

FDIC OIG Unimplemented Recommendations
As of October 15, 2020

#	OIG Report No.	Report Title	Rec No.	Recommendation	Issued Date
1	AUD-17-001	Audit of the FDIC's Information Security Program - 2016	5	Non-public report.	11/2/2016
2	AUD-18-004	The FDIC's Governance of Information Technology Initiatives	7	Identify and document the information technology resources and expertise needed to execute the FDIC's IT Strategic Plan.	7/26/2018
3	AUD-19-003	Payments to Pragmatics, Inc.	1	Determine the portion of the \$7,510 in unsupported labor charges that should be disallowed and recover that amount.	12/10/2018
4	AUD-19-003	Payments to Pragmatics, Inc.	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
5	AUD-19-003	Payments to Pragmatics, Inc.	3	Determine the portion of the \$39,979 in unallowable labor charges that should be disallowed and recover that amount.	12/10/2018
6	AUD-19-003	Payments to Pragmatics, Inc.	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
7	AUD-20-001	The FDIC's Information Security Program - 2019	2	Monitor employee and contractor compliance with policy requirements for properly safeguarding sensitive electronic and hardcopy information.	10/23/2019
8	AUD-20-003	The FDIC's Privacy Program	3	Develop and approve privacy plans for all information systems containing personally identifiable Information consistent with Office of Management and Budget (OMB) Circular A-130.	12/18/2019
9	AUD-20-003	The FDIC's Privacy Program	4	Implement a Privacy Continuous Monitoring (PCM) program to regularly assess the effectiveness of privacy controls.	12/18/2019

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10	AUD-20-003	The FDIC's Privacy Program	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
11	AUD-20-003	The FDIC's Privacy Program	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
12	AUD-20-003	The FDIC's Privacy Program	7	Complete and implement the data protection program policy directive, data labeling guide, and associated job aids.	12/18/2019
13	AUD-20-003	The FDIC's Privacy Program	8	Develop and implement controls to ensure that personally identifiable information 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
14	AUD-20-003	The FDIC's Privacy Program	9	Ensure that Divisions and Offices complete File Plans.	12/18/2019
15	AUD-20-003	The FDIC's Privacy Program	10	Perform annual evaluations of the Records Information Management (RIM) program.	12/18/2019
16	AUD-20-003	The FDIC's Privacy Program	11	Generate reports to monitor and audit compliance with the FDIC's records retention and disposition requirements.	12/18/2019
17	AUD-20-003	The FDIC's Privacy Program	12	Finalize and implement a records management framework for FDIC information systems that ensures compliance with records retention requirements.	12/18/2019
18	AUD-20-003	The FDIC's Privacy Program	13	Revise and implement processes to ensure that Privacy Impact Assessments (PIAs) are completed and made available to the public prior to authorizing information	12/18/2019

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				systems containing personally identifiable Information to operate.	
19	AUD-20-003	The FDIC's Privacy Program	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
20	EVAL-19-001	The FDIC's Physical Security Risk Management Process	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
21	EVAL-19-002	Minority Depository Institution Program at the FDIC	1	Establish, implement, and document a process to assess the effectiveness of Minority Depository Institution (MDI) Program supervisory strategies.	9/24/2019
22	EVAL-19-002	Minority Depository Institution Program at the FDIC	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
23	EVAL-20-001	Contract Oversight Management	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
24	EVAL-20-001	Contract Oversight Management	2	Provide enhanced contract portfolio reports to FDIC executives, senior management, and the Board of Directors.	10/28/2019

[^] The Corporation's Corrective Action Closure Package with OIG for review.

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25	EVAL-20-001	Contract Oversight Management	4	Evaluate Contract Electronic File /Consolidated Document Information System (CDIS) performance to assess Oversight Managers' concerns regarding extensive document upload time, and, if substantiated, implement a solution.	10/28/2019
26	EVAL-20-001	Contract Oversight Management	5	Require Divisions/Offices to implement a routine process to verify that Oversight Managers are uploading documents in Contract Electronic File in a timely manner and are maintaining complete files.	10/28/2019
27	EVAL-20-001	Contract Oversight Management	7	Complete an updated Privacy Threshold Analysis of Contract Electronic File as well as an updated Privacy Threshold Analysis of Consolidated Document Information System, in conjunction with the Division of Information Technology.	10/28/2019
28	EVAL-20-001	Contract Oversight Management	8	In conjunction with the Division of Information Technology, develop controls around access to information contained within Contract Electronic File to ensure that Personally Identifiable Information is appropriately protected, or identify an alternative to Contract Electronic File that can serve as a secure repository for all contract documents.	10/28/2019
29	EVAL-20-002	Offsite Reviews of 1- and 2-Rated Institutions	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
30	EVAL-20-003	Cost Benefit Analysis Process for Rulemaking	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

