPERATIONALLY AVAILABLE.**

Source: 16 CFR 1110.13(b)-(c) [1]. Retrieval drill is a Registry Intelligence control recommendation.

QUESTION 16

# Do a report URL and access key satisfy recordkeeping?

No. Optional report metadata can accelerate retrieval, but it does not replace a durable five-year record and evidence chain.

OPTIONAL METADATA

### Pointer

Test Report URL, Test Report ID, and Access Key help locate an external record. Links can expire, permissions can change, and identifiers can be mistyped.

REQUIRED CONTROL

### Durable record

Retain the certificate and supporting records in a controlled repository for five years from certificate creation, with version and evidence linkage intact.

POINTER HEALTH CHECK

For every external report link, monitor ownership, expiration, password or key validity, file immutability, and whether a durable internal copy is permitted and retained.

- Start the retention clock from certificate creation, not manufacture, test, upload, or entry date.
- Preserve superseded versions and the evidence set supporting each version.

RECORDKEEPING RULE: OPTIONAL FIELDS HELP FIND EVIDENCE; THEY ARE NOT THE EVIDENCE.

Sources: 16 CFR 1110.17; CPSC eFiling FAQ; CSV Upload Guide v3 [1][5][4]

RELEASE DESIGN

# Who owns each fact before the certificate is released?

Assign a source, owner, evidence object, and stop condition. Blank, unknown, and not applicable are not interchangeable states.

| DATA DOMAIN             | PRIMARY SOURCE         | OWNER               | RELEASE CONDITION                         |
|-------------------------|------------------------|---------------------|-------------------------------------------|
| Product identity        | ERP + packaging        | Product master      | ID and description match finished product |
| Factory and date        | Production record      | Supplier compliance | Site and run are traceable                |
| Rules / exclusions      | Regulatory analysis    | Compliance          | Every applicable rule resolved            |
| Tests / components      | Reports + traceability | Testing owner       | Every relied-on relationship mapped       |
| Certifier / attestation | Account + action log   | Importer admin      | Authorized user and account verified      |
| Records custody         | Repository + RACI      | Records POC         | Retrieval drill passes                    |

**STOP: unknown fact is unresolved. Blank is a transmission state. Not applicable requires a documented reason. Never convert one state into another to pass validation.**

**RELEASE GATE: NO MATERIAL FIELD WITHOUT A NAMED SOURCE, OWNER, AND EVIDENCE OBJECT.**

Sources: 16 CFR 1110.11-1110.17 [1]. Ownership matrix and state taxonomy are Registry Intelligence controls.

FINAL CONTROL

# Field-level checklist, official sources, and working links

Use this gate after semantic review and before certification. Recheck current official materials because system instructions and code lists can change.

1

Certifier identity and Business Account verified

2

One matchable finished product per certificate

3

Actual factory and covered production period confirmed

4

Every applicable rule listed separately

5

Every lab, rule, report, component, and date cross-mapped

6

Every exclusion paired to its applicable rule

7

Records custodian and backup can retrieve the record

8

Certificate and evidence retention clock recorded

REGISTRY INTELLIGENCE WORKING LINKS

Full article - CPSC eFiling Data Elements

Free CPSC eFiling PDF guide library

CPSC eFiling Resource Center

Registry Intelligence - polandoc.com

Official source set

[1] 16 CFR Part 1110

[2] Product Registry Guide v3

[3] Template v3

[4] CSV Guide v3

[5] eFiling FAQ

[6] CPC guidance

[7] CPC FAQ

[8] Code list

[9] 16 CFR Part 1109

Citation and exclusion guidance

CPSC eFiling Document Library

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