

Bureau of Consumer Financial Protection

Bureau Efforts to Share Consumer Complaint Data Internally Are Generally Effective; Improvements Can Be Made to Enhance Training and Strengthen Access Approval



Office of Inspector General
Board of Governors of the Federal Reserve System
Bureau of Consumer Financial Protection



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Executive Summary, 2019-FMIC-C-008, June 3, 2019

Bureau Efforts to Share Consumer Complaint Data Internally Are Generally Effective; Improvements Can Be Made to Enhance Training and Strengthen Access Approval

Findings

Overall, the Office of Consumer Response (Consumer Response) effectively shares consumer complaint data within the Bureau of Consumer Financial Protection (Bureau). To increase the incorporation of complaint data in the Bureau's work, Consumer Response can better educate users about the internal complaint-sharing tools. Consumer Response can also enhance access controls to ensure that access to complaint data, which can contain sensitive consumer information, is limited to only users who need such information to perform their job functions.

Almost all the internal complaint-sharing tool users we interviewed reported using complaint data to inform their work. Consumer Response offered more training on the complaint-sharing tools to Division of Supervision, Enforcement and Fair Lending (SEFL) users as compared with other divisions because SEFL has the largest number of users. Expanding outreach and training to other divisions could increase opportunities for users in other divisions to incorporate consumer complaints in their work.

Additionally, Consumer Response established processes for Bureau users to access the complaint-sharing tools through which sensitive consumer information can be accessed. However, Consumer Response inconsistently approved access to two complaint-sharing tools and did not assess whether users needed continued access to one tool or to network drive folders containing complaint reports. Consumer Response can better limit access to sensitive consumer information by improving its processes to approve access and to review continued access to the complaint-sharing tools. During our evaluation, Consumer Response began taking actions to improve its access processes.

Recommendations

Our report contains recommendations designed to further enhance the effectiveness of Consumer Response's internal complaint-sharing efforts and to strengthen access controls over complaint data containing sensitive consumer information. In his response to our draft report, the Assistant Director of Consumer Response concurs with our recommendations and describes actions to address them. We will follow up to ensure that the recommendations are fully addressed.

Purpose

The objectives of this evaluation were to examine (1) the extent to which Consumer Response's consumer complaint-sharing efforts help to inform the work of internal stakeholders and (2) Consumer Response's controls over internal access to shared complaint data, which can contain sensitive consumer information.

Background

Pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Bureau collects consumer complaints on financial services and products. The effective sharing of complaint information can help the Bureau understand the problems consumers are experiencing in the financial marketplace and identify and prevent unfair practices.

Consumer Response is responsible for collecting, managing, and sharing complaint data to drive its work and that of the Bureau. It created internal complaint-sharing tools to help Bureau users efficiently search complaint data, identify issues, and use the data to inform their work. Our evaluation covered the use of and access to the following complaint-sharing tools: Complaint Analytics (including Explorer), Advanced Analytics, and complaint reports produced by Consumer Response. We analyzed user data for 2017 and 2018.

The Bureau began receiving consumer complaints in July 2011 and had received 1.7 million consumer complaints as of December 20, 2018.



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

Recommendations, 2019-FMIC-C-008, June 3, 2019

Bureau Efforts to Share Consumer Complaint Data Internally Are Generally Effective; Improvements Can Be Made to Enhance Training and Strengthen Access Approval

Finding 1: Consumer Response’s Complaint-Sharing Tools Inform the Work of Internal Stakeholders

Number	Recommendation	Responsible office
	No recommendations.	

Finding 2: Consumer Response Can Expand Training on Complaint-Sharing Tools

Number	Recommendation	Responsible office
1	Increase outreach to divisions to identify specific division needs for complaint data and develop targeted training on the complaint-sharing tools and their capabilities to address the identified division-specific needs.	Office of Consumer Response

Finding 3: Consumer Response Can Improve Its Access Authorization Processes for Explorer and Advanced Analytics

Number	Recommendation	Responsible office
2	Update the <i>Procedural Guidance for Data Access</i> to reflect the current process for approving access to Explorer, including requiring supervisory approval for all users.	Office of Consumer Response
3	Update the Advanced Analytics access process to reflect required approvals by type of user and consistently implement the updated process.	Office of Consumer Response
4	Enhance access review activities for Explorer, including establishing documented processes and procedures for evaluating the access privileges of current users, to ensure that these activities are consistent with Bureau information security requirements.	Office of Consumer Response

Finding 4: Consumer Response’s Process for Sharing Complaint Reports Can Be Improved

Number	Recommendation	Responsible office
5	Coordinate with the Chief Information Officer to conduct a review of network drive folders that contain complaint reports to verify that users have access to only the folders they need to perform their job function and request that T&I revoke access privileges as needed.	Office of Consumer Response
6	Coordinate with the Chief Information Officer to enhance access review activities for network drive folders that contain complaint reports, including establishing documented processes and procedures for evaluating the access of current users, to ensure that these activities are consistent with Bureau information security requirements.	Office of Consumer Response



Office of Inspector General

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

MEMORANDUM

DATE: June 3, 2019

TO: Christopher Johnson
Assistant Director, Office of Consumer Response
Bureau of Consumer Financial Protection

FROM: Michael VanHuysen 
Assistant Inspector General for Audits and Evaluations

SUBJECT: OIG Report 2019-FMIC-C-008: *Bureau Efforts to Share Consumer Complaint Data Internally Are Generally Effective; Improvements Can Be Made to Enhance Training and Strengthen Access Approval*

We have completed our report on the subject evaluation. We conducted this evaluation to assess the effectiveness of the Office of Consumer Response’s (Consumer Response) complaint-sharing efforts within the Bureau of Consumer Financial Protection (Bureau).

We provided you with a draft of our report for review and comment. In your response, you concur with our recommendations and outline actions that have been or will be taken to address our recommendations. We have included your response as appendix B to our report.

We appreciate the cooperation that we received from Consumer Response management and staff during our evaluation. Please contact me if you would like to discuss this report or any related issues.

cc: Gail Hillebrand
Chad Tompkins
Elizabeth Reilly
Dana James
Lauren Hassouni
Carlos Villa



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Introduction

Objectives

We evaluated the effectiveness of the Office of Consumer Response’s (Consumer Response) complaint-sharing efforts within the Bureau of Consumer Financial Protection (Bureau). The effective sharing of complaint information can help the Bureau understand the problems consumers are experiencing in the financial marketplace and identify and prevent unfair practices.

The objectives of this evaluation were to examine (1) the extent to which Consumer Response’s consumer complaint–sharing efforts help to inform the work of internal stakeholders and (2) Consumer Response’s controls over internal access to shared complaint data, which can contain sensitive consumer information. The scope of our evaluation included the use of and access to the following, which we refer to collectively as *complaint-sharing tools*: Complaint Analytics (including Explorer), Advanced Analytics, and complaint reports produced by Consumer Response. We analyzed user data for 2017 and 2018.¹

To address our first objective, we interviewed complaint-sharing tool users across the agency about their use of complaint data and the related tools. We selected a nonstatistical sample of 30 users from four of the Bureau’s six divisions. To address our second objective, we tested Consumer Response’s access controls over complaint data that are accessible with the complaint-sharing tools. Specifically, we tested Consumer Response’s processes for approving access and reviewing continued access to the complaint-sharing tools. Details on our scope and methodology are in appendix A.

Background

The Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) created the Bureau to regulate the offering and provision of consumer financial products and services under the federal consumer financial laws. Under authority granted by the Dodd-Frank Act, the Bureau collects complaints from consumers on financial services and products. In accordance with its authority to regulate the offering and provision of consumer financial products and services, the Bureau uses the consumer complaint data to help supervise companies, enforce federal consumer financial laws, and write rules and regulations. The Bureau receives consumer complaints from a variety of sources, including submissions by telephone, mail, email, and fax, and through the Bureau’s website. The Bureau began receiving consumer complaints in July 2011 and had received 1,725,945 consumer complaints as of December 20, 2018.

¹ The Office of Inspector General is excluded from this evaluation.

