

# Next Generation Policy & Compliance

Mason Karrer, CISSP, CISA

*GRC Strategist - Policy and Compliance, RSA*

Core Competencies – C33



**CRISC**

**CGEIT**

**CISM**

**CISA**

2013 Fall Conference – “Sail to Success”

# Introductions...



- **Mason Karrer CISSP, CISA**
  - GRC Strategist, Policy and Compliance
  - Solution Management & Direction
  - Archer Content Operations
  
- **Past Experience:**
  - Practitioner for 15 years
  - Software Development & IT
  - Security & Audit



Trust in, and value from, information systems

San Francisco Chapter



**CRISC**

**CGEIT**

**CISM**

**CISA** <sup>3</sup>

2013 Fall Conference – “Sail to Success”

# Overview

- Policy and compliance challenges
- Regulatory hurdles & consequences
- Policy and compliance in the new era

# Today's Policy and Compliance Challenges...



Executive Management must establish the overall vision and expectations for compliance.

Multiple Requirements

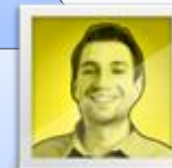
Business Management must ensure proper practices.



The CIO must fold IT compliance into technology picture.

Multiple Processes & Tools

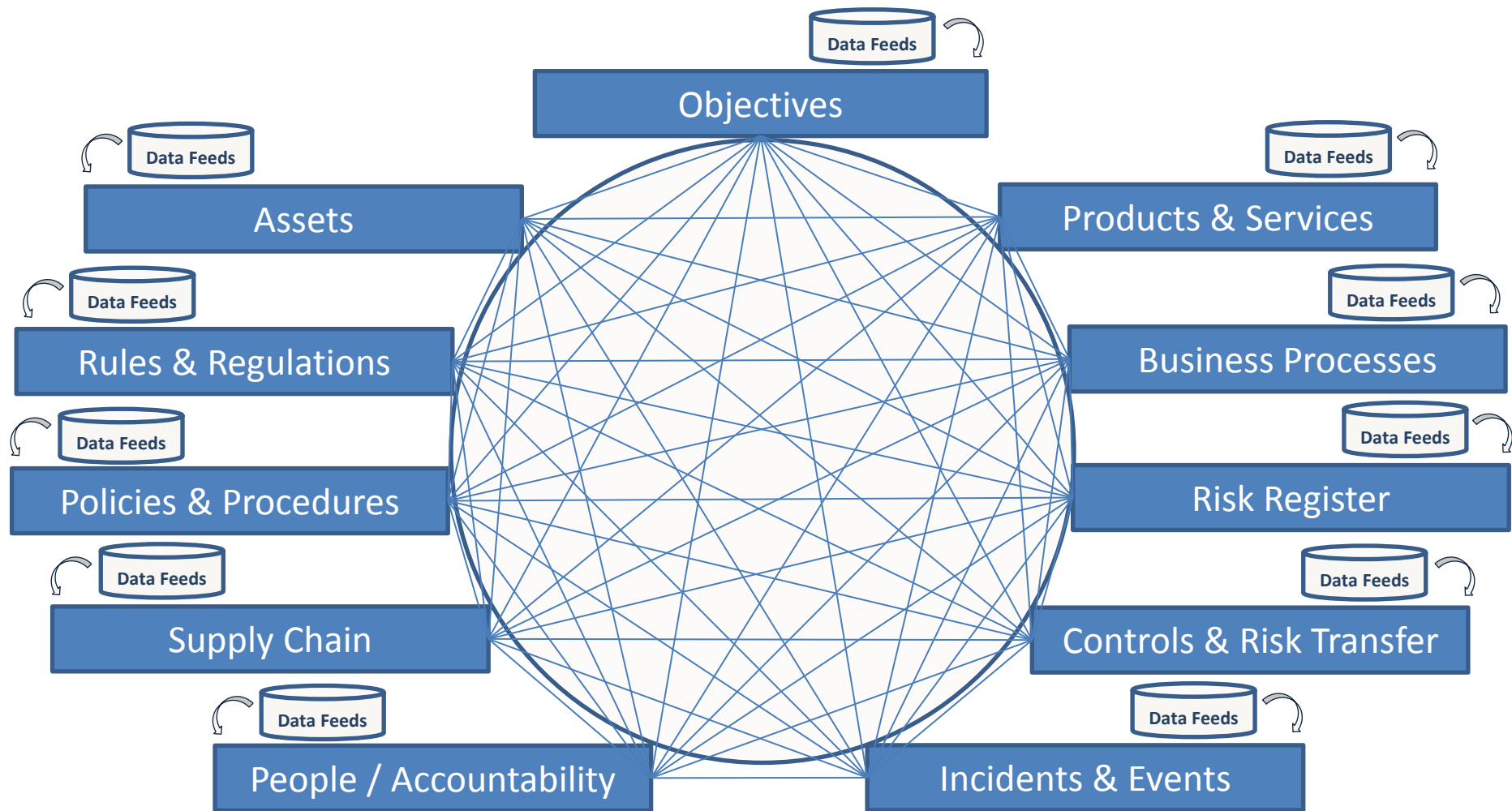
Business associates must execute the business within regulatory bounds.



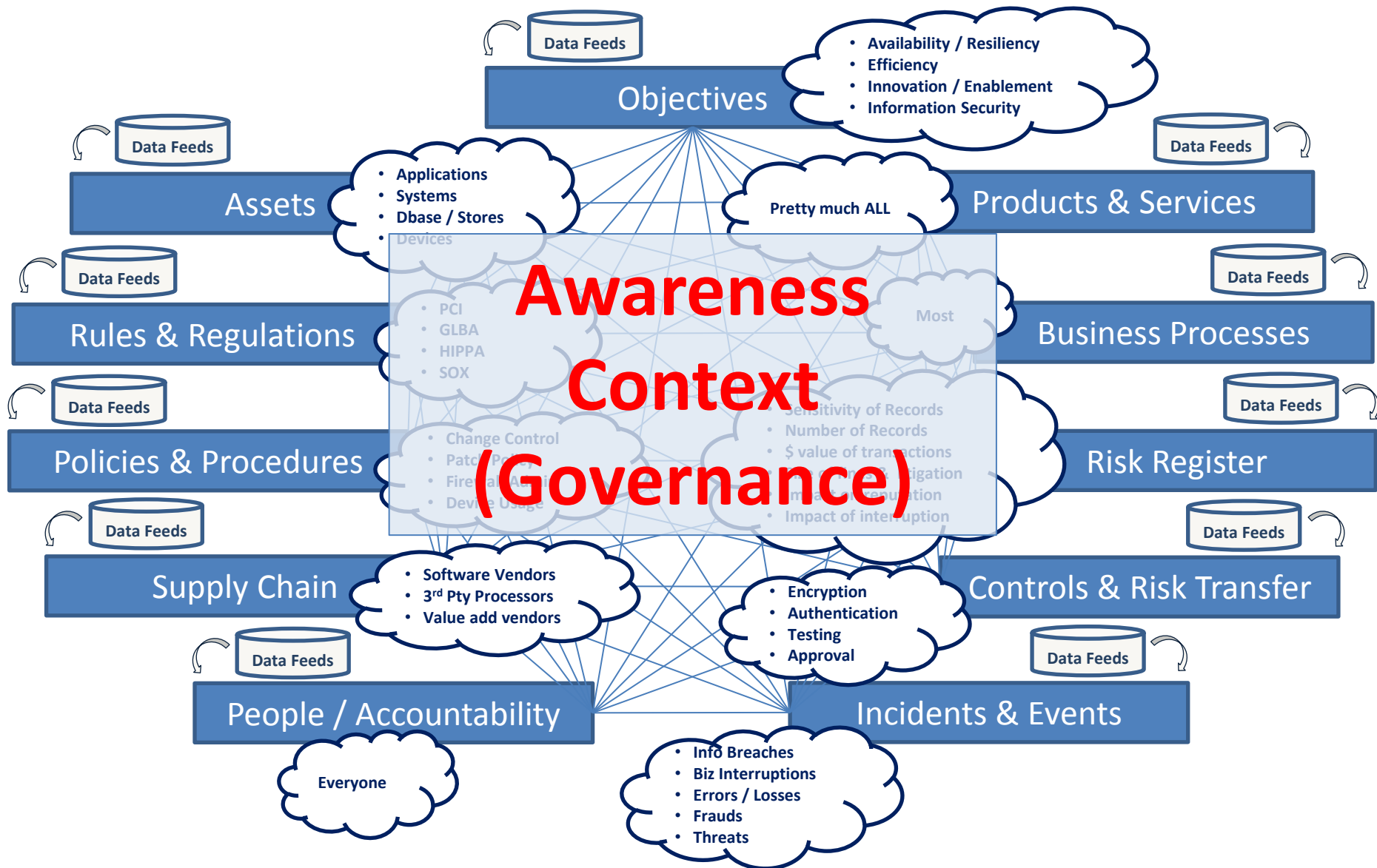
IT personnel must juggle operational duties while meeting compliance requirements.

