



Office of Inspector General

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

MEMORANDUM

DATE: February 3, 2026

TO: Mary Aiken
Acting Director, Division of Supervision and Regulation
Board of Governors of the Federal Reserve System

FROM: Michael VanHusen Associate Inspector General for Audits and Evaluations

SUBJECT: OIG Memorandum Report 2026-SR-B-001: *Results of Scoping of the Evaluation of the Board's Practices and Controls for Safeguarding Confidential Supervisory Information in OASIS*

Executive Summary

During the financial institution supervisory process, Board of Governors of the Federal Reserve System and Federal Reserve Bank staff review, create, and store materials, including records collected from supervised institutions and other regulators, that contain confidential supervisory information (CSI).¹ The loss or misuse of CSI can result in significant legal, reputational, or financial risk to the Board, Reserve Banks, supervised institutions, and individuals.

Historically, the Board maintained several systems for supervisory staff to document its oversight activities. In 2023, the Board's Division of Supervision and Regulation (S&R) recognized that using multiple documentation systems was inefficient and complex. It launched OASIS that year to provide Board and Reserve Bank staff with one common platform for documenting examination work.²

We initiated this evaluation in April 2025 to assess the Board's practices and controls for safeguarding CSI in OASIS. To accomplish our objective, we interviewed Board and Reserve Bank officials and staff and reviewed relevant policies, procedures, and other documentation. We focused on the Board's access controls for Large Institution Supervision Coordinating Committee (LISCC) and Large and Foreign Banking

¹ Under 12 C.F.R. § 261.2(b)(1), CSI is nonpublic information that is exempt from disclosure pursuant to 5 U.S.C. § 552(b)(8) and includes information created or obtained in furtherance of the Board's supervisory, investigatory, or enforcement activities, including activities conducted by a Reserve Bank under delegated authority.

² The platform's name was initially an acronym for One Agile Supervision Solution. In March 2025, S&R staff informed us that the division no longer considered it an acronym and simply refers to the platform as *OASIS*.

Organization (LFBO) portfolio users. The scope of our evaluation did not include access controls for other supervisory portfolios using OASIS, or access controls for external users.

During our scoping phase, we identified several concerns regarding CSI access and opportunities for the Board to enhance its controls for LISCC and LFBO user access in OASIS. Given these concerns, we are communicating our results at the end of our scoping effort. Specifically, the Board provides LISCC and LFBO OASIS users with access to information across both supervisory portfolios even if staff do not need such access to perform their work. This approach is inconsistent with Board policy, the *Federal Reserve Administrative Manual* (FRAM), and the National Institute of Standards and Technology's (NIST) least privilege principle, which emphasizes that staff should only have access to information that is necessary to accomplish their assigned tasks. The Board has also not developed guidance for using sensitive file folders in OASIS, which enables users to restrict access to CSI and other sensitive documents to a subset of individuals assigned to a supervisory event. Additionally, the Board should develop guidance for conducting the annual access review process to determine whether users need continued access to OASIS and ensure that the staff performing the review have knowledge of the users' job duties.

This memorandum report includes four recommendations to enhance the Board's practices and controls for safeguarding CSI in OASIS. We believe that these key aspects of user access controls for safeguarding CSI must be addressed before we conduct further work on this evaluation. Once the Board has implemented our recommendations, and those enhancements have been in place for a period of time, we will consider whether additional testing would be appropriate.

In its response to our draft memorandum report, S&R concurs with our recommendations and outlines actions that have been or will be taken to address the recommendations. We will follow up to ensure that the recommendations are fully addressed.

