



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV - 4 2013

THE INSPECTOR GENERAL

The Honorable Rafael Moure-Eraso, Ph.D.  
Chairperson and Chief Executive Officer  
U.S. Chemical Safety and Hazard Investigation Board  
2175 K Street, NW, Suite 400  
Washington, D.C. 20037-1809

Dear Dr. Moure-Eraso:

Thank you for the U.S. Chemical Safety and Hazard Investigation Board's (CSB) response to Report No. 13-P-0337, U.S. Chemical Safety and Hazard Investigation Board Needs to Complete More Timely Investigations. We appreciate the board's efforts to be responsive to our recommendations.

We find your proposed corrective actions adequate to address recommendations 1, 3, 5, 7, 8 and 9. The language in your response indicated that you do not concur with recommendations 2 and 6. Further, we would like for you to clarify whether you will combine your current and planned "initiatives" into a succession or retention policy as we requested in recommendation 4.

For recommendation 2 we requested that you, "Revise and publish an annual action plan to comply with GPRA 2010 [Government Performance and Results Act] and update related individual performance plans to ensure that performance indicators are addressed and investigative staff are held accountable for performing key phases in the investigation process." You stated that you believe you have met the requirements of GPRA by publishing an up-to-date Strategic Plan, annual performance-based budgets, and annual performance reports. GPRA 2010 requires that agencies annually establish performance plans to include a balanced set of performance indicators to be used in measuring or assessing progress toward each performance goal. It stipulates that agencies are to provide a description of how the performance goals are to be achieved, including the operation processes, training, skills and technology, and the human capital, information, and other resources and strategies required to meet those performance goals. Our review of your GPRA 2010 documents did not disclose the level of details required by GPRA 2010. We maintain that a published agency performance plan with performance indicators as prescribed by GPRA 2010 is needed along with updated individual performance plans to ensure that investigative staff are held accountable for performing key phases of the investigative process. We request that you provide a date by which you will publish an agency performance plan with performance indicators and detailed descriptions as defined by GPRA 2010 and that you update individual performance plans to meet the terms of this recommendation.

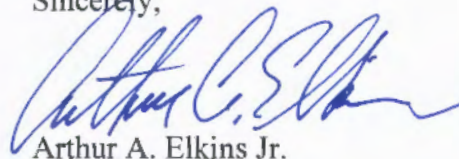
For recommendation 6 we requested that you, "Review and collocate investigation files for each ongoing investigation to ensure that they contain all the supporting documents related to the investigation. At a minimum, ensure files have proper classifications, project plans, scoping documents and board decisions." You disagreed with this recommendation. In general you stated that our assertions concerning the lack of co-location of files and incorrectly classified or coded investigation files have nothing to do with the completion of final written products. You explained that the Total Records and Information Management (TRIM) system is a tool for searching/reviewing evidence during a case and as a system of archiving once the case is complete and that the evergreen planning and scoping documents developed internally by CSB staff would not be included in this system since team members do not need such records when reviewing evidence. During our audit, however, we could not locate the investigation status summary describing what remains to be done for the six sample investigations in our audit. In our report, U.S. Chemical Safety and Hazard Investigation Board Should Improve Its Recommendations Process to Further Its Goal of Chemical Accident Prevention (Report No. 12-P-0724, August 22, 2012), we noted that CSB had acknowledged TRIM's ability to track workflow activities related to recommendations as well as other organizational activities. This indicates that TRIM has the capability to handle the planning function. We maintain that co-locating the project planning and evidence files provides a complete view of the investigation status at any given time. We request that CSB provide a corrective action plan to co-locate investigative files and correctly classify/code investigative documents.

For recommendation 4 we requested that you, "Develop and implement a succession or retention policy to help with any future effects of the turnover rate on CSB's mission." You listed multiple succession/retention initiatives that you have implemented and mentioned the positive effect they have had with your workforce based on the zero investigative turnover during the past eight months. You also listed initiatives you are either developing or considering that should have a positive effect on succession and retention. We request that you clarify whether you plan to consolidate your succession and retention initiatives into a policy as we recommended, and include corrective action dates.

We are closing all recommendations from this report in our tracking system except for recommendations 2, 4, and 6, which remain in an unresolved status. We will follow up to determine your progress in implementing the planned corrective actions on the recommendations and the effectiveness of actions taken to correct the deficiencies we found.

If you or your staff have any questions regarding this report, please contact Michael Davis, product line director for efficiency audits, at (513) 487-2363; or Gloria Taylor-Upshaw, project manager, at (404) 562-9842.

Sincerely,



Arthur A. Elkins Jr.

cc: Mr. Mark Griffon, Board Member, U.S. CSB  
Ms. Beth J. Rosenberg, Board Member, U.S. CSB  
Mr. Daniel M. Horowitz, Managing Director, U.S. CSB  
Ms. Anna Brown, Director of Administration and Audit Liaison, U.S. CSB