



AHFA Regulatory Summit 2024 A STURDY Audit

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AUGUST 7, 2024



About Chris Kleine

- VP of Logistics, Warehousing and Compliance
- 30+ years at Magnussen Home
- QA Manager
- QA and Compliance Manager
- VP of Quality and Compliance
- VP of Product Development, Quality and Compliance.
- VP Asia Operations





Overview

- Having extensive working experience with government agencies globally, it was always absolutely imperative to be prepared for every question that they will ask.
- Ask as many questions as you can to help you prepare for such a time as this
- Prepare, prepare and prepare again to provide everything that applies to the concerns with each specific agency you are engaging with.
- It is “all hands on deck” - prioritize the needs and go beyond their expectations.

“Before anything else,
preparation is the key
to success ...”

Alexander Graham Bell



A day in the in the life of

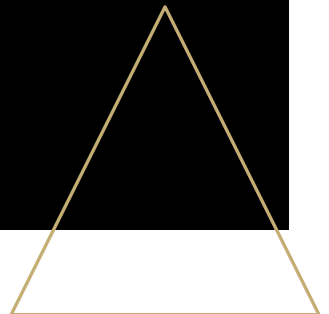
February 13, 2024

- Received a call from a CPSC inspector (2 pm) advising that they will be at our DC @10 am next day to review all our product pertaining to the STURDY act.
- Contacted AHFA for confirmation that I was not being “punked”
- Bill and Andy were most gracious to tell me – “yes this is the real thing...”
- Now for the “Rest of the story...”



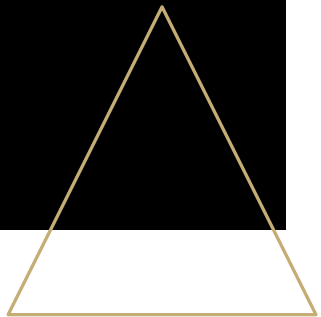
February 13 2:30 PM

- Prepared packets for each sku to be inspected consisting of:
 - Testing reports from 3rd party testing lab showing testing procedures and results with good quality photos of entire testing and weights
 - Current/Valid 3rd Party testing results for GCC documentation
 - List of current manufacturers by group , with full address and contact information
 - Visual cross sections of methods used for compliance to STURDY listed for each group.
 - Arranged to pull 3 pieces of each sku for inspection (different production dates for each sku starting 9/1/23 onward)
 - Product arranged in line along dock for ease of viewing
 - One piece of each sku unboxed with 2 additional pieces in line behind opened item.





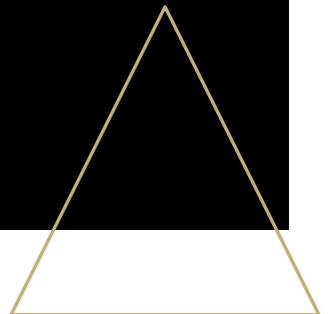
February 14th - : 11:00 AM – 5:00 PM

- CPSC agents begin the following:
 - Review tip test report with each unit
 - Document each sku for:
 - Factory name, address
 - Date of manufacture
 - Reviewed lab results for GCC filing on all sku's
 - Using handheld XRF gun, tested each unit for lead, heavy metals
 - Inspected several bin locations by sku for accuracy of inventory report provided to CPSC agent
- 



February 14th - : 11:00 AM – 5:00 PM

- We were required to provide :
 - Complete list of all retailers who are purchasing this product.
 - Importer number.
 - Port of receipt within the USA .
 - 3 of the most recent import documentation as submitted to US customs.
 - 3 recent invoices from in state (California) to retailers .
 - 3 recent out of state invoices .

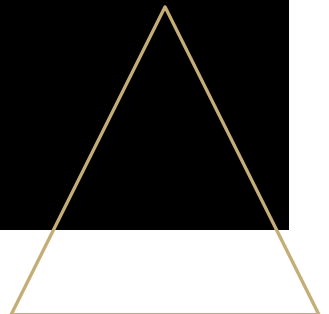




Conclusion to Inspection:

Inspection passed without condition.

Data to be input into CPSC system for future reference by agents visiting retail locations



Key Takeaways

ONE:

Know all compliance regulations in each country of distribution

TWO;

Test with accredited 3rd party
Keep records current

THREE:

Have a procedure in place for key personnel for the preparation of audits

FOUR:

Know your inventory (dating, location, quantity)

FIVE

All current and relevant testing reports to be readily available for printing and review

SIX:

Know your product – how it is constructed, what you have done to ensure compliance