

Open Recommendations Made to the Bureau of Consumer Financial Protection



We oversee the Bureau of Consumer Financial Protection (Bureau) by conducting audits, evaluations, and inspections of the Bureau’s programs and operations and by making recommendations to improve economy, efficiency, and effectiveness.

Audits assess aspects of the economy, efficiency, and effectiveness of Bureau programs and operations and are conducted in accordance with *Government Auditing Standards*, which is issued by the Comptroller General of the United States. Evaluations are generally focused on the effectiveness of specific programs or functions, and inspections are often narrowly focused on particular issues or topics and provide time-critical analyses. Evaluations and inspections are performed according to *Quality Standards for Inspection and Evaluation*, which is issued by the Council of the Inspectors General on Integrity and Efficiency.

Our audit, evaluation, and inspection reports explain why we conducted the review and the issues we found that should be corrected or improved, and they contain specific recommendations for agency corrective action. Table 1 shows, as of September 30, 2019, the total number and status of recommendations we made to the Bureau for calendar years beginning with the first year for which recommendations remain open.

Table 1. Status of Recommendations for 2013–2019, as of September 30, 2019

Status	2013	2014	2015	2016	2017	2018	2019
Recommendations	43	30	51	20	65	29	24
Open	1	1	0	4	2	12	22
Closed	42	29	51	16	63	17	2
Public recommendations	34	26	41	20	56	28	19
Open	1	1	0	4	2	12 ^a	17 ^a
Closed	33	25	41	16	54	16	2
Nonpublic recommendations	9	4	10	0	9	1	5
Open	0	0	0	0	0	0	5
Closed	9	4	10	0	9	1	0

Note. Some reports are restricted and not publicly available because they contain sensitive information. The recommendations from these reports are identified as nonpublic.

^aOnly the recommendations that have been open for more than 12 months are reflected in the accompanying list of open recommendations.

This document provides a list of publicly available report recommendations we made to the Bureau that have been open for more than 12 months as of September 30, 2019, and their status. The status designations and their definitions are as follows:

- **Agency concurrence**—The Bureau stated that it plans to implement the recommendation.
- **Agency nonconcurrence**—The Bureau stated that it does not concur with the recommendation. We continue to believe the recommendation should be implemented and are working with the Bureau to reach a resolution.
- **Agency partial concurrence**—The Bureau stated that it does not agree with part of the recommendation. We continue to believe the recommendation should be fully implemented and are working with the Bureau to reach a resolution.
- **Agency action**—The Bureau reported that it has begun taking steps to implement the recommendation.
- **Partial implementation**—The Bureau reported that it has completed actions to close part of the recommendation and is taking steps to close the remaining aspects.
- **Verification in progress**—The Bureau reported that it has completed actions to fully close the recommendation. We are verifying that the actions address the recommendation.

For inquiries about the list of open recommendations, please contact oig.media@frb.gov or 202-973-5043.

