

FDIC OIG Unimplemented Recommendations  
As of December 15, 2018

#	OIG Report No.	Report Title	Rec No.	Recommendation	Issued Date
1	AUD-16-001	<a href="#">Audit of the FDIC's Information Security Program - 2015</a>	4	Non-public report.	10/28/2015
2	AUD-17-001	<a href="#">Audit of the FDIC's Information Security Program - 2016</a>	5	Non-public report.	11/2/2016
3	AUD-17-004	<a href="#">Follow-up Audit of the FDIC's Identity, Credential, and Access Management (ICAM) Program</a>	3	Take steps to ensure the reliability of contractor personnel data in Corporate Human Resource Information System - Human (CHRIS-HR). <sup>^</sup>	6/8/2017
4	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	4	Non-public report.	10/25/2017
5	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	5	Non-public report.	10/25/2017
6	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	6	Non-public report. <sup>^</sup>	10/25/2017
7	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	9	Non-public report.	10/25/2017
8	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	10	Non-public report.	10/25/2017
9	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	14	Non-public report. <sup>^</sup>	10/25/2017
10	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	15	Non-public report.	10/25/2017

<sup>^</sup> The Corporation's Corrective Action Closure Package with OIG for review.

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11	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	2	Incorporate the Cloud Strategy principles into the FDIC's IT governance framework. <sup>^</sup>	7/26/2018
12	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	3	Implement an EA that is part of the FDIC's IT Governance Framework and used to guide IT decision-making. <sup>^</sup>	7/26/2018
13	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	4	Revise the FDIC's IT Governance Processes, including roles and responsibilities for governance bodies. <sup>^</sup>	7/26/2018
14	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	5	Incorporate the revised IT Governance Processes into applicable FDIC policies, procedures, and charters.	7/26/2018
15	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	6	Define and document roles and responsibilities for information security within the IT Governance Framework and Governance Processes. <sup>^</sup>	7/26/2018
16	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	7	Identify and document the IT resources and expertise needed to execute the FDIC's IT Strategic Plan.	7/26/2018
17	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	8	Define and document procedures for evaluating the costs and potential benefits associated with cloud projects. <sup>^</sup>	7/26/2018
18	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	1	Non-public report.	10/25/2018
19	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	2	Non-public report.	10/25/2018

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20	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	3	Non-public report.	10/25/2018
21	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	4	Non-public report.	10/25/2018
22	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	1	Revise and update existing policies and procedures to address the Planning, Establishment, Maintenance, and Termination of system interconnections, including roles and responsibilities and documentation requirements.	12/4/2018
23	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	2	Execute MOAs and ISAs with Organization 2 and Organization 10 in accordance with the relevant contracts.	12/4/2018
24	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	3	Revise the standard contract language used for future contracts involving system interconnections, in coordination with DOA, to align with NIST guidance.	12/4/2018
25	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	4	Ensure that Division and Office ISMs review MOAs and ISAs annually to ensure they remain current.	12/4/2018
26	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	5	Implement procedures to regularly review, update, and reauthorize MOAs and ISAs, including contacting outside organizations when appropriate.	12/4/2018
27	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	6	Develop and implement procedures for providing written notification to technical staff within the FDIC and at outside organizations when a system interconnection is no longer needed.	12/4/2018
28	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	7	Develop and implement policies and procedures to govern the secure transfer of data outside of the FDIC using technologies that are not considered system interconnections.	12/4/2018

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29	AUD-19-003	<a href="#">Payments to Pragmatics, Inc.</a>	1	Determine the portion of the \$7,510 in unsupported labor charges that should be disallowed and recover that amount.	12/10/2018
30	AUD-19-003	<a href="#">Payments to Pragmatics, Inc.</a>	2	Determine whether the remaining labor charges for the subject under Task Orders 4 and 5 are unsupported charges that should be disallowed.	12/10/2018
31	AUD-19-003	<a href="#">Payments to Pragmatics, Inc.</a>	3	Determine the portion of the \$39,979 in unallowable labor charges that should be disallowed and recover that amount.	12/10/2018
32	AUD-19-003	<a href="#">Payments to Pragmatics, Inc.</a>	4	Determine whether additional labor charges should be disallowed for off-site work performed under Task Orders 4 and 5 that was not covered by the audit.	12/10/2018
33	AUD-19-003	<a href="#">Payments to Pragmatics, Inc.</a>	5	Document the disposition of the Pragmatics site visit in CEFile.	12/10/2018
34	AUD-19-003	<a href="#">Payments to Pragmatics, Inc.</a>	6	Remind Oversight Managers of the requirement to document the disposition of required site visits in the FDIC's contract files.	12/10/2018
35	AUD-19-003	<a href="#">Payments to Pragmatics, Inc.</a>	7	Ensure that all task orders under the ITAS II BOA and TBOAs identify a place of performance.	12/10/2018

