

FDIC OIG Unimplemented Recommendations  
As of April 15, 2019

#	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-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>	6	Non-public report. ^	10/25/2017
6	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	9	Non-public report.	10/25/2017
7	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	10	Non-public report.	10/25/2017
8	AUD-18-001	<a href="#">Audit of the FDIC's Information Security Program - 2017</a>	15	Non-public report.	10/25/2017
9	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	3	Implement an enterprise architecture (EA) that is part of the FDIC's Information Technology (IT) Governance Framework and used to guide IT decision-making. ^	7/26/2018
10	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

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11	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
12	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	2	Non-public report.	10/25/2018
13	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	3	Non-public report.	10/25/2018
14	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	4	Non-public report.	10/25/2018
15	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
16	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	2	Execute Memorandum of Agreement (MOAs) and Interconnection Security Agreement (ISAs) with Organization 2 and Organization 10 in accordance with the relevant contracts.	12/4/2018
17	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 Division of Administration (DOA), to align with National Institute of Standards and Technology (NIST) guidance.	12/4/2018
18	AUD-19-002	<a href="#">Controls Over System Interconnections with Outside Organizations</a>	4	Ensure that Division and Office Interconnection Security Agreement (ISMs) review Memorandum of Agreement (MOAs) and ISAs annually to ensure they remain current.	12/4/2018
19	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

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20	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
21	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
22	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
23	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
24	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
25	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
26	AUD-19-003	<a href="#">Payments to Pragmatics, Inc.</a>	5	Document the disposition of the Pragmatics site visit in CEFile.	12/10/2018
27	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
28	AUD-19-004	<a href="#">Security Configuration Management of the Windows Server Operating System</a>	3	Establish requirements to ensure the independence of security control assessors.	1/16/2019

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29	AUD-19-004	<a href="#">Security Configuration Management of the Windows Server Operating System</a>	4	Establish and implement procedures to ensure that contractor-submitted Continuous Controls Assessment (CCA) Reports are reviewed for consistency with applicable requirements in contractual agreements and that such reviews are documented.	1/16/2019
30	AUD-19-004	<a href="#">Security Configuration Management of the Windows Server Operating System</a>	5	Require that CIO Organization management ensure the sufficiency of CCA Report reviews and provide feedback when review activities are deemed insufficient.	1/16/2019
31	AUD-19-004	<a href="#">Security Configuration Management of the Windows Server Operating System</a>	7	Update the security plan for the Windows Server operating system to reflect current security controls.	1/16/2019
32	AUD-19-004	<a href="#">Security Configuration Management of the Windows Server Operating System</a>	8	Define roles and responsibilities to ensure FDIC personnel update security plans as security controls change.	1/16/2019
33	EVAL-17-007	<a href="#">Controls over Separating Personnel's Access to Sensitive Information</a>	2	Incorporate a risk assessment of individual separating employees into the FDIC's preexist clearance process.	9/18/2017
34	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
35	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
36	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. <sup>^</sup>	8/8/2018

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37	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> <li>d. Updating and reviewing facility security plans on an annual basis;</li> <li>e. Ensuring that all facility security assessment (FSA) recommendations are identified, prioritized, and tracked;</li> <li>f. Identifying requirements for pre-lease physical security activities and deliverables; and</li> <li>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.</li> </ul>	4/9/2019
38	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
39	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

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40	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	4	Implement an automated facility security assessment (FSA) template, tool, or other mechanism to ensure that that the FSAs consider all threat, consequence, and vulnerability assessments of undesirable events and assess relevant countermeasures for each FDIC facility. This tool or mechanism should track and record: <ul style="list-style-type: none"> <li>a. Recurring, structured testing and maintenance programs for the FDIC's electronic security systems;</li> <li>b. Controls for electronic building and access systems at FDIC facilities;</li> <li>c. Security countermeasures for child-care centers in FDIC facilities;</li> <li>d. Facility Security Plans for FDIC facilities; and</li> <li>e. Accurate facility security level (FSL) and FSA data.</li> </ul>	4/9/2019
41	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	5	Track and record training programs for physical security awareness that is provided to FDIC employees and contractors annually.	4/9/2019
42	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	6	Evaluate the resource needs for the physical security risk management process and modify resources as necessary.	4/9/2019
43	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

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44	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	8	Provide the FDIC Board with revised, accurate information supporting the use of security guards at facility security level (FSL) II Offices and identifying the related financial impact.	4/9/2019
45	EVAL-19-001	<a href="#">The FDIC's Physical Security Risk Management Process</a>	9	Identify goals and metrics for measuring the performance of the physical security program to ensure the timeliness, quality, and effectiveness of FDIC risk management process activities.	4/9/2019
46	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

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