

## Office of Inspector General

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

# Work Plan

Current as of April 1, 2025





# Overview

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The *Work Plan* presents the audits and evaluations that we have planned, are developing, and are conducting to assist the Board of Governors of the Federal Reserve System and the Consumer Financial Protection Bureau in fulfilling their respective missions. Our independent oversight is statutorily mandated by the Inspector General Act of 1978 and other federal statutes, such as the Federal Information Security Modernization Act of 2014. We focus on those programs and operations in which potential deficiencies pose the highest risk to the Board and the CFPB in achieving their strategic goals, objectives, and priorities; meeting budgetary and financial commitments; and complying with applicable laws, regulations, and guidance.

The *Work Plan* is updated quarterly. Each project is categorized as *initiated*, *in development*, or *planned*.

- Initiated: The project is underway; the description of the project includes the calendar quarter in which we expect to complete the project.
- In development: The project team is determining the project's scope and completion date.
- Planned: The project is conceptual and may not be undertaken.

Each quarter, projects that are new or have been updated, canceled, terminated, suspended, or issued as reports are marked as such. For a list of issued reports, please view the [Audit Reports page](#) on our website.

We may be required to perform unanticipated work based on congressional or agency requests, sector- or industry-specific events, OIG Hotline complaints, new statutory mandates, or other inputs. In addition, our findings on completed projects may cause us to reassess our audit plan and prioritize new work. Such work, as well as resource constraints, may result in our deferring, canceling, or modifying projects. Agility is key to our effectiveness.

For congressional, media, or other inquiries, please email [oig.media@frb.gov](mailto:oig.media@frb.gov).



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# Board: Initiated Projects

with calendar quarter of expected completion

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## **Audit of the Board's Financial Statements as of and for the Years Ended December 31, 2024 and 2023** ISSUED

### **First quarter 2025**

We have contracted with an independent public accounting firm to audit the financial statements of the Board. We are overseeing the activities of the independent public accounting firm to ensure compliance with generally accepted government auditing standards and Public Company Accounting Oversight Board auditing standards related to internal controls over financial reporting.

## **Audit of the Federal Financial Institutions Examination Council's (FFIEC) Financial Statements as of and for the Years Ended December 31, 2024 and 2023** ISSUED

### **First quarter 2025**

The Board performs the accounting function for the FFIEC, and we have contracted with an independent public accounting firm to audit the financial statements of the FFIEC. We are overseeing the activities of the independent public accounting firm to ensure compliance with generally accepted government auditing standards.

## **Evaluation of the Board and Federal Reserve Banks' Bank Exams Tailored to Risk (BETR) Process for Community Banking Organizations** ISSUED

### **First quarter 2025**

In 2019, the Board implemented the BETR process to help determine the scope of the supervisory work performed in safety-and-soundness examinations of community and regional state member banks. The BETR process combines surveillance metrics with examiner judgment to classify the levels of risk at state member banks for individual risk dimensions, such as credit, liquidity, and operational risk. According to the

Board, supervisory personnel then tailor the examination work programs to align examination staff resources and activities to a bank's risk profile. We are assessing the Board and Reserve Banks' application of the BETR process for community banking organizations, which are state member banks with less than \$10 billion in total assets.

## **Audit of the Board's Travel Card Program**

### **Second quarter 2025**

The Government Charge Card Abuse Prevention Act of 2012 requires inspectors general of executive agencies to conduct periodic audits of their agency's travel card or convenience check programs. We are assessing whether the Board has established and maintained effective internal controls for its government travel card program.

## **Evaluation of the Board's Approach to Cybersecurity Supervision for Small Banks**

### **Second quarter 2025**

Cyberattacks continue to pose challenges for financial institutions. In the past several years, we have identified cybersecurity oversight of supervised financial institutions as a major management challenge. The Board's August 2023 *Cybersecurity and Financial System Resilience Report* notes that as ransomware and other cyberattacks persist, these attacks may disproportionately affect small banks that may not have sufficient information security resources and capabilities to protect their banking systems against sophisticated actors. We are assessing the effectiveness of the Board's and the Federal Reserve Banks' cybersecurity supervision of community banking organizations.