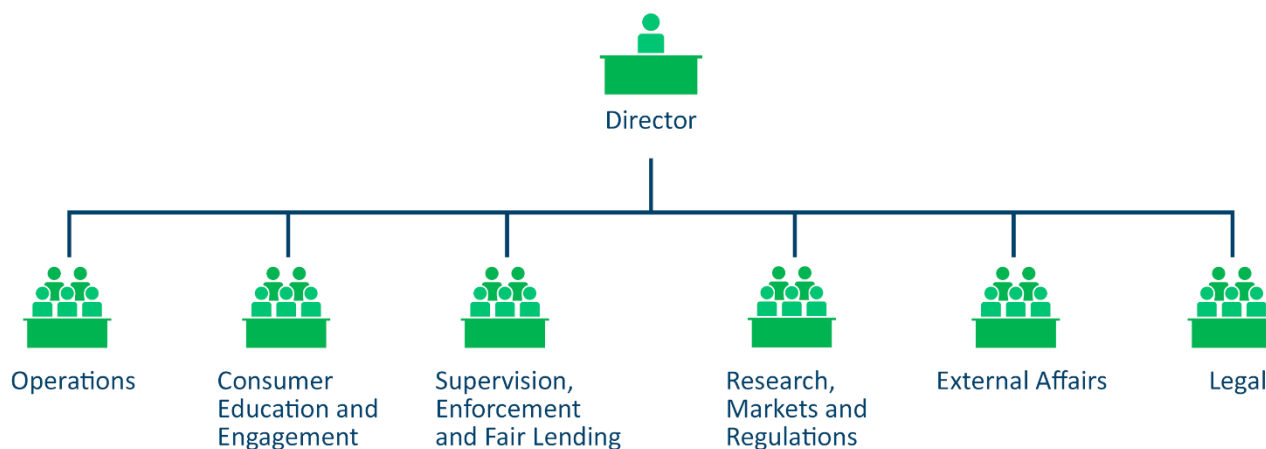
Consumer Response Collects, Manages, and Shares Complaint Data

Consumer Response, located in the Consumer Education and Engagement Division, is responsible for collecting, managing, and sharing complaint data to drive its work and that of the Bureau.² Consumer Response’s *Strategic Plan for FY18* defines the office’s desired outcomes, which include ensuring that consumer voices are integrated into the Bureau’s work. Consumer Response accomplishes this through the sharing of complaint data with staff in all the Bureau’s divisions, who can use complaint data to inform their work (figure 1).

“Promote accountability to consumers by ensuring their voices are integrated into the Bureau’s work.”

—Desired outcome listed in Consumer Response’s *Strategic Plan for FY18*

Figure 1. The Six Bureau Divisions



Source. Developed by the OIG based on a review of the Bureau’s organizational structure.

Consumer Response’s Internal Complaint-Sharing Tools

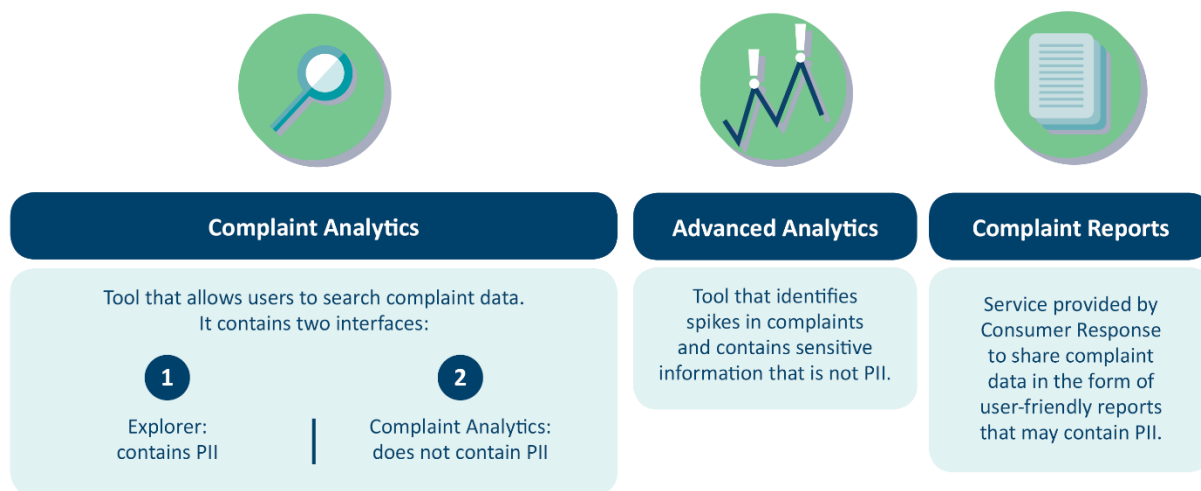
To optimize resources and help facilitate the sharing of complaint data, Consumer Response created the following internal complaint-sharing tools: Complaint Analytics, Advanced Analytics, and complaint reports (figure 2).³ The complaint-sharing tools are available to help Bureau users efficiently search complaint data, identify issues, and summarize and visualize complaint data. The complaint-sharing tools, except for part of Complaint Analytics, contain sensitive information, such as consumers’ personally

² In January 2018, the Bureau announced that Consumer Response would become a part of the Consumer Education and Engagement Division. Prior to that, the office was part of the Operations Division.

³ Consumer Response offers additional internal complaint-sharing tools that are outside the scope of this evaluation because they either were released after the start of this evaluation or are not for use Bureauwide.

identifiable information (PII)⁴ or indications of market practices that may be harmful to consumers. As such, the tools can be accessed only by approved users and only through the Bureau’s network. Prior to approving access, Consumer Response notifies users of their responsibilities for handling PII, including notifying users about restrictions on the unauthorized distribution or disclosure of PII. Consumer Response also provides Bureau staff with training on the complaint-sharing tools. The training provides users with an understanding of the capabilities of the tools and how complaint data can enhance their work.

Figure 2. Consumer Response’s Internal Complaint-Sharing Tools



Source. Developed by the OIG based on discussions with Consumer Response and a review of Consumer Response’s documents about the internal complaint-sharing tools.

Complaint Analytics

Complaint Analytics is a tool that allows Bureau users to search consumer complaint data, which consist of consumers’ descriptions of their experiences with financial products and services and consumer complaints submitted about financial products and services that are sent to companies for response. In addition to searching consumer complaint data, Complaint Analytics enables users to perform functions such as similarity analysis, trend analysis, and pattern detection. Complaint Analytics began as a pilot program in December 2015 and officially launched Bureauwide in June 2016. From January 2016 to December 2017, Bureau users conducted 266,046 searches in Complaint Analytics.

The Complaint Analytics tool has two interfaces—one that omits PII and is available to all Bureau users,⁵ and another, called Explorer, that includes complaints that contain relevant PII and is visible only to

⁴ Office of Management and Budget Memorandum 07-16 defines PII as information that can be used to distinguish or trace an individual’s identity alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

⁵ In November 2017, the Bureau made the Complaint Analytics non-PII interface available to internal users and to the public on its website.

approved Bureau users.⁶ Consumer Response manages the tool’s functionality and approves user access.⁷ During 2017, there were 610 users of Explorer (table 1). This evaluation focuses on the Explorer interface of Complaint Analytics.

Table 1. Bureau Users of Explorer

Division/Office	User population
Supervision, Enforcement and Fair Lending	396
Consumer Response	100
Operations	34
Research, Markets and Regulations	30
Consumer Education and Engagement	25
Office of the Director ^a	15
External Affairs	9
Legal	1

Source. OIG analysis of user data provided by Consumer Response.

^a Users in the Office of the Director are in Director’s Financial Analyst positions; these are 2-year rotational positions at the Bureau. Director’s Financial Analysts use complaint data for the jobs they perform in the other Bureau divisions but are counted as Office of the Director users.

Advanced Analytics

Advanced Analytics is a customized tool that uses complex statistical methodologies to identify statistically significant changes in complaint volume. Advanced Analytics began as a pilot program in March 2016 and officially launched in November 2017. Although the tool does not provide access to PII, it is only available to a limited number of Bureau users because it displays sensitive information, such as indications of market practices that may result in consumer harm.

The Bureau established a committee to approve access to Advanced Analytics (in conjunction with Consumer Response) and to manage the processes and procedures for responding to identified complaint spikes. This committee, called the Spike Committee, is made up of representatives from offices in the Division of Supervision, Enforcement and Fair Lending (SEFL). Consumer Response is responsible for

⁶ Explorer was formerly known as Complaint Analytics Search.

⁷ The Office of Technology and Innovation, which is part of the Operations Division, also provides support.

ensuring the tool’s functionality and for managing user access. As of April 2018, 74 users had access to Advanced Analytics (table 2).

