

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Chemical Safety and Hazard Investigation Board (CSB)

Follow-up to OGE Report Number: 23-35I

Report No.: 25-50IF

Date: April 24, 2025

**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

As a result of its review of the Chemical Safety and Hazard Investigation Board's ethics program, the Office of Government Ethics (OGE) issued ten recommendations in its July 2023 review report. OGE conducted a second follow-up review to assess whether CSB has taken sufficient action to resolve the deficiencies underlying recommendation 3 through 10. The results of the follow-up review are summarized below. A previous follow-up review was conducted solely on recommendations 1 and 2 that resulted in both recommendations being closed.

	Recommendation	Agency Action and OGE Finding	Status
3	Ensure the timely collection of new entrant non-PAS public financial disclosure reports.	CSB did not have any new public financial disclosure filer appointments during the period covered by this review. OGE will return in six months to determine whether this recommendation can be closed.	Open
4	Ensure the timely review/certification of all non-PAS public financial disclosure reports.	There was one non-PAS public financial disclosure report required in 2024. This report was reviewed and certified timely.	Closed
5	Ensure the timely collection of both new entrant and annual confidential financial disclosure reports.	OGE found that 91% (10 out of 11) of annual reports were filed timely. Therefore, OGE is partially closing the recommendation with respect to annual confidential financial disclosure reports. However, only 67% (2 out of 3) of new entrant reports were filed timely. OGE will return in six months to assess the collection of new entrant reports and to determine whether this recommendation can be closed.	Open
6	Ensure the timely review/certification of all confidential financial disclosure reports.	OGE's review found that 33% (1 out of 3) of new entrant reports were certified timely and 100% (11 out of 11) of annual reports were certified timely. Therefore, OGE is partially closing the recommendation with respect to annual confidential financial disclosure reports. OGE will return in six months to assess the review/certification of new entrant reports and to determine whether the recommendation can be closed.	Open

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7	Ensure that written procedures include a description of the role the Interior Business Center or any other provider plays in meeting ethics program requirements.	OGE's review found that CSB provided a draft description that sufficiently describes the ethics services covered by the Interior Business Center. CSB attests that this wording will be added to the appropriate written procedures.	Closed
8	Ensure that notices to prospective employees include the required financial disclosure information for employees entering into positions whose incumbents are required to file financial disclosure reports.	OGE's review of a new sample of actual notices issued to prospective employees found that they contain the required financial disclosure information.	Closed
9	Ensure that all new supervisors receive the required notice of their enhanced ethics-related responsibilities. In addition, ensure that these notices include access to (e.g. a link or instructions for accessing) the Principles of Ethical Conduct.	CSB had one new supervisor that required receiving the ethics notice in 2024. OGE's review found that this supervisor received the notice as required and the notice contained all required information.	Closed
10	Ensure that all non-PAS public financial disclosure filers receive annual ethics training.	OGE's review found that the one non-PAS public financial disclosure filer received annual ethics training in 2024 as required	Closed

Based on the results of OGE's second follow-up review, recommendations 4, 7, 8, 9, and 10 are closed. OGE will conduct a third follow-up review in approximately six months to determine whether recommendations 3, 5, and 6 can be closed.