

# The CSB's Fiscal Year 2026 Top Management Challenges

May 6, 2026 | Report No. 26-N-0006



## Abbreviations

C.F.R.	Code of Federal Regulations
CSB	U.S. Chemical Safety and Hazard Investigation Board
EPA	U.S. Environmental Protection Agency
OIG	Office of Inspector General
U.S.C.	United States Code

## Cover Image

Overhead satellite image of a chemical plant facility and the surrounding area.  
(CSB May 2025 investigation report image)

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# At a Glance

## The CSB's Fiscal Year 2026 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.

The U.S. Environmental Protection Agency Office of Inspector General, which provides oversight for the U.S. Chemical Safety and Hazard Investigation Board, has identified two management challenges facing the CSB in fiscal year 2026: operating effectively without a full board and improving information security.

### 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.*

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### What We Found

For fiscal year 2026, we identified two management challenges facing the CSB. 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.

#### 1. Operating effectively without a full board

As of November 2025, the CSB’s governing board was operating at 40 percent capacity, with only two confirmed members. The Clean Air Act Amendments of 1990 established that the CSB’s board shall consist of five board members, including a chairperson, who are appointed by the president and confirmed by the Senate. The board is responsible for major budgeting decisions, strategic planning and direction, general oversight of the CSB, and approval of investigation reports and studies. The CSB is challenged in meeting its mission to “drive chemical safety excellence through independent investigations to protect communities, workers, and the environment” while operating without a full board.

#### 2. Improving information security

EPA OIG Report No. [25-P-0037](#), *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*, dated June 17, 2025, assessed the CSB’s information security program to be at a maturity of Level 2, Defined. This means that policies, procedures, and strategies are formalized and documented but not consistently implemented. Additionally, as of June 2025, the CSB’s chief information officer position is vacant, which could hinder the CSB’s capacity to improve its information security program.



**OFFICE OF INSPECTOR GENERAL**  
U.S. ENVIRONMENTAL PROTECTION AGENCY

May 6, 2026

Steve Owens  
Chairperson  
U.S. Chemical Safety and Hazard  
Investigation Board  
470 L'Enfant Plaza SW, Suite 604 #23278  
Washington, D.C. 20026

Dear Mr. Owens:

Enclosed is the Office of Inspector General's fiscal year 2026 management challenges report for the U.S. Chemical Safety and Hazard Investigation Board. The Reports Consolidation Act of 2000 requires that I prepare an annual statement summarizing what the OIG considers to be the "most serious management and performance challenges facing" the CSB. This statement is also to briefly assess the CSB's progress in addressing these challenges.

We identified two management challenges facing the CSB in fiscal year 2026. The first of these challenges concerns the CSB's ability to operate as intended with less than a fully confirmed board. The second challenge pertains to the CSB's information security program, which has been assessed at an overall maturity of Level 2, Defined.

Your office is not required to provide a written response to this final report. We will post this report to our website at [www.epa.gov/oig](http://www.epa.gov/oig).

Sincerely,

Nicole N. Murley  
Deputy Inspector General  
performing the duties of the Inspector General

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# Introduction

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The Clean Air Act, 42 U.S.C. § 7412(r)(6), authorized the creation of the U.S. Chemical Safety and Hazard Investigation Board, which became operational in January 1998. The CSB is an independent federal agency; as stated on its [website](#), its mission is to “drive chemical safety excellence through independent investigations to protect communities, workers, and the environment.” The CSB examines all aspects of significant chemical incidents, including root causes, and it makes recommendations to facilities, industry organizations, labor groups, regulatory agencies, and others.

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. Since 2004, Congress has designated the U.S. Environmental Protection Agency inspector general to also serve as the CSB inspector general. This report represents the EPA Office of Inspector General’s statement for the CSB, which we provide to Congress and the CSB as an independent and objective assessment of the CSB’s top management and performance challenges for fiscal year 2026.

As part of our annual assessment, we consider our prior year’s oversight work and how the CSB’s programs addressed management challenges identified in previous fiscal years. We also review congressional hearings and public statements, analyze oversight work conducted by the U.S. Government Accountability Office, and consider issues raised in media coverage. For fiscal year 2026, we also surveyed CSB staff, submitted a staffing questionnaire, and considered a U.S. Office of Government Ethics inspection report.