Table 2. Bureau Users of Advanced Analytics

Division/Office	User population
Consumer Response	33
Supervision, Enforcement and Fair Lending	28
Consumer Education and Engagement	6
Operations	6
Research, Markets and Regulations	1

Source. OIG analysis of user data provided by the Office of Technology and Innovation.

Complaint Reports

Complaint reports are a service provided by Consumer Response that allows Consumer Response to share complaint data with internal users in the form of user-friendly reports. Consumer Response has provided complaint reports internally since 2011 and began to formally track them in May 2015. Bureau users request complaint reports for in-depth analysis or for visualizations of complaint data. The request defines the level of detail and information that will appear in the completed complaint report, and as such, some reports may contain PII. From May 2015 through December 2017, Consumer Response completed 2,435 complaint reports, including 583 complaint reports completed in 2017 (table 3).

Table 3. Complaint Reports Completed in 2017

Division/Office	Number of complaint reports
Consumer Response	350
Supervision, Enforcement and Fair Lending	158
Consumer Education and Engagement	30
External Affairs	24
Research, Markets and Regulations	8
Office of the Director	4
Operations	4
Not identified	5
Total complaint reports completed in 2017	583

Source. OIG analysis of complaint report data provided by Consumer Response.

On July 23, 2018, Consumer Response expanded Complaint Analytics to include a self-service Interactive Reports tool. The tool is available to Bureau users with access to Explorer. Because of the timing of the launch, this tool was outside the scope of this evaluation.

Consumer Response’s Access Approval Process for Internal Complaint-Sharing Tools

As the owner of complaint data, Consumer Response is responsible for implementing access controls over the data and controlling access to the complaint-sharing tools through which complaint data can be accessed.

Applicable Criteria

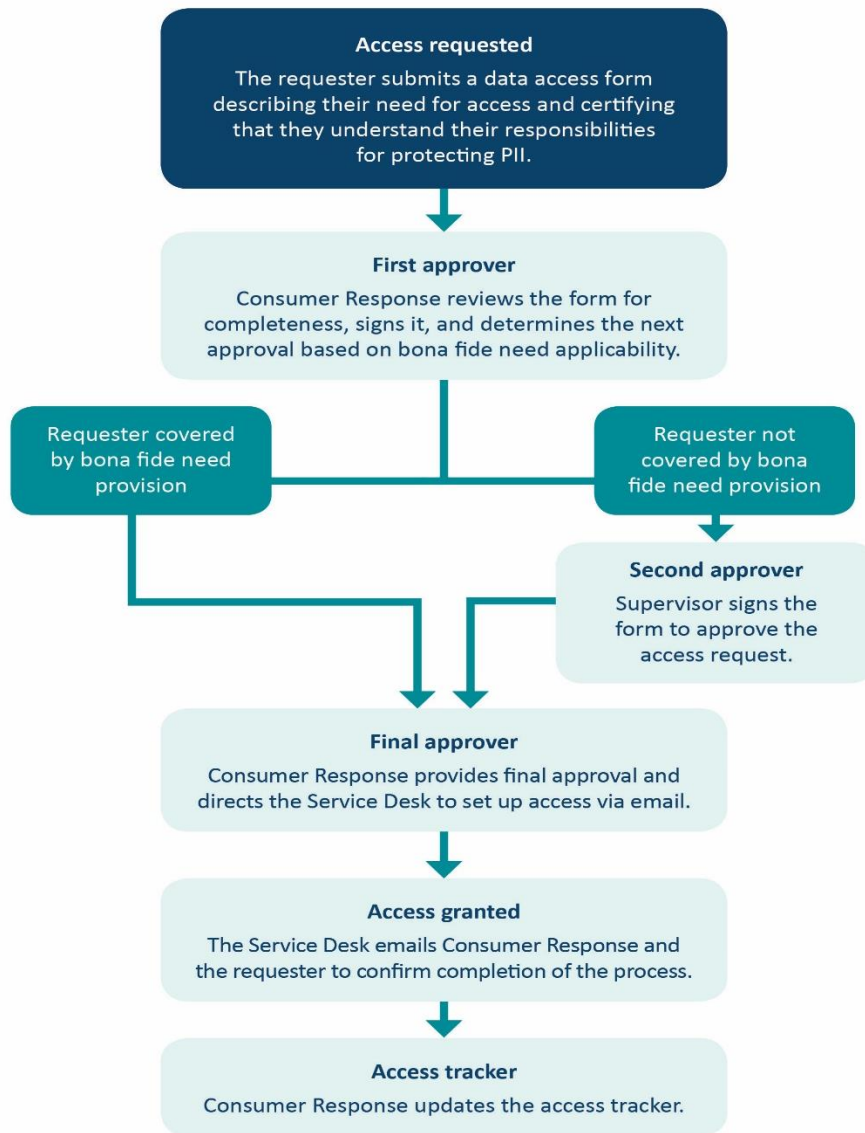
The *CFPB Information Security Program Policy*, dated January 11, 2013, designates responsibilities and authorities for ensuring an adequate level of information security for all Bureau information. The policy explains the role of the system owners in determining the need for access and the permissible degree of access in accordance with applicable laws, regulations, agreements, and the policy, taking into consideration coordination with the Chief Information Security Officer, the Privacy Office, and the Legal Division.

Consumer Response established processes for approving and managing Bureau users' access to Consumer Response systems and tools, including Explorer, Advanced Analytics, and complaint reports produced by Consumer Response. During our evaluation, Consumer Response staff described the access processes relevant to the complaint-sharing tools; these processes are formally documented in Consumer Response's *Procedural Guidance for Data Access*, dated December 19, 2017, and the "Access to Advanced Analytics Tools" memorandum, dated October 19, 2017.

Approving Access to Explorer

Consumer Response approves and manages access to Explorer. For users in most Bureau divisions, the access process requires their supervisor to sign the data access form as evidence of approval. The process also incorporates a bona fide need provision, which assumes that users from Consumer Response, the Office of the Ombudsman, and SEFL have a need to access the complaint data. Therefore, Consumer Response approves access to Explorer for users from these offices without requesting approval from the users' supervisor. Consumer Response then contacts the Service Desk in the Office of Technology and Innovation (T&I), which is part of the Operations Division, to set up access for the requester (figure 3).

Figure 3. Consumer Response’s Process for Approving Access to Explorer



Source. Developed by the OIG based on discussions with Consumer Response and Consumer Response’s *Procedural Guidance for Data Access*.

Approving Access to Advanced Analytics

Consumer Response and the Spike Committee have roles in the process for approving and managing access to Advanced Analytics. Specifically, Consumer Response is responsible for ensuring the tool’s functionality and for processing access for users approved by the Spike Committee. Consumer Response relies on the Service Desk in T&I to set up access for the requester (figure 4).

Figure 4. Consumer Response’s Process for Approving Access to Advanced Analytics



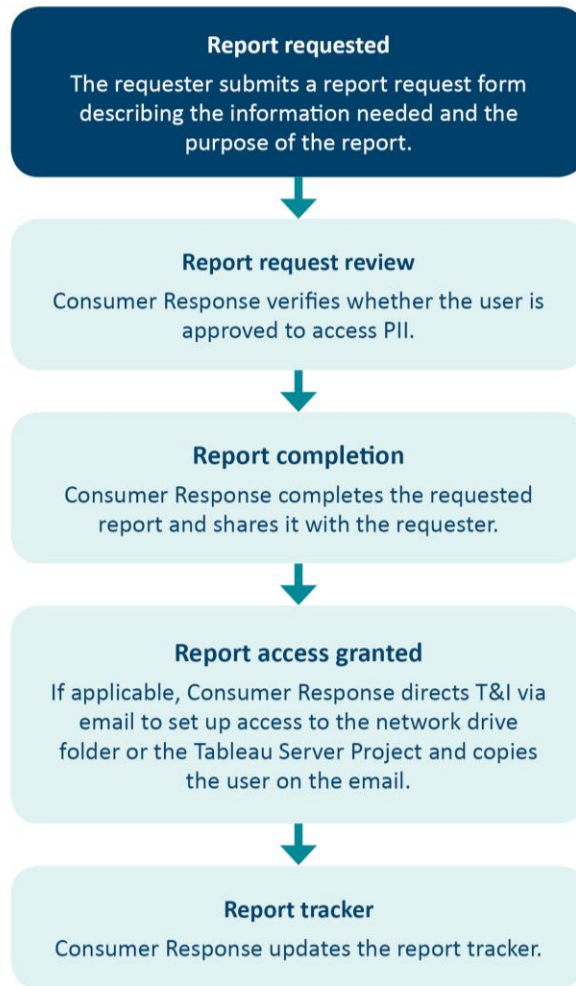
Source. Developed by the OIG based on discussions with Consumer Response and Consumer Response’s “Access to Advanced Analytics Tools” memorandum, dated October 19, 2017.

