

The CSB's Fiscal Year 2024 Top Management Challenges

What Are Management Challenges?

The Reports Consolidation Act of 2000 requires each inspector general to prepare an annual statement summarizing what the inspector general considers to be "the most serious management and performance challenges facing the agency" and to briefly assess the agency's progress in addressing those challenges.

Our previous U.S. Chemical Safety and Hazard Investigation Board report, Fiscal Year 2023 U.S. Chemical Safety and Hazard Investigation Board Management Challenges, issued October 21, 2022, identified three top management challenges facing the agency. Those challenges addressed operating effectively without a full board, minimizing mission-critical staff vacancies and attrition rates, and improving cybersecurity. We have retained these challenges for fiscal year 2024. In addition, we have identified the promotion of ethical conduct as a new top management challenge for the CSB.

This report addresses the three CSB goals:

- Prevent recurrence of significant chemical incidents.
- Advocate safety and achieve change.
- Create and maintain an engaged, high-performing workforce.

Address inquiries to our public affairs office at (202) 566-2391 or OIG.PublicAffairs@epa.gov.

List of OIG reports.

What We Found

We retained the three previously identified top management and performance challenges from the prior year's report, and we added a fourth challenge. We consider these to be the CSB's greatest vulnerabilities to waste, fraud, abuse, and mismanagement and the most significant barriers to accomplishing the CSB's mission during fiscal year 2024:

1. Management Challenge (initially identified in fiscal year 2019): Operating effectively without a full board.

The CSB's governing board has only three confirmed members, one more than when we highlighted this challenge in fiscal year 2023. The Clean Air Act Amendments of 1990 authorized the creation of the CSB and established a board of five members, including a chairperson. That board is responsible for major budgeting decisions, strategic planning and direction, general oversight of the CSB, and approval of investigation reports and studies. The lack of a full board has inhibited the CSB's mission to conduct investigations to protect people and the environment. A full board ensures that the CSB can function in the event of the loss of one or two board members.

2. Management Challenge (initially identified in fiscal year 2023): Minimizing mission-critical staff vacancies and attrition rates.

The CSB is working to increase hiring, but vacancies and attrition rates remain a concern. As of the end of September 2023, the CSB's staffing level was short of fiscal year-end projections by ten full-time equivalents, or about 20 percent. Mission-critical positions have remained vacant for more than one year. Despite some improvements, we remain concerned that staffing problems affect the CSB's ability to carry out day-to-day operations in a timely manner, including deployment to new incidents, completion of investigations, and issuance of reports.

3. Management Challenge (initially identified in fiscal year 2023): Improving cybersecurity.

The CSB has demonstrated a strong commitment to its cybersecurity program and to addressing the Office of Inspector General's cybersecurity recommendations to ensure the reliability, availability, and accuracy of CSB data. However, the CSB should ensure that it has formalized and documented policies, procedures, and strategies for its information security program and that they are consistently implemented. The risk that vulnerabilities may be exploited is elevated at the CSB's latest assessed information security level. The CSB's continued improvement to its cybersecurity posture and increased maturity level is necessary to fully address prior Office of Inspector General recommendations.

4. Management Challenge (new): Promoting ethical conduct.

In July 2023, the U.S. Office of Government Ethics recommended that the CSB take steps to improve its ethics program. The CSB is reviewing this recommendation and plans to fully respond by January 2024. A robust ethics program, combined with training, can assist employees in recognizing potential ethics concerns.