



# At a Glance

## Audit of the U.S. Chemical Safety and Hazard Investigation Board's Compliance with the Federal Information Security Modernization Act of 2014 for Fiscal Year 2024

### Why This Audit Was Performed

#### To accomplish this objective:

The U.S. Environmental Protection Agency Office of Inspector General contracted this audit to assess the U.S. Chemical Safety and Hazard Investigation Board's compliance with *Fiscal Year 2023–2024 Inspector General Federal Information Security Modernization Act of 2014 Reporting Metrics* during fiscal year 2024. We contracted with SB & Company LLC to perform this audit under our direction and oversight.

The *Reporting Metrics* outlines five security function areas and nine corresponding domains to help federal agencies manage cybersecurity risks. The document also outlines five maturity levels by which inspectors general should rate their agencies' information security programs:

- Level 1, Ad Hoc.
- Level 2, Defined.
- Level 3, Consistently Implemented.
- Level 4, Managed and Measurable.
- Level 5, Optimized.

#### To support this CSB mission-related effort:

- *Creating and maintaining an engaged, high-performing workforce.*

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### What SB & Company Found

SB & Company concluded that the CSB achieved an overall maturity of Level 2, Defined, in fiscal year 2024. This means that the CSB's information security policies, procedures, and strategies are formalized and documented but not consistently implemented.

While the CSB maintained the same overall Defined maturity level that it achieved in fiscal year 2023, SB & Company identified an area of needed improvement associated with the *Reporting Metrics*' Risk Management domain in the Identify function area. SB & Company concluded that the CSB should ensure that its information can be reliably accessed in a timely manner even if key personnel are absent. Specifically, the CSB should ensure that its deputy chief information officer position is filled or that another CSB representative is available to respond to Federal Information Security Modernization Act of 2014 inquiries. CSB Board Order 034, *Information Technology Security Program*, states that the chief information officer is responsible for ensuring that appropriate resources are allocated to the CSB's Information Technology Security Program and for selecting an individual to serve as the deputy chief information officer. If the CSB does not ensure that key roles and responsibilities are backed up, it risks the timely execution of tasks and hinders the access and availability of information.

**The deputy chief information officer plays a key role in maintaining the continuity of CSB operations and preserving institutional knowledge if the chief information officer is unavailable.**

### Recommendation and Planned Agency Corrective Action

SB & Company made one recommendation to the CSB, and we agree with and adopt the recommendation. SB & Company recommended that the CSB "[d]evelop a process for designating and maintaining personnel in key roles (permanent and/or temporary) to ensure the continuity of essential security functions," including availability to respond to Federal Information Security Modernization Act of 2014 inquiries. As of March 2025, an information technology specialist is serving as acting deputy chief information officer and can serve as a backup for the chief information officer according to CSB Board Order 034. Therefore, we consider the corrective action for this recommendation to be completed.

The CSB believes that it has met the threshold for maturity Level 3, despite its overall maturity being assessed at Level 2. However, the reporting metrics focused on a calculated average approach, wherein the average of the metrics in a particular domain was used to determine the effectiveness of the overall program. Because the majority of metrics were rated at Level 2, the CSB's overall calculated maturity level resulted in a Level 2 rating.