Publicly Available Bureau Recommendations Open for More Than 12 Months

Report title	Issuance date	Recommendation	Recommendation status
The CFPB Should Strengthen Internal Controls for Its Government Travel Card Program to Ensure Program Integrity 2013-AE-C-017	09/30/2013	5. Coordinate with the Office of Human Capital to obtain personnel leave data and require the Travel Office to expand the monthly cardholder statement review to include cardholders on leave in order to identify potential cases of unauthorized or fraudulent use and incorporate this requirement in the draft internal procedure.	Agency action
2014 Audit of the CFPB's Information Security Program 2014-IT-C-020	11/14/2014	3. Strengthen the Bureau's vulnerability management practices by implementing an automated solution and process to periodically assess and manage database and application-level security configurations.	Partial implementation
The CFPB Should Continue to Enhance Controls for Its Government Travel Card Program 2016-FMIC-C-009	06/27/2016	3. Revise the Policy on Travel Cards and Temporary Duty Travel to <ol style="list-style-type: none"> include clear language describing personal use and improper use of the government travel card. consolidate the Policy on Travel Cards and Temporary Duty Travel and all addendums and forms into a single policy document. require certified, agency-specific training on a recurring basis for approving officials and cardholders. 	Partial implementation Parts (a) and (b) of this recommendation are closed; part (c) remains open.
		4. Develop mandatory, certified, agency-specific training for approving officials and cardholders that includes, but is not limited to, <ol style="list-style-type: none"> detailing their roles and responsibilities. explaining the electronic travel system. providing instruction on how to document personal leave while on official travel. 	Agency action
		6. Enhance the monthly compliance audits of the Bureau's government travel card program by <ol style="list-style-type: none"> directing the Travel Office to obtain training from the government travel card provider on how to use all the available monitoring resources. finalizing the development of and implementing in-house data mining tools. 	Partial implementation Part (a) of this recommendation is closed; part (b) remains open.
2016 Audit of the CFPB's Information Security Program 2016-IT-C-012	11/10/2016	1. Evaluate options and develop an agency-wide insider threat program to include <ol style="list-style-type: none"> a strategy to raise organizational awareness. an optimal organizational structure. integration of incident response capabilities, such as ongoing activities around data loss prevention. 	Partial implementation Parts (a) and (b) of this recommendation are closed; part (c) remains open.

Report title	Issuance date	Recommendation	Recommendation status
2017 Audit of the CFPB's Information Security Program 2017-IT-C-019	10/31/2017	1. Ensure that a risk appetite statement and associated risk tolerance levels are defined and used to develop and maintain an agencywide risk profile.	Partial implementation
		2. Develop and implement a tiered approach for implementing multifactor authentication that considers system risk levels and user roles and uses lessons learned to inform broader adoption.	Partial implementation
The CFPB Can Further Strengthen Controls Over Certain Offboarding Processes and Data 2018-MO-C-001	01/22/2018	2. Finalize the building access system upgrade to ensure that personal identity verification badges and site badges are automatically deactivated in the building access system and that personal identity verification badges are automatically deactivated in the USAccess system upon an individual's separation.	Agency concurrence
		11. Once upgrades to the offboarding system have been fully implemented, develop a process to periodically reconcile new separation data in the offboarding system with one of the Bureau's human resources systems to ensure that the separation data are current, accurate, and complete.	Agency action
Report on the Independent Audit of the Consumer Financial Protection Bureau's Privacy Program 2018-IT-C-003	02/14/2018	1. Develop, document, and fully implement a formal process to identify, track, and periodically update all personally identifiable information collected, processed and stored throughout the Bureau. At a minimum this inventory should clearly identify what personally identifiable information the Bureau is collecting or handling, who within the Bureau is responsible for the security of the personally identifiable information, where the personally identifiable information is stored (both physical and logical), and whether a privacy impact assessment or system of records notice is required.	Agency concurrence
		2. Develop, document and implement a formal process to monitor for compliance with physical security requirements around portable media such as laptops, thumb drives and smart phones, as well as passwords and hard copies of sensitive personally identifiable information.	Agency concurrence
The Bureau's Travel Card Program Controls Are Generally Effective but Could Be Further Strengthened 2018-FMIC-C-014	09/26/2018	1. Update travel guidance to clarify how to submit vouchers for multicity trips.	Agency concurrence
		2. Incorporate instruction on multicity trips into training for cardholders and approving officials.	Agency concurrence

Report title	Issuance date	Recommendation	Recommendation status
		3. Evaluate the benefit of implementing additional controls to detect duplicative reimbursements, such as developing and implementing a tool for identifying travel vouchers with overlapping trip dates.	Agency concurrence
		4. Review transactions and seek reimbursement in accordance with Bureau policy from cardholders who received duplicative reimbursements for multicity trips and from cardholders who were reimbursed for lodging and meals and incidental expenses incurred while on personal leave during official travel.	Agency concurrence