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31	EVAL-20-003	Cost Benefit Analysis Process for Rulemaking	2	Establish, document, and implement policy and procedures that clearly define the roles and responsibilities for the Regulatory Analysis Section (RAS), and early involvement for the RAS in participating in and framing the initial policy direction of a rule.	2/4/2020
32	EVAL-20-003	Cost Benefit Analysis Process for Rulemaking	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
33	EVAL-20-003	Cost Benefit Analysis Process for Rulemaking	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
34	EVAL-20-003	Cost Benefit Analysis Process for Rulemaking	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 Division of Insurance and Research (DIR)/ Regulatory Analysis Section (RAS).	2/4/2020
35	EVAL-20-004	The FDIC's Readiness for Crises	1	Establish and implement a policy providing senior management's crisis readiness directives.	4/7/2020
36	EVAL-20-004	The FDIC's Readiness for Crises	2	Establish a committee to guide and oversee FDIC crisis readiness planning.	4/7/2020

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37	EVAL-20-004	The FDIC's Readiness for Crises	3	Establish and implement procedures supporting an Agency-wide process for crisis readiness planning.	4/7/2020
38	EVAL-20-004	The FDIC's Readiness for Crises	4	Establish and implement an Agency-wide all-hazards readiness plan that identifies and integrates FDIC readiness activities common to all crises impacting insured depository institutions.	4/7/2020
39	EVAL-20-004	The FDIC's Readiness for Crises	5	Establish and implement Agency-wide hazard-specific readiness plans, as needed, to identify and integrate FDIC readiness plans and activities unique to specific hazards impacting insured depository institutions.	4/7/2020
40	EVAL-20-004	The FDIC's Readiness for Crises	6	Establish and implement a process for ensuring periodic training of responsible personnel on their task-related responsibilities in executing readiness plans.	4/7/2020
41	EVAL-20-004	The FDIC's Readiness for Crises	7	Establish and implement a process for regularly documenting readiness plan exercise results and related recommendations, and retaining that documentation for use in readiness improvement activities.	4/7/2020
42	EVAL-20-004	The FDIC's Readiness for Crises	8	Establish and implement a monitoring process for lessons learned that prioritizes and tracks recommendations to improve readiness activities	4/7/2020
43	EVAL-20-004	The FDIC's Readiness for Crises	9	Establish and implement a process to ensure that the FDIC reviews and updates readiness plans on a recurring basis.	4/7/2020

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44	EVAL-20-004	The FDIC's Readiness for Crises	10	Establish and maintain a central repository of up-to-date readiness plans.	4/7/2020
45	EVAL-20-004	The FDIC's Readiness for Crises	11	Establish and implement a process to assess and report regularly on the state of the FDIC's Agency-wide readiness to address crises impacting insured depository institutions.	4/7/2020
46	EVAL-20-005	The FDIC's Implementation of Enterprise Risk Management	1	Define, document, and implement the authorities, roles, and responsibilities of the Operating Committee as the RMC, including: a) Oversight of the establishment of the Agency's risk profile; b) Oversight of the regular assessment of risks; c) Oversight of the development of appropriate risk responses; and d) Final determinations of the approaches and actions to address the risks in the FDIC's risk profile. These determinations should be based on deliberative discussion and consideration around additional actions that may be suggested or required to reduce the overall level of residual risk and align to the organization's risk appetite and tolerance levels.	7/8/2020
47	EVAL-20-005	The FDIC's Implementation of Enterprise Risk Management	2	Define the roles and responsibilities of the Board with respect to enterprise risk management, including its role in endorsing the risk appetite statement.	7/8/2020
48	EVAL-20-005	The FDIC's Implementation of Enterprise Risk Management	3	Develop and implement enterprise risk management communication protocols to the Board.	7/8/2020

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49	EVAL-20-005	The FDIC's Implementation of Enterprise Risk Management	4	Define the roles and responsibilities of each committee in relation to enterprise risk management.	7/8/2020
50	EVAL-20-005	The FDIC's Implementation of Enterprise Risk Management	5	Develop and implement procedures on how the risk committees interface with other enterprise risk management processes.	7/8/2020
51	EVAL-20-005	The FDIC's Implementation of Enterprise Risk Management	7	Develop and implement procedures pertaining to how the Divisions, Offices, and Risk Management and Internal Controls Branch should execute their particular job functions related to enterprise risk management.	7/8/2020
52	EVAL-20-005	The FDIC's Implementation of Enterprise Risk Management	8	Define, document, and implement procedures to ensure that enterprise risks are evaluated using enterprise risk management before enterprise-wide decisions are made.	7/8/2020
53	EVAL-20-006	Preventing and Addressing Sexual Harassment	1	Develop and implement a strategy for acknowledging employees, supervisors, and managers, as appropriate, for creating and maintaining a culture in which harassment is not tolerated and promptly reporting, investigating, and resolving harassment complaints.	7/10/2020
54	EVAL-20-006	Preventing and Addressing Sexual Harassment	2	Define in FDIC policy the terminology involving sexual harassment and ensure that it includes the Equal Employment Opportunity definition.	7/10/2020
55	EVAL-20-006	Preventing and Addressing Sexual Harassment	3	Specify within FDIC policy that HR Specialists (Labor and Employee Relations Section) are avenues for employees to report sexual harassment and correct the contact information for the Anti-Harassment Program Coordinator.	7/10/2020

