



Monitoring and Supporting Security Change Management: From determining risk to efficient and effective execution

MAY 15 & 16, 2019

CLEVELAND PUBLIC AUDITORIUM, CLEVELAND, OHIO

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Agenda

- Introduction
- Process Overview
- Risk Assessment and Scoping
- Current State
- Remediation and Issues
- Implementing Process and Control

Introduction



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Fastpath

- Founded in 2004
- Cloud-based Cross-Platform solution for Security, SoD, and Configuration management

Process Overview

Risk Assessment

- *Regulation and Scope:* What is driving your compliance?
- *Assessment and Approach:* What do you need to do to comply?
- *Communication:* Who needs to be involved and/or notified? Who needs to buy-in?

Current State

- *Determine current landscape:* Where do you stand?
- *Gap Assessment:* What is missing?
- *Communication:* Who needs to act? Who is ultimately accountable?

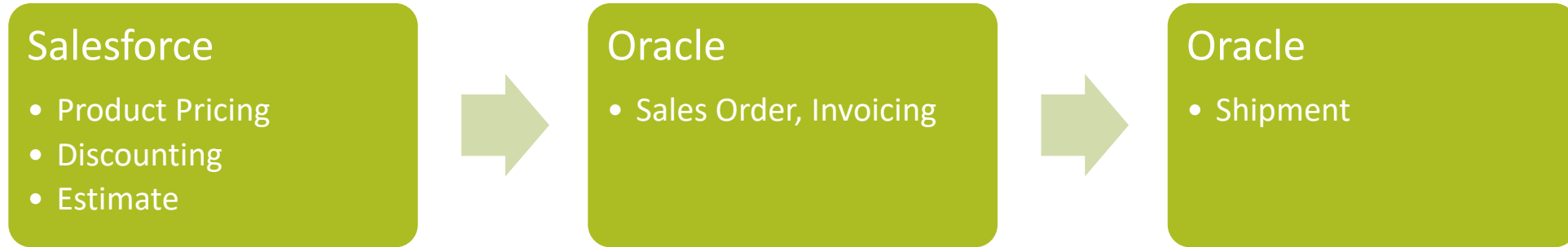
Remediation

- *Remediation and Issues:* What is acceptable? What needs fixing? What is your timeline?
- *Implementing Process and Control:* Drive process and control through policy!
- *Communication:* Get appropriate sign-off, and involve audit!

Risk Assessment and Scoping

- Identify the audit driver (e.g. SOX, SOC, NIST, TPA) – Let's use SOX
- Determine Risk Universe – Financial Statements driven
- Quantitative Materiality Assessment (e.g. ~1% of Revenue or ~2% of Equity or Working Capital)
- Qualitative Risk Assessment (e.g. Risk of Fraud or Significant Estimates)
- Determine related business processes
- Determine related financial systems
- Determine scope of procedures
- Define 'Projected Baseline' and Policy > Procedure > Control

What are you looking for?



Business Process	Systems	Access	Objects
Revenue Generation	Salesforce	Pricing & Discounting	<ul style="list-style-type: none">• Security to related objects
	Oracle	Sales Order, Invoice & Shipment, Revenue Recognition	<ul style="list-style-type: none">• Security to related objects• System configuration

Risk Assessment and Scoping

- Security should be focused on access to relevant objects and access to modify system configuration
- System configuration should be focused on key risk points – examples include:
 - Credit check, including categories
 - Debit/Credit Memo approval and threshold settings
 - Workflow configuration
 - Revenue Recognition: invoicing rules
- Don't forget to consider system integrations, and related access and configuration!

Current State

Now that you have defined the details of what you are going to rely on for risk and compliance, you need to assess where you stand.

- Access Reporting
 - Look at those objects that you've defined to determine if issues exist
 - Look for conflicting access both inter- and intra-system, relying on your business process and risk assessment to guide the way
- Configuration Analysis
 - Look at your current system configuration to identify current settings
 - Look for company policies to drive configuration

Current State

- Gap Assessment
 - Be sure you've defined your optimal state as part of Risk Assessment and Scoping
 - Compare existence of policies to current state to identify gaps
 - Compare current security setup against projected baseline for gaps
 - Compare system configuration against projected baseline for gaps
- Communicate
 - Interim reporting to stakeholders is key to check initial assumptions and validate a path forward
 - Early communication to your auditors (both internal and external) is key – surprising your auditor is never a good idea!

Current State: Reporting

- Report on current state as scoped, being sure to obtain completeness and accuracy

The screenshot displays the FASTPATH Oracle EBS and SPOC DEMO interface. The left sidebar shows navigation options: Access Reviews, Critical Access, Responsibility Access, User Access, Reports, Setup, Segregation of Duties, Audit Trail, Identity Manager, and Report Management. The main content area is split into two panels.

