



Office of Inspector General

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

MEMORANDUM

DATE: March 23, 2020

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

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

SUBJECT: OIG Report 2020-IT-C-007R: *Technical Testing Results of the Bureau’s Data Exfiltration Controls and Related Technologies*

Executive Summary

This memorandum communicates the detailed results of our testing of the data exfiltration controls and related technologies used by the Bureau of Consumer Financial Protection. We completed this testing as part of our 2019 audit of the Bureau’s information security program, which we performed to meet the requirements of the Federal Information Security Modernization Act of 2014 (FISMA).¹ We did not include the details of this testing in our public FISMA audit report due to the sensitive nature of the results.

Our testing found that the Bureau could improve its data exfiltration controls throughout its environment. Specifically, a technology being used by the Bureau to monitor and control data exfiltration was not consistently implemented across the agency’s information technology (IT) environment. Further, this technology was not being used to block access to known internet storage sites. These issues increase the risk of unauthorized exfiltration of sensitive Bureau data without detection. Our 2019 FISMA report includes a recommendation to strengthen controls in these areas—specifically, that the chief information officer (CIO) perform a risk assessment to determine the optimal deployment of the Bureau’s technology for monitoring and controlling data exfiltration to all network access points and appropriate access to internet storage sites. This memorandum provides the details of our testing results to facilitate the Bureau’s ongoing actions to address our recommendation.

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