

SECURITIES AND EXCHANGE COMMISSION
AUDIT RECOMMENDATION TRACKING SYSTEM (SEMIANNUAL)

Print Date : 11/30/2009

ADT SEQ	AUDIT TITLE	REC LTR	RECOMMENDATION	STATUS
471	Audit of OAS Procurement and Contract Management Functions	1	The Office of Administrative Services should develop record-keeping standard operating procedures to track procurement and contracting (acquisition) activities.	Pending
		2	The Office of Administrative Services should develop a periodic internal review process to ensure that the newly developed recordkeeping standards are followed.	Pending
		3	The Office of Administrative Services should determine the universe of active and open contracts and the corresponding value of the contracts. Once this is . . .	Pending
		4	The Office of Administrative Services should develop an internal process to ensure procurement data is accurately and fully reported in the Federal . . .	Pending
		5	The Office of Administrative Services shall develop an acquisition training plan to ensure all Commission headquarters and Regional Offices/Divisions . . .	Pending
		6	The Office of Administrative Services shall provide Regional Offices with oversight including the proper use of Contracting Officer Technical . . .	Pending
		7	The Office of Acquisitions should revise and finalize its data migration plan and include key controls or steps that will ensure that all data migrated into . . .	Pending
		8	The Office of Acquisitions should re-educate the acquisition workforce on the Federal Acquisition Regulation requirements that are related to Time-and-Materials, . . .	Pending
		9	The Office of Acquisitions should update the SECR 10-14, Procurement Contract Administration, regarding contract closeout and ensure that it . . .	Pending
		10	The Office of Acquisitions should develop an internal review process and checklist to further ensure compliance with the Federal Acquisition Regulation contract closeout procedures.	Pending
470	Audit of the Commission's Process for Conducting Investment Advisor Examinations	1	OCIE should implement a procedure requiring, as part its process for creating a risk rating for an investment adviser, ...	Pending
		2	OCIE should change the risk rating of an investment adviser based on pertinent information garnered from all Divisions and Offices of the Commission, ...	Pending
		3	Enforcement and OCIE should establish and adhere to a joint protocol providing for the sharing of all pertinent information...	Pending
		4	OCIE should establish a procedure to thoroughly evaluate negative information that it receives about an investment adviser and ...	Pending
		5	When the OCIE becomes aware of negative information pertaining to an investment adviser, OCIE should examine the investment adviser's Form ADV filings and...	Pending
		6	OCIE should establish a procedure to thoroughly evaluate an investment adviser's Form ADVs when OCIE becomes aware of issues or problems with an investment adviser.	Pending
		7	OCIE should re-evaluate the point scores that it assigns to advisers based on their reported assets under management.	Pending

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470	Audit of the Commission's Process for Conducting Investment Advisor Examinations	8	OCIE should re-evaluate the point scores that it assigns to firms based on their reported number of clients to which they provide investment advisory services.	Pending
		9	OCIE should recommend to the Chairman's office that it institute a Commission rulemaking that would require the following additional information to be reported as part of Form ADV:	Pending
		10	The Commission should finalize the proposed rule titled Amendments to Form ADV [Release No. IA-2711; 34-57419].	Pending
		11	OCIE should develop and adhere to policies and procedures for conducting third party verifications, such that OCIE verifies the existence of assets, custodian statements, and other relevant criteria.	Pending
468	Review of the OCIE Examination Process	1	OCIE should provide all examiners access to relevant industry publications . . .	Pending
		2	OCIE should establish a protocol for searching and screening news articles and information from relevant industry sources that may indicate . . .	Pending
		3	OCIE should establish a protocol that explains how to identify red flags and potential violations of securities law based on . . .	Pending
		4	In accordance with the findings of the Center for Enterprise Modernization project and prior to its completion, OCIE should . . .	Pending
		5	OCIE should annually review and test the effectiveness of its policies and procedures with regard to its tip and complaint collection system.	Pending
		6	Tips and complaints reviewed by the OCIE that appear on the surface to be credible and compelling should . . .	Pending
		7	All OCIE-related tips and/or complaints that are not vetted within 30 days of receipt should be . . .	Pending
		8	All potentially relevant information received by the Office of Compliance Inspections and Examinations from a tip or complaint source should be . . .	Pending
		9	OCIE should augment its policies and procedures related to the use of scope memoranda to better . . .	Pending
		10	OCIE should timely modify or append the scope memorandum when significant new facts and issues emerge.	Pending
		11	After examination scoping provisions have been approved, along with all other elements of the Planning Memorandum, the Planning Memorandum should be subjected to . . .	Pending
		12	After the Planning Memorandum is first drafted, it should be circulated to all examination team members, and . . .	Pending
		13	The examination team leader should ensure that all steps of the examination methodology, as stated in the Planning Memorandum, are completed and . . .	Pending