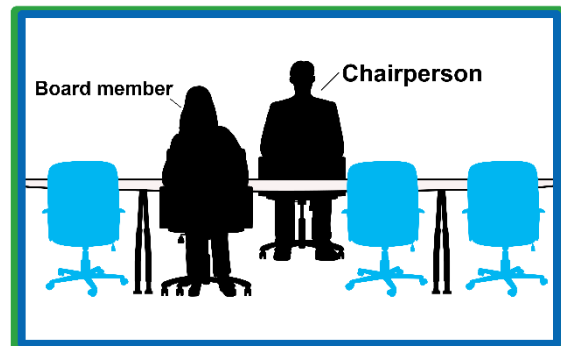
We identified the following top management challenges facing the CSB in fiscal year 2026:

1. Operating effectively without a full board.
2. Improving information security.

We have numbered these for reference, not as an indication of priority, severity, or precedence. Each challenge relates significantly to the CSB’s ability to meet its mission of protecting communities, workers, and the environment. These challenges are both current and forward-looking to assist the CSB in its operations, as well as to guide us in our oversight planning throughout fiscal year 2026 and beyond.

## Challenge 1: Operating Effectively Without a Full Board

The CSB's governing body has been operating with less than the five-member board authorized by the Clean Air Act Amendments of 1990. As of this report's release, the CSB's board consists of two members. The board needs three additional members to reach the number Congress intended. The CSB is challenged in meeting its mission while operating without a full board.



The Clean Air Act states that the CSB's governing body shall consist of five technically and professionally qualified members, including a chairperson. In July 2025, one board member retired, and the board went from having three to two members. According to the CSB's [website](#), board members may serve as the principal spokespersons at accident sites and conduct community meetings, hearings, and boards of inquiry during accident investigations. The board's responsibilities also include budget approval, approval of investigation reports, strategic planning, and general oversight.

As provided in the CSB's regulations at 40 C.F.R. § 1600.5(a), a quorum of the board is required for business, and a simple majority is necessary to approve an item of business. A quorum consists of three board members unless the number of members is less than three, in which case the quorum is the number of members. When a two-member board disagrees, a tie vote results in no action, limiting the board's efficacy. If the board were reduced to a single member, it would be unable to perform some critical functions. For example, although a single-member board may approve the budget, it may not approve investigation reports or safety recommendations. Furthermore, when all board functions rest with one member, it creates internal control vulnerabilities in terms of separation of duties and workload management.

With two members, the CSB's governing board operates at 60 percent below the five-person board that Congress intended. Board requirements under the Clean Air Act; fixed five-year terms; and the risk of resignations, removals, and natural attrition all put the CSB's governing body at a continued risk of unfilled membership.<sup>1</sup> The lack of five board members may prevent the CSB from achieving its stated mission. However, board members must be appointed by the president and confirmed by the Senate, making composition of the board outside the CSB's control.

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<sup>1</sup> Among the two board members, Sylvia Johnson's five-year term is set to expire first. She was confirmed by the U.S. Senate on December 9, 2021. She began her post on February 3, 2022.

## Challenge 2: Improving Information Security

In EPA OIG Report No. [25-P-0037](#), *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*, dated June 17, 2025, we rated the CSB's Information Technology Security Program at a maturity level of Level 2, Defined. The CSB earned a Level 2 rating for a majority of the metrics, which span five function areas as shown in Figure 1. Level 2 maturity means that the CSB's information security policies, procedures, and strategies are formalized and documented but not consistently implemented. Improving to a Level 3 maturity or higher would indicate that the program consistently implements policies, procedures, and strategies. As stated in the *FY 2025 Inspector General Federal Information Security Modernization Act of 2014 (FISMA) Reporting Metrics v 2.0*, dated April 3, 2025, the Office of Management and Budget "believes that achieving a Level 4 ... or above represents an effective level of security."



Figure 1: FISMA metrics maturity model



Source: OIG summary of *FY 2025 Inspector General Federal Information Security Modernization Act of 2014 (FISMA) Reporting Metrics*. (EPA OIG image)

In addition to its Level 2 maturity rating, the CSB's challenges are compounded by its chief information officer position being vacant since June 2025, which may impact the CSB's efforts to improve its information security program and maturity level. The chief information officer is responsible for ensuring that the CSB complies with applicable information technology security requirements and that the appropriate resources are allocated to the CSB's information security program.

The CSB continues to make progress in updating its information security program and has indicated that it intends to make additional improvements over the next year. However, the CSB needs to further improve its information security program, and the vacant chief information officer position could hinder those efforts. The CSB must continue to make progress in preventing and responding to cyberthreats and ensuring that its information systems operate as intended.



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