## Evaluation of the Board's Physical Security Program

### Third quarter 2025

The Board currently owns or leases space in seven facilities. Protection of both owned and leased spaces falls under the responsibility of the Board's Law Enforcement Unit, whose mission is to provide a safe and secure environment for Board staff and others on Board-designated property. We are assessing whether the Board has an effective oversight structure to manage its physical security program and whether selected security measures in Board spaces are effective.

## Audit of the Board's Contract Solicitation, Selection, and Award Processes

### Fourth quarter 2025

The Division of Financial Management's Procurement function oversees the Board's contract solicitation, selection, and award processes. The Board needs strong controls to ensure that it acquires goods and services timely and at reasonable prices. We are assessing the effectiveness of the Board's contract solicitation, selection, and award processes, including the Board's compliance with applicable laws, regulations, and internal policies and procedures.

## Audit of the Board's Processes for Approving and Monitoring the Bureau of Engraving and Printing's (BEP) Multicycle Projects

### Fourth quarter 2025

The Board approves the annual currency budget, through which the Board reimburses the BEP for expenses related to the production of Federal Reserve notes. The calendar year 2024 currency budget includes multicycle project funds for (1) the construction of the BEP's new Washington, DC, currency production facility with an estimated total cost of \$1.8 billion, (2) the expansion of the BEP's Fort Worth currency production facility with an estimated total cost of \$282.8 million, and (3) the upgrade of note production equipment with an estimated cost of \$1.3 billion. We are assessing the Board's processes for approving and monitoring the BEP's multicycle project budget.

## Evaluation of the Board's Approach to Information Technology (IT) Governance

### Fourth quarter 2025

IT governance is a formal framework that provides a structure for organizations to ensure that IT investments support business objectives. The Board's strategic plan includes an objective to transform its IT environment and to support emerging technologies that can increase employee productivity, improve operational efficiency, and bolster the agency's resilience in an ever-evolving environment. We are assessing the Board's processes for ensuring that IT investments support business objectives, including through capital planning and investment control.

## 2025 Audit of the Board's Information Security Program <sup>NEW</sup>

### Fourth quarter 2025

The Federal Information Security Modernization Act of 2014 (FISMA) requires that each agency inspector general conduct an annual independent evaluation of their respective agency's information security program and practices. To meet FISMA requirements for 2025, we are conducting an audit of the Board's information security program. Our objectives are to evaluate the effectiveness of the Board's (1) security controls and techniques for selected information systems and (2) information security policies, procedures, standards, and guidelines. We will use the results from our audit to respond to the Office of Management and Budget's fiscal year 2025 FISMA reporting metrics for inspectors general.



# Board: Projects in Development

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## Audit of the Board's Foreign Travel Reporting <sup>NEW</sup>

By law, security clearance holders must self-report life events or incidents, such as undertaking foreign travel that is not for official U.S. government business, that could affect their ability to meet security clearance requirements. The Board requires Secret and Top-Secret clearance holders to report foreign travel plans to the Board's Personnel Security Unit before travel begins, including submitting their itinerary, passport or visa details, emergency points of contact, and foreign national contact information. We will assess whether the Board complies with relevant federal directives and whether its foreign travel requirements align with those of other leading agencies.

## Audit of the Board's Offboarding Process <sup>NEW</sup>

In the regular course of business, employees, interns, and contractors separate from the Board. Maintaining an effective offboarding process helps to mitigate operational and reputational risks associated with separating individuals continuing to have access to Board facilities and assets, including information, property, or systems. Multiple Board divisions share responsibility for ensuring that separating employees and contractors complete the offboarding process. Recently, the Board transitioned its offboarding process workflow to its human resource management system, which alerts relevant Board divisions of an individual's imminent separation. Although the alerts are automated, some division-specific separation actions are manual. In addition, some facets of the offboarding process are decentralized, such as the return of information technology assets. Considering the implementation of the new offboarding workflow as well as the decentralized nature of certain aspects of the process, we will examine the effectiveness of select offboarding controls as well as review the coordination between the divisions.