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

Recommendations, 2026-SR-B-001, February 3, 2026

Results of Scoping of the Evaluation of the Board's Practices and Controls for Safeguarding Confidential Supervisory Information in OASIS**Finding: The Board Should Enhance Its Controls for LISCC and LFBO User Access in OASIS**

| Number | Recommendation | Responsible office |
|--------|--|--|
| 1 | Develop and implement a plan for restricting user access for LISCC and LFBO users in OASIS consistent with the need-to-know requirement in Board policy and the FRAM and NIST's least privilege principle. | Division of Supervision and Regulation |
| 2 | Define an access approach for the eventual transition of the CBO and RBO portfolios into OASIS appropriate for the CBO and RBO supervisory framework and based on users' need to know. | Division of Supervision and Regulation |
| 3 | Update existing OASIS guidance to clarify how examiners should use sensitive file folders, including expectations for the types of files that should be stored in the folders and who should have access to the folders. | Division of Supervision and Regulation |
| 4 | Develop guidance that <ol style="list-style-type: none">defines the need-to-know principle and how it should be applied when granting user access to CSI in OASIS.describes the expectations for performing the Board's annual access review process for OASIS, including designating responsibility for performing the attestation to individuals with knowledge of the user's roles and responsibilities, such as the user's supervisor or other possible alternatives. | Division of Supervision and Regulation |

Objective

Our objective was to assess the Board's practices and controls for safeguarding CSI in OASIS. OASIS is a technology platform that allows Board and Reserve Bank staff to document examination activities. We focused on the Board's access controls for LISCC and LFBO portfolio users.

Background

The Board and Reserve Banks play a significant role in supervising and regulating financial institutions. S&R oversees the Reserve Banks' execution of supervisory activities and issues guidance to help the Reserve Banks operate consistent with the Board's expectations.

S&R groups its oversight activities into supervisory portfolios generally based on the total asset size of the supervised institutions. The LISCC portfolio includes the largest, most systemically important financial institutions. The LFBO portfolio includes domestic institutions with more than \$100 billion in total consolidated assets and foreign institutions, regardless of size, not subject to LISCC portfolio supervision. As of June 2025, the LISCC portfolio included 8 institutions and the LFBO portfolio included 173 institutions. Among other activities, LISCC and LFBO supervision include institution-specific examinations and horizontal reviews addressing a common topic at similarly situated institutions in a portfolio.

During the supervisory process, Board and Reserve Bank examination staff review, create, and store materials, such as records collected from supervised institutions and other federal and state regulators, that contain CSI. Supervisory staff also create CSI through the supervisory process when they analyze information that institutions provide and document their conclusions. The loss or misuse of CSI can result in significant legal, reputational, or financial risk to the Board, Reserve Banks, supervised institutions, and individuals.

Historically, supervisory staff used several systems to document their oversight activities. In 2023, S&R recognized that using multiple documentation systems was inefficient and complex. It launched OASIS that year to provide Board and Reserve Bank staff with a common platform for documenting examination work. As of September 2025, the Federal Reserve System has transitioned the LISCC, LFBO, Financial Market Utility, Supervised Insurance Organization, Shared National Credit, and Significant Service Provider portfolios to OASIS. The Board had planned to transition the Community Banking Organization (CBO) and Regional Banking Organization (RBO) portfolios into OASIS in 2025.³ However, the Board has deferred those plans while it prioritizes making improvements to the platform.

As of July 2025, about 2,500 Board and Reserve Bank employees had access to OASIS. The OASIS documentation system also has a portal that allows external stakeholders, such as supervised institutions and federal and state regulators, to upload materials. As of July 2025, about 2,800 external users had access to OASIS for the purpose of uploading materials.

³ The CBO portfolio includes domestic banking organizations with less than \$10 billion in total consolidated assets. The RBO portfolio includes institutions with \$10 billion to \$100 billion in total consolidated assets.

Finding: The Board Should Enhance Its Controls for LISCC and LFBO User Access in OASIS

The Board provides LISCC and LFBO supervision staff with access to information and documentation in OASIS for both portfolios, even when staff do not need such access to perform their work. This approach is inconsistent with the Board's *Access to Federal Open Market Committee and Confidential Supervisory Information* policy and the FRAM 2-091: *Regulation on Granting Eligibility for Access to FOMC Information and CSI*, both of which require a need to know for staff to be eligible to access CSI. In addition, NIST's least privilege principle emphasizes that staff should only have access to information that is necessary to accomplish their assigned tasks.⁴

Both the Board's policy and the FRAM state that S&R policies will determine the designation of access and whether there is a need to know. However, our analysis found that S&R policies do not define the circumstances when a need to know exists and OASIS guidance does not state how to apply the need-to-know principle when granting access to the platform.