Approving Access to Complaint Reports

Consumer Response shares completed complaint reports with Bureau users by storing them either in one of its network drive folders or in one of its Tableau Server Projects. Consumer Response generally organizes its network drive folders and Tableau Server Projects by division or office. According to Consumer Response, its Tableau Server Projects do not contain reports with PII, whereas its network

drive folders may contain complaint reports with PII. Consumer Response is responsible for approving access to its network drive folders and Tableau Server Projects that contain complaint reports and relies on T&I to grant or revoke the approved access (figure 5).⁸ In addition, Consumer Response occasionally provides complaint information to users through other methods, including encrypted email messages.⁹

Figure 5. Consumer Response’s Process for Approving Access to Complaint Reports



Source. Developed by the OIG based on discussions with Consumer Response and Consumer Response’s *Procedural Guidance for Data Access*.

⁸ Specifically, the Service Desk in T&I manages the Bureau’s network drive folders and the Business Intelligence team in T&I supports the Bureau’s Tableau application.

⁹ Consumer Response also shares complaint reports through SEFL’s platform for sharing data, which was outside the scope of this evaluation.



Finding 1: Consumer Response's Complaint-Sharing Tools Inform the Work of Internal Stakeholders

Consumer Response offers internal complaint-sharing tools to help users use the consumer complaint data that the Bureau collects to support their work. Almost all the internal complaint-sharing tool users we interviewed reported using complaint data to inform their work, with SEFL accounting for the largest number of users and the most activity. We learned that the shared complaint data inform the work of the users in our sample in various ways. As such, we are not making any recommendations.

Most of the Users in Our Sample Use Complaint-Sharing Tools to Incorporate Complaint Data in Their Work

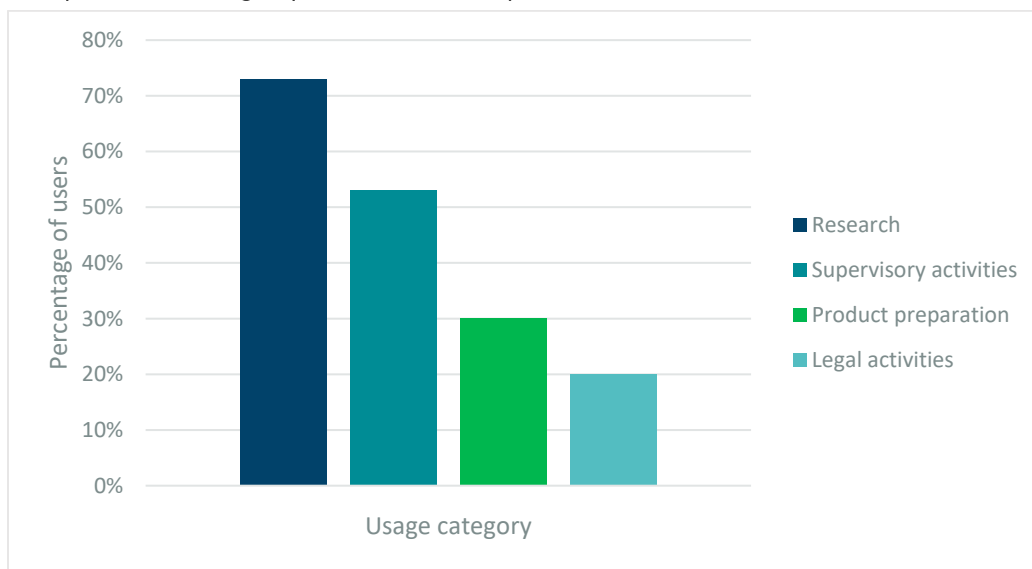
We interviewed a nonstatistical sample of 30 of 592 users of complaint-sharing tools.¹⁰ We determined that most of the complaint-sharing tool users we interviewed are using complaint data to inform their work. Specifically, our testing showed that 97 percent of the users in our sample use complaint data in their work. The tools help Bureau users to efficiently search, summarize, and visualize complaint data and identify trends and issues.

Data provided by Consumer Response show that the number of users of complaint-sharing tools and the use of the tools Bureauwide has increased since the tools were released in 2016. For instance, from March 2017 to November 2017, the total number of Complaint Analytics searches each month was at least 1,000 searches greater than the same month in the prior year. Additionally, Consumer Response has added capabilities within each tool over time to help users conduct efficient searches and analyses of the complaint data.

We found that users of the complaint-sharing tools vary in job function and division at the Bureau. Further, we learned that the shared complaint data inform the work of the users in our sample in the following ways: research, supervisory activities, product preparation, and legal activities (figure 6).

¹⁰ The eligible population for our sample consisted of unique users of Complaint Analytics and Explorer and excluded users in Consumer Response and T&I. Refer to appendix A for more information on our sample and eligible population.

Figure 6. Complaint Data Usage by Users in Our Sample



Source. Developed by the OIG based on our summary of interviews with users in our sample.

Shared Complaint Data Inform Research

Seventy-three percent of the users we sampled reported that they use complaint data for research. Some examples include research to supplement other sources of data and research to identify trends in incoming complaints by issue or institution. Multiple users indicated that they used complaint data to understand consumer perspectives on various topics. One user commented that complaint data are important for monitoring fair lending in certain markets.

Shared Complaint Data Inform Supervisory Activities

Fifty-three percent of users in our sample use complaint data for supervisory activities, including the examination process. Multiple SEFL users indicated that data in the complaint-sharing tools are used as one component in selecting institutions and products to examine. Users also stated that they request complaint reports from Consumer Response at the beginning of an examination to compile a summary of relevant complaints and to identify issues to cover during the examination. Several users indicated that complaint data assist in enforcement actions.

Shared Complaint Data Inform Product Preparation

Thirty percent of sampled users use complaint data for product preparation. Some examples of products include internal summary reports on monitoring activities, internal memorandums on spikes identified in complaints, and external reports that are available to the public. For instance, complaint data contribute to the *Annual Report of the CFPB Student Loan Ombudsman*. In addition, complaint data are used to create content for the Bureau's blog and other social media, and they are cited in internal reports that describe emerging trends or themes in consumer financial markets. Several users explained that they review complaint data to prepare for external meetings with stakeholders.

Shared Complaint Data Inform Legal Activities

Twenty percent of users in our sample use complaint data for legal activities. Complaint data have been used to support litigation; for example, complaint data have been used in the Bureau's responses to discovery requests. One user explained that the identification of applicable consumer narratives assisted in settlement negotiations. Some users referred to complaint data when engaging in rulemaking.

SEFL Users Account for the Largest Number of Users of Complaint-Sharing Tools and the Most Activity

SEFL accounted for the largest portion of complaint-sharing tool users and complaint-sharing tool activity, which consists of searches and report requests, in 2017.¹¹ We interviewed 17 SEFL users and learned that 94 percent of them relied on internal complaint data for their work. Of those interviewed, 82 percent of users reported using the internal complaint data for supervisory activities, 59 percent for research, 12 percent to support legal actions, and 6 percent to prepare products. For example, as part of supervisory activities, 7 SEFL users indicated that complaint data contribute to determining the examination schedule. Also, some SEFL users stated that complaint data help to inform enforcement actions by identifying potential violations or supporting leads that have been identified through the examination process.

Over 75 percent of the SEFL users that we interviewed reported using the complaint-sharing tools at least quarterly. For instance, users regularly use the tools to identify new complaints.

¹¹ This calculation excludes users in Consumer Response and T&I.



Finding 2: Consumer Response Can Expand Training on Complaint-Sharing Tools

We found that complaint-sharing tool users in our sample who work in divisions other than SEFL were less knowledgeable about the various capabilities of the tools as compared with SEFL users. Consumer Response communicates with and educates Bureau staff on the use of the complaint-sharing tools to help reach a desired outcome in its strategic plan: to promote accountability to consumers by ensuring that their voices are integrated into the Bureau's work. We determined that Consumer Response provided SEFL with robust training on how to use the complaint-sharing tools because SEFL users account for the largest number of users; Consumer Response did not provide the same level of training to users in the other five divisions. Efforts by Consumer Response to increase its outreach to other divisions and develop targeted training could increase opportunities for users of complaint-sharing tools to incorporate consumer voices into their work.