Multiple Duties

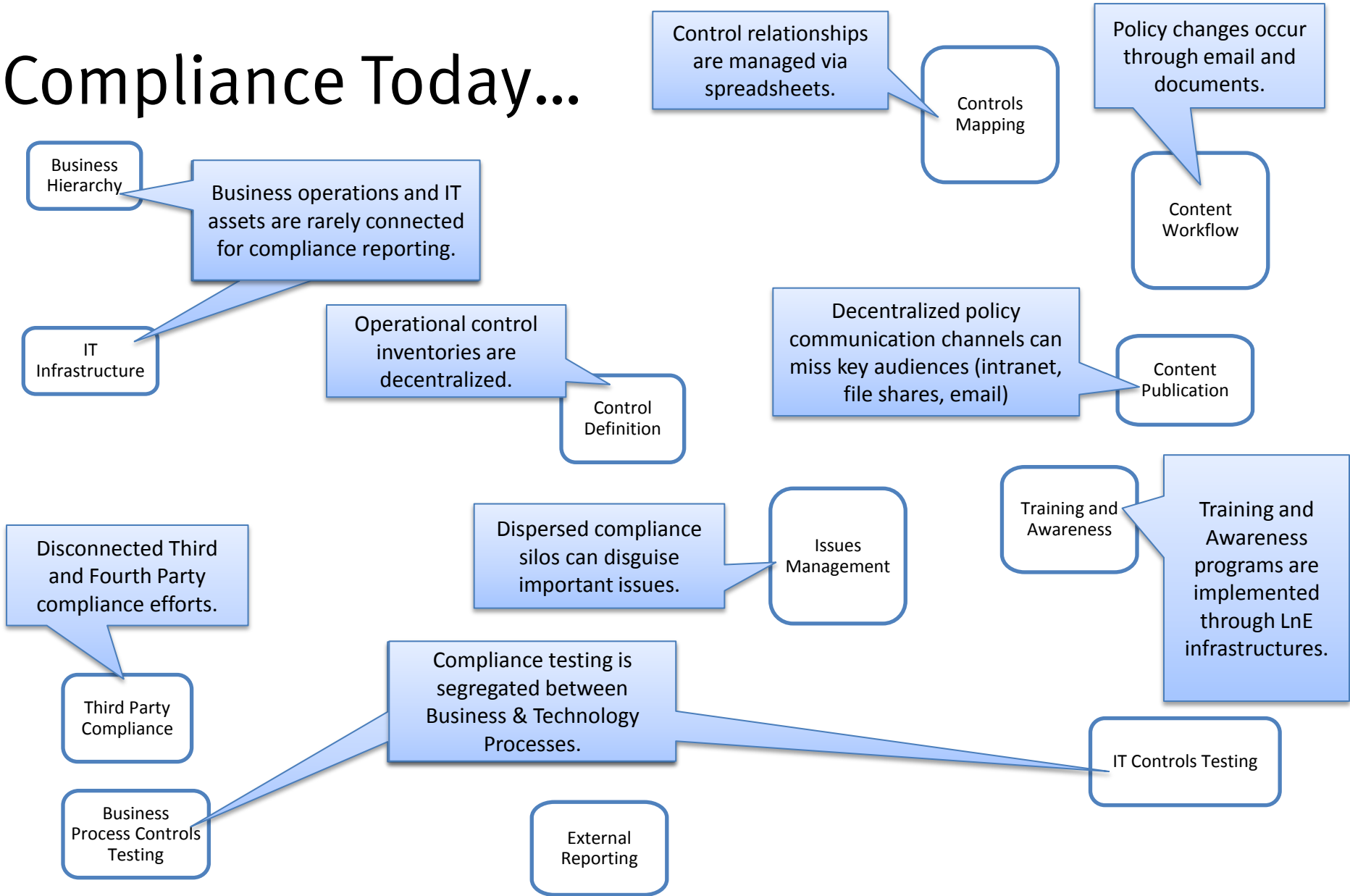
# Typical Information Architecture



# Typical Information Architecture



# Compliance Today...





# Consequences...

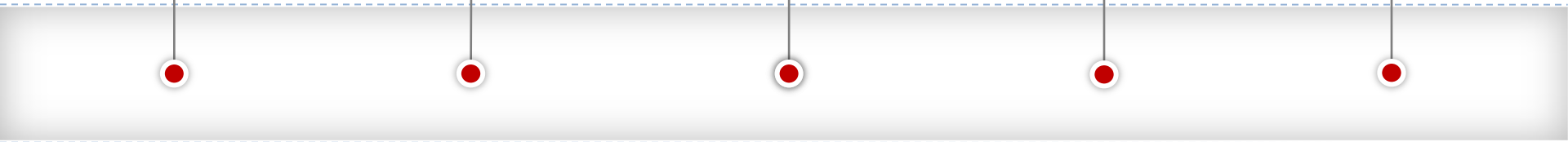
Compliance initiatives  
are tackled as  
individual projects.

Fragmented manual  
processes hamper  
the efficient support  
of business  
objectives.

“ Is my company  
meeting its  
compliance  
requirements? ”  
- CEO

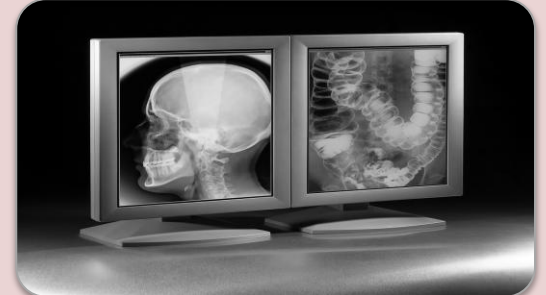
Burdensome  
regulatory climate  
and lack of visibility  
amplify operational  
risk.

Blurry big picture  
inhibits  
performance and  
decision making.



# Regulatory "Motivation"...

Affecting the bottom line across industries



\$2.8B

81%

9000+

# Regulatory "Motivation"...

Affecting the bottom line in financial services



\$2.8B

FY2011: 735 SEC enforcement actions  
(9% increase from 2010)

