# The CFPB Can Improve Its Process for Onboarding Depository Institutions That Transition to Its Oversight





Executive Summary, 2024-SR-C-021, December 2, 2024

# The CFPB Can Improve Its Process for Onboarding Depository Institutions That Transition to Its Oversight

### **Finding**

The Consumer Financial Protection Bureau can improve its process for onboarding depository institutions that transition to its oversight. We found that the Office of Supervision Examinations (OSE) did not complete most of the transitions we reviewed timely or effectively. For example, the regional offices completed most of the key onboarding steps several months after the institutions transitioned and some of the key steps more than a year after the institutions transitioned. In addition, the regional offices' approaches to coordinating with the prudential regulators varied significantly. Officials indicated that OSE has historically operated in a decentralized manner. We believe that this approach afforded the regional offices considerable autonomy to handle the onboarding process with no centralized monitoring or oversight. Without centralized monitoring or oversight, one regional office developed its own guidance on the onboarding process, while the other regional offices did not have any guidance.

A key mission of the CFPB is overseeing compliance with federal consumer financial laws and regulations for depository institutions with over \$10 billion in total assets. Therefore, it is critical that the CFPB prioritize establishing a program for onboarding depository institutions by creating objectives, clear roles and responsibilities at the headquarters level to oversee the onboarding process, an officewide policy that describes management's expectations, and methods to monitor the regional offices' execution of onboarding activities. Establishing an onboarding program will help the CFPB to ensure that it is fulfilling its statutory obligation timely and effectively.

### Recommendations

Our report contains four recommendations designed to enhance the effectiveness of the CFPB's process for onboarding depository institutions that transition to its oversight. In its response to our draft report, the CFPB concurs with our recommendations and outlines actions to address them. We will follow up to ensure that the recommendations are fully addressed.

### **Purpose**

We conducted this evaluation to assess the CFPB's process for transitioning depository institutions with assets over \$10 billion to its oversight. We focused our review on transitions that occurred from 2017 through 2023.

### Background

Under the Dodd-Frank Wall Street Reform and Consumer Protection Act, the CFPB supervises depository institutions and their affiliates with more than \$10 billion in total assets. When a depository institution exceeds the \$10 billion total asset threshold for four consecutive quarters, the consumer protection authority shifts from the institution's prudential regulator to the CFPB.

Within the CFPB, OSE supervises depository institutions' compliance with federal consumer financial laws. OSE's regional offices onboard the transitioning depository institutions. Key onboarding steps include assigning a field manager to oversee the institution, coordinating with the applicable prudential regulator, and communicating with an institution before and after it transitions to CFPB oversight.

The number of depository institutions supervised by the CFPB has increased over the past several years. From 2017 through 2023, 90 depository institutions transitioned to the CFPB's oversight.

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Recommendations, 2024-SR-C-021, December 2, 2024

# The CFPB Can Improve Its Process for Onboarding Depository Institutions That Transition to Its Oversight

### Finding: Supervision Should Establish a Program for Onboarding Depository Institutions

Number	Recommendation		Responsible office
1	Establish Supervision's objectives for the onboarding process for transitioning depository institutions.		Division of Supervision
2	Establish clear roles and responsibilities at the headquarters level for overseeing Supervision's onboarding process.		Division of Supervision
3	Develop and implement an officewide policy that describes management's expectations for onboarding depository institutions that transition to the CFPB's supervisory oversight. The policy should articulate		Division of Supervision
	a.	key onboarding steps that OSE should take before and after a depository institution transitions.	
	b.	expected time frames for completing the key steps.	
	C.	guidance on coordinating with the prudential regulator of the onboarding institution, including discussion topics; documentation needs; and the process for managing preexisting supervisory issues, such as MRAs and enforcement actions.	
4	Develop methods to monitor OSE's execution of the onboarding process, including		Division of Supervision
	a.	a tracking mechanism to determine whether the key onboarding steps have been completed.	
	b.	a process for obtaining feedback from the depository institutions that transitioned regarding the effectiveness of the onboarding process.	
	C.	a forum for the regional offices to share their experiences regarding the onboarding process to drive continuous improvement.	