Board staff indicated that the open-access approach fulfills a business need for quick access to information. Officials and staff we interviewed also cited several other rationales for the approach, including the following:

The Board's approach for providing access to CSI in OASIS is modeled after legacy examination systems, which provided LISCC and LFBO examiners open access to information across both portfolios.

The Board implemented the open-access approach for all LISCC and LFBO supervision staff because the supervision of large financial institutions includes horizontal reviews, which necessitate examiners accessing information in OASIS on each of the institutions subject to the review.

The open-access approach promotes consistency in supervisory messages when examiners encounter similar issues across different institutions.

None of these rationales address the fundamental question of under what circumstances an individual examiner needs access to the information to perform his or her work. Numerous Board interviewees stated that user access in OASIS should be more restricted. For example, Board interviewees noted that not all LISCC and LFBO supervisory staff participate in horizontal reviews and highlighted an opportunity to incorporate more customized access rights based on a user's specific job responsibilities. In addition, multiple Board interviewees shared that access rights should not be granted indefinitely and that there should be options to provide short-term access in OASIS.

We acknowledge that conducting horizontal reviews in the LISCC or LFBO portfolio may justify providing some examiners with open access to information regarding firms in their assigned portfolio. However, conducting horizontal reviews does not appear to justify providing LISCC examiners access to LFBO portfolio information in OASIS, nor LFBO examiners access to LISCC information, and access should be

⁴ NIST Special Publication 800-53, Revision 5, *Security and Privacy Controls for Information Systems and Organizations*.

managed on a need-to-know basis consistent with Board policy, the FRAM, and the least privilege principle rather than defaulting to a blanket approach.

S&R Has Considered Further Restricting Access in OASIS, but Has Made Little Progress in Adjusting Its Approach

S&R officials have acknowledged the need for a more granular approach to providing access in OASIS, but this acknowledgment has not progressed to an implementation plan. In December 2024, the OASIS sponsors sent a memorandum to the OASIS product team indicating that, while maintaining an open-access approach fulfills business needs for quick access to information, it does not adequately reduce the risk of inadvertent disclosure or limit the damage of a potential breach.⁵ The memorandum recommended a more restrictive approach to user access.⁶

In April 2025, OASIS sponsors met to discuss improving security in OASIS. As part of this meeting, the sponsors determined that the next steps should include limiting access to information in OASIS to users that have a need to know, as well as evaluating the possibility of providing temporary user access. OASIS sponsors have considered multiple options for restricting access in OASIS, including event-based or firm-based access depending on a user's role, but none have been implemented to date.⁷

While the Board identifying the need to modify the approach to user access in OASIS is a positive development, the Board should work with the OASIS product team to finalize and execute a plan to implement a more restrictive approach to user access for the LISCC and LFBO portfolios, consistent with Board policy, the FRAM, and the least privilege principle. The Board should also define an access approach for the eventual transitioning of the CBO and RBO portfolios into OASIS that is appropriate for the CBO and RBO supervisory framework and based on users' need to know.⁸

The Board Has Implemented Sensitive File Folders in OASIS, but Has Not Developed Sufficient Guidance on Their Use

Multiple interviewees noted that to mitigate the risk of open access in OASIS, the application has a sensitive file folder functionality that allows examination teams to restrict access to the most sensitive information to a subset of individuals assigned to the supervisory event. Interviewees described various

⁵ OASIS sponsors establish the strategic direction for OASIS, build alignment among various portfolio sponsors, and endorse product financial plans. The OASIS product team handles the technical aspects of OASIS, such as defining the product strategy, engaging with users, supporting operational activities, delivering product features to meet quality and performance requirements aligned with business needs, and ensuring the successful adoption of the product.

⁶ The importance of a more restrictive access approach is reflected in an evaluation we conducted to assess the Consumer Financial Protection Bureau's controls for safeguarding CSI after the agency declared a major breach in 2023 that affected about 256,000 consumers and 46 institutions. We determined that the individual who caused the breach had access to documentation that was not directly related to their assigned duties. See Office of Inspector General, *The CFPB Can Improve Its Safeguards for Protecting Confidential Supervisory Information*, [OIG Report 2025-SR-C-005](#), May 5, 2025.