Consumer Response Should Offer Additional Training Opportunities to Other Bureau Divisions

Consumer Response's *Strategic Plan for FY18* establishes Consumer Response's commitment to ensuring that consumer voices are integrated into the Bureau's work. Additionally, Consumer Response management has stated that it would like to increase user knowledge of the complaint-sharing tools and their capabilities in order to increase user comfort and efficiency with the data. Accordingly, Consumer Response has attempted to raise awareness and educate Bureau staff on the complaint-sharing tools. Since 2015, Consumer Response has hosted several Complaint Analytics Expositions; the most recent event showcased the capabilities of the complaint-sharing tools for all Bureau staff. Also, Consumer Response sends Bureauwide communications when new tools or capabilities become available.

Consumer Response Provided Effective Training to SEFL Users

We found that Consumer Response has effectively trained SEFL users on the use of complaint-sharing tools. Consumer Response's *Strategic Plan for FY18* contains specific goals related to providing support to SEFL. As such, Consumer Response provides SEFL staff with a robust training program, including onsite demonstrations for the regional offices, on how to use the complaint-sharing tools. Of the six formal trainings that Consumer Response conducted in 2017, SEFL received five.¹² Consumer Response conducted three of the five trainings for SEFL's regional staff, who are geographically dispersed. Additionally, Consumer Response indicated that each SEFL regional office had a designated user who received training on tool capabilities and was assigned to train others in their respective region. Most of the SEFL users we interviewed indicated that they attended Consumer Response's formal trainings on the complaint-sharing tools, were comfortable using the tools, and generally were aware of the various capabilities.

¹² The sixth training was for the Investigations section of Consumer Response.

Consumer Response Provided Fewer Training Opportunities to Users in Divisions Other Than SEFL

We found that Consumer Response has provided fewer training opportunities to complaint-sharing tool users from other divisions, and we observed that some of the non-SEFL users we interviewed were not knowledgeable about the various capabilities of the complaint-sharing tools. Specifically, we interviewed 13 users in the Research, Markets and Regulations Division; the Consumer Education and Engagement Division; and the External Affairs Division and learned that more than half of those users had not received formal training from Consumer Response. Although the users thought that the complaint-sharing tools were generally intuitive, some users stated that they were unfamiliar with certain capabilities, such as the Collections function, that are intended to increase the efficiency of the searches. Some users seemed to be unaware that they had the ability to access some of the complaint-sharing tools. Further, the users reported using the complaint-sharing tools with less overall frequency than most SEFL users, who reported using the tools at least quarterly.

We partially attribute the knowledge gap between SEFL users and users in other divisions to Consumer Response's approach of providing more training to SEFL users. Consumer Response indicated that it provided more support and training to SEFL because the division accounts for the largest number of users and its staff are geographically dispersed. Additionally, SEFL was a primary intended audience when Consumer Response developed the complaint-sharing tools and added capabilities.

Users who lack familiarity with the complaint-sharing tools and their capabilities may miss opportunities to incorporate complaint data in their work. By increasing outreach to other Bureau divisions and developing targeted training to address their users' needs, Consumer Response could meet its stated desired outcome of ensuring that consumer voices are integrated into the Bureau's work.

Recommendation

We recommend that the Assistant Director of Consumer Response

1. Increase outreach to divisions to identify specific division needs for complaint data and develop targeted training on the complaint-sharing tools and their capabilities to address the identified division-specific needs.

Management Response

In his response to our draft report, the Assistant Director of Consumer Response concurs with our recommendation. Specifically, the Assistant Director states that Consumer Response has already taken steps to implement new outreach efforts to engage with relevant divisions that use Explorer. The Assistant Director also states that Consumer Response has begun providing relevant divisions with a demonstration of current and new features and engaging the user community on the functionality. Finally, the Assistant Director indicates that Consumer Response continues to offer one-on-one training to identify specific division or individual needs for complaint data, if any. The first sessions were held in March 2019 and will be offered twice each year on an ongoing basis.

OIG Comment

We believe that the actions described by the Assistant Director are responsive to our recommendation. We will follow up to ensure that our recommendation is fully addressed.



Finding 3: Consumer Response Can Improve Its Access Authorization Processes for Explorer and Advanced Analytics

Consumer Response can improve its processes for approving access and reviewing continued access to Explorer and Advanced Analytics. Specifically, we found that Consumer Response’s practices were not aligned with its documented procedures for approving access to Explorer and Advanced Analytics. Additionally, Consumer Response’s continued-access review process does not assess whether users need ongoing access to Explorer. Finally, the access log does not identify denial of access to users attempting to conduct searches in Explorer. The *CFPB Information Security Program Policy* explains that users are to be granted only the access privileges needed to perform their job functions and that access privileges should be reviewed at least annually and adjusted as appropriate to prevent and protect against unauthorized or unintentional disclosure. We identified several factors that contributed to these issues, two of which Consumer Response is in the process of addressing. Revising documented access approval processes for Explorer and Advanced Analytics, enhancing access review activities, and updating the Explorer access log could help Consumer Response ensure that it meets Bureau information security requirements and that it is consistently implementing the access approval process.

Consumer Response’s Access Authorization Procedures for Explorer Should Be Updated

Consumer Response’s process to approve access to Explorer, which contains PII, incorporates a bona fide need provision. The provision assumes that users from Consumer Response, the Office of the Ombudsman, and SEFL have a bona fide need to access complaint data in Explorer. Therefore, Consumer Response approves access to Explorer for users associated with these offices without requesting approval from the users’ supervisor. Conversely, Consumer Response requires supervisors to approve the access requests of users from offices not covered by the bona fide need provision before Consumer Response approves the users’ access to Explorer. According to Consumer Response, it included the bona fide need provision as part of its process to address delays in the approval process that resulted from the volume of requests requiring supervisory approval.

We found that employing the bona fide need provision can lead to the inadvertent approval of access without appropriate authorization. Specifically, in our nonstatistical sample of 45 Explorer users, we identified 2 users from offices not covered by the bona fide need provision that Consumer Response mistakenly approved for access under the bona fide need provision instead of requesting approval from their supervisor.

The *CFPB Information Security Program Policy* states that users should be granted only the access privileges they need to perform their job functions. This requirement is intended to prevent and protect against unauthorized or unintentional disclosure of Bureau data.

We believe that Consumer Response should reconsider the value of the bona fide need provision, currently documented in the *Procedural Guidance for Data Access*, because the potential to mistakenly apply the bona fide need provision hinders Consumer Response’s ability to limit access to complaint data in Explorer to only users who need it. Additionally, we believe that supervisors, not Consumer Response staff, are better able to make an informed decision as to whether users need access to Explorer in order to perform their duties. Ensuring that users have only the access they need to perform their duties is consistent with the *CFPB Information Security Program Policy*.

Consumer Response’s Access Authorization Process for Advanced Analytics Should Be Updated

Consumer Response documented an access authorization process for the Advanced Analytics tool in the “Access to Advanced Analytics Tools” internal memorandum. This memorandum states that all individuals requesting access must first receive approval from the Spike Committee. However, we found that Consumer Response did not consistently follow this process.

We tested all 74 users of the Advanced Analytics tool and found that 4 users had not received Spike Committee approval. Consumer Response, with concurrence from the Spike Committee, originally approved access to the Advanced Analytics tool for 59 users in October 2017. Since then, 15 additional users were granted access to this tool. We found that 11 of these 15 users had Spike Committee approval and 4 did not.

Consumer Response stated that Spike Committee approval was not requested for these 4 users because they were Advanced Analytics tool developers and not users of the data. Consumer Response determined that approval by the system owner in Consumer Response would be sufficient for these types of users. However, the access process memorandum does not define any exceptions regarding approval by the Spike Committee. Additionally, we noted that other users with similar roles as tool developers (meaning, others who provide technical support and do not use the data available through the tool) received approval from the Spike Committee, which was consistent with the access process memorandum.

Although tool developers are not users of the Advanced Analytics data, granting them access to the tool without the Spike Committee’s approval may hinder the committee’s ability to protect the sensitive data available through the tool. By ensuring that the Advanced Analytics approval process clearly outlines the required approvals by type of user, Consumer Response can help ensure that access is approved for only those users who need it and can more consistently implement the access approval process.

