

FDIC OIG Unimplemented Recommendations  
As of November 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 the OIG for review.

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11	AUD-18-002	<a href="#">Material Loss Review of First NBC Bank, New Orleans, Louisiana</a>	2	Update training materials and conduct training to reflect the lessons learned from this failure. ^	11/3/2017
12	AUD-18-004	<a href="#">The FDIC's Governance of Information Technology Initiatives</a>	1	Develop an implementation plan to support the IT Strategic Plan, in coordination with FDIC stakeholders. The implementation plan should reflect the priorities of the FDIC and resources needed to execute the implementation plan. ^	7/26/2018
13	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. ^	7/26/2018
14	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. ^	7/26/2018
15	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. ^	7/26/2018
16	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
17	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. ^	7/26/2018
18	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

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19	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. ^	7/26/2018
20	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	1	Non-public report.	10/25/2018
21	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	2	Non-public report.	10/25/2018
22	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	3	Non-public report.	10/25/2018
23	AUD-19-001	<a href="#">The FDIC's Information Security Program - 2018</a>	4	Non-public report.	10/25/2018

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24	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
25	EVAL-17-004	<a href="#">Technology Service Provider Contracts with FDIC-Supervised Institutions</a>	2	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.	2/14/2017
26	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

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27	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
28	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
29	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
30	EVAL-18-003	<a href="#">Processing of Consumer Complaints</a>	3	Implement measures to improve timeliness for processing Fair Lending cases.	5/2/2018
31	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
32	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
33	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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34	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
35	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
36	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
37	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
38	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
39	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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