⁷ Event-driven access gives users the ability to view documents associated with a specific supervisory event. Firm-based access gives users the ability to view documents related to all supervisory events associated with a specific institution.

⁸ In contrast to the year-round supervision of LISCC and LFBO institutions, CBOs typically undergo one examination every 12 to 18 months and RBOs typically undergo one or more examinations per year.

examples of the types of documents that examiners should store in sensitive file folders, such as files that contain personally identifiable information,⁹ pre-earnings data, and living wills.¹⁰ However, based on our review of the *OASIS User Guide* and *OASIS Workpapers Quick Reference Guide*, we determined that these guidance documents do not describe expectations for using the sensitive file folder functionality. For example, the *OASIS Workpapers Quick Reference Guide* describes how to create sensitive file folders but does not explain the types of documentation that examiners should store in these folders or who should have access to them.

Based on data provided by the Board, it appears that LISCC and LFBO examiners are using OASIS sensitive file folders infrequently. Specifically, of the 2,755 LISCC and LFBO supervisory events that began in 2024 and 2025, examination teams had established sensitive file folders for 193, or about 7 percent, of those events. Further, we could not test whether staff are using the folders consistent with expectations because the Board has not developed expectations for what should be saved in these folders or who should have access to them.

Developing guidance on the types of information that management expects OASIS users to store in these folders and which users should have access to them will help ensure that the most sensitive files are only accessible to individuals with a need to know.

The Board Does Not Have Guidance for the OASIS Annual Access Review Process

The Board and Reserve Banks complete an annual access attestation process to confirm whether OASIS users should continue to have access to the application.¹¹ A Board interviewee stated that the expectations for conducting the annual access review process are not formally documented. We learned that various parties from S&R's business lines and technical groups have been responsible for this process for Board users over the last 2 years. Board interviewees stated that designated S&R employees annually review whether Board users have a continued need for access to OASIS. However, a Board interviewee stated that the individual performing the annual access review does not have knowledge of all those users' job responsibilities and therefore must reach out to hundreds of users to determine the justification for their continued access to OASIS.

⁹ According to the Board's *Information Classification and Handling Standard*, personally identifiable information generally means any information that identifies or describes a particular individual and includes, but is not limited to, an individual's name combined with other personal information such as the individual's Social Security number, driver's license number, birth date, place of birth, account numbers, passwords or security codes, and any other personal information that is or can be linked to an individual.

¹⁰ The Dodd-Frank Wall Street Reform and Consumer Protection Act requires large banking organizations and certain other firms to periodically submit resolution plans to the Board and the Federal Deposit Insurance Corporation. Each plan, commonly known as a living will, must describe the company's strategy for rapid and orderly resolution in the event of material financial distress or failure of the company.

¹¹ To obtain initial access to OASIS, a user's supervisor sends a request to the OASIS support team, which verifies that the individual is eligible to view CSI and has signed a terms-of-use agreement. The OASIS support team assists internal and external users.

Users' supervisors, or others in their management hierarchy, such as their line officers, may be in a better position to understand the roles and responsibilities of their staff and assess whether they have a continued need to access OASIS. The Board should develop clear guidance for performing the annual access review process for OASIS. Such guidance should designate responsibility for performing the attestation to individuals with knowledge of the user's roles and responsibilities, such as the user's supervisor or others in their chain of command.

Recommendations

We recommend that the director of S&R

1. Develop and implement a plan for restricting user access for LISCC and LFBO users in OASIS consistent with the need-to-know requirement in Board policy and the FRAM and NIST's least privilege principle.
2. Define an access approach for the eventual transition of the CBO and RBO portfolios into OASIS appropriate for the CBO and RBO supervisory framework and based on users' need to know.
3. Update existing OASIS guidance to clarify how examiners should use sensitive file folders, including expectations for the types of files that should be stored in the folders and who should have access to the folders.
4. Develop guidance that
 - a. defines the need-to-know principle and how it should be applied when granting user access to CSI in OASIS.
 - b. describes the expectations for performing the Board's annual access review process for OASIS, including designating responsibility for performing the attestation to individuals with knowledge of the user's roles and responsibilities, such as the user's supervisor or other possible alternatives.