\$2.8B in penalties and disgorgements

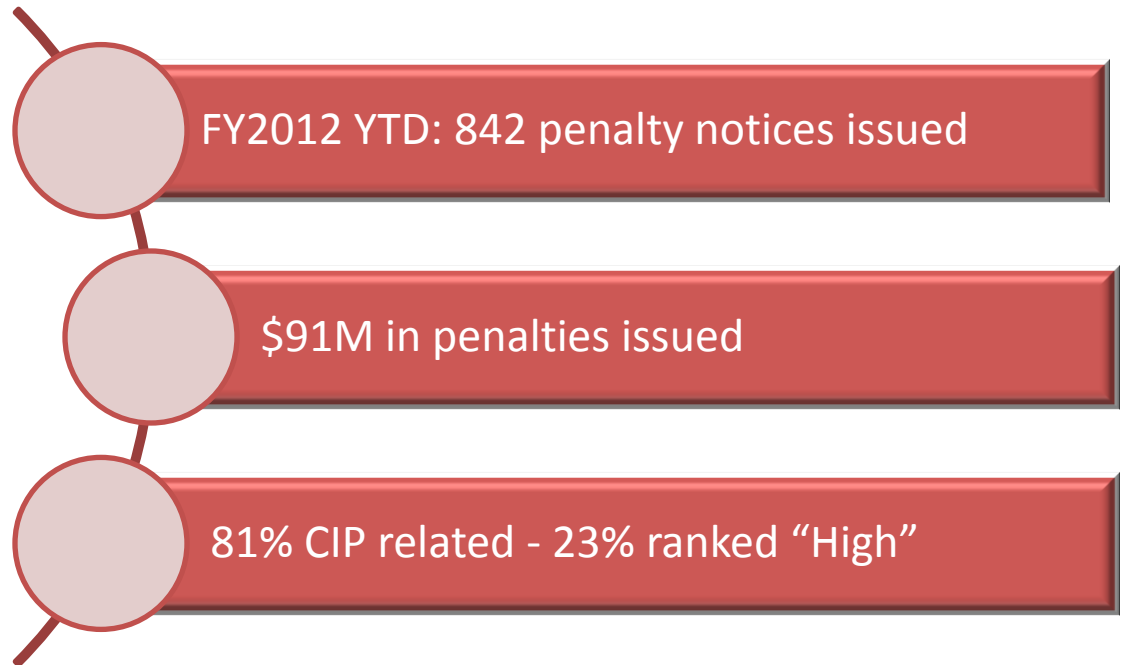
Morgan Stanley had better success

# Regulatory "Motivation"...

Affecting the bottom line in the utility sector

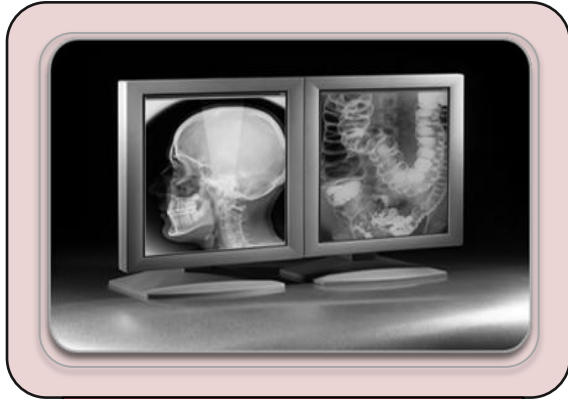


81%

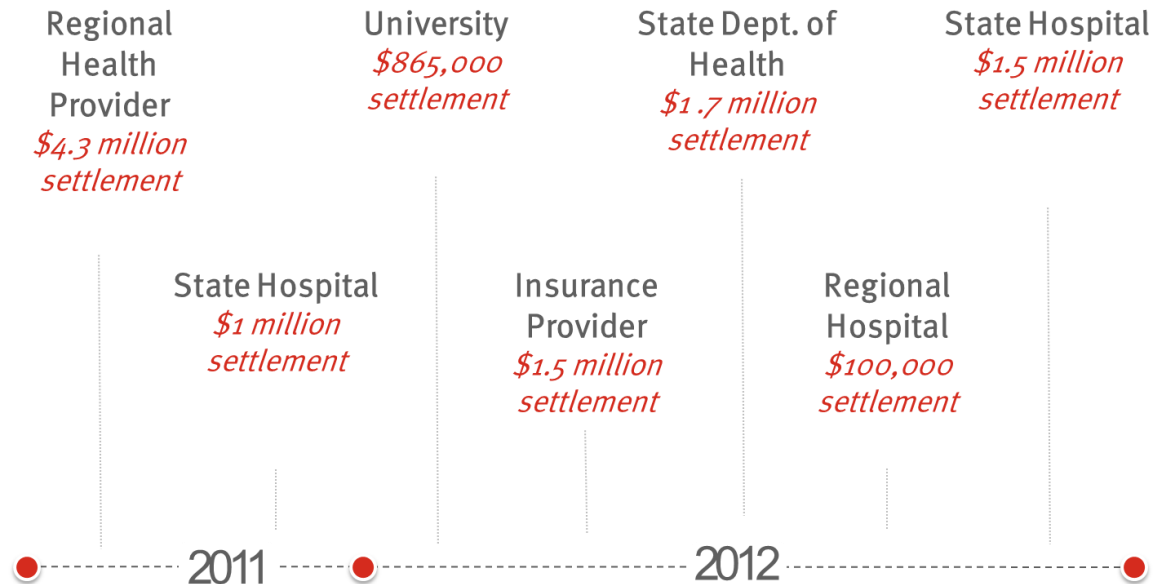


# Regulatory "Motivation"...

Affecting the bottom line in healthcare



9000+  
HIPAA  
privacy  
complaints  
in 2011.



Source: U.S. Health and Human Service Press Releases

# Elements of a Next Gen P&C Portfolio

## Guiding Principles

- Transparency
- Security & Peace of Mind
- Consistency & Sustainability
- Agility & Proficiency
- Balanced Effort vs. Reward

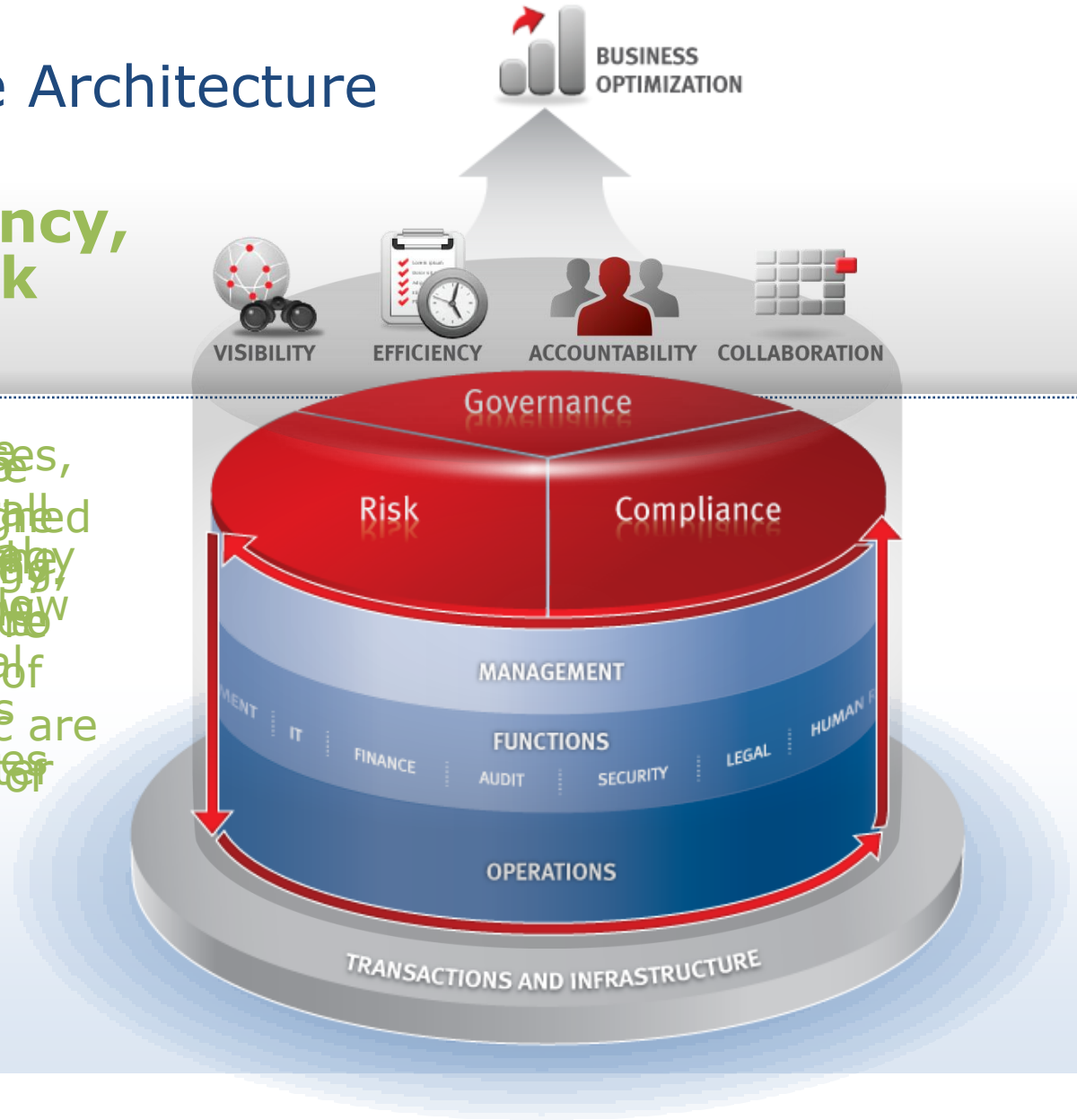
## Objectives

- End to End Coverage
- Clarified Ownership
- Information Integration
- Flexible & Easy to Use
- Efficiency & Unified View

# RSA GRC Reference Architecture

Visibility, Efficiency, Accountability, & Collaboration

The "operational" data feeds, and the risk responses in the "dashboards" however, GRC all have a large target audience. The operational data feeds, overall, do not flow to operations. Operational data/results/output flows are back to the GRC processes to inform business decisions.