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468	Review of the OCIE Examination Process	14	Substantive interviews conducted by OCIE of registrants and third-parties during OCIE's pre-examination activities and . . .	Pending
		15	The workpapers for a given examination should be in sufficient detail to provide a clear understanding of its purpose, source, and the conclusions reached.	Pending
		16	When logging all OCIE examinations into an examination tracking system, the team leader should verify that the appropriate entry is . . .	Pending
		17	OCIE should annually review and test the effectiveness of its policies and procedures with regard to conducting, documenting and concluding its examinations . . .	Pending
		18	The focus of an examination should drive the selection of the examination team and team members should be selected based upon their expertise related to such focus.	Pending
		19	Senior OCIE management should ensure that personnel with the appropriate skills and expertise are assigned to . . .	Pending
		20	OCIE should assign a Branch Chief, or a similarly designated lead manager, on every substantive project including all cause examinations.	Pending
		21	OCIE should develop a formal plan with specific goals associated with achieving and maintaining professional designations and/or licenses by . . .	Pending
		22	OCIE should develop and implement interactive exercises to be administered by OCIE training staff or an independent third party and . . .	Pending
		23	Subject to approval of the examination team leader, OCIE examiners should contact clients of a BD or IA when . . .	Pending
		24	In the course of an examination, if an examiner becomes aware of a potential securities law violation at another firm, that examiner should consult with the . . .	Pending
		25	OCIE examiners should be trained in the mechanics of securities settlement, both in the U.S. and in major foreign markets.	Pending
		26	OCIE examiners should be trained by the OIA in methods to access the expertise of foreign regulators, such as . . .	Pending
		27	For significant issues such as whether trades have been executed and who has custody of assets, in the absence of third party (counterparties, custodians, etc.)	Pending
		28	OCIE examination staff should be required to verify a test sample of trading or balance data with counterparties and other independent third parties such as . . .	Pending
		29	OCIE examiners should be trained jointly with the Office of Economic Analysis economists by FINRA, . . .	Pending
		30	OCIE staff should be given direct access to certain databases maintained by self-regulatory organizations or other similar agencies . . .	Pending

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468	Review of the OCIE Examination Process	31	When an examination team is pulled off the examination for a project of higher priority, upon completion of that project, the examination team should return to their . . .	Pending
		32	One person in OCIE should be responsible for tracking the progress of all cause examinations, and the tracking should include . . .	Pending
		33	OCIE'S policies and procedures should clearly indicate that at the conclusion of each examination, . . .	Pending
		34	Examination staff should not leave open any substantive issue without providing a sufficient basis for such a determination or a plan to pursue that issue at an appropriate later time.	Pending
		35	OCIE training should include instruction on personal liability, if any, assumed on the part of examiners for their actions in the course of performing their duties for OCIE.	Pending
		36	OCIE management should make clear that it will support OCIE examiners in their pursuit of evidence in the course of an examination, even if pursuing that evidence requires contacting customers . . .	Pending
		37	When an auditor's independence is questioned in a tip or complaint, OCIE . . .	Pending
467	Enforcement Management Effectiveness Survey	1	Enforcement should establish formal guidance for evaluating various types of complaints (e.g., Ponzi schemes) and train appropriate staff on the use of the guidance.	Pending
		2	Enforcement should ensure the SEC's tip and complaint handling system provides for data capture of relevant information relating to . . .	Pending
		3	Enforcement should require tips and complaints to be reviewed by at least two individuals experienced in the subject matter prior to deciding not to take further action.	Pending
		4	Enforcement should establish guidance to require that all complaints that appear on the surface to be credible and compelling be probed further by . . .	Pending
		5	Enforcement should provide training to staff to ensure they are aware of the guidelines contained in Section 3.2.5 of the Enforcement Manual and . . .	Pending
		6	Enforcement should annually review and test the effectiveness of its policies and procedures with regard to its new tip and complaint handling system.	Pending
		7	Enforcement should put in place procedures to ensure that investigations are assigned to teams where at least one individual on the team has specific and . . .	Pending
		8	Enforcement should train staff on what resources and information is available from the national specialized units and when and how assistance from these units should be requested.	Pending
		9	Enforcement should make it mandatory that planning memoranda be prepared during an investigation and that the plan includes a section identifying what type . . .	Pending

