Open Recommendations Made to the Consumer Financial Protection Bureau

OIG

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

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 March 31, 2024, 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 1. Status of Recommendations Made to the CFPB During 2018–2024, as of March 31, 2024

Status	2018	2019	2020	2021	2022	2023	2024
Recommendations	29	31	17	37	8	1	8
Open	3	0	3	0	4	1	7[a]
Closed	26	31	14	37	4	0	1
Public recommendations	28	26	13	33	8	1	8
Open	3	0	0	0	4	1	7[a]
Closed	25	26	13	33	4	0	1
Nonpublic recommendations	1	5	4	4	0	0	0
Open	0	0	3	0	0	0	0
Closed	1	5	1	4	0	0	0

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

[a] Only the recommendations that have been open for more than 6 months are reflected in table 2.

Because we recognize that some recommendations may require complex corrective actions, table 2 only includes the text of each public and nonpublic recommendation that has been open for more than 6 months, which for this report means open recommendations made through September 30, 2023, and the recommendations' status. Given their sensitivity, the nonpublic recommendations are summarized. 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 or 202-973-5043.

Table 2. Open CFPB Recommendations Made Through September 30, 2023

Report title	Issuance date	Recommendation	Recommendation status
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.	Verification in process
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.	Verification in process
		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
Technical Testing Results for the Bureau's Legal Enclave 2020-IT-C-017R	07/22/2020	1. The open recommendation relates to strengthening vulnerability management.	Verification in process
		2. The open recommendation relates to strengthening testing processes.	Verification in process
		4. The open recommendation relates to strengthening configuration management.	Verification in process
2022 Audit of the CFPB's Information Security Program 2022-IT-C-014	09/30/2022	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.	Verification in process

Report title	Issuance date	Recommendation	Recommendation status
		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.	Verification in process
2023 Audit of the CFPB's Information Security Program 2023-IT-C-016	09/29/2023	1. Maintain a comprehensive schedule for testing current contingency plans, documenting test procedures, and maintaining relevant updates to the contingency plan.	Agency concurrence