# Our Approach - 50,000 ft. View

## Governance

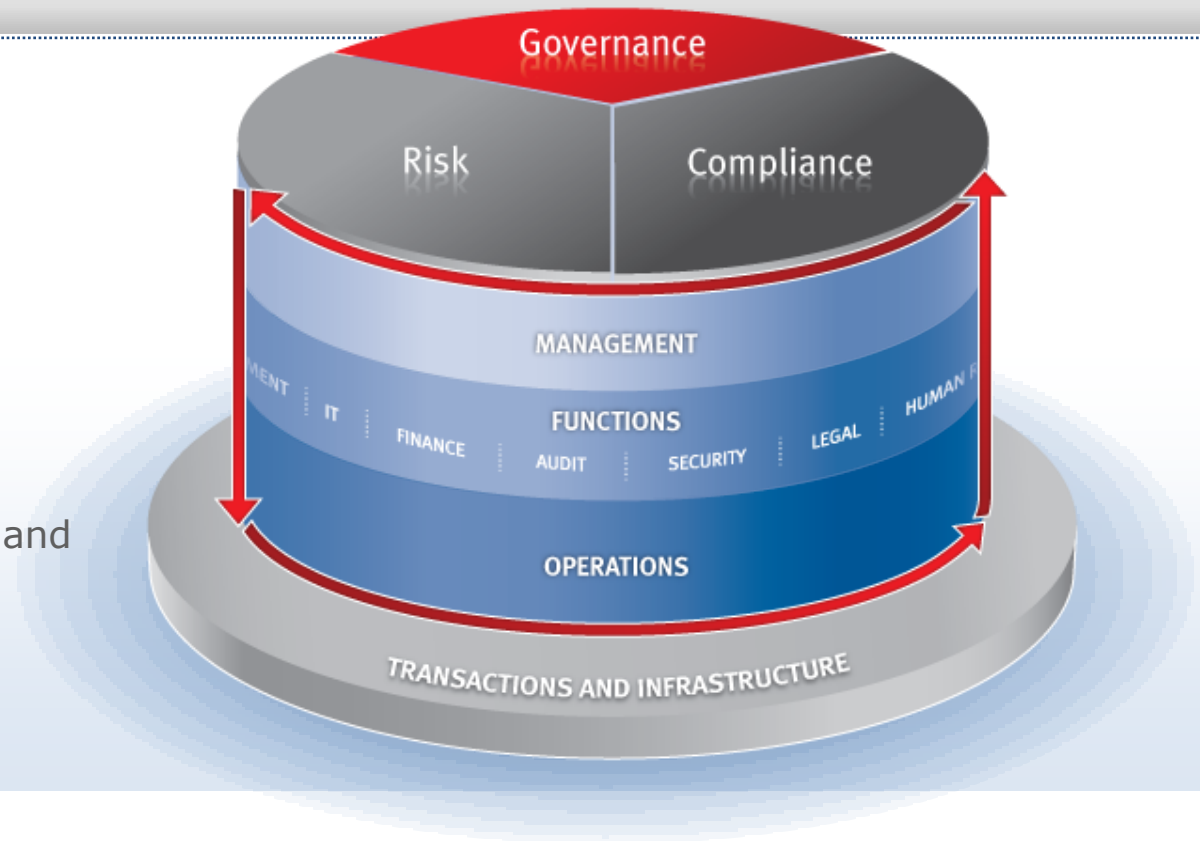
Description of the organization, its business assets and asset ownership and relationships as well as definition of prescribed business practices

### Key Processes:

- Process Management
- Enterprise Management
- Strategy Management

### Key capabilities

- **Asset Awareness**
- Organizational Hierarchy
- **Controls Mapping and Rationalization**
- Policy & Standards Creation and Publication
- Delegated Authorities
- Role Management
- Strategic Planning





# Our Approach - 50,000 ft. View

## Risk

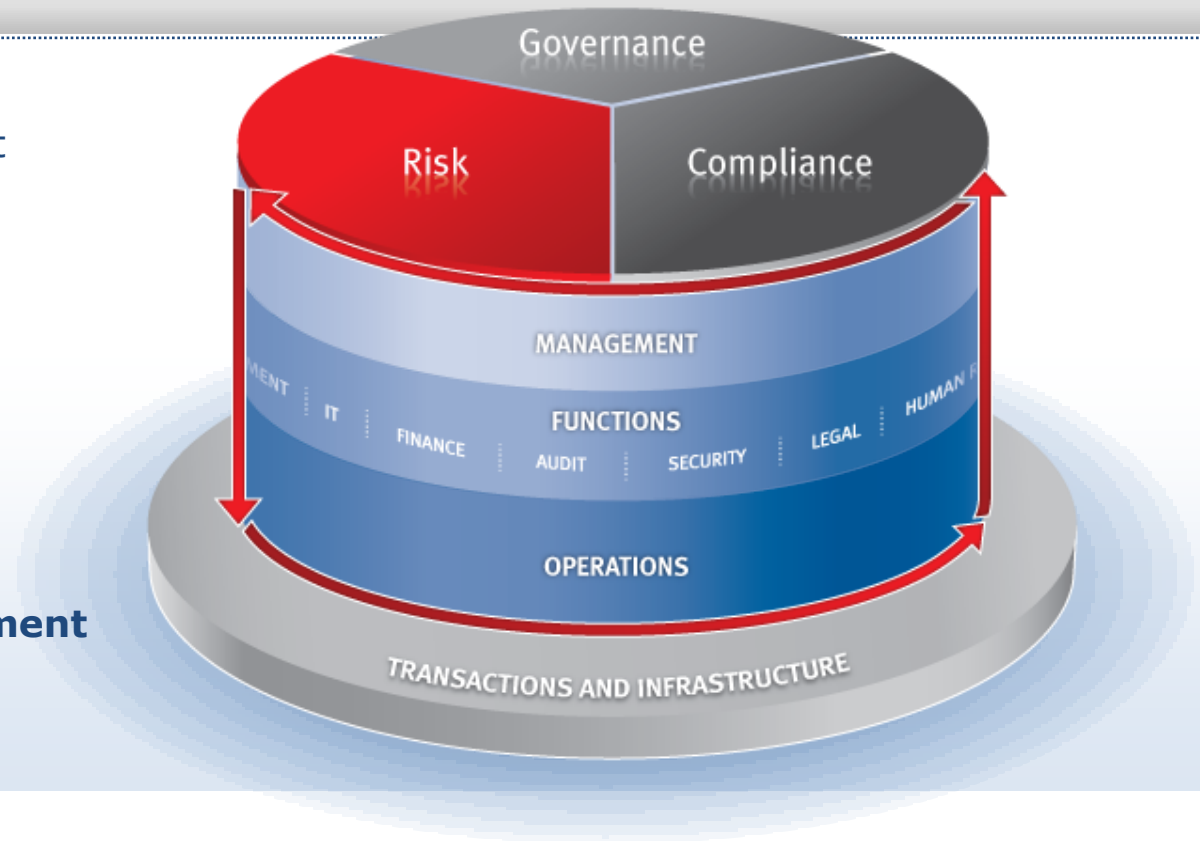
Identification, management and tracking of issues that could adversely affect the business

### Key Processes:

- Enterprise Risk Management
- Third Party Management
- Event Management

### Key capabilities

- Risk Assessment
- Financial Risk Management
- **IT Security Management**
- BCM/DR
- Matters Management
- Crisis Management
- **Third Party Risk Management**
- KRIs



# Our Approach - 50,000 ft. View

## Compliance

Assurance that the business is adhering to defined business practices.