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467	Enforcement Management Effectiveness Survey	10	Enforcement should require that after the planning memorandum is drafted, it is circulated to all team members assigned to the investigation, and all team . . .	Pending		
		11	Enforcement should establish procedures so that junior-level Enforcement attorneys who are having difficulty with obtaining timely assistance from . . .	Pending		
		12	Enforcement should conduct periodic internal reviews of any newly implemented policies and procedures related to information sharing with Divisions and Offices . . .	Pending		
		13	Enforcement should require that the planning memorandum and associated scope, methodology and timeframes be routinely reviewed by an investigator's . . .	Pending		
		14	Enforcement should ensure that sufficient resources, both supervisory and support are dedicated to investigations upfront to provide for adequate and thorough . . .	Pending		
		15	Enforcement should put in place policies and procedures or training mechanisms to ensure staff have an understanding of what types of information should be . . .	Pending		
		16	Enforcement should include in its complaint handling guidance proper procedures for ensuring complaints received even if an investigation is pending closure, are properly vetted.	Pending		
		17	Enforcement should conduct periodic internal reviews to ensure that MUIs are opened in accordance with any newly developed Commission guidance and examine ways to streamline the case closing process.	Pending		
		18	Enforcement should put in place a process to periodically remind staff of their responsibilities regarding impartiality in the performance of official duties and instruct staff where they can . . .	Pending		
		19	Enforcement should establish or utilize an existing working group to analyze the OIG survey information regarding staff concerns over communication of program priorities and . . .	Pending		
		20	Enforcement should establish or utilize an existing working group to analyze the OIG survey information regarding staff concerns regarding case handling . . .	Pending		
		21	Enforcement should establish or utilize an existing working group to analyze the OIG survey information regarding staff concerns over working relationships within . . .	Pending		
		465	FOIA Review	1	The Chairman's Office shall fill the Chief FOIA Officer position with a qualified candidate and ensure that the Chief FOIA Officer has the appropriate authority to . . .	Pending
				2	The Chairman's Office shall communicate on an ongoing basis to Commission employees and the public the importance of the Freedom of Information Act	Pending
				3	The Chairman's Office shall direct the Chief FOIA Officer to ensure that: . . .	Pending
				4	The Chairman's Office shall direct the Chief Freedom of Information Act (FOIA) Officer to provide guidelines or written policies and procedures for all FOIA . . .	Pending

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465	FOIA Review	5	The Office of General Counsel shall provide and enforce a clear policy of the separation of roles and responsibilities and stipulate that the Office of General . . .	Pending		
		6	The Chairman's Office shall direct the Chief Freedom of Information Act (FOIA) Officer to ensure that sufficient legal expertise is available to the Office of . . .	Pending		
		7	The Chairman's Office shall direct the Chief Freedom of Information Act (FOIA) Officer to collaborate with the respective office and division managers and the . . .	Pending		
		8	The Chairman's Office shall direct the Chief Freedom of Information Act (FOIA) Officer to ensure that appropriate training opportunities are provided to all . . .	Pending		
		9	The Chairman's Office shall direct the Chief Freedom of Information Act (FOIA) Officer and the Office of Freedom of Information Act/Privacy Act Operations to . . .	Pending		
		10	The Chairman's Office shall direct the Chief Freedom of Information Act Officer to conduct training that is needed to fully implement the productive and suitable use of the . . .	Pending		
		464	Notification to OIG of Decisions on Disciplinary Action and Settlement Agreements Involving Subjects of OIG Investigations	1	Provide OIG with three business days notice prior to decisions on disciplinary action	Pending
				2	Provide OIG with five business days notice prior to executing settlement agreements	Pending
		463	OASIS System Report - 2008 FISMA	1	Evaluate OCIE Advisor Intelligence System within its production environment	Complete
				2	Evaluate access controls to ensure OCIE Advisor Intelligence System has an adequate formal account management process	Complete
3	Implement adequate information flow enforcement control for OCIE Advisor Intelligence System			Complete		
461	Review of the Commission's Restacking Project	1	Review the results of OIG survey to determine whether changes should be made to the project	Complete		
		2	Conduct another survey of staff after the restacking process has been completed	Pending		
		3	Conduct appropriate analysis and complete and submit an Exhibit 300 to OMB	Pending		
		4	Develop and adopt policies and procedures for investments in space consistent with OMB guidance	Pending		
459	Regulation D Exemption Process	1	Develop process to assess and ensure compliance with Regulation D	Pending		
		2	Establish procedures to review Form D information in the aggregate and develop management reports	Pending		
		3	Take appropriate action when issuers fail to file Form D	Pending		

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459	Regulation D Exemption Process	4	Reintroduce early intervention program and use it to assist in enforcement of Regulation D	Pending		
		5	Develop criteria for referral of potential Regulation D abuses and improve communication and coordination with Enforcement	Pending		
		6	Take efforts to finalize proposed rule	Pending		
		7	Raise with Commission the option of making filing Form D a condition for claiming Regulation D exemptions	Pending		
		8	Issue additional guidance to issuers on Form D filing requirements	Complete		
		9	Discuss enhancements to and work to revise Form D	Pending		
		10	Coordinate with staff who review registration statements, 10-Ks and 8-Ks and follow up with delinquent Form D filers	Pending		
		11	Coordinate to ensure timely receipt of examination reports disclosing potential Regulation D misuses, violations and abuses and provide copies of related Enforcement referrals	Complete		
		12	Issue formal, public guidance on how to request a wavier of disqualification under Rule 505	Pending		
		13	Evaluate EDGAR authentication process and make necessary changes to further streamline or simplify the process	Pending		
		14	Analyze how other agencies have implemented authentication processes and implement any appropriate procedures	Pending		
		15	Work with NASAA to finalize memorandum of understanding and recommend Commission approval	Pending		
		16	Timely coordinate with NASAA staff to develop system to enable issuers to file Form D electronically with the states	Pending		
		17	Determine further coordination with NASAA staff and contact state regulatory staff when discussing and drafting proposed Regulation D rule changes	Pending		
		458	Oversight of NRSRO	1	TM should ensure that all significant issues identified in the application review process are resolved before it recommends that a credit rating agency be registered as a NRSRO.	Pending
				2	TM, in consultation with the OCIE and the OEA, should evaluate whether action should be taken regarding the CRA that was granted registration as a NRSRO...	Pending
				3	TM should ensure that all pending issues identified during the application process involving the CRAs that the SEC approved as NRSROs are resolved within six months of [8/27/09].	Pending
4	TM, in consultation with the OEA and the OCIE, should develop measures for determining whether subscriber fees charged by the credit rating agencies are reasonable.			Pending		

