

Open Recommendations Made to the Bureau of Consumer Financial Protection



We oversee the Bureau of Consumer Financial Protection 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 March 31, 2020, the total number and status of recommendations we made to the Bureau by calendar year, beginning with the first year for which recommendations remain open.

Table 1. Status of Recommendations for 2013–2020, as of March 31, 2020

Status	2013	2014	2015	2016	2017	2018	2019	2020
Recommendations	43	30	51	20	65	29	31	3
Open	1	1	0	2	2	10	20	3
Closed	42	29	51	18	63	19	11	0
Public recommendations	34	26	41	20	56	28	26	3
Open	1	1	0	2	2	10	15 ^a	3 ^a
Closed	33	25	41	18	54	18	11	0
Nonpublic recommendations	9	4	10	0	9	1	5	0
Open	0	0	0	0	0	0	5	0
Closed	9	4	10	0	9	1	0	0

Note: Some reports are restricted because they contain sensitive information. The recommendations from these reports are identified as nonpublic.

^a Only 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 March 31, 2020, 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	6. Enhance the monthly compliance audits of the Bureau's government travel card program by a. directing the Travel Office to obtain training from the government travel card provider on how to use all the available monitoring resources. b. 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 a. a strategy to raise organizational awareness. b. an optimal organizational structure. c. 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.
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.	Partial implementation

Report title	Issuance date	Recommendation	Recommendation status
Report on the Independent Audit of the Consumer Financial Protection Bureau's Privacy Program 2018-IT-C-003	02/14/2018	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.	Partial implementation
		2. Develop, document and implement a formal process for monitoring 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 action
		2. Incorporate instruction on multicity trips into training for cardholders and approving officials.	Agency action
		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 action
		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 action
2018 Audit of the Bureau's Information Security Program 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.	Agency action
		2. Develop and implement a process to ensure the timely application of patches and security updates for Bureau-issued mobile phones.	Agency action
		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 concurrence

Report title	Issuance date	Recommendation	Recommendation status
<p>The Bureau Can Improve Its Follow-Up Process for Matters Requiring Attention at Supervised Institutions</p> <p>2019-SR-C-001</p>	01/28/2019	1. Clarify the Division of Supervision, Enforcement and Fair Lending's purpose and intent for tracking and reporting its Matters Requiring Attention follow-up activities and ensure that the calculation of the measurement and the description of the measurement clearly and accurately communicate the Bureau's recent and historical performance against those objectives.	Verification in progress
		3. Implement guidance that establishes the Division of Supervision, Enforcement and Fair Lending's expectations and training for new and existing policies that cover the following: <ul style="list-style-type: none"> a. posting Matter Requiring Attention documentation to the Supervisory and Examination System, including what to post, when to post it, and to what the Supervisory and Examination System folder it should be posted. b. receiving, approving, and retaining Matter Requiring Attention extension and closure communications. c. documenting Matter Requiring Attention closure dates in the Supervisory and Examination System. 	Agency concurrence
		4. Develop training and monitoring activities to ensure that Division of Supervision, Enforcement and Fair Lending employees are aware of and comply with policies and procedures related to communicating the closure of Matters Requiring Attention to supervised entities.	Agency concurrence
		6. Evaluate whether more involvement from the regional analysts in the Matter Requiring Attention follow-up process may help improve consistency.	Agency concurrence