### Key Processes:

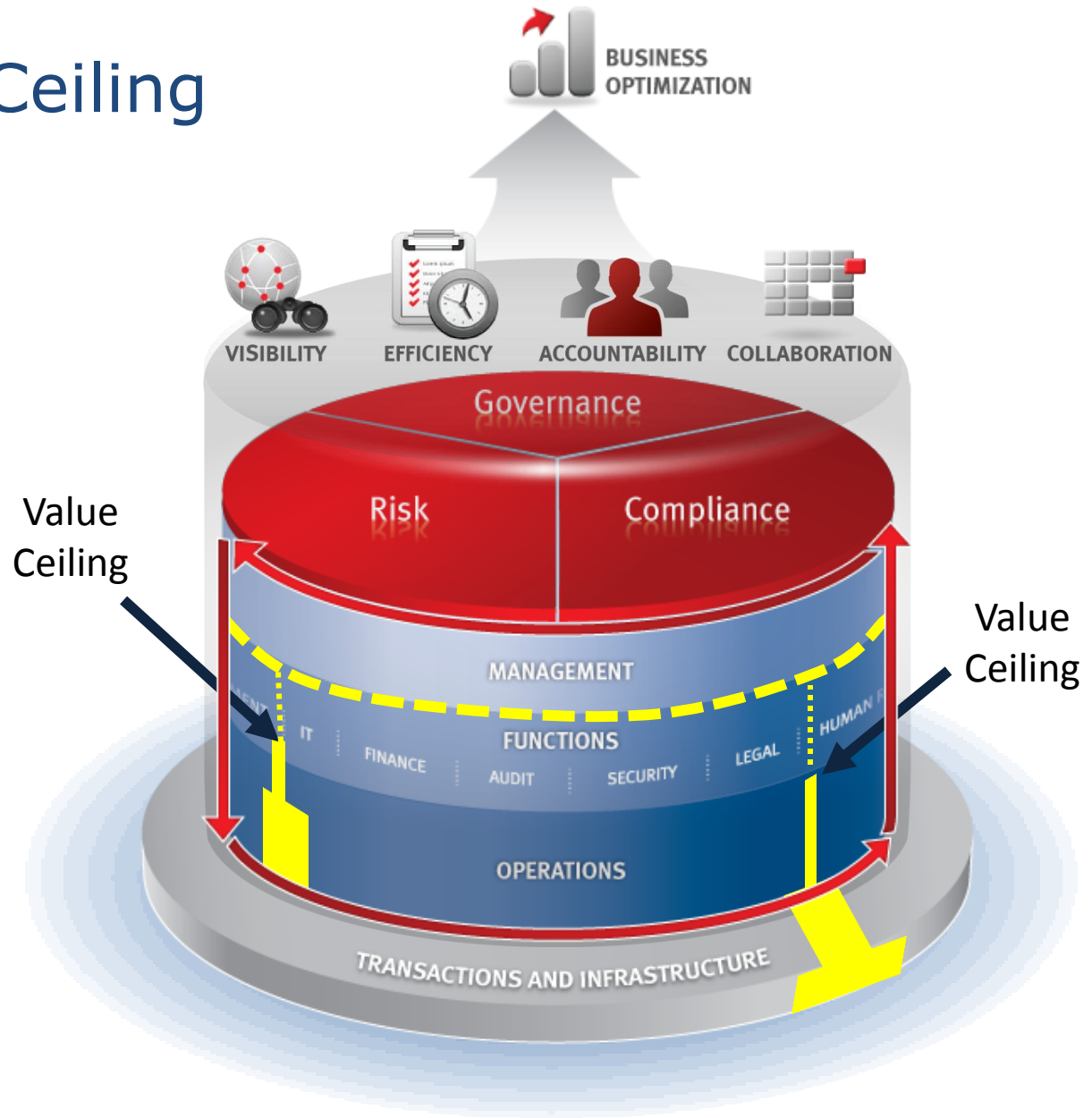
- Audit Management
- Compliance Management

### Key capabilities

- Control Assessments
- IT System Compliance
- Financial Reporting Compliance
- Business Process Compliance
- **Regulatory Change**
- Compliance Reporting
- Third Party Compliance



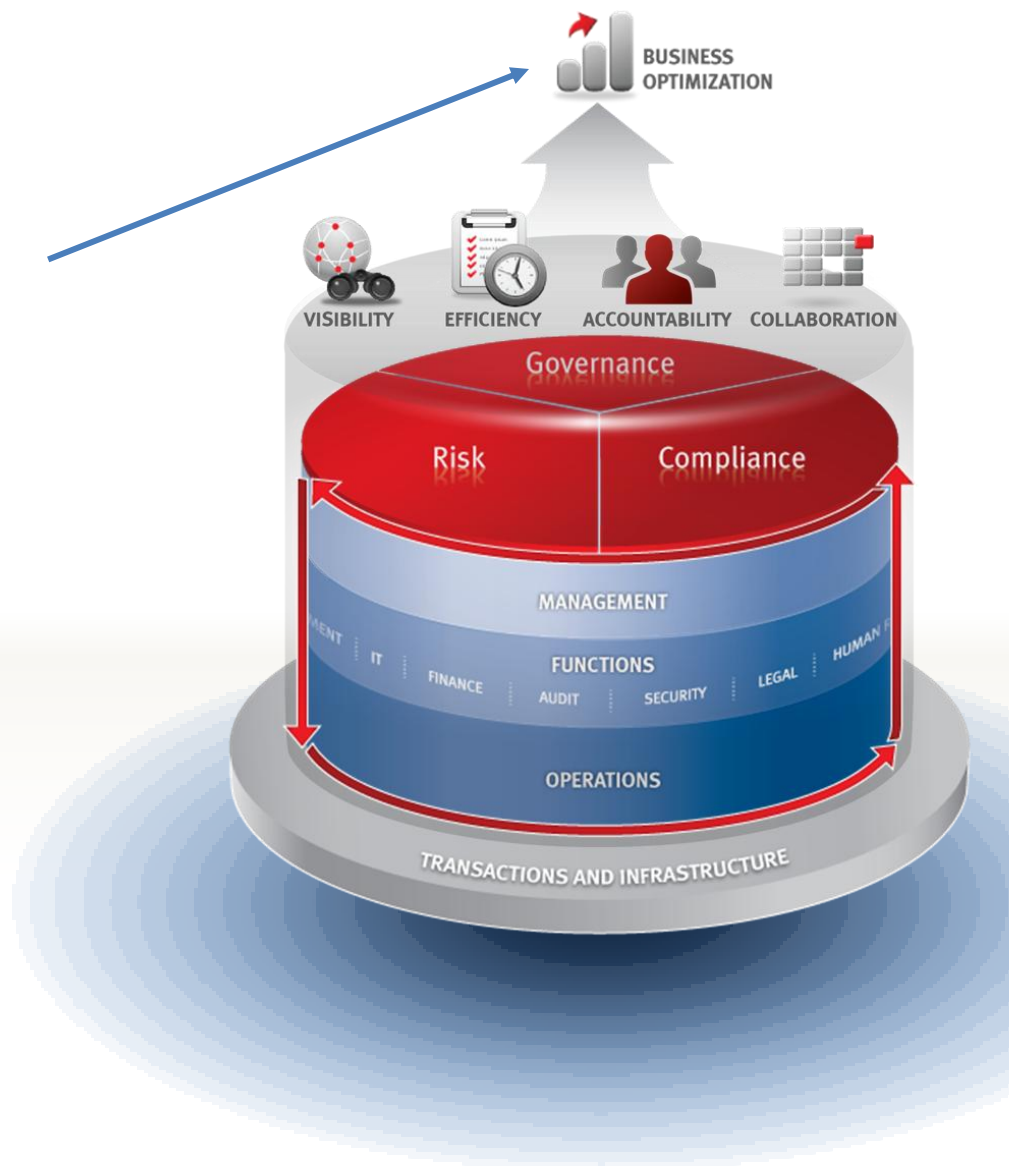
# Concept: Value Ceiling



# Using the RSA GRC Reference Architecture

*What is the ultimate objective of the GRC effort?*

What is the part of the business that the company wants to optimize?



