

FDIC OIG Unimplemented Recommendations  
As of March 15, 2020

#	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. <sup>^</sup>	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-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	4	Non-public report.	10/25/2017
4	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	5	Non-public report.	10/25/2017
5	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	10	Non-public report.	10/25/2017
6	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	15	Non-public report.	10/25/2017
7	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
8	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
9	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	2	Non-public report.	10/25/2018
10	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

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

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11	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
12	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
13	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
14	AUD-19-004	<a href="#">Security Configuration Management of the Windows Server Operating System</a>	2	Establish and implement controls to ensure that Chief Information Officer (CIO) Organization policies and procedures are established before deploying new or modified IT processes or programs.	1/16/2019
15	AUD-19-005	<a href="#">Preventing and Detecting Cyber Threats</a>	1	Require that all existing firewall rules be documented with an approval and mission/business need, including the duration of that need. ^	5/28/2019
16	AUD-19-005	<a href="#">Preventing and Detecting Cyber Threats</a>	2	Establish and implement a firewall policy consistent with National Institute of Standards and Technology guidance. ^	5/28/2019
17	AUD-20-001	<a href="#">The FDIC's Information Security Program - 2019</a>	1	Reinforce to employees and contractor personnel the importance of properly safeguarding sensitive electronic and hardcopy information.	10/23/2019
18	AUD-20-001	<a href="#">The FDIC's Information Security Program - 2019</a>	2	Monitor employee and contractor compliance with policy requirements for properly safeguarding sensitive electronic and hardcopy information.	10/23/2019
19	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	1	Revise and implement policies, procedures, and/or guidance to address OMB policy and guidance for assessing privacy risk when categorizing information systems containing personally identifiable information.	12/18/2019

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20	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	2	Clarify and implement policies, procedures, and/or guidance that defines the role of the Senior Agency Official for Privacy (SAOP) in reviewing and approving system categorizations for information systems containing PII.	12/18/2019
21	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	3	Develop and approve privacy plans for all information systems containing PII consistent with Office of Management and Budget (OMB) Circular A-130.	12/18/2019
22	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	4	Implement a Privacy Continuous Monitoring (PCM) program to regularly assess the effectiveness of privacy controls.	12/18/2019
23	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	5	Update policies and/or procedures to reflect the current organizational structure of the Privacy Program and responsibilities of agency personnel and component offices that support the FDIC's Privacy Program.	12/18/2019
24	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	6	Establish a governance body or other governance mechanisms to assist the Chief Records Officer (CRO) with records management implementation and compliance.	12/18/2019
25	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	7	Complete and implement the data protection program policy directive, data labeling guide, and associated job aids.	12/18/2019
26	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	8	Develop and implement controls to ensure that PII stored in network shared drives and in hard copy is regularly monitored and reviewed for compliance with privacy laws, regulations, policy, and guidelines.	12/18/2019
27	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	9	Ensure that Divisions and Offices complete File Plans.	12/18/2019

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28	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	10	Perform annual evaluations of the Records Information Management (RIM) program.	12/18/2019
29	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	11	Generate reports to monitor and audit compliance with the FDIC's records retention and disposition requirements.	12/18/2019
30	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	12	Finalize and implement a records management framework for FDIC information systems that ensures compliance with records retention requirements.	12/18/2019
31	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	13	Revise and implement processes to ensure that PIAs are completed and made available to the public prior to authorizing information systems containing PII to operate.	12/18/2019
32	AUD-20-003	<a href="#">The FDIC's Privacy Program</a>	14	Revise and implement policy and/or processes to ensure Privacy Impact Assessments (PIAs) are periodically reviewed, updated, and removed from the FDIC's public website when systems are retired.	12/18/2019
33	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	1	Revise and update the FDIC Physical Security Program Circular and develop and implement procedures to define the roles, responsibilities, and requirements for physical security risk management activities and decision-making. These revisions should include: <ul style="list-style-type: none"> <li>a. Ensuring that there is sufficient documentation and support for physical security risk management activities and decisions, including those decisions related to when the Interagency Security Committee (ISC) standards were determined to be not practical;</li> <li>b. Ensuring that each facility security level (FSL) determination is documented, accurate, and adequately supported;</li> <li>c. Ensuring that if an FSL is revised, the FDIC reviews the countermeasures and risk mitigation strategies for the facility;</li> </ul>	4/9/2019

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				d. Updating and reviewing facility security plans on an annual basis; e. Ensuring that all facility security assessment (FSA) recommendations are identified, prioritized, and tracked; f. Identifying requirements for pre-lease physical security activities and deliverables; and g. Requiring that FDIC senior management be routinely advised of the status of the physical security program at FDIC Headquarters, Regional, Area, and Field Offices.	
34	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	2	Establish and implement training requirements for personnel conducting facility security level (FSL) determinations and Facility security assessments (FSAs).	4/9/2019
35	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	3	Establish and implement controls to ensure that DOA maintains security assessment-related records in accordance with the FDIC Records and Information Management Policy Manual.	4/9/2019
36	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	7	Document the justifications for the physical security activities that the FDIC has taken in response to recommendations, including decisions to accept risk or regarding expenditures for security countermeasures above the recommended standards for an assigned facility security level (FSL).	4/9/2019
37	EVAL-19-002	<a href="#">Minority Depository Institution Program at the FDIC</a>	1	Establish, implement, and document a process to assess the effectiveness of Minority Depository Institution (MDI) Program supervisory strategies.	9/24/2019