Management Response

In response to our draft memorandum report, the acting director of S&R concurs with our recommendations.

Regarding recommendation 1, the response states that S&R has developed a plan to further restrict user access for LISCC and LFBO users in OASIS and has established a cross-functional workgroup to review current access controls, identify gaps, and implement enhancements to strengthen access controls. S&R estimates delivering several enhancements regarding security permissions and access controls by September 30, 2026, and fully delivering the enhancements by June 30, 2027.

Regarding recommendation 2, the response states that by December 31, 2026, S&R will define an access approach tailored for the CBO and RBO portfolios that will align with the supervisory framework while ensuring access is based on users' need to know.

Regarding recommendation 3, the response states that by June 30, 2026, S&R will revise and update OASIS guidance to provide clear instructions on the proper use of sensitive file folders, including expectations regarding the types of files that should be stored in the folders and criteria for determining who should have access to these files. The response also states that S&R will implement a training program to ensure all examiners understand these expectations.

Regarding recommendation 4, the response states that S&R will develop comprehensive guidance that clarifies the need-to-know principle; provides instructions on its application when managing user access to CSI in OASIS; and establishes expectations for the Board's annual access review process, including defined responsibilities for review and action. Additionally, S&R will establish processes to ensure appropriate individuals with knowledge of users' roles and responsibilities, such as direct supervisors or suitable alternatives, are designated to perform these attestation responsibilities. The response states that S&R will develop the guidance by September 30, 2026, and implement all recommendation 4 deliverables by December 31, 2026.

OIG Comment

The actions described by the acting director of S&R appear to be responsive to our recommendations. We will follow up to ensure that the recommendations are fully addressed.

Scope and Methodology

To accomplish our objective, we developed an understanding of the Board and Reserve Banks' processes and practices for safeguarding CSI in OASIS. We observed a walkthrough of OASIS to understand how examiners use the application and how they create sensitive file folders. We also interviewed Board and Reserve Bank officials and staff about the processes and practices for safeguarding CSI in OASIS. Additionally, we reviewed applicable policies and procedures, such as the *OASIS User Guide*, the *OASIS Workpapers Quick Reference Guide*, and the *OASIS Permission Groups Quick Reference Guide*, and relevant documentation, such as materials describing the current access configuration and various options for modifying the configuration. We also reviewed data on the number of OASIS sensitive file folders that examination teams established for LISCC and LFBO supervisory events that began in 2024 and 2025. However, we could not test whether staff are using the folders consistent with expectations because the Board has not developed expectations for what should be saved in these folders or who should have access to them.

We focused our scoping activities on the Board's approach to safeguarding CSI in OASIS for LISCC and LFBO portfolio users. We did not assess controls for other portfolios onboarded into OASIS, and we did not assess controls for external users.

We conducted our scoping phase from April 2025 through October 2025 in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

Closing

The Board can better safeguard CSI by implementing guidance that clearly defines the need-to-know principle and how it should be applied when granting user access in OASIS—consistent with Board policy, the FRAM, and the NIST least privilege principle—and by developing guidance on using the sensitive file folders and performing the Board’s annual access review process. Taking these steps will also reduce the significant legal, reputational, and financial risks to the Board, the Reserve Banks, and the institutions they supervise. Once the Board has implemented our recommendations, we will consider whether additional testing would be appropriate.

We provided you with a draft of our memorandum report for review and comment. In your response, you concur with our recommendations and outline actions that have been or will be taken to address the recommendations. We have included your response as an attachment to our memorandum report.

We appreciate the cooperation we received from S&R and the Reserve Banks during the evaluation. Please contact me if you would like to discuss this memorandum report or any related issues.

Attachment

cc: Kate Fulton
Nathan Ragan
Brent Richards
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Mary Aiken

February 3, 2026

Jennifer Herring
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Attachment

Management Response



BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
WASHINGTON, D. C. 20551

DIVISION OF
SUPERVISION AND REGULATION

January 16, 2026

Michael VanHuysen
Associate Inspector General for Audits and Evaluations
Office of Inspector General
Board of Governors of The Federal Reserve System
Washington, DC 20551

Dear Mr. VanHuysen,

Thank you for the opportunity to respond to the report on the *Results of Scoping of the Evaluation of the Board's Practices and Controls for Safeguarding Confidential Supervisory Information in OASIS*. We appreciate the Office of Inspector General's (OIG) insights and constructive feedback on our practices and controls for safeguarding confidential supervisory information (CSI) in the OASIS system.

