



Office of Inspector General U.S. Environmental Protection Agency

At a Glance

October 21, 2022

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.

For fiscal year 2023, we examined whether the U.S. Chemical Safety and Hazard Investigation Board addressed its management challenge for fiscal year 2022, which we identified in Report No. [22-N-0003](#), issued on November 10, 2021. We determined that the understaffed board remains a top management challenge for the CSB. In addition, we identified two new top management challenges for the Agency: minimize mission critical staff vacancies and attrition rates and improve cybersecurity weaknesses.

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_WEBPOSTINGS@epa.gov.

[List of OIG reports.](#)

Fiscal Year 2023 U.S. Chemical Safety and Hazard Investigation Board Management Challenges

What We Found

The U.S. Environmental Protection Agency Office of Inspector General identified three top management challenges that we believe represent the CSB's greatest vulnerability to waste, fraud, abuse, and mismanagement and present the most significant barriers to accomplishing the mission during fiscal year 2023. In addition to the challenge retained from our previous top management challenges report, we identified two new top management challenges that affect the CSB operations and that may prevent the CSB from efficiently and effectively driving chemical safety change through independent investigations to protect people and the environment.

Management Challenge (initially identified in fiscal year 2019):

Accomplishment of the CSB's Mission Remains Impaired Until the Full Board Is Confirmed

The CSB has only two of five authorized members. The Clean Air Act Amendments of 1990 authorized the creation of the CSB and established a board of five members, including a chairperson, that 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. As noted in our [Special Review of the U.S. Chemical Safety and Hazard Investigation Board Capabilities to Effectively Administer Its Programs and Operations](#), Board Order 028 prohibits a single board member from taking actions or giving any approvals where the order requires approval of the full board. The loss of one of the two current board members could prevent the CSB governing body from meeting its mission and goals.

Management Challenge (new): *Minimize Mission Critical Staff Vacancies and Attrition Rates*

Mission-critical staff positions have remained vacant for more than a year. Former CSB leadership did not ensure that sufficient staff were hired and retained to meet the CSB's mission. These staffing problems have affected the CSB's ability to carry out day-to-day operations in a timely manner, including deployments to new incidents, completion of investigations, and issuance of reports.

Management Challenge (new): *Improve Cybersecurity Weaknesses*

In May 2022 the CSB's two board members stated that they had little insight into the changes needed to improve cybersecurity because of limited information sharing from the then-chairperson. Although communication between the board members and the latest chairperson was strained, previous OIG reporting and recommendations regarding CSB cybersecurity deficiencies were available for board-member review. The board needs to implement the OIG's cybersecurity recommendations to ensure the reliability, availability, and accuracy of CSB data, as well as to protect Agency information technology systems from cyberthreats.