



**Office of Inspector General**

Board of Governors of the Federal Reserve System  
Bureau of Consumer Financial Protection

## MEMORANDUM

**DATE:** March 23, 2020

**TO:** Donna Roy  
Chief Information Officer  
Bureau of Consumer Financial Protection

Ren Essene  
Chief Data Officer  
Bureau of Consumer Financial Protection

**FROM:** Peter Sheridan *Peter Sheridan*  
Associate Inspector General for Information Technology

**SUBJECT:** OIG Report 2020-IT-C-008R: *Testing Results of Select Bureau Cybersecurity Incident Response Processes*

### Executive Summary

This memorandum communicates the detailed results of our testing of the Bureau of Consumer Financial Protection’s processes for categorizing cybersecurity events and ensuring the timely closure of related cybersecurity incident tickets. We completed this testing as part of our 2019 audit of the Bureau’s information security program, which we performed to meet the requirements of the Federal Information Security Modernization Act of 2014 (FISMA).<sup>1</sup> We did not include the details of this testing in our public FISMA audit report due to the sensitive nature of the results.

Our testing showed that the Bureau is not consistently categorizing information security events in its cybersecurity incident response tickets. This could negatively affect the Bureau’s analysis of these events as well as the resulting responses to any confirmed security incidents. Our 2019 FISMA report includes a recommendation to strengthen controls in this area—specifically, that the chief information officer (CIO) and the chief data officer ensure that data captured in security and privacy incident processes and tickets are accurate, consistent, and of high quality. This memorandum provides the details of our testing results to facilitate the Bureau’s ongoing efforts to address this recommendation.

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<sup>1</sup> Office of Inspector General, *2019 Audit of the Bureau’s Information Security Program*, [OIG Report 2019-IT-C-015](#), October 31, 2019.

In addition, our testing identified that cybersecurity incident response ticket average closure times for security events and incidents have increased since 2018. Although we are not making recommendations about the timeliness of cybersecurity incident response ticket closures, we are providing the detailed results of this testing for management's consideration as it works to strengthen the Bureau's incident response program. We will continue to monitor the Bureau's efforts to mature its incident response processes as part of our future FISMA reviews.