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### Office of Inspector General

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

### **MEMORANDUM**

**DATE:** December 2, 2024

**TO:** Lorelei Salas

Director, Division of Supervision

Consumer Financial Protection Bureau

FROM: Michael VanHuysen Jule Sau Huy

Associate Inspector General for Audits and Evaluations

**SUBJECT:** OIG Report 2024-SR-C-021: The CFPB Can Improve Its Process for Onboarding Depository

Institutions That Transition to Its Oversight

We have completed our report on the subject evaluation. We conducted this evaluation to assess the Consumer Financial Protection Bureau's process for transitioning depository institutions to its oversight.

We provided you with a draft of our 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 them. We have included your response as appendix B to our report.

We appreciate the cooperation that we received from the Division of Supervision during our evaluation. Please contact me if you would like to discuss this report or any related issues.

cc: Jan Singelmann

Adam Martinez

Jean Chang

Cassandra Huggins

Calvin Hagins

Marianne Roth

Richard Austin

Ashley Adair

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## Introduction

# **Objective**

Our objective for this evaluation was to assess the Consumer Financial Protection Bureau's process for transitioning depository institutions with assets over \$10 billion to its oversight. The scope of our evaluation included all 90 transitions to the CFPB's oversight that occurred from 2017 through 2023.

To accomplish our objective, we reviewed regional guidance and other relevant documentation pertaining to the onboarding process for depository institutions. We also interviewed CFPB officials and staff involved in transitioning depository institutions. Additional details on our scope and methodology are in appendix A.

# **Background**

The Dodd-Frank Wall Street Reform and Consumer Protection Act established the CFPB to regulate the offering and provision of consumer financial products and services under federal consumer financial laws. Under the Dodd-Frank Act, the CFPB supervises depository institutions and their affiliates with more than \$10 billion in total assets and certain nondepository institutions.<sup>1</sup>

A depository institution's prudential regulator has the primary consumer protection supervisory authority if the depository institution has total assets of \$10 billion or less. Once the depository institution exceeds the \$10 billion total asset threshold for four consecutive quarters, the consumer protection supervisory authority shifts to the CFPB.<sup>2</sup> The Dodd-Frank Act requires the CFPB to coordinate its supervisory activities with prudential regulators and state financial regulatory authorities.<sup>3</sup>

The number of depository institutions supervised by the CFPB has increased over the past several years. From 2017 through 2023, 90 depository institutions crossed the \$10 billion total asset threshold and transitioned to the CFPB's oversight. The transition to supervision by the CFPB should include a transfer of institutional knowledge from the prudential regulator to help the CFPB understand the depository institution's supervision history, including any prior consumer protection supervisory issues or concerns.

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<sup>&</sup>lt;sup>1</sup> Among nondepository institutions, the CFPB has the authority to supervise entities in the consumer mortgage lending, payday lending, and private education lending markets regardless of size; larger participants in markets for other consumer financial products or services as defined by the CFPB; and entities the CFPB has reasonable cause to determine, by order, are "engaging, or ha[ve] engaged, in conduct that poses risks to consumers with regard to the offering or provision of consumer financial products or services."

<sup>&</sup>lt;sup>2</sup> In November 2011, the CFPB and prudential regulators issued an interagency statement to establish the CFPB's consumer protection supervisory authority over depository institutions that have reported more than \$10 billion in total assets for four consecutive quarters.

<sup>&</sup>lt;sup>3</sup> The prudential regulators include the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the National Credit Union Administration, and the Office of the Comptroller of the Currency. In 2012, the CFPB signed a memorandum of understanding with each prudential regulator to coordinate supervisory activities.

Additionally, the transition process should enable the CFPB to determine the appropriate supervisory approach for the transitioning entity and to prioritize its oversight activities.