Consumer Response Should Perform Regular Access Reviews of Explorer Users

Consumer Response does not regularly assess whether Explorer users need continued access to the tool to perform their jobs, as required by the *CFPB Information Security Program Policy*. Of the 63 Explorer users in our nonstatistical sample, Consumer Response had not reviewed the access privileges for 11

users whose access was approved over a year ago as of August 2018.¹³ Specifically, the data access forms for these 11 users were approved prior to August 16, 2017.

The *CFPB Information Security Program Policy* requires program managers to review access privileges at least annually and to modify, revoke, or deactivate them as appropriate. Additionally, the policy states that users should be granted only the access privileges they need to perform their job functions. These requirements are intended to prevent and protect against unauthorized or unintentional disclosure of Bureau data.

Although Consumer Response does not regularly assess whether Explorer users need continued access to the tool, it has conducted some access reviews of Explorer users. In 2017, Consumer Response requested that users of various Consumer Response systems, including some Explorer users, submit new data access forms to assess their continued need to access complaint data. It completed these assessments in November 2017. Additionally, Consumer Response periodically reviews the list of Explorer users to determine the users' current employment status (meaning, whether they are currently employed or separated) to verify eligibility for continued access. In August 2018, Consumer Response stated that it was working on a process to review Explorer users' continued access more regularly. That process was not finalized before our fieldwork concluded.

By not regularly reviewing whether Explorer users have a continued need to access complaint data to perform their job, Consumer Response is not meeting Bureau information security requirements. Accordingly, Consumer Response may be providing access to Explorer to internal users who no longer need it, which could result in users having inappropriate access to complaint data.

Consumer Response Should Update the Explorer Access Log

We found that the Explorer access log does not identify denial of access to users who are not approved to access complaint data in Explorer. As a result, the access log provides the appearance of successful searches conducted by nonapproved users. Consumer Response is responsible for approving access to complaint data and manages the Explorer access log, which records the activity of Explorer users. The access log identifies the user, the URL of the search, and the date and time of the search. According to Consumer Response, when a nonapproved user attempts to access or search complaint data in Explorer, the tool displays an error message to the user and records the activity in the access log as a search.

Of the 63 users who were recorded on the Explorer access log as having searched complaint data, we identified 16 users who may not have been approved to access Explorer at the time. Consumer Response explained that the search patterns for these users were consistent with a scenario in which a user attempts access but is unsuccessful. However, Consumer Response could not determine whether the users accessed complaint data because the Explorer access log did not identify whether the searches were denied and whether the users received an error message. Additionally, Consumer Response was unable to verify the users' access privileges at the time of the searches; T&I maintains those records, but for only 1 year.

¹³ We conducted our analysis in August 2018.

By augmenting the Explorer access log to indicate whether searches are denied, Consumer Response can better monitor the tool and ensure that access to complaint data is provided to only those approved users who need it.

Management Actions Taken

Consumer Response is in the process of adjusting the process for approving access to Explorer, including making changes to its *Procedural Guidance for Data Access*. Based on pending Bureauwide data access requirements, Consumer Response took measures to require all internal staff who request access to Explorer to obtain approval from their supervisor prior to gaining access to Explorer. This change would end the bona fide need provision. Although Consumer Response explained that it began using this process in March 2018, it had not updated its procedural guidance document as of October 2018 to reflect these changes. We will continue to monitor Consumer Response's actions regarding this matter as we follow up on the recommendations in this report.

Further, during the course of our evaluation Consumer Response enhanced its Explorer access log. The access log now records an access denial when a Bureau user who is not approved to access complaint data in Explorer attempts to do so. This enhancement took place on August 6, 2018. We verified that this enhancement addresses the issue identified in this finding. Therefore, we are not making any recommendations regarding the Explorer access log.

Recommendations

We recommend that the Assistant Director of Consumer Response

2. Update the *Procedural Guidance for Data Access* to reflect the current process for approving access to Explorer, including requiring supervisory approval for all users.
3. Update the Advanced Analytics access process to reflect required approvals by type of user and consistently implement the updated process.
4. Enhance access review activities for Explorer, including establishing documented processes and procedures for evaluating the access privileges of current users, to ensure that these activities are consistent with Bureau information security requirements.

Management Response

In his response to our draft report, the Assistant Director of Consumer Response concurs with our recommendations. Specifically, the Assistant Director states that Consumer Response has begun amending the *Procedural Guidance for Data Access* to reflect the current process for approving access to Explorer and to include (1) a requirement for supervisory approval, (2) a description of the process for authorizing access to Advanced Analytics consistent with the current process, and (3) a description of processes and procedures for evaluating access privileges of current users. The Assistant Director also states that Consumer Response will perform review activities in a manner consistent with the amended procedural guidance. The Assistant Director further states that Consumer Response has communicated its business requirements to T&I to inform system capabilities for data access, including features such as

recertification. Finally, the Assistant Director states that these amendments will further align the procedure and process with the Bureau's *Information Security Program Policy* and *Policy on Data Access*.

OIG Comment

We believe that the actions described by the Assistant Director are responsive to our recommendations. We will follow up to ensure that our recommendations are fully addressed.



Finding 4: Consumer Response’s Process for Sharing Complaint Reports Can Be Improved

We found that Bureau users had appropriate access to complaint reports stored in Tableau Server Projects and shared by other methods; however, Consumer Response can improve access controls for its internal network drive folders where complaint reports are stored. The *CFPB Information Security Program Policy* explains that users are to be granted only the access privileges needed to perform their job functions and that access privileges should be reviewed at least annually to prevent and protect against unauthorized or unintentional disclosure. According to Consumer Response, neither it nor the Service Desk could provide us with documentation to support that Consumer Response appropriately approved access to selected network drive folders for the users in our sample. Additionally, Consumer Response stated that the large number of network drive folders is difficult to manage. As a result, users who no longer need access may be able to access Consumer Response’s network drive folders containing complaint reports, which increases the risk of unauthorized or unintentional disclosure.

Consumer Response Provided Appropriate Access to Complaint Reports Stored in Tableau Server Projects and Shared by Other Methods

As part of the report request process, Consumer Response shares completed reports by storing them in Tableau Server Projects or network drive folders, or by sharing them through other methods, including encrypted email. We found that Bureau users had appropriate access to complaint reports stored in Tableau Server Projects and shared by other methods. Specifically, we selected a nonstatistical sample of 8 users of the 393 users who had access to five selected Tableau Server Projects and found that Consumer Response appropriately approved access, consistent with the users’ job function, for all 8 users. Additionally, we tested 5 of the 20 users who received complaint reports that were shared through methods other than storing the report in a network drive folder or Tableau Server Project and found that Consumer Response properly shared the complaint reports.¹⁴

Consumer Response Should Limit Access to Its Network Drive Folders That Contain Complaint Reports

Consumer Response approves Bureau users’ access to its network drive folders that contain completed complaint reports, some of which may include PII. According to Consumer Response, when a complaint

¹⁴ Of the five users we tested, Consumer Response provided completed complaint reports to four users and directed one user to obtain the requested complaint information from Explorer.

report is ready to be shared, Consumer Response selects an appropriate existing folder and directs the Service Desk via email to set up folder access for the user. Consumer Response typically approves users for access to folders that match the users' division; however, we found users who were able to access other divisions' folders.

We selected a nonstatistical sample of 10 Consumer Response network drive folders and identified 121 users who had access to multiple or all of these folders. We tested the access permissions for 13 of these users and found that all 13 could access other divisions' folders. Consumer Response could not provide any documentation evidencing that it had approved the 13 users for access to any of the 10 selected folders. In addition, Consumer Response indicated that the Service Desk did not have any records of a request for access from Consumer Response for these users. As such, neither Consumer Response nor our evaluation team could determine whether the 13 users' access was appropriately approved or granted, or necessary to their job at that time.

Because Consumer Response is the owner of the network drive folders where complaint reports are stored, it is responsible for ensuring that the access provided to these folders is consistent with user needs, including job functions, and complies with the *CFPB Information Security Program Policy*. The policy requires that users be granted only the access privileges they need to perform their job functions. Additionally, the policy requires that users must be formally authorized prior to being granted access to a particular resource. These requirements are intended to prevent and protect against unauthorized or unintentional disclosure of Bureau data. If access to Consumer Response network drive folders is not appropriately restricted, complaint reports could be available to users who do not need them or who are not approved for access, increasing the risk of unauthorized or unintentional disclosure.

