

Office of Inspector General

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

Work Plan

Current as of July 16, 2025





Overview

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.



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Board: Initiated Projects

with calendar quarter of expected completion

Audit of the Board's Travel Card Program ISSUED

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 ISSUED

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.

Security Control Review of the Board's Banknote Inventory System ^{NEW}

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 agency's information security program and practices, to include testing the effectiveness of controls for selected systems. As part of our 2025 FISMA audit of the Board's information security program, we are testing selected security controls for the Banknote Inventory System. The system is used to track banknotes and other items related to currency development, performance, and production.

Security Control Review of the Board's One Agile Supervision Solution (OASiS) ^{NEW}

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 agency's information security program and practices, to include testing the effectiveness of controls for selected systems. As part of our 2025 FISMA audit of the Board's information security program, we are testing selected security controls for the OASiS system. OASiS is a cloud-based solution that facilitates the process for assessing, monitoring, and rating firms supervised by the Federal Reserve System.

Security Control Review of the Board's Research and Statistics Recruiting System ^{NEW}

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 agency's information security program and practices, to include testing the effectiveness of controls for selected systems. As part of our 2025 FISMA audit of the Board's information security program, we are testing selected security controls for the Research and Statistics Recruiting system. The system is used to identify, track, screen, and select individuals for economist and research assistant positions at the Board.

2025 Audit of the Board's Information Security Program

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.

Audit of the Board's Foreign Travel Reporting

First quarter 2026

Federal guidance requires security clearance holders to 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 are assessing 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 UPDATED

First quarter 2026

In the regular course of business, employees and interns separate from the Board. Maintaining an effective offboarding process helps to mitigate risks associated with separating individuals removing or disclosing information and continuing to have access to Board facilities. We are assessing the Board's offboarding process controls for records management, security debriefings, and the return and deactivation of personal identity verification (PIV) cards, and we are determining whether these controls mitigate reputational and security risks effectively.

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

First quarter 2026

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 are assessing the design and implementation of the Board's processes for appointing, approving, and consulting on the selection of certain Reserve Bank leaders, including processes related to the identification and resolution of potential conflicts of interest.

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

Second quarter 2026

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 are assessing 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

Second quarter 2026

The Federal Reserve System generates and collects economic information that is considered sensitive because it can significantly influence financial market activity. We are assessing 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.



Board: Projects in Development

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

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

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 will oversee 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' Approach to Processing Certain Applications

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 will assess the Board and Reserve Banks' multistep approach to processing certain applications, including the efficiency of the approach. Specifically, we will 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's Eccles and 1951 Constitution Avenue Building Renovation Project ^{NEW}

We are initiating an evaluation to assess the Board's oversight of its Marriner S. Eccles Building and 1951 Constitution Avenue Building Renovation Project, including the associated costs. The scope will include a focus on the key factors contributing to the cost estimate increases, including assessing whether discretionary design features contributed materially to those increases. This evaluation is a follow on to a series of prior audits related to the Board's management of its renovation projects and its contracting practices supporting the renovation efforts.

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

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 will assess the Board's practices and controls for safeguarding confidential supervisory information in OASIS.



Board: Planned Projects

Audit of the Board's Gifts and Decorations Program

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

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.

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 are conducting security control reviews of a sample of the Board's information systems throughout the year. We are also using 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 Division of Supervision and Regulation's (S&R) Reserve Bank Oversight Program

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

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 Protective Services Unit (PSU)

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.

Forensic Evaluation of Software License Management in the Board's Information Technology Division ^{NEW}

The *Board Technology Strategy 2024–2027* includes strategic themes to foster operational excellence and technology financial management. In line with these themes, we plan to initiate a forensic evaluation to determine the efficiency and effectiveness of software inventory and license management practices in the Board's Division of Information Technology.

Forensic Evaluation of the Board's Physical Access Control System ^{NEW}

The Board maintains several leased and owned spaces for its workforce, placing an increased importance on maintaining effective physical access controls. Our planned objective is to assess the Board's physical access control system for data quality issues that may impact access permissions. We will also review procedures currently in place to mitigate data quality issues.



CFPB: Initiated Projects

with calendar quarter of expected completion

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

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 ISSUED

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 ISSUED

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.

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

Third quarter 2025

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 are assessing the CFPB's internal controls for receiving, inventorying, and disposing of IT assets.

CFPB Congressional Request: Review of Workforce and Contract Reduction Actions NEW

Third quarter 2025

We received three letters from United States senators generally focused on similar or related topics and questions about the CFPB's recent workforce reduction measures and contract cancellations. In response, we began an initial review of the agency's workforce and contracting actions to determine their high-level effects on mission-related activities and support functions. Because the CFPB's actions are the subject of pending litigation, we are not assessing whether they complied with applicable laws, regulations, policies, or procedures.

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.

Evaluation of the CFPB's Space Planning

Fourth 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.

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

Fourth quarter 2025

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.

Security Control Review of Consumerfinance.gov ^{NEW}

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 agency's information security program and practices, to include testing the effectiveness of controls for selected systems. As part of our 2025 FISMA audit of the CFPB's information security program, we are testing selected security controls for consumerfinance.gov, the agency's public-facing website. The website provides information and resources for consumers and intakes consumer complaints about financial products and services.

Security Control Review of the CFPB's Consumer Response System ^{NEW}

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 agency's information security program and practices, to include testing the effectiveness of controls for selected systems. As part of our 2025 FISMA audit of the CFPB's information security program, we tested selected security controls for the Consumer Response System. The system aids in data collecting, as well as in handling and responding to consumer complaints regarding certain financial products and services.

Security Control Review of the CFPB's Relativity Evidence Management System (EMS) ^{NEW}

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 agency's information security program and practices, to include testing the effectiveness of controls for selected systems. As part of our 2025 FISMA audit of the CFPB's information security program, we are testing selected security controls for the Relativity EMS used by the CFPB. This system is used to track and manage activity regarding potential, pending, and closed enforcement matters, such as investigations and litigations

2025 Audit of the CFPB's Information Security Program

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

All projects are currently in the initiated or planned stage.



CFPB: Planned Projects

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 are conducting security control reviews of a sample of the CFPB's information systems throughout the year. We are also using automated audit scanning tools to assist with conducting the reviews.