Critical Access Panel: Shows filters for Product (Oracle EBS), Company (Salesforce), and User (All Users). Below, it shows Group (BP | Item Master) and Object (All Objects). A table lists user access details:

Product	User ID	User Name	Group	Object
Oracle EBS	1008228	OBEAL	Item Master	Items: Ad
Oracle EBS	1008228	OBEAL	Item Master	Items: Ge
Oracle EBS	1008228	OBEAL	Item Master	Items: Inv
Oracle EBS	1008228	OBEAL	Item Master	Items: Inv

User Conflicts Panel: Shows filters for Product (Oracle EBS), Company (Salesforce), and User (All Users). A conflict rule is selected: "All Approve Adjustments & Sales Invoicing". A table lists user conflicts:

User Name	Name	Description	Risk	Status
INDIA	All Approve Adjust...	A user can enter a Credit Memo Transaction and adj...	High	New
QI-ZHANG	All Approve Adjust...	A user can enter a Credit Memo Transaction and adj...	High	New
JELAKE	All Approve Adjust...	A user can enter a Credit Memo Transaction and adj...	High	New
SDAWIS	All Approve Adjust...	A user can enter a Credit Memo Transaction and adj...	High	New
HUNGARIAN	All Approve Adjust...	A user can enter a Credit Memo Transaction and adj...	High	New
TSMITH	All Approve Adjust...	A user can enter a Credit Memo Transaction and adj...	High	New
MTHOMPSON	All Approve Adjust...	A user can enter a Credit Memo Transaction and adj...	High	New

Current State: Reporting

- Report on current state as scoped, being sure to obtain completeness and accuracy

The left screenshot shows the FASTPATH interface with the 'Connections' page. The main content area displays 'Oracle Financials Cloud' with a status indicator 'Last Security Import: 2/1/18 9:49 AM'. Below this, there are sections for 'Additional Connections...' listing 'Acumatica' and 'Dynamics 365'. The left sidebar shows navigation options: Access Reviews, Segregation of Duties, Report Management, Integrations, Connections, Plugins, Reports, and Setup.

The right screenshot shows the 'Oracle Financials Cloud Import Details' page. It features a table with columns for Start Date, End Date, Status, User, and Message. The table contains one record for a completed import on 2/1/18 at 9:44 AM by Nate Boettcher.

Start Date	End Date	Status	User	Message
2/1/18 9:44 AM	2/1/18 9:49 AM	Completed	Nate Boettcher	Import finished succes...

Remediation and Issues

- Once you have determined your gaps, rationalize that list into action vs. non-action
- Validate the two lists with stakeholders, get sign-off if possible
- Remediate those gaps you've determined are key
 - Implement new policies and procedures where necessary
 - Modify system security and configuration as needed
- Leverage reporting to provide the 'new current state'
- Communicate back to stakeholders (including audit) that current setup is "good to go!"

Implementing Process and Control

Change is constant – your ‘new current state’ will change, so you’ll need to monitor and support that with change management

- Annual revalidation of policy and procedures
- Implementation of controls to monitor change
- Implementation of controls to support change
- Rinse, repeat on an annual basis

Monitoring Controls

Detective Controls: those controls focused on monitoring 'after the fact'

- Periodic access reviews based squarely in sound policy
 - User Access, including appropriateness and existence
 - Sensitive Access
 - Elevated Access
 - SoD, being sure to assess from business process perspective
- Regular configuration review
 - Frequency depends on reliance and change
 - Leveraging audit trail where possible, confirming adherence to process

Monitoring Controls

- Produce periodic review reporting, again focusing on completeness and accuracy

The screenshot displays the FASTPATH Oracle EBS and SPC DEMO interface. The left sidebar contains navigation options: Access Reviews, Segregation of Duties, Audit Trail, Data Changes, Reports, Setup, Identity Manager, Report Management, and Integrations. The main content area is split into two panels. The left panel, titled 'Data Changes', shows a table of audit trail changes with columns for Date, Template, Table, Event, Field, Old Value, and New Value. The right panel, titled 'Review History', shows a table of review records with columns for Reviewer, Review Type, Frequency Type, Review Status, Review Items, and Generated Date. A search bar and various filters are visible at the top of the Review History panel.

Reviewer	Review Type	Frequency Type	Review Status	Review Items	Generated Date
Nate Boettcher	Product	Full	Not Started	2464	2/1/18 12:22 PM
Aidan Parsian	Security Role	Full	Not Started	209	2/1/18 12:22 PM
Nate Boettcher	Security Role	Full	Not Started	209	2/1/18 12:22 PM
Nate Boettcher	Critical Access	Full	Not Started	1301	2/1/18 12:22 PM
Nate Boettcher	Business Process	Full	Not Started	198	2/1/18 12:22 PM
Aidan Parsian	Business Process	Full	Not Started	1355	2/1/18 12:22 PM
Nate Boettcher	Conflict	Full	Not Started	196	2/1/18 12:22 PM
Aidan Parsian	Conflict	Full	Not Started	1273	2/1/18 12:22 PM

Supporting Controls

Preventative Controls: those controls that are focused on preventing exceptions

- Access request approval
 - Strong policies around granting access after approval
 - Leveraging workflow or technology to systematically prevent exception
- Change management
 - Include configuration in normal change management, with strong policies and use of a ticketing system
 - Leverage detective controls to validate adherence to policy

Supporting Controls

- Preventative controls and workflow can reduce risk at its source

The screenshot displays the FASTPATH Oracle Identity Manager interface. The main heading is "Request Management" with a sub-description: "Ability to create and edit Identity Manager requests for users and their access in the specified applications." The left sidebar lists various navigation options, with "Request Management" highlighted. The main content area shows a "Risk Analysis" section with the following data:

User Conflicts			View User Conflict Details
New	Removed	Total	
23	0	23	

Critical Access			View Critical Access Details
Groups	New	Removed	Total
	0	0	0

Objects			Total
New	Removed	Total	
0	0	0	0

Summary

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- Current State
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Questions?

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THANK YOU

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