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458	Oversight of NRSRO	5	TM should request that the Office of General Counsel develop guidance regarding hat should prompt TM either to . . .	Pending
		6	TM and the OCIE should take appropriate actions to inform NRSRO about the Commission's expectations regarding the experience of their compliance officers.	Pending
		7	TM should ensure that it seeks Commission orders in response to requests by NRSROs for extensions of time when required by statute or the Commission's rules.	Pending
		8	TM should ensure that credit rating agencies applying for designation as NRSROs and firms that have registered as NRSROs comply with the Commission's rules. . .	Pending
		9	The Chairman, in concert with the other Commissioners, shall review the Office of Inspector General's findings on conducting examinations before issuing orders . . .	Pending
		10	OCIE should include the NRSROs in its pilot monitoring program.	Pending
		11	OCIE, in consultation with the EO and the OAS, should obtain an additional review of the draft OCIE (NRSRO) examination module by an expert in credit rating and NRSRO matters.	Pending
		12	The Chairman, in concert with the other Commissioners, shall review the Office of Inspector General's findings concerning PCAOB oversight of NRSRO auditors, and . . .	Pending
		13	OCIE should perform examination work to determine whether the quality of credit ratings is being adversely affected by NRSROs performing . . .	Pending
		14	TM, in consultation with the OCIE, the OEA, the OIA, and the ORA, should . . .	Pending
		15	The Chairman, in concert with the other Commissioners, shall review the Office of Inspector General's findings on monitoring of credit ratings and, . . .	Pending
		16	The OCIE should perform examination work into whether, and under what circumstances, credit rating analysts face undue . . .	Pending
		17	TM, in consultation with the Office of OCIE, the OIA, and the ORA, should . . .	Pending
		18	The Chairman, in concert with the other Commissioners, shall review the Office of Inspector General's findings on credit ratings disclosures and, . . .	Pending
		19	OCIE should conduct examinations to evaluate whether the revolving door problem is negatively impacting the quality of credit ratings.	Pending
		20	TM, in consultation with the OCIE, the OIA, and the ORA should . .	Pending
		21	The Chairman, in concert with the other Commissioners, shall review the OIG's findings on the Rule 17g-5 information disclosure program and . . .	Pending

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458	Oversight of NRSRO	22	The Chairman, in concert with the Commissioners, shall review the Office of Inspector General's findings on forum shopping for credit ratings and, . . .	Pending
		23	The Chairman, in concert with the other Commissioners, shall review the OIG's findings on public comment on a firm's application and . . .	Pending
		24	TM , in consultation with OCIE, the OEA, the OIA, the ORA and the OGC, should . . .	Pending
456	Transit Benefit Program	1	Finanlize revised transit benefit program application by April 30, 2009 and ensure it requires a cost breakdown and certification	Complete
		2	Conduct periodic training and issue reminders to Administrative Officers to verify participants' eligibility and commuting costs	Pending
		3	Require participants to re-certify annually eligibility and commuting costs	Complete
		4	Implement process to obtain data on separated employees and compare to DOT transit database	Complete
		5	Pursue collection of erroneous benefits collected by transit participants after separating from the agency	Complete
		6	Ensure for files identified as missing or incomplete necessary documentation is obtained to create a file	Complete
		7	Conduct internal review periodically of program participants to ensure proper reduction of benefits	Pending
		8	Periodically remind program participants of requirement to reduce benefits if on extended leave, travel, etc.	Complete
		9	Seek recovery of overpayments erroneously collected by program participants while on leave	Complete
		10	Implement additional management controls over regional office program operations	Pending
455	Attorney Annual Certification of Bar Membership	1	OHR, in consultation with OGC, should require all Commission attorneys to certify annually that they are active bar members or disciplinary action will result.	Pending
454	ENF's Pol & Proc Governing the Sel of Receivers, Fund Admins, Indep Distr Consult, Tax Admin & Indep Consults	1	Revise policy on the selection of receivers and independent consultants to address actual and apparent conflicts of interest and provide guidance to staff .	Pending
		2	Determine whether any time limit should be placed on a request for conflict of interest or background information, or whether that information should be requested for more than five years	Pending
		3	Include in attachment to policy the applicant's certification that the information provided is complete and truthful and that the applicant understands the consequences for providing false information	Pending
452	Disgorgement Waivers	1	Ensure staff comply with procedures and consider payment plans and partial waivers	Pending

