



Executive Summary:

Opportunities Exist to Enhance the CFPB's Policies, Procedures, and Monitoring Activities for Conferences

2013-AE-C-011

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Purpose

Our evaluation determined the Consumer Financial Protection Bureau's (CFPB's) management controls, including its policies, procedures, and practices, associated with the agency's sponsored and nonsponsored conferences. Additionally, we assessed whether the CFPB's conference expenses and practices followed applicable policies and procedures. We initiated this evaluation, in part, to determine whether the facts, circumstances, and findings reported in the General Services Administration (GSA) Office of Inspector General's *2010 Western Regions Conference* investigation report, issued on April 2, 2012, had also occurred at the CFPB.

Background

The CFPB's Chief Financial Officer (CFO) formed a CFO Internal Review Team in response to the GSA Office of Inspector General's report to assess the CFPB's compliance with internal controls for conference-related activities. Subsequently, the CFPB implemented two conference-related policies in May 2012.

The CFPB has four acquisition approaches through which to coordinate conferences: the Department of the Treasury Departmental Offices, the Bureau of Public Debt's Administrative Resource Center, the CFPB's Office of Procurement, and the use of purchase cards by CFPB offices.

Findings

We found that although the CFPB's *Policy for Conference/Meeting Planning and Attendance* identified roles and responsibilities for conference coordination and approval, it did not adequately reflect the CFPB's current process for conference activities in certain respects. For example, the policy does not define the individuals who are authorized to coordinate and approve conferences, and it contains limited monetary threshold guidance for two of the four acquisition approaches and does not mention a third. In addition, we found that the policy does not include guidance on the expedited approval process for training requests that is provided in the CFPB's *Non-Academic External Training and Education Policy*. Consistency between policies would provide employees with clear guidance on the conference approval process.

We did not identify any material discrepancies in our sample testing of conference expenses. However, our sample testing did show that the Office of Human Capital has not consistently obtained conference and training certificates and affidavits from employees who attend conferences or training, as required by the *Non-Academic External Training and Education Policy*. Inadequate recordkeeping and lack of reviews increase the risk that the CFPB could expend funds for conferences and training that employees do not attend or complete.

Recommendations

We recommend that the CFPB update its policies and procedures for conference activities to accurately reflect the agency's current processes for conference coordination and approval, periodically review its conference policies and procedures and update them as needed, and conduct monthly reviews to ensure the receipt of training certificates and affidavits and follow up to obtain outstanding documentation.

Management stated that it concurred with the process improvements included in our recommendations and has begun implementing specific aspects of the recommendations. Management also provided additional perspective on the recommendations and information on completed and planned actions to further enhance conference-related processes and related controls.

Access the full report: http://www.federalreserve.gov/oig/files/CFPB_Conference_Policies_Procedures_full_Aug2013.pdf

For more information, contact the OIG at 202-973-5000 or visit <http://www.consumerfinance.gov/oig>.