### **Division of Supervision**

The Division of Supervision (Supervision) ensures compliance with federal consumer financial laws by supervising market participants.<sup>4</sup> The division comprises two offices: the Office of Supervision Policy and Operations and the Office of Supervision Examinations (OSE). OSE supervises and examines depository institutions' compliance with federal consumer financial laws through four regional offices: New York (Northeast), Chicago (Midwest), Atlanta (Southeast), and San Francisco (West). OSE onboards depository institutions.

### **Supervision's Onboarding Process for Depository Institutions**

Within the Office of Supervision Policy and Operations, the Reporting, Analytics, Monitoring, Prioritization, and Scheduling (RAMPS) team monitors for depository institutions that are approaching and exceeding the \$10 billion total asset threshold. The RAMPS team shares a list of these depository institutions with the regional offices quarterly. The assistant regional director and a regional analyst review the list for accuracy and contact RAMPS with any questions.

Based on our review of relevant documentation and interviews with OSE staff, the key steps in the process to onboard a depository institution generally include the following:

- 1. Field manager assignment: The assistant regional director assigns a field manager to begin the onboarding process and oversee the transition.
- 2. Outreach to prudential regulator: The field manager contacts the relevant prudential regulator to (a) establish relationships and explain the CFPB's supervision processes; (b) request an overview of the entity's supervisory history; and (c) discuss the entity's supervisory information, such as preexisting Matters Requiring Attention (MRAs) and enforcement actions. The prudential regulator may provide the field manager with examination reports or other documentation related to the agency's oversight activities.
- 3. Informal meet and greet with the depository institution: The field manager schedules an informal introductory meeting, referred to as a *meet and greet*, with the depository institution's chief compliance officer. During this meeting, the field manager explains the CFPB's mission, jurisdiction, and supervision approach. The field manager obtains an overview of the depository institution, including its geographic footprint, target market, and products and services offered.
- 4. Formal meeting with the depository institution: The regional director, in conjunction with the assistant regional director and field manager, conducts a formal meeting with the depository

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<sup>&</sup>lt;sup>4</sup> Effective September 2024, the CFPB reorganized the Division of Supervision, Enforcement and Fair Lending by winding down its front office and creating the Division of Supervision and the Division of Enforcement.

<sup>&</sup>lt;sup>5</sup> The RAMPS team also monitors for depository institutions that have fallen below the threshold.

<sup>&</sup>lt;sup>6</sup> MRAs are corrective actions that result from examination findings and require the attention of a supervised institution's board of directors or principals. *Enforcement actions* are the most severe type of corrective actions and are publicly reported.

institution's leadership to discuss the CFPB's supervisory approach and the depository institution's compliance management approach.

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# Finding: Supervision Should Establish a Program for Onboarding Depository Institutions

OSE regional offices did not complete most of the transitions we reviewed timely or effectively, and their approaches to coordinating with the prudential regulators varied significantly. We attribute these issues to Supervision not having established a program for onboarding depository institutions. Specifically, Supervision has not established its objectives for the onboarding process, established roles and responsibilities at the headquarters level to oversee the onboarding process, developed an officewide policy that describes management's expectations for the onboarding process, or implemented methods to monitor OSE's execution of onboarding activities. Officials indicated that OSE has historically operated in a decentralized manner. We believe that this decentralized approach has afforded the regional offices considerable autonomy to handle the onboarding process with no centralized monitoring or oversight. Without centralized monitoring or oversight, one regional office developed its own guidance on the onboarding process; the other three regional offices did not have any guidance. A key mission of the CFPB is overseeing compliance with federal consumer financial laws and regulations for depository institutions with over \$10 billion in total assets. Therefore, it is critical that Supervision prioritize establishing a program for the agency's onboarding activities to help ensure that the CFPB fulfills its statutory obligation timely and effectively.