Consumer Response Should Document and Enhance Its Access Review Process for Network Drive Folders

We found that Consumer Response does not determine whether Bureau users need continued access to Consumer Response's network drive folders as part of its periodic access reviews. Additionally, Consumer Response's *Procedural Guidance for Data Access* does not identify any practices related to reviewing users' access to its network drive folders.

Consumer Response explained that it periodically conducts access reviews, during which it validates whether users with access to its network drive folders are active Bureau employees or are separated from Bureau employment.¹⁵ During these access reviews, Consumer Response compares the list of persons with access, which it obtains from T&I, to an employee list, which it obtains from the Office of Human Capital. Consumer Response then works with the Service Desk to revoke folder access for any separated employees identified. We noted that these access reviews are not documented in the written procedures.

¹⁵ Network drive folders are accessible only through the Bureau's network, which is managed by T&I.

The *CFPB Information Security Program Policy* requires program managers to review access privileges at least annually and to modify, revoke, or deactivate them as appropriate. The requirement is intended to prevent and protect against unauthorized or unintentional disclosure of Bureau data.

Consumer Response explained that managing access to its network drive folders is difficult because of the large number of folders and varying user access needs. However, because Consumer Response is considering only the employment status of users with access to its network drive folders that contain complaint reports, current Bureau employees may continue to have access when they no longer need it. For instance, although 12 of the 13 users identified in our sample were current employees as of December 31, 2017, we questioned whether ongoing access to the folders was necessary to the users' job function. Further, 5 of the users were not approved to access PII but were able to access folders that may include complaint reports containing PII.

Consumer Response could enhance its periodic access reviews by identifying whether approved users continue to need access to its network drive folders in order to perform their job and by ensuring that only approved users can access folders that may contain PII. Also, Consumer Response should document the enhanced access review process to help ensure that it is consistently implemented and aligns with Bureau information security requirements.

Management Actions Taken

Prior evaluations conducted by our office found concerns with the Bureau's management of its internal network drives.¹⁶ As of October 2018, Consumer Response described the following changes related to network drive folders that were in process:

- Consumer Response indicated that a Bureauwide project is underway to consider the management of access to network drive folders.
- Consumer Response is considering a process change to limit access to network drive folders that contain complaint reports to a 1-year period.

We will continue to monitor Consumer Response's actions as we follow up on the recommendations in this report.

Recommendations

We recommend that the Assistant Director of Consumer Response

5. Coordinate with the Chief Information Officer to conduct a review of network drive folders that contain complaint reports to verify that users have access to only the folders they need to perform their job function and request that T&I revoke access privileges as needed.
6. Coordinate with the Chief Information Officer to enhance access review activities for network drive folders that contain complaint reports, including establishing documented processes and

¹⁶ Office of Inspector General, *The CFPB Can Improve Its Examination Workpaper Documentation Practices*, [OIG Report 2017-SR-C-016](#), September 27, 2017; Office of Inspector General, *The CFPB Can Improve Its Practices to Safeguard the Office of Enforcement's Confidential Investigative Information*, [OIG Report 2017-SR-C-011](#), May 15, 2017.

procedures for evaluating the access of current users, to ensure that these activities are consistent with Bureau information security requirements.

Management Response

In his response to our draft report, the Assistant Director of Consumer Response concurs with our recommendations. Specifically, the Assistant Director states that Consumer Response has restricted access to network drive folders that contain complaint data and requested revocation of access privileges as needed. The Assistant Director also states that Consumer Response has begun amending the Consumer Response data access procedure and process to include processes and procedures for evaluating access privileges of current users and that Consumer Response will review its network drive folders in a manner consistent with the amended procedure. The Assistant Director indicates that the amendment will further align the procedure and process with the Bureau's *Information Security Program Policy* and *Policy on Data Access*. Additionally, the Assistant Director states that Consumer Response will work with T&I to adopt the Bureau's replacement solution for network drive folders when the new solution becomes available.

OIG Comment

We believe that the actions described by the Assistant Director are responsive to our recommendations. We will follow up to ensure that our recommendations are fully addressed.



Appendix A: Scope and Methodology

We conducted an evaluation of the effectiveness of Consumer Response’s complaint-sharing efforts within the Bureau. Our objectives were to examine (1) the extent to which Consumer Response’s consumer complaint-sharing efforts help to inform the work of internal stakeholders and (2) Consumer Response’s controls over internal access to shared complaint data, which can contain sensitive consumer information. The scope of our evaluation included the internal use of and access to the following complaint-sharing tools: Complaint Analytics, Advanced Analytics, and complaint reports produced by Consumer Response. We analyzed user data for 2017 and 2018.¹⁷

To assess the extent to which Bureau staff used the internal complaint-sharing tools and incorporated complaint data into their work, we

- interviewed Consumer Response staff and T&I staff who are responsible for sharing and maintaining the complaint data and complaint-sharing tools
- reviewed available technical documentation and information about the complaint-sharing tools
- analyzed Complaint Analytics (including Explorer) user activity data for January 1, 2017, through December 31, 2017, including users, the number of searches, and the most recent login date for each user

We also assessed the reliability of the user activity data by interviewing Bureau staff to learn how the data are collected and maintained. We determined that the data are sufficiently accurate and complete to support our findings and conclusions.

To understand how complaint data are used, we interviewed a nonstatistical sample of 30 users of complaint-sharing tools. The sample size represented 5 percent of the 592 users in the eligible population. The eligible population consisted of unique users of Complaint Analytics and Explorer and excluded users in Consumer Response and T&I. The selected sample reflected the relative use by division and consisted of users who accessed the tool with varying frequency. Some selected users also had access to other complaint-sharing tools in our scope. The results of these interviews cannot be projected to the entire population of users of complaint-sharing tools. We categorized users in our sample according to division, as shown in table A-1.

¹⁷ The Office of Inspector General is excluded from this evaluation.

Table A-1. OIG Sample of Bureau Complaint-Sharing Tool Users

Division	Selected users	Total population
Supervision, Enforcement and Fair Lending	17	456
Research, Markets and Regulations	7 ^a	50
Consumer Education and Engagement	5	34
External Affairs	1	12

Source. OIG analysis.

Note. The total eligible population of 592 includes users who were not selected for our sample from the following divisions and offices: the Legal Division, the Operations Division, the Office of the Ombudsman, and the Office of the Director.

^a We jointly interviewed three Research, Markets and Regulations staff members about their use of complaint data on a specific project; they are counted as one user.

To assess Consumer Response’s access controls over shared complaint data, we

- reviewed relevant criteria, including the *CFPB Information Security Program Policy* with respect to establishing access control policies and procedures and Consumer Response’s *Procedural Guidance for Data Access* and other Consumer Response documents regarding access to the complaint-sharing tools
- interviewed Consumer Response and T&I staff who are involved in the access process
- reviewed access documentation, including data access forms, Consumer Response’s tracking spreadsheets, user lists maintained by T&I, and employee status data provided by the Office of Human Capital
- analyzed 2017 and 2018 user data for the complaint-sharing tools in our scope

We tested access to the complaint-sharing tools in our scope as described in tables A-2, A-3, and A-4. The results of these tests cannot be projected to the entire population.

Table A-2. Testing of Access to Explorer

Testing attribute	Methodology	Sample size	Selection method
Consumer Response processes requests for access to Explorer.	We verified whether data access forms were properly approved.	Population size: 482 ^a Sample size: 45	Nonstatistical based on user frequency and division/office
Consumer Response monitors access to Explorer.	We evaluated whether access was appropriate for users whose most recent login was prior to April 30, 2017. ^b	Population size: 19 ^{a,c} Sample size: 19	n.a.
Consumer Response monitors access to Explorer.	We evaluated whether data access forms were current for the users in the samples above. ^d	Sample size: 63 (1 user appeared in both samples.)	Nonstatistical, based on samples above
Consumer Response maintains the access log for Explorer.	We evaluated the access log activity of the users in the samples above.	Sample size: 63 (1 user appeared in both samples.)	Nonstatistical, based on samples above

Source. OIG analysis.

n.a. not applicable.

^a Excludes users in Consumer Response and T&I.

^b This date reflects 1 year of inactivity based on when we obtained the data.