# Using the RSA GRC Reference Architecture

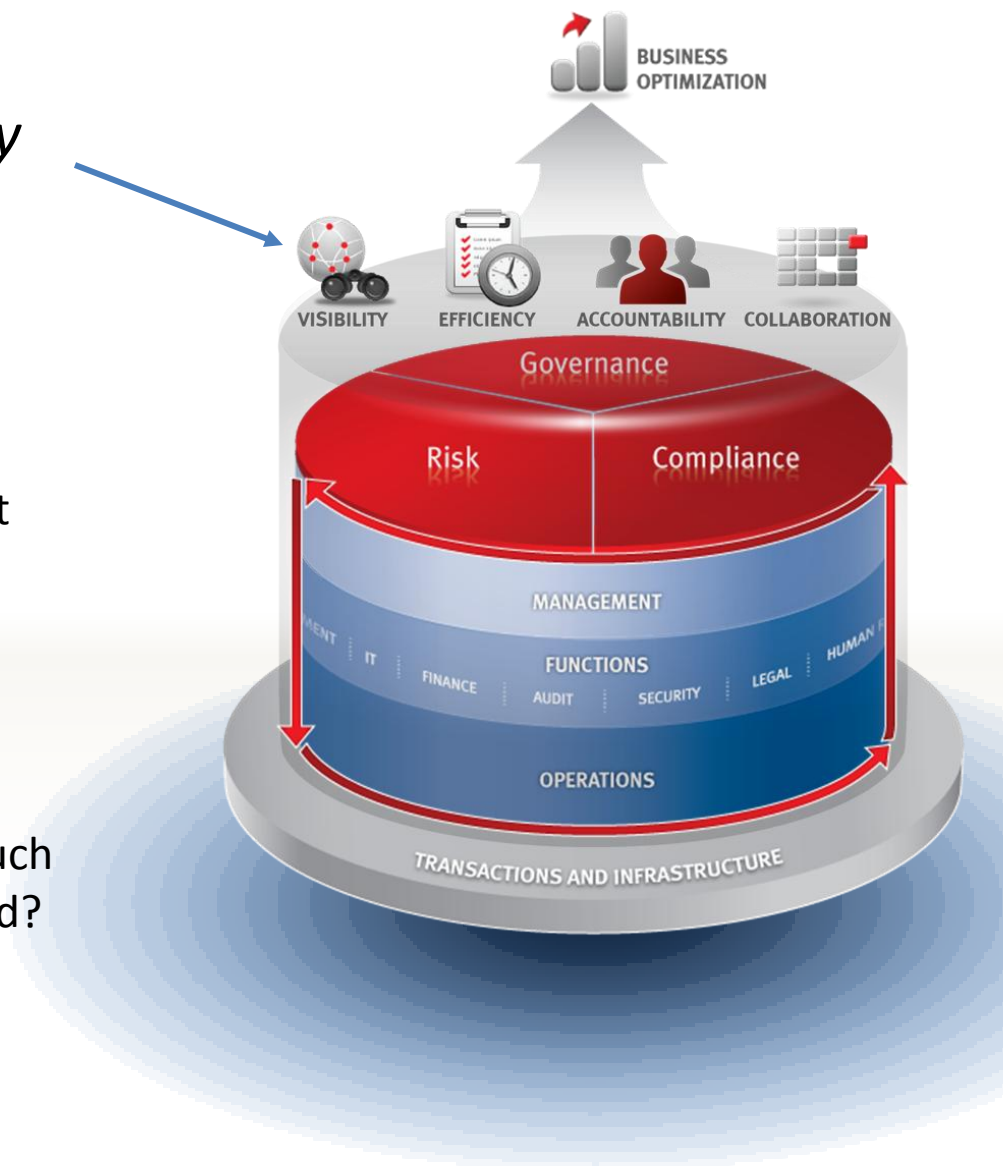
*What will it take to achieve the key values?*

What is the output that will provide the right visibility to make the decisions?

What processes need to be addressed? What efficiencies are targeted?

Who owns the processes? What type of accountability is being established?

How will stakeholders be engaged? What touch points between groups need to be established?



# Using the RSA GRC Reference Architecture

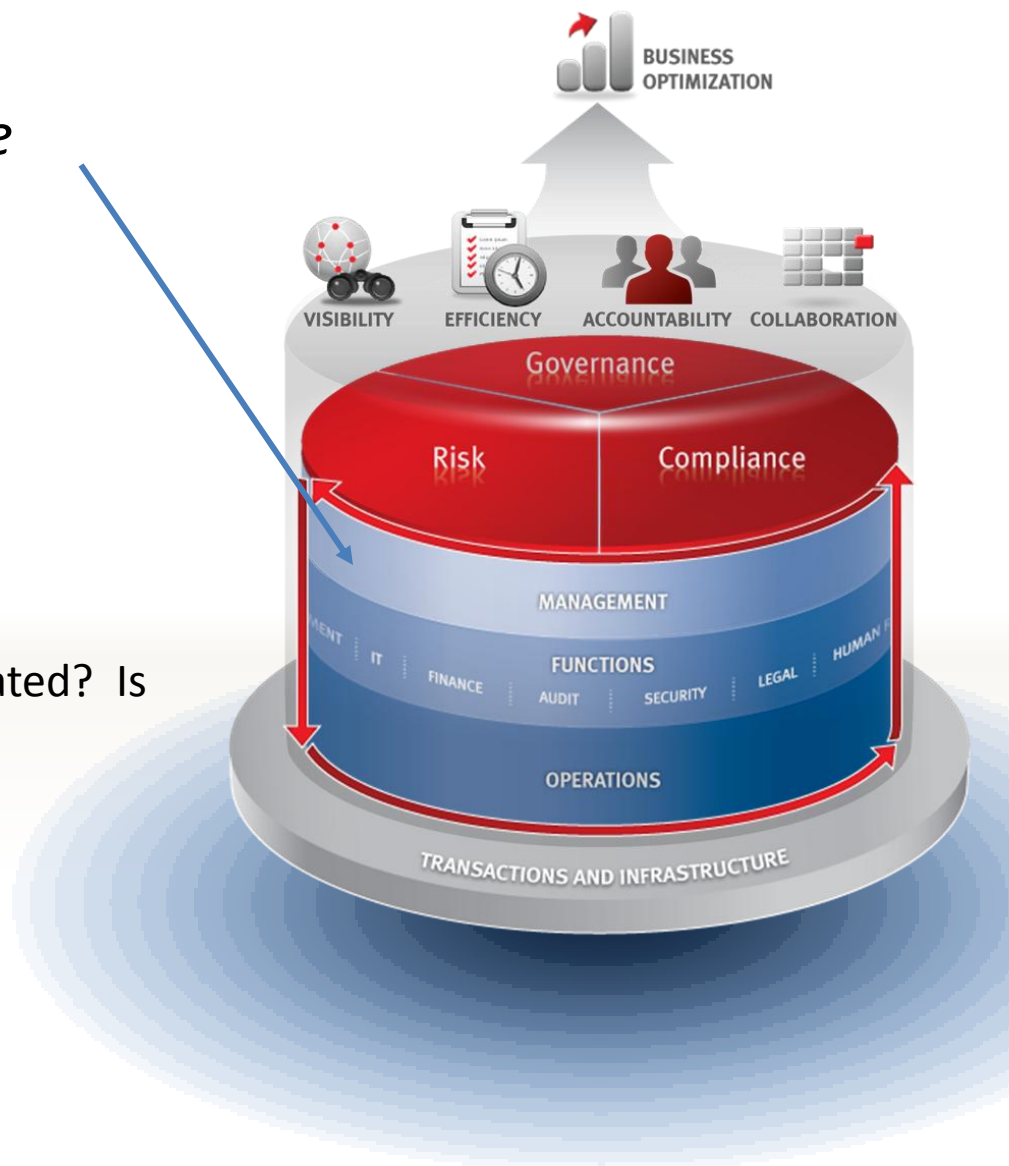
*What level of management will be affected?*

Who is the owner?

Who are the key stakeholders?