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452	Disgorgement Waivers	2	Ensure the review of financial information for accuracy prior to recommending a disgorgement waiver	Pending
		3	Clarify policies and procedures regarding when supporting documentation should be obtained and retained	Pending
		4	Ensure sworn financial statements from defendants/respondents who request disgorgement waivers are retained, signed and notarized	Pending
		5	Ensure checklist for disgorgement waiver cases is retained and signed by supervisor	Pending
		6	Ensure documentation is retained in case files and compliance with procedures for obtaining tax returns	Pending
		7	Ensure public database searches are performed for all defendants/respondents	Pending
		8	Ensure staff attorneys receive periodic formal training in disgorgement waiver process	Pending
		451	2008 Federal Information Systems Management Act Review	1
2	Adopt and implement FDCC standard configurations and document any deviations, modify contracts to include new FAR language, and implement FDCC security settings			Pending
3	Use Executive Summary Report, along with completed OIG reporting template, to develop SEC's annual FISMA report in accordance with OMB M-08-21			Complete
450	Practices Related to Naked Short Selling Complaints and Referrals	1	Develop written in-depth triage analysis steps for naked short selling complaints	Pending
		2	Revise written guidance to ECC staff to ensure proper scrutiny and referral of naked short selling complaints	Pending
		3	Add naked short selling to categories of complaints on public webpage and develop tailored online complaint form	Pending
		4	Develop and implement policies and procedures for supervisory review of a sample of e-mails not forwarded for further review	Complete
		5	Develop uniform written policies and procedures for the Complaints, Tips and Referrals program at headquarters and the regional offices	Pending
		6	Designate office or individual at headquarters to provide nationwide oversight for Complaints, Tips and Referrals program	Pending
		7	Require OIE to perform necessary follow-up to ensure all Complaints, Tips and Referrals (CTR) packages contain complete documentation and are entered into the CTR database	Pending
		8	Require regional office senior officials to perform monthly review of Complaints, Tips and Referrals	Pending

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450	Practices Related to Naked Short Selling Complaints and Referrals	9	Improve analytical capabilities of ECC's e-mail complaint system	Pending
		10	Improve Complaints, Tips and Referrals database to include additional information about and better track complaints	Pending
		11	Ensure OIE updates and resumes using previous complaint referral tracking system or develops a new system	Pending
449	Survey of Enforcement's HUB Database	1	Develop formal and written policies defining roles and responsibilities of staff for entering information into HUB system	Complete
		2	Perform an assessment of authorized users to ensure proper personnel are utilizing system fully & appropriately. Add a date requirement to referral section of the HUB system.	Complete
		3	Finalize the reports feature & incorporate respondents' comments to develop customized reports that can be exportable into spreadsheets	Complete
		4	Ensure that HUB system users become aware of the features & advantages of the HUB system	Complete
		5	Review the survey comments and look for areas that can be enhanced within the HUB system	Complete
448	Audit of Sensitive Payments	1	Provide a detailed justification for senior officer merit pay increases of \$20,000 or more, or bonuses of \$20,000 or more	Pending
		2	Send written reminder to senior executives that time and attendance should be certified by a senior official of equal or higher grade	Pending
		3	Revise policies and procedures to inform travelers of proper currency conversion rates	Pending
		4	Reimburse travelers amounts underpaid due to currency conversion and other errors	Complete
		5	Keep an account of prohibited gifts that are returned of which the Ethics Office has knowledge	Pending
		6	Ensure contracting files contain required documents and specify which documents are not required	Complete
447	Audit of Premium Travel	1	OFM should revise its current policies & procedures pertaining to travel upgrades to ensure they are comprehensive and current	Pending
		2	OFM should update its current travel website to ensure all travel policies and procedures are maintained electronically in one location for easy retrieval by Commission employees	Complete
		3	OFM, with FedTraveler developer, should enhance system to produce travel upgrade data and implement procedures to periodically obtain data from the Travel Management Center on business class travel	Pending
		4	OFM should implement a policy prohibiting subordinates from approving their supervisors' travel and require approval from a peer or higher level	Complete

