

August 27, 2025

The Honorable French Hill
United States House of Representatives
1533 Longworth Office Building
Washington, DC 20515

The Honorable Andy Barr
United States House of Representatives
2430 Rayburn House Office Building
Washington, DC 20515

RE: IIA Response to the Request for Feedback on the Gramm-Leach-Bliley Act

Dear Chairman Hill and Chairman Barr:

On behalf of the Institute of Internal Auditors (The IIA) – the international professional organization representing more than 265,000 internal auditors – I am writing in response to the U.S. House Committee on Financial Services’ request for feedback regarding Title V, Subtitle A of the Gramm-Leach-Bliley Act (GLBA).

For more than 25 years, the GLBA has provided a vital foundation for protecting the financial privacy of American consumers. However, the rapid pace of technological innovation – and corresponding rise in data privacy risks – demands action to ensure the law remains effective in a dynamic 21st-century economy. The IIA strongly supports current congressional efforts to modernize and strengthen the GLBA so it continues safeguarding sensitive financial information in a digital age.

As you know, Title V, Subtitle A of the GLBA mandates that financial institutions protect against the disclosure of nonpublic personal information. Sections 501–503, for example, include the following requirements¹:

- Adoption of an organizational privacy obligation policy
- Restrictions on the reuse of consumer information
- Notice to consumers about disclosure of information to nonaffiliated third parties, with an option to “opt out”
- Disclosure of an institution’s privacy policy
- Limitations on sharing account number information for marketing purposes

Although the provisions in Title V establish important safeguards, their effectiveness is undermined by the absence of independent assurance. The GLBA requires institutions to adopt internal controls and policies, but it does not explicitly require independent evaluation of whether those measures are adequate.

Consequently, as Congress evaluates prospective modifications to the GLBA, The IIA believes it is imperative that the law **encourage organizations to maintain an internal audit function to provide independent assurance.**

¹ “Gramm-Leach-Bliley Act.” Pub. L. No. 106-102, 113 Stat. 1338. November 12, 1999.

<https://www.govinfo.gov/content/pkg/PLAW-106publ102/pdf/PLAW-106publ102.pdf>

An internal audit function – operating in conformity with the [International Professional Practices Framework](#)® – is the entity responsible for providing an organization’s governing body (i.e. board of directors) with objective assurance over data-related risk management and internal control processes. Moreover, internal audit leverages a deep understanding of the organization to conduct evaluations designed to promote data security and accountability.

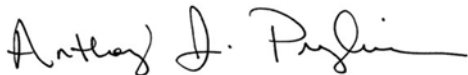
This private-sector oversight is important because it ensures the professionals performing assessments possess a thorough knowledge of the organization’s strategic goals, culture, processes, and risk appetite. These powerful insights produce evaluations that provide a governing body with substantive and actionable information.

Given the significant financial and reputational costs of data violations in an increasingly connected digital economy, it is essential that Congress implement practical solutions to protect American consumers. The presence of an internal audit function strengthens transparency, accountability, and compliance with the law. Accordingly, The IIA respectfully urges Congress to incorporate language in any modernization of the GLBA that formally recognizes and encourages the role of independent internal audit as a critical component of consumer data protection.

Should you have any questions regarding this letter, please contact Michael Downing, Senior Director of North American Advocacy, at Michael.Downing@TheIIA.org.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, reading "Anthony J. Pugliese". The signature is fluid and cursive, with the first name "Anthony" and last name "Pugliese" clearly legible.

Anthony J. Pugliese, CIA, CPA, CGMA, CITP
President and Chief Executive Officer
The Institute of Internal Auditors

cc: Members of the U.S. House Committee on Financial Services