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38	EVAL-19-002	<a href="#">Minority Depository Institution Program at the FDIC</a>	2	Establish and implement a process to assess the effectiveness of the FDIC's MDI Program technical assistance efforts, including using outcome-oriented goals and related performance measures.	9/24/2019
39	EVAL-19-002	<a href="#">Minority Depository Institution Program at the FDIC</a>	3	Establish and implement a process to further assess the effectiveness of the FDIC's MDI Program training sessions, education, and outreach efforts.	9/24/2019
40	EVAL-19-002	<a href="#">Minority Depository Institution Program at the FDIC</a>	4	Issue guidance to the Regional Offices defining the types of activities that comprise technical assistance, as distinct from training, education, and outreach.	9/24/2019
41	EVAL-19-002	<a href="#">Minority Depository Institution Program at the FDIC</a>	5	Assess the benefit and feasibility of increasing MDI Program training, education, and outreach for MDIs, and if deemed beneficial and feasible, do so.	9/24/2019
42	EVAL-20-001	<a href="#">Contract Oversight Management</a>	1	Collect key acquisition data, including original contract award amount for modified contracts, original period of performance for modified contracts, clear and properly recorded contract modifications, and oversight manager workload, which will enhance automated portfolio-wide analyses and reporting to support informed decision-making.	10/28/2019
43	EVAL-20-001	<a href="#">Contract Oversight Management</a>	2	Provide enhanced contract portfolio reports to FDIC executives, senior management, and the Board of Directors.	10/28/2019
44	EVAL-20-001	<a href="#">Contract Oversight Management</a>	4	Evaluate CEFile/CDIS performance to assess Oversight Managers' concerns regarding extensive document upload time, and, if substantiated, implement a solution.	10/28/2019

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45	EVAL-20-001	<a href="#">Contract Oversight Management</a>	5	Require Divisions/Offices to implement a routine process to verify that Oversight Managers are uploading documents in CEFile in a timely manner and are maintaining complete files.	10/28/2019
46	EVAL-20-001	<a href="#">Contract Oversight Management</a>	7	Complete an updated Privacy Threshold Analysis of CEFile as well as an updated Privacy Threshold Analysis of CDIS, in conjunction with the Division of Information Technology.	10/28/2019
47	EVAL-20-001	<a href="#">Contract Oversight Management</a>	8	In conjunction with the Division of Information Technology, develop controls around access to information contained within CEFile to ensure that Personally Identifiable Information is appropriately protected, or identify an alternative to CEFile that can serve as a secure repository for all contract documents.	10/28/2019
48	EVAL-20-001	<a href="#">Contract Oversight Management</a>	9	Provide Oversight Manager workload ratio information to Division and Office management to assist in making informed workforce planning decisions.	10/28/2019
49	EVAL-20-001	<a href="#">Contract Oversight Management</a>	10	Determine the appropriate number of oversight managers needed to manage the Division of Information Technology's (DIT) contract workload in conjunction with DIT, and ensure the Oversight Manager workforce is appropriately staffed.	10/28/2019
50	EVAL-20-001	<a href="#">Contract Oversight Management</a>	11	Revise the Acquisition Services Branch's Oversight Manager training and certification verification process to require the use of Corporate University's Learning Management System.	10/28/2019
51	EVAL-20-002	<a href="#">Offsite Reviews of 1- and 2-Rated Institutions</a>	1	Evaluate the feasibility of using additional methods and innovative technologies to identify 1- and 2-rated institutions with other types of emerging supervisory concerns.	12/18/2019

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52	EVAL-20-002	<a href="#">Offsite Reviews of 1- and 2-Rated Institutions</a>	2	Provide guidance on the scope and methodology to be applied when conducting an offsite review.	12/18/2019
53	EVAL-20-002	<a href="#">Offsite Reviews of 1- and 2-Rated Institutions</a>	3	Provide Offsite Review Program training for Case Managers to ensure consistent application of offsite review procedures and to ensure Case Managers understand the importance of conducting offsite reviews on institutions that recur on the Offsite Review List.	12/18/2019
54	EVAL-20-003	<a href="#">Cost Benefit Analysis Process for Rulemaking</a>	1	Establish, document, and implement policy and procedures for conducting cost benefit analyses, including when and how the cost benefit analyses will be performed.	2/4/2020
55	EVAL-20-003	<a href="#">Cost Benefit Analysis Process for Rulemaking</a>	2	Establish, document, and implement policy and procedures that clearly define the roles and responsibilities for the RAS, and early involvement for the RAS in participating in and framing the initial policy direction of a rule.	2/4/2020
56	EVAL-20-003	<a href="#">Cost Benefit Analysis Process for Rulemaking</a>	3	Establish, document, and implement policy and procedures that clearly define the Chief Economist's roles and responsibilities for reviewing and concurring on cost benefit analyses performed.	2/4/2020
57	EVAL-20-003	<a href="#">Cost Benefit Analysis Process for Rulemaking</a>	4	Establish, document, and implement policy and procedures that address how cost benefit analyses and supporting information, such as scope and methodology, analyses, conclusions, and reconciliation to the Agency's final policy decision will be documented and published in the Federal Register to ensure transparency.	2/4/2020
58	EVAL-20-003	<a href="#">Cost Benefit Analysis Process for Rulemaking</a>	5	Establish, document, and implement policy and procedures for conducting retrospective cost benefit analyses on existing rules, including a regulatory risk assessment, as well as roles and responsibilities for the Driver Divisions, Chief Economist, and DIR/RAS.	2/4/2020