# OSE Regional Offices Did Not Complete Most of the Transitions Timely or Effectively

We selected eight depository institutions for testing and found that the regional offices did not complete most of those transitions timely or effectively. For example, the regional offices completed most of the key onboarding steps several months after the institutions transitioned and some of the key steps more than a year after the institutions transitioned (see figure).<sup>7</sup>

- The number of days to assign a field manager to a depository institution ranged from 111 days before the transition date to 610 days after the transition date.
- Outreach to prudential regulators ranged from 25 days before the transition date to 193 days after the transition date.
- The informal meet and greet ranged from 111 days before the transition date to 635 days after the transition date.
- The formal meeting ranged from 23 to 451 days after the transition date.

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<sup>&</sup>lt;sup>7</sup> A depository institution's *transition date* is the date when the institution becomes subject to the CFPB's supervision and occurs when a depository institution's total assets exceed \$10 billion for four consecutive quarters.

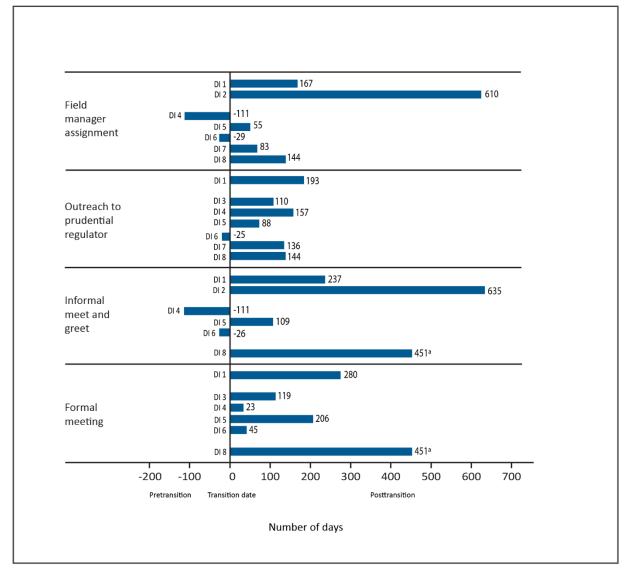


Figure. Number of Days to Complete the Key Onboarding Steps for Eight Selected Depository Institutions

Source: OIG generated based on data provided by the CFPB.

Note: OSE could not provide the completion dates of some of the key onboarding steps for depository institutions 2, 3, and 7. DI depository institution.

OSE had difficulty locating, and in some cases could not locate, documentation showing the completion dates for key onboarding steps. We noted that for three of the eight depository institutions, OSE could not provide completion dates for some of the key onboarding steps. Additionally, OSE could not provide documentation to support certain dates for key onboarding steps for six of the eight depository institutions. We noted that two of the eight depository institutions merged with institutions already

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<sup>&</sup>lt;sup>a</sup> For DI 8, the informal meet and greet and the formal meeting were held simultaneously.

supervised by the CFPB; thus, the applicable regional offices were able to complete the onboarding steps for those institutions more quickly.<sup>8</sup>

# OSE Regional Offices' Approaches to Coordinating With the Prudential Regulators Varied Significantly

OSE regional offices' approaches to coordinating with the prudential regulators varied significantly. For example, interviewees from the regional offices did not have a shared understanding of the CFPB's role in following up on preexisting MRAs and enforcement actions for transitioning institutions. Multiple interviewees stated that the prudential regulator is responsible for following up on preexisting MRAs and enforcement actions, one interviewee indicated that the CFPB is responsible, and yet another was unsure.

During the onboarding process, regional office conversations with the prudential regulators varied, as did the documentation received from those regulators. For example, four of the eight depository institutions we tested transitioned with preexisting MRAs, but the regional office for only one of the four institutions indicated discussing this topic with the prudential regulator. In addition, we identified an instance in which a regional office did not request any prior examination reports or documentation from the prudential regulator.