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447	Audit of Premium Travel	5	OFM should revise current policy to address situations where travelers leave from a telework location & prohibit travel from a telework location if it results in additional cost to the Commission	Complete
		6	OFM should immediately enforce and include in its policies and procedures OMB's requirement to restrict premium class travel when employee is not required to report to duty the following day	Complete
446-B	SEC's Oversight of Bear Stearns and Related Entities: Broker-Dealer Risk Assessment Program	1	By 3/25/09, TM should establish a timeframe to update and finalize temporary rules 17h-1T and 17h-2T	Pending
		2	TM should determine whether Bear Stearns and the broker-dealers of the other (former) CSE firms, are required to file Form 17-H.	Complete
		3	At least annually, TM should remind subject broker-dealers to retain information specified in temporary rule 17h-1T. TM should also determine broker-dealer compliance with this requirement.	Complete
		4	TM should establish a procedure to ensure that subj broker-dealers file Form 17-H in a timely manner and conduct reviews of 17(h) filings in a timely manner.	Complete
		5	TM should either comply with its written policy to document its review of quarterly filings or appropriately update its written policy	Complete
		6	TM should ensure that its staff process & disseminate 17(h) filings in a defined period of time, which ensures that the info in the filings is current and relevant	Complete
		7	By 12/25/08, TM should develop & maintain a current list, with supporting documents, of the broker-dealers exempt from filing Form 17-H. TM should update this list as needed.	Complete
		8	TM should aggressively encourage firms to file Form 17-H electronically, using the BDRA system	Complete
		9	OIT, in coordination with TM, should ensure that BDRA system includes financial information, staff notes & other written documentation about the firms that TM reviews, & generates management reports	Pending
		10	OIT, in coordination with TM, should ensure that the technical problems with the BDRA system are resolved.	Pending
446-A	SEC's Oversight of Bear Stearns and Related Entities: The CSE Program (Including Reviews Performed on Bear Stearns)	1	TM, with Federal Reserve and Basel Committee, should reassess guidelines & rules for CSE firms' capital levels, and identify instances when firms should be required to raise additional capital	Complete
		2	TM with Federal Reserve should reassess pillar 2 of the Basel II framework & CSE program guidelines regarding liquidity & make appropriate changes to program's liquidity requirements.	Complete
		3	TM should incorporate a firm's concentration of securities into the CSE program's assessment of a firm's risk management system & prompt firms to take appropriate actions to mitigate such risks	Complete
		4	TM with Federal Reserve should reassess the CSE program's policy regarding leverage ratio limits & make a determination to impose leverage ratio limits on the CSEs	Complete

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446-A	SEC's Oversight of Bear Stearns and Related Entities: The CSE Program (Including Reviews Performed on Bear Stearns)	5	TM should ensure CSE firms have specific criteria for reviewing & approving models used for pricing & risk management, and that reviews are independent, thorough & timely	Complete
		6	TM should be more skeptical of CSE firms risk models & work with regulated firms to help them develop additional stress scenarios that may or may not have been contemplated	Complete
		7	TM should be involved in formulating action plans for a variety of stress or disaster scenarios including plans for every stress scenario that CSE firms uses in risk management	Complete
		8	TM should take steps to ensure that mark disputes do not provide an occasion for CSE firms to inflate the combined capital of two firms by using inconsistent marks	Complete
		9	TM should encourage CSE firms to present VaR & other risk management data in a useful manner, which is consistent with how the firms use the information internally	Complete
		10	TM should ensure that CSEs take appropriate valuation deductions for illiquid, hard-to-value assets & appropriate capital deductions for stressed repos	Complete
		11	TM, with Chairman's Office, should discuss risk tolerance with Board and senior management of CSE firms to better understand whether the actions of CSE firm staff are consistent with their desires	Complete
		12	TM should require compliance with existing rule that requires external auditors to review the CSE firms' risk management control systems or seek Commission approval for deviation from this requirement	Pending
		13	TM should ensure that reviews of a firm's Contingency Funding Plan include an assessment of a CSE firm's internal and external communication strategies	Complete
		14	TM should develop a formal automated process to track material issues identified by the monitoring staff to ensure that they are adequately resolved	Complete
		15	TM should reassess all the prior OCIE issues to ensure that no significant issues are unresolved and follow up on all significant issues	Complete
		16	TM should ensure that they complete all phases of a firm's inspection process before recommending that the SEC allow any addl CSE firms the authority to use the alternative captial method	Complete
		17	CF and TM should take concrete steps to improve their collaboration efforts and should determine whether TM's information on CSE firms should be used by CF in its review of the CSE firms	Complete
		18	TM & OCIE should develop a collaboration agreement that maintains a clear delineation of responsibilities between TM & OCIE with respect to CSE and inform the Chairman's Office of any disagreements	Complete
		19	TM & ORA should develop an agreement outlining their roles & responsibilities such as communicating project results and inform the Chairman's Office of any disagreements	Complete