^c Excludes users in offices covered by the bona fide need provision of Consumer Response's *Procedural Guidance for Data Access*.

^d We considered data access forms approved by Consumer Response after August 17, 2017, to be current.

Table A-3. Testing of Access to Advanced Analytics

Testing attribute	Methodology	Sample size	Selection method
Spike Committee approves access to Advanced Analytics.	We verified whether users with access as of April 19, 2018, ^a received approval from the Spike Committee.	Population size: 74 Sample size: 74	n.a.

Source. OIG analysis.

n.a. not applicable.

^a This date is when T&I provided the user list.

Table A-4. Testing of Access to Complaint Reports

Testing attribute	Methodology	Sample size	Selection method
Consumer Response approves access to complaint reports stored in network drive folders and Tableau Server Projects and shared by other methods.	We selected a sample of locations, then a sample of users with access to each location. We verified whether users were approved to access select folders, projects, and other methods.	Location sample and population sizes: <ul style="list-style-type: none">• 10 of 119 network drive folders• 5 of 27 Tableau Server Projects• 5 of 20 other methods^a User ^b sample sizes: <ul style="list-style-type: none">• 13 of 121 network drive folder users^c• 8 of 393 Tableau Server Project users• 5 of 5 other method users	Nonstatistical, locations chosen by division Nonstatistical, users chosen by division

Source. OIG analysis.

^a The other methods population consists of complaint reports completed in 2017 for which Consumer Response’s report tracker does not specify a network drive folder or a Tableau Server Project. The population excludes complaint reports completed for Consumer Response users and complaint reports intended for public release.

^b Excludes users in Consumer Response and T&I.

^c Network drive folder users had access to either all 10 folders or multiple folders. Our sample consisted of eight users with access to all folders and five users with access to multiple folders.

We conducted our fieldwork from December 2017 through October 2018. We performed our evaluation in accordance with the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency in January 2012.

Appendix B: Management Response



1700 G Street NW, Washington, D.C. 20552

April 18, 2019

Ms. Cynthia Gray
Acting Associate Inspector General for Audits and Evaluations
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Dear Ms. Gray,

Thank you for the opportunity to review and comment on the Office of Inspector General's (OIG) official draft report: *Bureau Efforts to Share Consumer Complaint Data Internally Are Generally Effective; Improvements Can Be Made to Enhance Training and Strengthen Access Approval*. The Consumer Education and Engagement Division's Office of Consumer Response (Consumer Response) appreciates the OIG's review and concurs with the recommendations.

Consumer Response's mission is to answer questions, handle complaints, and share data and insights to empower consumers to make independent and informed financial decisions. Your evaluation provided a comprehensive review of Consumer Response's internal data sharing efforts, including various aspects of our operations to effectively manage access and ensure proper controls. We appreciate that you gave us the opportunity to brief you about the types of analytical products and services that Consumer Response provides to inform the Bureau's decision-making and that your scope and approach focused on our most-used and highest-value analytical tools.

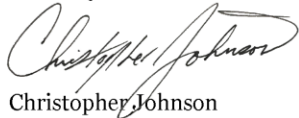
We are pleased that you had no recommendations to improve how our complaint sharing tools and services inform the work of the Bureau's staff. It is encouraging that your testing showed that 97 percent of the users you sampled use complaint data to inform their work.

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We also acknowledge and concur with the recommendations you made around enhancing our training efforts and strengthening our access approval processes. As you noted, Consumer Response has already begun making enhancements to address some of your recommendations and has been actively engaged in continuous improvement activities throughout the audit.

We appreciate the amount of work that went into this audit and thank you for the opportunity to comment on the report. We provide the following management responses for each recommendation.

Sincerely,



Christopher Johnson
Assistant Director
Office of Consumer Response

Finding 1: Consumer Response’s Complaint-Sharing Tools Inform the Work of Internal Stakeholders

No recommendations.

Consumer Response is pleased the audit found that its complaint sharing tools effectively inform the work of internal stakeholders as the OIG noted: “We determined that most complaint-sharing tool users we interviewed are using complaint data to inform their work. Specifically, our testing showed that 97 percent of the users in our sample use complaint data in their work. The tools, which are available to all Bureau divisions, help users to efficiently search, summarize, and visualize complaint data and identify trends and issues. ... We found that users of the complaint-sharing tools vary in job function and division at the Bureau. Further, we learned that the shared complaint data informs the work of the users in our sample in the following ways: research, supervisory activities, product preparation, and legal activities.”

Finding 2: Consumer Response Can Expand Training on Complaint-Sharing Tools

Recommendation 1: Increase outreach to divisions to identify specific division needs for complaint data and develop targeted training on the complaint-sharing tools and their capabilities to address the identified division-specific needs.

Consumer Response concurs with this recommendation, while noting that this recommendation has been addressed. Consumer Response has already taken steps to implement new outreach efforts to engage with relevant divisions using Complaint Analytics Explorer, including Research, Markets, and Regulations, External Affairs, and other offices within the Consumer Education and Engagement Division. Consumer Response has begun providing relevant divisions a demonstration of current and new features, and engaging the user community on the functionality. Consumer Response continues to offer one-on-one training to identify specific division and/or individual needs for complaint data, if any. The first round of sessions was held in March 2019 and will be offered twice each year on an ongoing basis.

Finding 3: Consumer Response Can Improve Its Access Authorization Processes for Explorer and Advanced Analytics

Recommendation 2: Update the *Procedural Guidance for Data Access* to reflect the current process for approving access to Explorer, including requiring supervisory approval for all users.

Consumer Response concurs with this recommendation and has begun amending the Procedural Guidance for Data Access to reflect the current process and to include a requirement for supervisory approval. The amendment will further align the procedure and process with the Bureau's Information Security Program Policy and Policy on Data Access.

Recommendation 3: Update the Advanced Analytics access process to reflect required approvals by type of user and consistently implement the updated process.

Consumer Response concurs with this recommendation and has begun amending the Procedural Guidance for Data Access to include a description of the process for authorizing access to Advanced Analytics consistent with the current process. The amendment will further align the procedure and access process for Advanced Analytics with the Bureau's Information Security Program Policy and Policy on Data Access.

Recommendation 4: Enhance access review activities for Explorer, including establishing documented processes and procedures for evaluating the access privileges of current users, to ensure that these activities are consistent with Bureau information security requirements.

Consumer Response concurs with this recommendation and has begun amending the Procedural Guidance for Data Access to include processes and procedures for evaluating access privileges of current users. The amendment will further align the procedure and process with the Bureau's Information Security Program Policy and Policy on Data Access. Consumer Response will perform review activities consistent with the amended Procedural Guidance for Data Access. Consumer Response has communicated its business requirements to the Office of Technology and Innovation (T&I) to inform system capabilities for data access, including features such as recertification.

Finding 4: Consumer Response's Process for Sharing Complaint Reports Can Be Improved

Recommendation 5: Coordinate with the Chief Information Officer to conduct a review of network drive folders that contain complaint reports to verify that users have access to only the folders they need to perform their job function and request that T&I revoke access privileges as needed.

Consumer Response concurs with this recommendation, while noting that this recommendation has been addressed. During the course of the audit, Consumer Response worked with T&I to restrict access to network drive folders that contained complaint data, requesting revocation of access privileges as needed.

Recommendation 6: Coordinate with the Chief Information Officer to enhance access review activities for network drive folders that contain complaint reports, including establishing documented processes and procedures for evaluating the access of current users, to ensure that these activities are consistent with Bureau information security requirements.

Consumer Response concurs with this recommendation and has begun amending the Consumer Response Data Access procedure and process to include processes and procedures for evaluating access privileges of current users. The amendment will further align the procedure and process with the Bureau's Information Security Program Policy and Policy on Data Access. Consumer Response will perform review activities of its network drive folders consistent with the amended Procedural Guidance for Data Access, requesting that T&I revoke privileges, as needed. Additionally, Consumer Response will

work with T&I to adopt the Bureau's replacement solution for network drive folders when the new solution becomes available.



Abbreviations

Bureau	Bureau of Consumer Financial Protection
Consumer Response	Office of Consumer Response
Dodd-Frank Act	Dodd-Frank Wall Street Reform and Consumer Protection Act
OIG	Office of Inspector General
PII	personally identifiable information
SEFL	Division of Supervision, Enforcement and Fair Lending
T&I	Office of Technology and Innovation

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