# Supervision Does Not Have the Fundamental Aspects of a Program for Onboarding Depository Institutions

Despite the increase in depository institutions subject to the CFPB's oversight from 2017 through 2023, Supervision has not developed the fundamental aspects of a program for onboarding depository institutions that transition to the CFPB's oversight. Specifically,

- Supervision has not established its objectives for the onboarding process. Supervision has not defined its objectives to guide the efforts of the parties involved in onboarding depository institutions and to convey the intended outcomes for the onboarding process.
- Supervision has not established clear roles and responsibilities for overseeing the onboarding process. Officials indicated that the onboarding process has historically been decentralized, giving OSE's regional offices autonomy to implement their own approaches for onboarding depository institutions. However, these officials acknowledged that Supervision should provide more oversight.
- Supervision does not have an officewide policy for the onboarding process. Supervision has not developed an officewide policy that describes management's expectations for the process. Specifically, Supervision has not set clear expectations regarding the key steps that the regional offices should take before and after a depository institution transitions or the expected time frames for completing those key steps. Further, Supervision has not defined guidelines for

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<sup>&</sup>lt;sup>8</sup> Depository institutions 4 and 6 merged with institutions already under the CFPB's oversight.

coordinating with the prudential regulator, such as expected discussion topics when meeting with the prudential regulator; supervisory documents to obtain to effectively transfer knowledge about the depository institution; or the process for managing preexisting supervisory issues, such as MRAs and enforcement actions.

• Supervision does not have methods to monitor the onboarding process. Supervision has not developed methods to monitor the efficiency and effectiveness of the onboarding process across the regional offices. Specifically, Supervision does not have a tracking mechanism to determine whether the regional offices have completed the key onboarding steps timely and strengthen accountability for these responsibilities. In addition, Supervision does not have an approach to gather feedback from depository institutions about their onboarding experience to assess the effectiveness of the process and identify ways to improve it. Further, Supervision does not have a forum for the regional offices to share their experiences regarding the onboarding process, such as effective practices or lessons learned, to drive continuous improvement.

# The Southeast Regional Office Has Guidance and a Tracking Mechanism for Onboarding Depository Institutions

Without an officewide program for the onboarding process, the Southeast regional office developed guidance for onboarding depository institutions in 2023. Interviewees informed us that the Southeast regional office developed its guidance following an influx of institutions transitioning to its oversight.

The guidance states that the assistant regional director will begin the onboarding process after a depository institution's total assets exceed the \$10 billion threshold for two consecutive quarters, which is before the institution officially transitions to the CFPB's oversight. The guidance also includes time frames for completing the key onboarding steps:

- The assistant regional director will assign a field manager to a depository institution no later than 70 days before the institution transitions.
- The field manager will contact a depository institution's prudential regulator no later than 45 days before the institution transitions.
- The field manager will schedule an informal meet and greet with a depository institution 40 days before the institution transitions.
- The regional director will hold a meeting with a depository institution 30 days after the institution transitions.

The Southeast regional office's guidance also addresses coordinating with prudential regulators. The guidance directs field managers to contact the relevant prudential regulator no later than 45 days before a transition to establish relationships and explain the CFPB's supervision processes; request a high-level overview of the depository institution's supervisory history; and discuss supervisory information, including any preexisting MRAs and enforcement actions.

In addition, this region developed an onboarding tracker to help ensure that the key onboarding steps are completed timely. The tracker includes fields for the depository institution's transition date, the

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responsible field manager, the key onboarding steps, and the anticipated and completed date for each step.

# **Supervision Should Establish a Program to Effectively Oversee the Onboarding Process**

A key mission of the CFPB is overseeing compliance with federal consumer financial laws and regulations for depository institutions with over \$10 billion in total assets. Therefore, it is critical that Supervision prioritize establishing a program to effectively oversee the onboarding process for depository institutions by establishing its objectives for the onboarding process, establishing clear roles and responsibilities at the headquarters level for overseeing the onboarding process, developing a policy that describes management's expectations for onboarding depository institutions, and implementing methods to monitor OSE's execution of onboarding activities. Establishing a program for the agency's onboarding activities will help the CFPB to ensure that it is fulfilling its statutory obligation timely and effectively.

