

# Open Recommendations Made to the Consumer Financial Protection Bureau



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

Audits assess aspects of the economy, efficiency, and effectiveness of CFPB 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 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 and evaluation 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, 2023, the total number and status of recommendations we made to the CFPB by calendar year, beginning with the first year for which recommendations remain open; table 2 displays each open recommendation, organized by report. We recognize that some recommendations may require complex actions; therefore, our twice-yearly open recommendations reports to the CFPB include only public and nonpublic recommendations that have been open for more than 6 months. Given their sensitivity, the nonpublic recommendations are summarized.

**Table 1. Status of Recommendations for 2014–2023, as of September 30, 2023**

Status	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Recommendations	30	51	20	65	29	31	17	37	8	1
Open	1	0	0	1	3	0	3	10	5	1 <sup>a</sup>
Closed	29	51	20	64	26	31	14	27	3	0
Public recommendations	26	41	20	56	28	26	13	33	8	1
Open	1	0	0	1	3	0	0	7	5	1 <sup>a</sup>
Closed	25	41	20	55	25	26	13	26	3	0
Nonpublic recommendations	4	10	0	9	1	5	4	4	0	0
Open	0	0	0	0	0	0	3	3	0	0
Closed	4	10	0	9	1	5	1	1	0	0

Note: Some reports are nonpublic because they contain sensitive information; therefore, the recommendations from these reports are also nonpublic.

<sup>a</sup>Only the recommendations that have been open for more than 6 months are reflected in the accompanying list of open recommendations.

This document provides a list of public and nonpublic report recommendations we made to the CFPB that have been open for more than 6 months as of September 30, 2023, and their status. The status designations and their definitions are as follows:

- **Agency concurrence**—The CFPB stated that it plans to implement the recommendation.
- **Agency nonconcurrence**—The CFPB stated that it does not concur with the recommendation. We continue to believe the recommendation should be implemented and are working with the CFPB to reach a resolution.
- **Agency partial concurrence**—The CFPB 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 CFPB to reach a resolution.
- **Agency action**—The CFPB reported that it has begun taking steps to implement the recommendation.
- **Partial implementation**—The CFPB 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 CFPB 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](mailto:oig.media@frb.gov) or 202-973-5043.

**Table 2. CFPB Recommendations Open for More Than 6 Months**

Report title	Issuance date	Recommendation	Recommendation status
<a href="#">2014 Audit of the CFPB's Information Security Program</a> 2014-IT-C-020	11/14/2014	3. Strengthen the CFPB's vulnerability management practices by implementing an automated solution and process to periodically assess and manage database and application-level security configurations.	Verification in progress
<a href="#">2017 Audit of the CFPB's Information Security Program</a> 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.	Agency action
<a href="#">The CFPB Can Further Strengthen Controls Over Certain Offboarding Processes and Data</a> 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.	Verification in progress
<a href="#">2018 Audit of the Bureau's Information Security Program</a> 2018-IT-C-018	10/31/2018	1. Strengthen configuration management processes by a. remediating configuration-related vulnerabilities in a timely manner. b. ensuring that optimal resources are allocated to perform vulnerability remediation activities.	Verification in progress
		3. Determine whether established processes and procedures for management of user-access agreements and rules-of-behavior forms for privileged users are effective and adequately resourced and make changes as needed.	Agency action
<a href="#">Technical Testing Results for the Bureau's Legal Enclave</a> 2020-IT-C-017R	07/22/2020	1. The open recommendation relates to strengthening vulnerability management.	Verification in progress
		2. The open recommendation relates to strengthening testing processes.	Verification in progress
		4. The open recommendation relates to strengthening configuration management.	Agency action

Report title	Issuance date	Recommendation	Recommendation status
<a href="#">The Bureau Can Strengthen Its Hiring Practices and Can Continue Its Efforts to Cultivate a Diverse Workforce</a>  <a href="#">2021-MO-C-006</a>	03/29/2021	1. Monitor the use of structured interviews and provide periodic reports tracking the use of structured interviews to senior CFPB officials, such as division and office leaders and the chief operating officer.	Verification in progress
		5. Align policy, procedure, and guidance documents with the actual practices related to identifying subject-matter experts early in the hiring process and requiring subject-matter expert signatures on combined rating sheets.	Verification in progress
		7. Implement automated system controls to ensure that key date fields are completed for all hiring actions in the Hiring Tracker database.	Verification in progress
		8. Update the Measuring and Reporting Time to Hire standard operating procedure to include <ul style="list-style-type: none"> <li>a. comprehensive guidance on documenting purposeful omissions in the Hiring Tracker data entry form.</li> <li>b. Office of Human Capital practices for reviewing the Hiring Tracker database for accuracy and completeness.</li> </ul>	Verification in progress
		9. Require training for staff responsible for entering information into the Hiring Tracker database on <ul style="list-style-type: none"> <li>a. using the Hiring Tracker data entry form and database.</li> <li>b. the updated standard operating procedure so that practices align with established processes.</li> </ul>	Verification in progress
<a href="#">The Bureau Can Improve Its Controls for Issuing and Managing Interagency Agreements</a>  <a href="#">2021-FMIC-C-009</a>	07/21/2021	1. Create or update existing interagency agreement policies and procedures to establish clear expectations for issuing and managing interagency agreements. Ensure that expectations for the key activities in the interagency agreement process are addressed, including <ul style="list-style-type: none"> <li>a. roles and responsibilities of relevant parties, including the Bureau of the Fiscal Service, Administrative Resource Center; the Office of the Chief Financial Officer; the Office of the Chief Procurement Officer; program offices; and invoice approvers.</li> <li>b. training and certification requirements for invoice approvers.</li> <li>c. developing and maintaining interagency agreement documents.</li> <li>d. monitoring performance under the interagency agreement.</li> <li>e. approving Intra-Governmental Payment and Collections.</li> <li>f. deobligating and closing interagency agreements.</li> </ul>	Agency action

Report title	Issuance date	Recommendation	Recommendation status
<a href="#">Evaluation of the Bureau's Implementation of Splunk</a> 2021-IT-C-010R	09/08/2021	1. The open recommendation relates to strengthening risk management.	Verification in progress
		2. The open recommendation relates to strengthening access controls.	Verification in progress
		4. The open recommendation relates to strengthening hardware asset management processes.	Verification in progress
<a href="#">The Bureau Can Improve Aspects of Its Quality Management Program For Supervision Activities</a> 2021-SR-C-016	11/01/2021	7. Assess the Quality Management Program's current staffing level and structure to determine whether additional or dedicated resources are needed or whether the current 25 percent time allotment for conducting quality assurance reviews and the 2-week time allotment for quality control reviews should be revised. Develop and implement plans to address the program's staffing needs based on the results of the assessment.	Agency action
<a href="#">2022 Audit of the CFPB's Information Security Program</a> 2022-IT-C-014	09/30/2022	2. Ensure that the CFPB's new data loss prevention tool is implemented and configured to monitor traffic across all network access points and environments, as applicable.	Verification in progress
		3. Ensure that policies and supporting procedures for developing and maintaining an enterprisewide software inventory are developed and maintained.	Agency action
		4. Ensure that an enterprisewide software inventory is conducted and maintained.	Agency action
		5. Ensure the development of policies and procedures for the performance and maintenance of an organizationwide business impact analysis.	Agency action
		6. Update the CFPB's organizationwide business impact analysis and ensure that the results are used to make applicable changes to related contingency and continuity plans.	Agency action