The Division of Supervision & Regulation (S&R) is committed to ensuring its information technology platforms protect its data. The OASIS platform and the CSI it contains remain safe and secure, with robust controls in place to protect this sensitive data. That said, we have developed a comprehensive plan to address all the recommendations and to further strengthen our existing security framework.

Please see our responses below to the recommendations.

Finding: The Board Should Enhance Its Controls for LISCC and LFBO User Access in OASIS

Recommendation 1: Develop and implement a plan for restricting user access for LISCC and LFBO users in OASIS consistent with the need to know requirement in Board policy and the FRAM and NIST's least privilege principle.

Management Response: We concur with the recommendation. S&R developed a comprehensive plan to further restrict user access for Large Institution Supervision Coordinating Committee (LISCC)¹ and Large and Foreign Banking Organization (LFBO) users in OASIS. This plan aligns with Recommendation 1's need-to-know requirement in the Board policy and the Federal Reserve Administration Manual (FRAM), as well as the National Institute of Standards and Technology's (NIST's) principle of least privilege. We have established a cross-functional workgroup to review current access controls, identify gaps, and implement enhancements to strengthen access controls and least privilege measures. In 2025, we self-identified the need to implement additional security permissions and implemented several high priority enhancements to access controls in OASIS. Starting in 2026, we are initiating the comprehensive plan for remediation. We are targeting a 3Q 2026 release to deliver the next set of high-priority enhancements with full delivery estimated by 2Q 2027.

Recommendation 2: Define an access approach for the eventual transition of the CBO and RBO portfolios into OASIS appropriate for the CBO and RBO supervisory framework and based on users' need to know.

Management Response: We concur with the recommendation. To address Recommendation 2, S&R will define an access approach tailored for the Community Banking Organization (CBO) and Regional Banking Organization (RBO) portfolios. This approach will align with the supervisory framework for these portfolios while ensuring access is based on users' need-to-know. We estimate completion by 4Q 2026.

Recommendation 3: Update existing OASIS guidance to clarify how examiners should use the sensitive file folder, including expectations for the types of files that should be stored in the folder and who should have access to the folder.

Management Response: We concur with the recommendation. To address Recommendation 3, S&R will revise and update the existing OASIS guidance to provide clear instructions on the proper use of sensitive file folders. The updated guidance will include expectations regarding the types of files that should be stored in the folder and criteria for determining who should have access to these files. We will also implement a training program to ensure all examiners understand these expectations. We estimate completion by 2Q 2026.

Recommendation 4: Develop guidance that

- a. defines the need to know principle and how it should be applied when granting user access to CSI in OASIS.

¹ LISCC includes the Global Systemically Important Banks (G-SIBs).

- b. describes the expectations for performing the Board's annual access review process for OASIS, including designating responsibility for performing the attestation to individuals with knowledge of the user's roles and responsibilities, such as the user's supervisor or other possible alternatives.

Management Response: We concur with the recommendation. To address Recommendation 4, S&R will develop comprehensive guidance that clarifies the need-to-know principle and provides instructions on its application when managing user access (i.e., granting, revoking, etc.) to CSI in OASIS. This guidance will also establish expectations for the Board's annual access review process, including defined responsibilities for review and action. We will establish processes to ensure appropriate individuals with knowledge of users' roles and responsibilities, such as direct supervisors or suitable alternatives, are designated to perform these attestation responsibilities. The guidance will include a structured review process and documentation requirements. The guidance will be completed by 3Q 2026 with full implementation by 4Q 2026.

We appreciate the OIG's evaluation and recommendations, which will enhance our controls for safeguarding CSI. S&R is committed to implementing these recommendations to optimize our information security practices.

Regards,



Mary Aiken
Acting Director, Division of Supervision and Regulation
Board of Governors of the Federal Reserve System