# **Management Actions Taken and OIG Assessment**

The CFPB implemented a policy for the onboarding process on September 11, 2024, shortly before we issued our discussion draft report to the agency. The policy outlines the steps Supervision staff should take during the onboarding process and the expected time frames for completing those steps. Our preliminary assessment of the policy is that it does not address all our recommendations. We understand that the CFPB plans to update the policy as outlined in its management response to our report.

### Recommendations

We recommend that the director of Supervision

- 1. Establish Supervision's objectives for the onboarding process for transitioning depository institutions.
- 2. Establish clear roles and responsibilities at the headquarters level for overseeing Supervision's onboarding process.
- 3. Develop and implement an officewide policy that describes management's expectations for onboarding depository institutions that transition to the CFPB's supervisory oversight. The policy should articulate
  - a. key onboarding steps that OSE should take before and after a depository institution transitions.
  - b. expected time frames for completing the key steps.
  - c. guidance on coordinating with the prudential regulator of the onboarding institution, including discussion topics; documentation needs; and the process for managing preexisting supervisory issues, such as MRAs and enforcement actions.
- 4. Develop methods to monitor OSE's execution of the onboarding process, including
  - a. a tracking mechanism to determine whether the key onboarding steps have been completed.

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- b. a process for obtaining feedback from the depository institutions that transitioned regarding the effectiveness of the onboarding process.
- c. a forum for the regional offices to share their experiences regarding the onboarding process to drive continuous improvement.

## **Management Response**

In response to our draft report, the director of Supervision concurs with our recommendations. Regarding recommendation 1, the response states that in September 2024, the CFPB implemented a policy to govern the onboarding process. The CFPB will review the policy to ensure that it clearly states the objectives of the onboarding process. The CFPB estimates completing the policy update by the fourth quarter of fiscal year (FY) 2025.

Regarding recommendation 2, the response states that in its new onboarding policy, the CFPB established roles and responsibilities at the headquarters level for overseeing the onboarding process. When the CFPB updates the onboarding policy, it will revise the roles and responsibilities to meet the intent of the recommendation. The CFPB estimates completing the policy update by the fourth quarter of FY 2025.

Regarding recommendation 3, the response states that the CFPB established key onboarding steps and expected time frames in its new onboarding policy. The CFPB will revise the policy to provide additional guidance on coordinating with the prudential regulators of onboarding institutions, including discussion topics, documentation needs, and the process for managing preexisting supervisory issues, such as MRAs and enforcement actions. The CFPB estimates completing the policy update by the fourth quarter of FY 2025.

Regarding recommendation 4, the response states that the CFPB will develop methods to monitor the execution of the onboarding process, including a process for tracking completed steps, a mechanism for obtaining feedback from depository institutions that transitioned, and a forum for the regional offices to share their experiences to drive continuous improvement. The CFPB estimates completing this effort by the fourth quarter of FY 2025.

### **OIG Comment**

The planned actions described by the director of Supervision appear to be responsive to our recommendations. We will follow up to ensure that the recommendations are fully addressed.

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# **Appendix A: Scope and Methodology**

We initiated this evaluation to assess the CFPB's approach to transitioning depository institutions with total assets over \$10 billion to its oversight. The scope of our evaluation included all 90 transitions to the CFPB's oversight from 2017 through 2023.

Of the 90 depository institutions that transitioned to the CFPB's oversight during our scope period, we selected eight for testing. Specifically, we selected two depository institutions from each region, one that transitioned with a preexisting MRA and one without. Our results cannot be projected across the population of depository institutions that transitioned to the CFPB's oversight.