## Evaluation of the Board's and the Federal Reserve Banks' Practices for Following Up on Supervisory Findings That Address Safety and Soundness Issues

The Federal Reserve System communicates supervisory findings through matters requiring attention (MRAs) and matters requiring immediate attention (MRIAs). According to the *Commercial Bank Examination Manual*, MRAs are matters that the System expects a banking organization to address over a reasonable amount of time, and MRIAs are matters of significant importance and urgency that the System expects a banking organization to address immediately. The Board expects examiners to follow up on MRAs and MRIAs to assess a banking organization's progress and to validate that the organization has implemented satisfactory corrective actions. We will assess the effectiveness of the Board's and the Reserve Banks' practices for following up on supervisory findings that address safety and soundness issues.

## Evaluation of the Board's Insider Risk Management Activities <sup>NEW</sup>

The Federal Reserve System generates and collects economic information that is considered sensitive because it can significantly influence financial market activity. We will assess the insider risk management activities of the Board, focusing on the design and effectiveness of the Board's approach to deter, detect, and mitigate insider risks.

## Evaluation of the Board's Processes for Appointing and Approving Federal Reserve Bank Leaders

The 12 Reserve Banks execute the day-to-day operations of the Federal Reserve System. A nine-member board supervises each Reserve Bank and includes three directors appointed by the Board to represent the public. The Board also approves Reserve Bank presidents and first vice presidents appointed by the Reserve Bank boards and consults on the appointment of other Reserve Bank leadership.

positions, including the heads of supervision and general auditors. We will assess the effectiveness of the Board's processes for appointing and approving certain Reserve Bank leaders, including its consideration of qualifications and the identification and resolution of conflicts of interest.



# Board: Planned Projects

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## **Audit of the Board's Financial Statements as of and for the Years Ended December 31, 2025 and 2024** NEW

We contracted with an independent public accounting firm to audit the financial statements of the Board. We plan to oversee the activities of the independent public accounting firm to ensure compliance with generally accepted government auditing standards and Public Company Accounting Oversight Board auditing standards related to internal controls over financial reporting.

## **Audit of the Board's Gifts and Decorations Program** NEW

The Foreign Gifts and Decorations Act allows federal employees to accept certain gifts and decorations from foreign governments but prohibits employees from requesting or otherwise encouraging a gift or decoration. The Board's implementing regulations, *Rules Regarding Foreign Gifts and Decorations*, govern when Board employees, their spouses, and their dependents may accept and retain gifts, and when gifts must be deposited with the Board's Office of the Secretary and reported to the secretary of state. We plan to assess the adequacy of internal controls related to the management and administration of the Board's gifts and decorations program. We also plan to assess the controls designed to ensure that recipients properly report gifts above the acceptable value and receive prior approval before accepting decorations.

## **Audit of the Board's Information Technology (IT) Asset Inventory Management Processes** NEW

To support employees in conducting their work, the Board purchases and stores various IT assets. Effectively tracking and securing equipment and managing inventory levels can reduce the risk of loss, theft, and technology obsolescence. We plan to assess the effectiveness of the Board's internal controls for managing its IT asset inventory.

## **Audit of the Federal Financial Institutions Examination Council's (FFIEC) Financial Statements as of and for the Years Ended December 31, 2025 and 2024** NEW

The Board performs the accounting function for the FFIEC, and we contracted with an independent public accounting firm to audit the financial statements of the FFIEC. We plan to oversee the activities of the independent public accounting firm to ensure compliance with generally accepted government auditing standards.

## **Board Security Control Reviews**

The Federal Information Security Modernization Act of 2014 requires that each agency inspector general evaluate a representative subset of their agency's information systems, including third-party systems. To meet this requirement, we plan to conduct security control reviews of a sample of the Board's information systems throughout the year. We also plan to use automated audit scanning tools to assist with conducting the reviews.