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446-A	SEC's Oversight of Bear Stearns and Related Entities: The CSE Program (Including Reviews Performed on Bear Stearns)	20	CF should develop internal guidelines for reviewing filings in a timely manner and track & monitor compliance with these internal guidelines.	Pending
		21	CF should establish a policy outlining when firms are expected to substantively respond to issues raised in CF's comment letters, and track & monitor compliance with this policy	Pending
		22	Create a task force led by ORA with staff from TM, IM & OIEA to perform an analysis of large firms with customer accounts to determine the costs and benefits of consolidated supervision	Pending
		23	TM, with the Chairman's Office, should determine what additional changes need to be made to the CSE program in light of the collapse of Bear Stearns	Complete
		24	TM should fill critical existing positions & consider what additional staff will be needed to carry out the CSE program's function and establish milestones for completing each phase of an inspection	Complete
		25	TM with OCIE & the Commission's Ethics Ofc should develop an ethics manual	Complete
		26	TM should continue to seek out ways to increase its communication, coordination, and information sharing with the Federal Reserve and other Federal Regulators	Complete
445	SafeSearch Filter on Internet Search Engines	A	Implement technology to prevent employees from turning off SafeSearch Filter	Complete
444	Prohibition on Use of Government Resources and Official Time to Support Private Businesses	A	Remind employees and contractors of prohibition on use of government resources and time to support private businesses	Complete
442	ENTERPRISE ARCHITECTURE	A	Develop EA metrics to assess or track Commission's performance in implementing and tracking performance of SEC FEA program	Pending
		B	ITCPC should require periodic reports on EA progress overall, including specifically how EA can help make strategic purchasing decisions	Pending
		C	Reconstitute EA Working Group as an EA Steering Committee	Complete
		D	EA Steering Committee should report to the IT CPC/Executive Operations Committee and ITCPC should consider input from EA to make strategic purchasing decisions	Complete
		E	The EA Steering Committee should have subcommittees on Data Management, Technology Standards, IT Strategy and other areas of focus	Pending
		F	EA should be involved in all technology implementations, especially ones that are "fast tracked"	Pending
		G	High level policy makers should establish a process that ensures participation from EA team	Pending
441	CONTROLS OVER OIT LAPTOPS	A	Revise its draft policy to identify Commission-wide sensitive items.	Complete
		B	Require a method of accountability for sensitive property to ensure accurate accounting of laptops.	Complete

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441	CONTROLS OVER OIT LAPTOPS	C	OIT, through AMB, should complete a full inventory of laptops to establish baseline level	Complete
		D	Through AMB should revise procedures to establish clear accountability for laptops.	Complete
		E	Should specify a form to account for sensitive property. Needs to include contact information of recipient of equipment.	Complete
440	PURCHASE CARDS	1	OAS should revise the SECR 10-6 Smartpay Purchasing Card Program to reflect relevant procedures that GPC program officials & cardholders should follow. Should also be revised periodically	Complete
		2	OAS should require that GPC use a BankCard log (manual or automated) each month to verify purchases	Complete
		3	OAS should revise SECR 10-6 and require cardholders to retain in their files in an accessible manner: purchase receipts, GPC statements, invoices, confirms for availability of funds, etc.	Complete
		4	OAS Agency Program Coordinator should periodically issue a reminder to cardholders that monthly GPC statements must be signed by the assigned Approv Ofcl prior to pmt	Complete
		5	OAS should revise SECR 10-6 to ensure compliance with the FAR pertaining to vendor quotes and the \$3K micropurchase threshold limit	Complete
		6	The Prog Coord shold periodically issue a reminder to cardholders that prior to making a purchase over \$3K, they must obtain and retain evidence of quotes or a sole souce justification	Complete
		7	OAS should issue guidance to cardholders describing what constitutes a split purchase, warning of the prohibition against splitting purchases and specifying the penalty for making a split purchase	Complete
		8	OAS, with OIT, should revise SECR 10-6 to reflect current practices regarding approval of IT purchases with GPC and to emphasize importance of OIT approval of such purchases	Complete
		9	OAS Ag Prog Coord should issue a reminder to cardholders that GPC transactions must have funds obligated prior to making a purchase	Complete
		10	OAS Agency Program Coordinator should consult with OFM to verify that obligations open at the end of FY are rolled forward to next FY	Complete
		11	OAS Agency Prog Coord & OFM work together to ID underlying root causes, thereby ensuring pmts are made to Mellon Bank w/ 30 days after receipt of statement	Complete
		12	OAS should develop a formal SEC GPC training course & set up a plan to rollout the training to all cardholders in a timely manner	Complete
		13	OAS Agency Prog Coord should update the email distribution list to ensure that GPC email messages are sent to all cardholders	Complete
		14	OAS should set up a process to ensure completion of GPC training and a signed Letter of Delegation before the GPC is issued to the cardholder	Complete

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440	PURCHASE CARDS	15	OAS should develop procedures to review and ensure that cardholder limits agree to the Letter of Delegation and the GPC provider on a regular basis	Complete
		16	OAS should revise SECR 10-6 to require notification to the APC that a cardholder is leaving the SEC. The APC should immediately suspend the cardholder's GPC	Complete
		17	OAS should revise SECR 10-6 to ensure the Agency Program Coordinator does not have direct access to a GPC	Complete
439	STUDENT LOAN PROGRAM	A	Undertake actions to delegate in writing approving waivers, amend Form 2497, and issue guidance for approval requirements of SLP award	Pending
		B	The OED should review OPM regulations to ensure proper individual approves SLP awards	Pending
		C	Ensure SLP files contain appropriate documentation of repayments by employees not completing Service Agreements	Pending
		D	Ensure documentation in SLP files correctly indicates who prepared/reviewed the payments	Pending
		E	Implement methods to mitigate the risk of fraudulent documentation submitted by employees	Pending
		F	Ensure the reliability of management records regarding former employees	Pending
		G	Review the reliability of management records involving former employees	Pending
		H	Take necessary steps to adequately safeguard the SLP files	Complete
		I	Implement a separation of duties in the review, processing and approval of SLP awards	Pending
		J	Consult with DOI to ensure that \$129,336 owed to Commission is collected, documented and recorded in timely manner	Pending
		K	Conduct a thorough review of Employee Clearance process to initiate improvements	Pending
		L	If retrieving the collection of employee debts relating to SLP is not feasible by contractor, then OHR and OFM should prepare a report to OIG explaining why recommendations were not implemented	Pending
		M	In consultation with the Union, provide supervisors with guidance on preparing substantial justification memoranda	Pending
		N	Return justification memoranda to supervisors that lack substantiation of the criteria	Pending
		O	Prepare document regarding the required criteria for justification memoranda for the 2008 Open Season	Pending
P	Implement an automated process for monitoring lifetime awards before the 2009 "Open Season"	Pending		