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56	EVAL-20-006	Preventing and Addressing Sexual Harassment	4	Clearly identify in FDIC policy the Anti-Harassment Program Coordinator roles and responsibilities with respect to sexual harassment allegations.	7/10/2020
57	EVAL-20-006	Preventing and Addressing Sexual Harassment	5	Include requirements in FDIC policy for proportionate corrective action (discipline) when harassment is substantiated.	7/10/2020
58	EVAL-20-006	Preventing and Addressing Sexual Harassment	6	Incorporate in FDIC policy options of alternative disciplinary action.	7/10/2020
59	EVAL-20-006	Preventing and Addressing Sexual Harassment	7	Include in FDIC policy Legal Division responsibilities.	7/10/2020
60	EVAL-20-006	Preventing and Addressing Sexual Harassment	8	Develop and implement a tracking system for sexual harassment misconduct allegations handled by the Anti-Harassment Program to ensure that relevant information is centralized, complete, accurate, and updated timely.	7/10/2020
61	EVAL-20-006	Preventing and Addressing Sexual Harassment	9	Track data elements for misconduct allegations, including original allegation date; misconduct classification; date investigation concluded; name of investigator; names of complainant, alleged harasser, and witnesses; whether the allegation was substantiated or unsubstantiated; and date of written notification to complainant and alleged harasser regarding completion of the investigation.	7/10/2020

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62	EVAL-20-006	Preventing and Addressing Sexual Harassment	10	Develop and implement procedures for investigating sexual harassment misconduct allegations.	7/10/2020
63	EVAL-20-006	Preventing and Addressing Sexual Harassment	12	Develop and implement procedures to ensure that supervisors take consistent disciplinary actions for substantiated sexual harassment, in line with Federal government law on imposing disciplinary actions.	7/10/2020
64	EVAL-20-006	Preventing and Addressing Sexual Harassment	13	Develop and implement a comprehensive, centralized database of disciplinary actions, including those associated with sexual harassment.	7/10/2020
65	EVAL-20-006	Preventing and Addressing Sexual Harassment	14	Enhance employee and supervisor training on identifying and reporting sexual harassment, to include the training content recommended by the Equal Employment Opportunity Commission.	7/10/2020
66	EVAL-20-006	Preventing and Addressing Sexual Harassment	15	Develop oversight mechanisms to assess the effectiveness of the FDIC's sexual harassment prevention efforts and determine whether the FDIC is addressing sexual harassment allegations in a prompt and effective manner.	7/10/2020
67	EVAL-20-007	In-Depth Review of Enloe State Bank, Cooper, Texas	1	Clarify criteria the examiners should use to identify an official as dominant.	9/30/2020
68	EVAL-20-007	In-Depth Review of Enloe State Bank, Cooper, Texas	2	Train examiners on the importance of understanding and documenting the independence and qualifications of internal auditor(s), and reviewing internal audit work papers and results.	9/30/2020

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69	EVAL-20-007	In-Depth Review of Enloe State Bank, Cooper, Texas	3	Train examiners on the importance of adequate annual external financial audit coverage, and under what circumstances and with what justifications banks may obtain reviews in place of audits.	9/30/2020
70	EVAL-20-007	In-Depth Review of Enloe State Bank, Cooper, Texas	4	Implement guidance and train personnel on monitoring and following up on State-issued Matters Requiring Board Attention.	9/30/2020
71	EVAL-20-007	In-Depth Review of Enloe State Bank, Cooper, Texas	5	Train examiners on the importance of ensuring that information system user access controls be adequately tested.	9/30/2020
72	EVAL-20-007	In-Depth Review of Enloe State Bank, Cooper, Texas	6	Enhance case study training to incorporate the lessons learned from Enloe State Bank in regard to performing additional procedures related to the bank's loan related activity.	9/30/2020
73	EVAL-20-007	In-Depth Review of Enloe State Bank, Cooper, Texas	7	Train examiners to perform additional procedures to determine the likelihood of fraud once a dominant official designation is made at a bank with a weak internal control environment.	9/30/2020
74	EVAL-20-007	In-Depth Review of Enloe State Bank, Cooper, Texas	8	Train examiners on indicators of fraud and how individual issues identified during an examination should be considered holistically to facilitate fraud detection.	9/30/2020