## **Calendar Year 2024 Risk Assessment of the Board's Government Travel Card Program** SUSPENDED

The Government Charge Card Abuse Prevention Act of 2012 requires inspectors general of executive agencies to conduct periodic risk assessments of travel card or convenience check programs. The objective of our risk assessment is to analyze the risks of illegal, improper, or erroneous purchases and payments associated with the Board's travel card program to determine an overall risk level for the program. We plan to use the results of the risk assessment to determine the frequency and scope of future OIG travel card audits.

## **Evaluation of the Board and Federal Reserve Banks' Approach to Processing Certain Applications** NEW

The Board and the Reserve Banks review applications submitted by banking organizations to undertake corporate activities such as becoming a state member



bank, pursuing mergers or acquisitions, and engaging in new nonbanking activities. We understand that application reviews consist of a multistep process and may involve numerous stakeholders, including the relevant Reserve Bank and multiple Board divisions. We plan to assess the Board and Reserve Banks' multistep approach to processing certain applications, including the efficiency of the approach. Specifically, we plan to determine application processing times and explore the factors that could influence process efficiency, such as the roles and responsibilities of multiple groups and chains of command, delegation and escalation practices, and workflow monitoring tools.

### **Evaluation of the Board Division of Supervision and Regulation's (S&R) Reserve Bank Oversight Program** NEW

Under the Federal Reserve Act, the Board must assess each Federal Reserve Bank's execution of the Board's delegated supervisory authority at least once each year. S&R satisfies this requirement by conducting oversight activities to evaluate the effectiveness of each Reserve Bank's safety and soundness supervisory programs annually. Oversight activities include monitoring and reviews of portfolio supervision, specialized supervision areas, national programs, and other areas. We plan to assess the design and effectiveness of S&R's Reserve Bank oversight program.

### **Evaluation of the Board's Oversight of Service Providers** NEW

Under the Bank Service Company Act of 1962, the Board and other federal banking agencies have the authority to examine and monitor bank service companies performing key services to the same extent as if the bank performed the services itself on its own premises. In its oversight, the Board seeks to ensure that service providers are able to protect against cyberattacks, safeguard critical infrastructure, and address emerging technology risks. We plan to focus this evaluation on the Board's governance of its examination and monitoring of service providers.

### **Evaluation of the Board's Practices and Controls for Safeguarding Confidential Supervisory Information in OASIS** NEW

Board and Reserve Bank staff use OASIS, a technology platform launched in 2023, to document their supervisory activities for large financial institutions. During the supervisory process, Board and Reserve Bank staff review, create, and store materials, such as records collected from institutions, that contain confidential supervisory information. Inadequate safeguards for such information could have adverse implications for supervised institutions, their customers, and the Federal Reserve System. We plan to assess the Board's practices and controls for safeguarding confidential supervisory information in OASIS.

### **Evaluation of the Board's Protective Services Unit (PSU)** NEW

As the Board's External Oversight Function, we review and evaluate the Board's law enforcement programs and operations, including the PSU. The PSU's mission is to ensure the physical security of the Board chair at all times; this level of protection requires highly trained staff, a full array of protection measures, and active planning and coordination with intelligence sources and law enforcement. We plan to assess certain aspects of the PSU's operations.



# CFPB: Initiated Projects

with calendar quarter of expected completion

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## Audit of the CFPB's Compliance With the Payment Integrity Information Act (PIIA)

**Second quarter 2025**

The PIIA requires agency heads to periodically review and identify programs and activities that may be susceptible to significant improper payments. The PIIA requires agency inspectors general to determine each fiscal year whether the agency is in compliance with the PIIA. The CFPB has determined that its Consumer Financial Civil Penalty Fund is subject to the PIIA. We are assessing the CFPB's compliance with the act.