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439	STUDENT LOAN PROGRAM	Q	Develop a plan to obtain data and a methodology to analyze and record data to comply with CBA requirements	Pending
		R	In consultation with the Union, develop a detailed distribution plan	Pending
		S	Ensure that all vacancy announcements issued include language regarding the SLP	Complete
438	SRO RULE FILING PROCESS	A	TM should establish a division-wide goal for issuing a "Notice" release for proposed rule changes within a certain timeframe	Complete
		B	TM should establish a policy to ensure that it meets the statutory timeframe for finalizing proposed rule changes that have been Noticed	Complete
		C	TM should establish a written policy for following up with SROs on open proposed rule changes, asking SROs to withdraw a rule, and rejecting & disapproving a proposed rule change	Complete
		D	Ensure completeness of SRO official rule files and work with OS to ensure all "Notices" and orders contain SEC raised seal	Complete
		E	Establish complete written list of all documents that should be contained in each SRO official rule file. Remind Staff of this requirement and spot-check files for completeness	Complete
		F	Ensure the SRO's digital signature is valid for each SRO submission received by SRTS and note this in SRTS	Complete
		G	Correct all data in SRTS that OIG identified as incorrect and periodically compare samples of SRTS data to source documents to ensure data accuracy	Complete
		H	Work with OS to ensure comment letters associated with an SRO rule are contained in TM's official file, available on SEC's website and listed in SRTS	Complete
		I	TM should coordinate with OS and OIT to ensure that, where practical, all comment letters in OS' comment log accurately and completely upload into SRTS	Complete
		J	OS should discontinue sending hard copy comment letters to TM unless specifically requested by TM staff. OS should only send an electronic version.	Complete
		K	TM should issue reminder to SRO's of requirement to post proposed rule changes and amendments to their websites within two business days of filing with the SEC.	Complete
		L	OIT should send a SRTS access report to TM each quarter to ensure user's access and level of access is appropriate and remove SRTS access from persons immediately upon permanent departure from SEC.	Complete
		M	TM should reconsider granting SRTS access to the Commission's Secretary and Deputy Secretary	Complete
		N	Enhance SRTS by (1) identifying 19(b)(3)(a) comment letters; (2) improving speed; (3) retaining 19(b)(3)(a) proposed rule changes in inbox; and (4) ensuring upload of all 19(B)(3)(a) comment letters	Pending

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438	SRO RULE FILING PROCESS	O	TM should determine which add'l rule files should be imaged and coordinate with OIT to establish timeline	Complete
		P	OS archivist should update document retention policy pertaining to SRO rule filing info in paper and electronic form	Complete
		Q	OS web unit should list the SRO rule filings in chronological order on the SEC website.	Complete
		R	Ensure labels on shelves in filing room correctly identify SRO rule files	Complete
		S	Improve review process of articulating what criteria qualifies for accelerated approval and providing guidance to staff on requesting amendments for non-substantive issues	Complete
436	USEFULNESS OF IM'S WEBSITE	A	Identify clear and specific objectives for its intranet and discuss with its IT staff for further clarification	Complete
		B	Improve its intranet which should include developing an appropriate project plan that incorporates applicable website best practices and systems development processes	Complete
		C	IM's IT staff should obtain the appropriate assistance and training to ensure Imweb meet Section 508 accessibility requirements	Complete
434	BACKGROUND INVESTIGATIONS	A	Develop operating procedures for Program by June 30, 2008	Complete
		B	Develop or acquire a case management tracking system	Complete
		C	Evaluate and restructure staff resources assigned to PSB	Complete
		D	Obtain secure storage for personnel security files	Complete
		E	Ensure personnel security specialist are properly trained of e-QIP	Complete
		F	PSB should revise current procedures to insure interim clearances granted after acceptable review	Complete
		G	Develop milestones and methodology for completing minimum background investigations for contractors and employees	Complete
		H	Should notify OMB of any reported data that cannot be supported and develop a methodology and system for quarterly reporting	Complete
433	CORPORATION FINANCE & ENFORCEMENT COORDINATION	1	CF & ENF with OIT should develop a centralized referral tracking system for non-delinquent filer referrals.	Pending
		2	ENF should record information about the outcome of non-delinquent filer referrals in current database to improve referral process	Complete

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433	CORPORATION FINANCE & ENFORCEMENT COORDINATION	3	CF should enhance CF-OEL's gatekeeper role once outcome information becomes more available	Pending