How is the strategy being directed?

Is there top down guidance? Is it communicated? Is it clear?



# Using the RSA GRC Reference Architecture

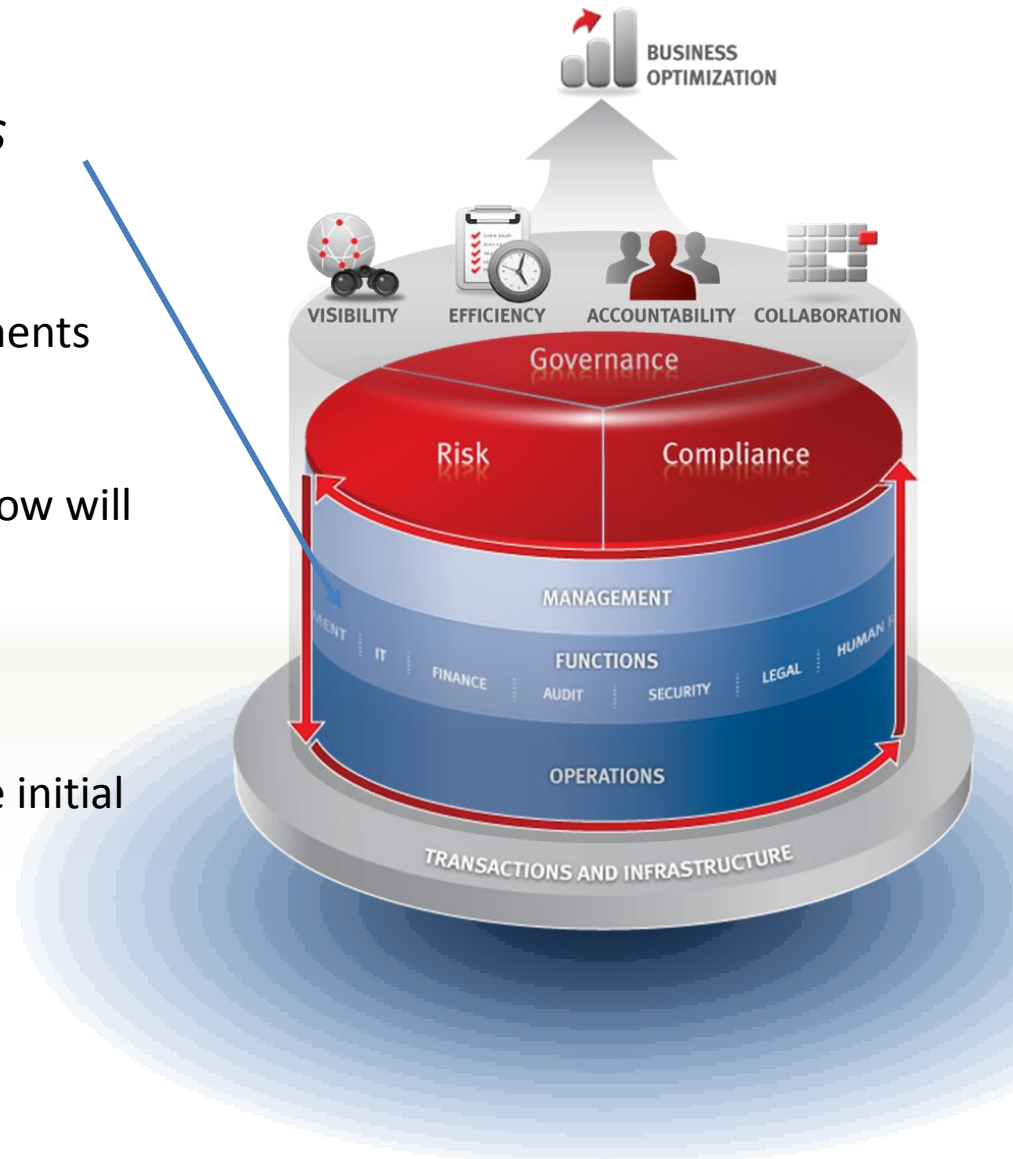
*What are the Functional elements involved?*

What departments or organizational components are affected?

How do the functions communicate now? How will they in the future?

What level of coordination is needed?

Is there a plan to expand or grow beyond the initial functional groups?





# Using the RSA GRC Reference Architecture

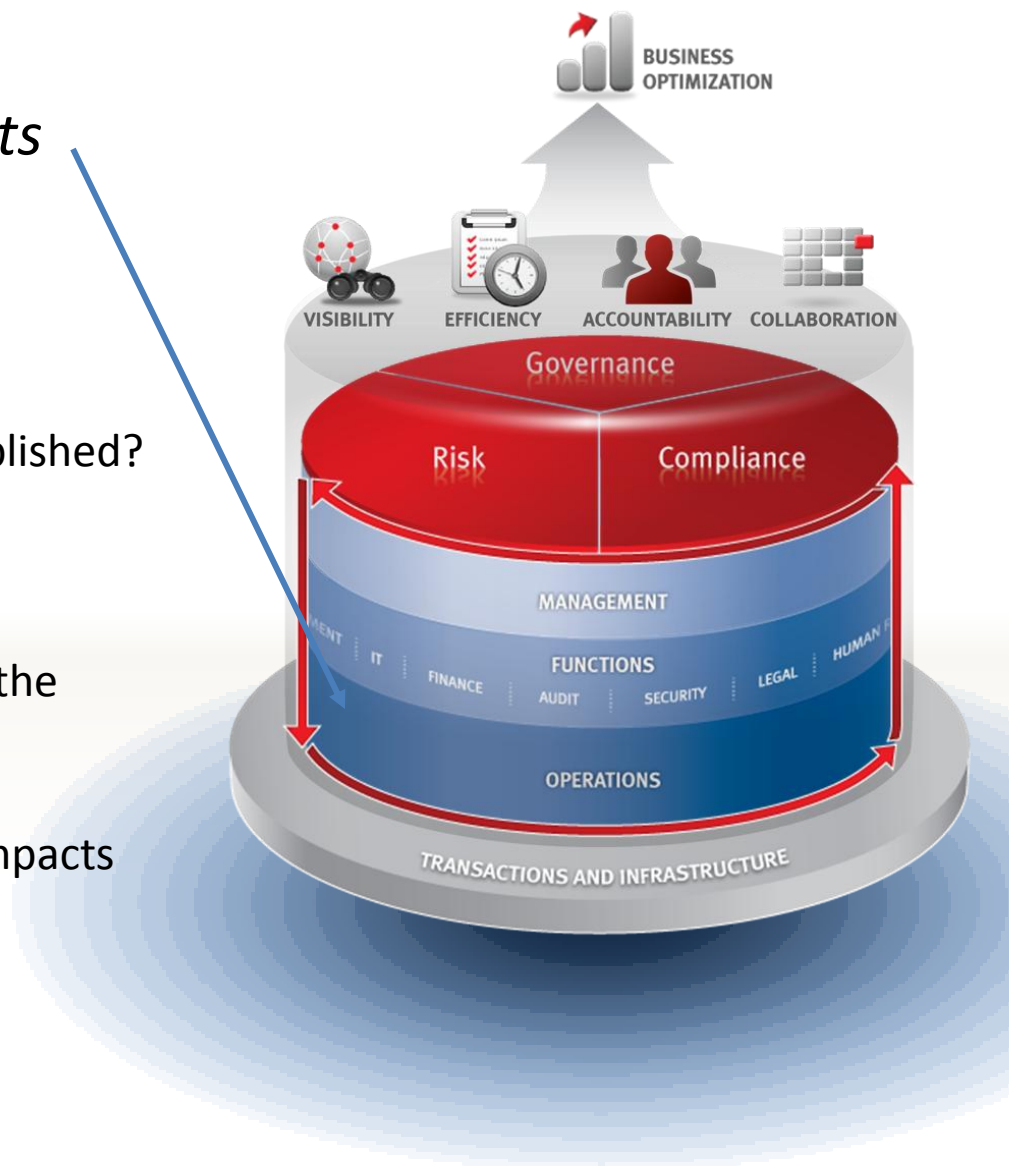
*What are the Operational elements involved?*

What operational groups are affected?

What operational processes need to be established?  
Adjusted? Re-engineered?

