

Open Recommendations Made to the Consumer Financial Protection Bureau



We oversee the Consumer Financial Protection Bureau by conducting audits and evaluations of the CFPB’s programs and operations and by making recommendations to improve economy, efficiency, and effectiveness.

Audits assess aspects of the economy, efficiency, and effectiveness of CFPB programs and operations and are conducted in accordance with *Government Auditing Standards*, which is issued by the comptroller general of the United States. Evaluations are generally focused on the effectiveness of specific programs or functions and are performed according to *Quality Standards for Inspection and Evaluation*, which is issued by the Council of the Inspectors General on Integrity and Efficiency.

Our audit and evaluation reports explain why we conducted the review and the issues we found that should be corrected or improved, and they contain specific recommendations for agency corrective action. Table 1 shows, as of September 30, 2024, the total number and status of recommendations we made to the CFPB by calendar year, beginning with the first year for which recommendations remain open.

Table 1. Status of Recommendations Made to the CFPB During 2018–2024, as of September 30, 2024

Status	2018	2019	2020	2021	2022	2023	2024
Recommendations	29	31	17	37	8	1	14
Open	2	0	3	0	4	1	10 ^a
Closed	27	31	14	37	4	0	4
Public recommendations	28	26	13	33	8	1	14
Open	2	0	0	0	4	1	10 ^a
Closed	26	26	13	33	4	0	4
Nonpublic recommendations	1	5	4	4	0	0	0
Open	0	0	3	0	0	0	0
Closed	1	5	1	4	0	0	0

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

^aOnly the recommendations that have been open for more than 6 months are reflected in table 2.

Because we recognize that some recommendations may require complex corrective actions, table 2 only includes information about each public and nonpublic recommendation that has been open for more than 6 months, which for this report means open recommendations made through March 31, 2024, and the recommendations’ status. Given their sensitivity, the nonpublic recommendations are summarized. The status designations and their definitions are as follows:

- **Agency concurrence**—The CFPB stated that it plans to implement the recommendation.
- **Agency nonconcurrence**—The CFPB stated that it does not concur with the recommendation. We continue to believe the recommendation should be implemented and are working with the CFPB to reach a resolution.
- **Agency partial concurrence**—The CFPB stated that it does not agree with part of the recommendation. We continue to believe the recommendation should be fully implemented and are working with the CFPB to reach a resolution.
- **Agency action**—The CFPB reported that it has begun taking steps to implement the recommendation.
- **Partial implementation**—The CFPB reported that it has completed actions to close part of the recommendation and is taking steps to close the remaining aspects.
- **Verification in progress**—The CFPB reported that it has completed actions to fully close the recommendation. We are verifying that the actions address the recommendation.

For inquiries about the list of open recommendations, please contact oig.media@frb.gov or 202-973-5043.

Table 2. Open CFPB Recommendations Made Through March 31, 2024

Report title	Issuance date	Recommendation	Recommendation status
2018 Audit of the Bureau's Information Security Program 2018-IT-C-018	10/31/2018	1. Strengthen configuration management processes by a. remediating configuration-related vulnerabilities in a timely manner. b. ensuring that optimal resources are allocated to perform vulnerability remediation activities.	Verification in progress ^a
		3. Determine whether established processes and procedures for management of user-access agreements and rules-of-behavior forms for privileged users are effective and adequately resourced and make changes as needed.	Agency action
Technical Testing Results for the Bureau's Legal Enclave 2020-IT-C-017R	07/22/2020	1. The open recommendation relates to strengthening vulnerability management.	Verification in progress
		2. The open recommendation relates to strengthening testing processes.	Verification in progress
		4. The open recommendation relates to strengthening configuration management.	Verification in progress
2022 Audit of the CFPB's Information Security Program 2022-IT-C-014	09/30/2022	3. Ensure that policies and supporting procedures for developing and maintaining an enterprisewide software inventory are developed and maintained.	Verification in progress ^a
		4. Ensure that an enterprisewide software inventory is conducted and maintained.	Agency action
		5. Ensure the development of policies and procedures for the performance and maintenance of an organizationwide business impact analysis.	Verification in progress ^a
		6. Update the CFPB's organizationwide business impact analysis and ensure that the results are used to make applicable changes to related contingency and continuity plans.	Verification in progress ^a

Report title	Issuance date	Recommendation	Recommendation status
2023 Audit of the CFPB's Information Security Program 2023-IT-C-016	09/29/2023	1. Maintain a comprehensive schedule for testing current contingency plans, documenting test procedures, and maintaining relevant updates to the contingency plan.	Agency action
The CFPB Can Enhance Certain Aspects of Its Enforcement Investigations Process 2024-SR-C-002	01/08/2024	1. Incorporate the timing expectations for key steps in the enforcement process established in the Office of Enforcement's internal guidance into the tracking and monitoring of matters.	Agency concurrence
Results of Scoping of the Evaluation of the CFPB's Healthcare Benefits Eligibility Processes 2024-MO-C-010	03/20/2024	1. Ensure that the Office of Human Capital continues to monitor dependent eligibility on a biweekly basis and corrects discovered discrepancies.	Agency concurrence
		2. Ensure that the Office of Human Capital conducts a comprehensive annual review of the control activities for administering the agency's vision and dental programs to ensure that they are operating effectively.	Agency concurrence
		4. Develop and periodically provide tailored training for employees who administer the agency's vision and dental programs.	Agency concurrence

^a This recommendation will be closed upon issuance of our 2024 audit report on the CFPB's information security program.