To accomplish our objective, we reviewed regional guidance and other relevant documentation pertaining to the onboarding process for depository institutions. We also analyzed data and supporting documentation related to OSE's process for completing the key onboarding steps, including (1) field manager assignment, (2) outreach to the prudential regulator, (3) informal meet and greet with the depository institution, and (4) formal meeting with the depository institution. In addition, we assessed OSE's approach to gaining institutional knowledge during the onboarding process. Specifically, we obtained and analyzed information regarding the discussion topics with the prudential regulators, what documents the prudential regulators provided, and which agency closed preexisting MRAs.

We also interviewed CFPB staff and officials from headquarters and the four regional offices who are involved in transitioning and onboarding depository institutions to gather their perspectives on the onboarding process.

We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. We conducted our work from November 2023 to September 2024.

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# **Appendix B: Management Response**



1700 G Street NW, Washington, D.C. 20552

October 29, 2024

Mr. Michael VanHuysen Associate Inspector General for Audits and Evaluations Board of Governors of the Federal Reserve System Consumer Financial Protection Bureau 20th and Constitution Avenue NW Washington, DC 20551

Dear Mr. VanHuysen,

Thank you for the opportunity to review and comment on the Office of Inspector General's draft report *The CFPB Can Improve Its Process for Onboarding Depository Institutions That Transition to Its Oversight.* 

The Bureau appreciates the OIG's review and agrees with the recommendations for improving its approach to supervision. The Bureau is committed to addressing all of the recommendations: since the beginning of 2024, the CFPB has worked on developing its onboarding program and consulted with the OIG while drafting the policy.

Thank you again for your review and the opportunity to provide comments on the report.

Sincerely,

LORELEI SALAS
Date: 2024.10.29 09:54:40 -04'00'

Lorelei Salas Director Division of Supervision

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#### **Responses to Specific Recommendations**

- As indicated in the report, the CFPB implemented a new policy governing the onboarding process in September 2024. The policy establishes the steps Supervision staff should take during the onboarding process and the expected time frames for completing those steps. The CFPB will review the policy to ensure that that the objectives for the onboarding process are clearly stated. Estimated year and quarter of completion: FY 2025 Q4
- In its new policy governing onboarding, the CFPB established roles and responsibilities at the headquarters level for overseeing the onboarding process. As Supervision makes enhancements to the policy in response to other Recommendations by the OIG, the CFPB will revise the roles and responsibilities in the policy as needed. Estimated year and quarter of completion: FY 2025 Q4
- 3. The CFPB established key onboarding steps and expected timeframes in its new policy governing onboarding. The CFPB will revise the policy to provide additional guidance on coordinating with the prudential regulators of onboarding institutions, including discussion topics, documentation needs, and the process for managing preexisting supervisory issues, such as MRAs and enforcement actions. Estimated year and quarter of completion: FY 2025 Q4
- 4. The CFPB will develop methods to monitor execution of the onboarding process, including a method of tracking completed steps, a mechanism for obtaining feedback from depository institutions that transitioned, and a forum for regional offices to share their onboarding experiences to drive continuous improvement. Estimated year and quarter of completion: FY 2025 Q4

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# **Abbreviations**

**FY** fiscal year

MRA Matter Requiring Attention

**OSE** Office of Supervision Examinations

**RAMPS** Reporting, Analytics, Monitoring, Prioritization, and Scheduling

**Supervision** Division of Supervision

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# **Report Contributors**

Michael Olukoya, Senior Auditor
Johnna Bradley, Auditor
Tina Vuong, Auditor
Taylor Winzenburg, Auditor
Margaret An, OIG Manager, Supervision and Regulation
Laura Shakarji, Senior OIG Manager for Supervision and Regulation
Cynthia Gray, Deputy Associate Inspector General for Audits and Evaluations
Michael VanHuysen, Associate Inspector General for Audits and Evaluations

### **Contact Information**

### General

Office of Inspector General Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue NW Mail Center I-2322 Washington, DC 20551

Phone: 202-973-5000 Fax: 202-973-5044

### **Media and Congressional**

OIG.Media@frb.gov



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Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Mail Center I-2322
Washington, DC 20551

Phone: 800-827-3340 Fax: 202-973-5044

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