## Evaluation of the CFPB's Approach to Safeguarding Confidential Supervisory Information

**Second quarter 2025**

The CFPB ensures compliance with federal consumer financial laws by supervising market participants. During examinations, CFPB examiners obtain information from supervised entities, including nonpublic, confidential information that could cause harm if lost or misused. CFPB examiners also prepare reports, working papers, and other documents and materials that contain confidential supervisory information. We are assessing the CFPB's controls for safeguarding confidential supervisory information.

## Evaluation of the CFPB's Records Management Program

**Second quarter 2025**

Federal agencies must maintain a records management program that addresses creating, maintaining, and disposing of records. We are assessing whether the CFPB has established such a records management framework that addresses the expectations outlined in federal laws, regulations, and guidance.

## Evaluation of the CFPB's Space Planning

**Second quarter 2025**

In December 2022, the CFPB's Human Capital Office negotiated and implemented an agreement with the National Treasury Employees Union establishing the terms and conditions of the CFPB's hybrid work environment. The agreement addresses policies and procedures for remote work, telework, employee-initiated requests for a change in duty station, work schedules, workspace, and parking. We are assessing the effectiveness of CFPB's space-planning activities following the implementation of its new Remote, Telework, and Hybrid Program.

## Evaluation of the CFPB's Approach to Information Technology (IT) Governance

**Fourth quarter 2025**

IT governance is a formal framework that provides a structure for organizations to ensure that IT investments support business objectives. The CFPB's strategic plan notes that to meet its mission, the agency will need to deploy and maintain cost-effective and secure tools and technologies and monitor developments in technology as they intersect with consumer financial markets. We are assessing the CFPB's processes for ensuring that IT investments support business objectives, including through capital planning and investment control.

## 2025 Audit of the CFPB's Information Security Program <sup>NEW</sup>

**Fourth quarter 2025**

The Federal Information Security Modernization Act of 2014 (FISMA) requires that each agency inspector general conduct an annual independent evaluation of their respective agency's information security program and practices. To meet FISMA requirements for 2025, we are conducting an audit of the CFPB's information security program. Our objectives are to evaluate the effectiveness of the CFPB's (1) security controls and techniques for selected information systems and (2) information security policies, procedures,

standards, and guidelines. We will use the results from our audit to respond to the Office of Management and Budget's fiscal year 2025 FISMA reporting metrics for inspectors general.



# CFPB: Projects in Development

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## **Audit of the CFPB's Information Technology (IT) Asset Management Processes**

To help meet its mission, the CFPB procures and assigns IT assets to its employees. Multiple offices and contractors are involved in receiving and inventorying IT assets. Effectively securing and tracking equipment can reduce the risk of loss or theft. We will assess the effectiveness of the CFPB's internal controls for receiving, inventorying, and disposing of IT assets, including the use of contractors, physical security controls, and IT asset inventory records.

## **Fiscal Years 2023–2024 Risk Assessment of the CFPB's Government Travel Card Program**

The Government Charge Card Abuse Prevention Act of 2012 requires inspectors general of executive agencies to conduct periodic risk assessments of travel card or convenience check programs. The objective of our risk assessment is to analyze the risks of illegal, improper, or erroneous purchases and payments associated with the CFPB's travel card program to determine an overall risk level for the program. We will use the results of the risk assessment to determine the frequency and scope of future OIG travel card audits.



# CFPB: Planned Projects

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## CFPB Security Control Reviews

The Federal Information Security Modernization Act of 2014 requires that each agency inspector general evaluate a representative subset of their agency's information systems, including third-party systems. To meet this requirement, we plan to conduct security control reviews of a sample of the CFPB's information systems throughout the year. We plan to use automated audit scanning tools to assist with conducting the reviews.

## Evaluation of the CFPB's Performance Management Process UPDATED

The CFPB administers a pass/fail performance management system that is designed to create a culture conducive to candid feedback at all employee grade levels. An effective performance management system helps to drive internal development, which is critical to achieving results for stakeholders. We plan to assess the CFPB's pass/fail performance system for executive-level employees and the system's alignment with the CFPB's strategic goals.

This project was incorrectly categorized as being in development. We are not taking up this project at this time.