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36	EVAL-17-004	<a href="#">Technology Service Provider Contracts with FDIC-Supervised Institutions</a>	1	<p>Continue to communicate to financial institutions (FI) the importance of:</p> <ul style="list-style-type: none"> <li>• Fully considering and assessing the risks that Third Party Service Providers (TSPs) could have on the financial institutions (FI's) ability to manage its own business continuity and incident response planning efforts;</li> <li>• Ensuring that contracts with TSPs include specific provisions that address FI-identified risks, protect FI interests, and provide details necessary to allow FIs to manage their own business continuity planning and incident response and reporting efforts through TSP operations; and</li> <li>• Clearly defining key contract terms that would be important in understanding FI and TSP rights and responsibilities in the event of a business disruption or computer security incident particularly for those contracts that FIs identify as critical or that have access to sensitive or personally identifiable information. <sup>^</sup></li> </ul>	2/14/2017
37	EVAL-17-004	<a href="#">Technology Service Provider Contracts with FDIC-Supervised Institutions</a>	2	<p>Following an appropriate amount of time for financial institutions (FIs) to implement guidance, conduct a follow-on study, such as a horizontal review of FIs, to assess to what extent the issues included in recommendation 1 are being effectively addressed by FIs.</p>	2/14/2017
38	EVAL-17-007	<a href="#">Controls over Separating Personnel's Access to Sensitive Information</a>	2	<p>Incorporate a risk assessment of individual separating employees into the FDIC's preexist clearance process.</p>	9/18/2017

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39	EVAL-17-007	<a href="#">Controls over Separating Personnel's Access to Sensitive Information</a>	3	Work with the FDIC's Chief Information Officer to establish appropriate policy for using data loss prevention to support the FDIC's pre-exit clearance process.	9/18/2017
40	EVAL-17-007	<a href="#">Controls over Separating Personnel's Access to Sensitive Information</a>	10	Work with the FDIC's Chief Information Officer to develop an expanded and better defined use of the data loss prevention tool for separating contractors.	9/18/2017
41	EVAL-18-001	<a href="#">FDIC's Implementation of Consumer Protection Rules Regarding Ability to Repay Mortgages and Compensation for Loan Originators</a>	4	Take steps to ensure Division of Depositor and Consumer Protection (DCP) examiners accurately complete and retain mandatory and other relevant examination workpapers to support their findings and conclusions. ^	12/6/2017
42	EVAL-18-003	<a href="#">Processing of Consumer Complaints</a>	3	Implement measures to improve timeliness for processing Fair Lending cases.	5/2/2018
43	EVAL-18-003	<a href="#">Processing of Consumer Complaints</a>	4	Establish separate performance goals for processing Fair Lending and Non-Fair Lending cases in a timely manner.	5/2/2018
44	EVAL-18-004	<a href="#">Forward-Looking Supervision</a>	1	Issue a comprehensive policy guidance document defining Forward-Looking Supervision, including its purpose, goals, roles, and responsibilities.	8/8/2018
45	EVAL-18-004	<a href="#">Forward-Looking Supervision</a>	3	Provide additional case studies on Forward-Looking Supervision to strengthen training for examiners on the analysis and identification of potential financial institution risk management weaknesses.	8/8/2018

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46	EVAL-18-004	<a href="#">Forward-Looking Supervision</a>	4	Conduct recurring retrospective reviews to validate that examiners thoroughly documented their written analyses of the financial institutions' practices regarding concentration risk management.	8/8/2018
47	OIG-18-001	<a href="#">The FDIC's Response, Reporting, and Interactions with Congress Concerning Information Security Incidents and Breaches</a>	2	Establish procedures for identifying, tracking, and providing guidance on the applicability and implementation of new statutory requirements and government-wide guidance. ^	4/16/2018
48	OIG-18-001	<a href="#">The FDIC's Response, Reporting, and Interactions with Congress Concerning Information Security Incidents and Breaches</a>	9	Develop guidance and training to ensure that employees and contractors are fully aware of the responsibility to return all FDIC equipment and documents and the prohibition against removing any sensitive information from FDIC premises before they depart, and understand the consequences—including available legal remedies—of providing false or inaccurate statements to the FDIC related to that responsibility.	4/16/2018
49	OIG-18-001	<a href="#">The FDIC's Response, Reporting, and Interactions with Congress Concerning Information Security Incidents and Breaches</a>	10	Ensure that its policies, procedures, and practices result in statements and representations to Congress and the American public that are full and complete and reflect the latest information known to agency personnel.	4/16/2018
50	OIG-18-001	<a href="#">The FDIC's Response, Reporting, and Interactions with Congress Concerning Information Security Incidents and Breaches</a>	11	Update and correct prior statements and representations made to Congress regarding the incidents addressed in this Special Inquiry where previous information is no longer accurate, valid, or complete.	4/16/2018
51	OIG-18-001	<a href="#">The FDIC's Response, Reporting, and Interactions with Congress Concerning Information Security Incidents and Breaches</a>	13	Ensure that Congressional communications policies, procedures, and guidelines establish a single office that has accountability and authority for providing timely responses compliant with Congressional requests and communicating with Congressional staff regarding those requests.	4/16/2018

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