What is the effort to sustain the operational impacts? How does the effort continue into the future?

Training, awareness, education and rollout impacts to frontline employees?





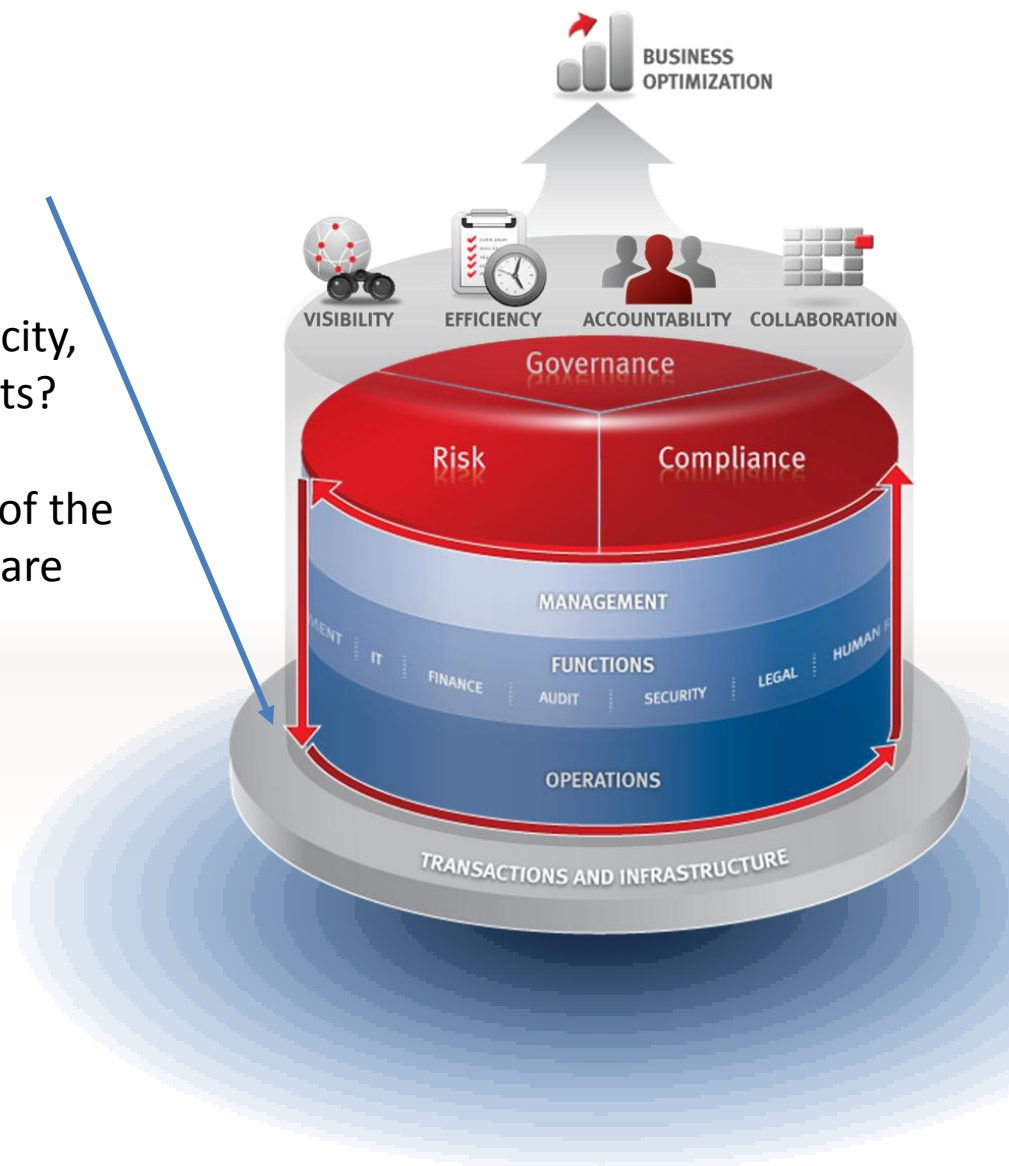
# Using the RSA GRC Reference Architecture

*What are Transactions and Infrastructure are relevant?*

What events are impactful? What is the velocity, volume, size, scope and nature of these events?

What systems are involved? What elements of the infrastructure (facilities, IT applications, etc.) are involved?

What is the technical overhead?



# Using the RSA GRC Reference Architecture

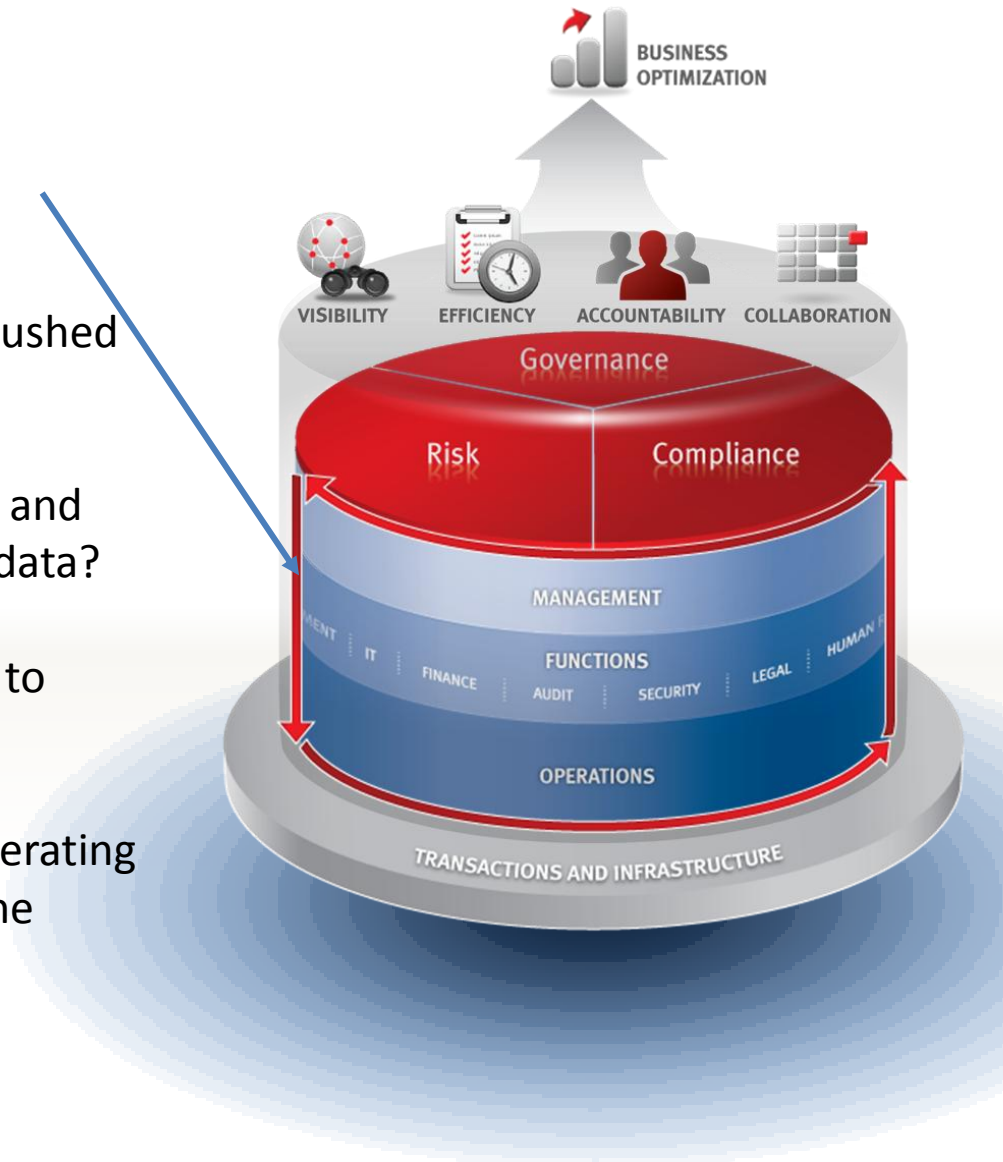
## *What are Feedback/Continuous Improvement needs?*

How will requirements and expectations be pushed down through the stack?

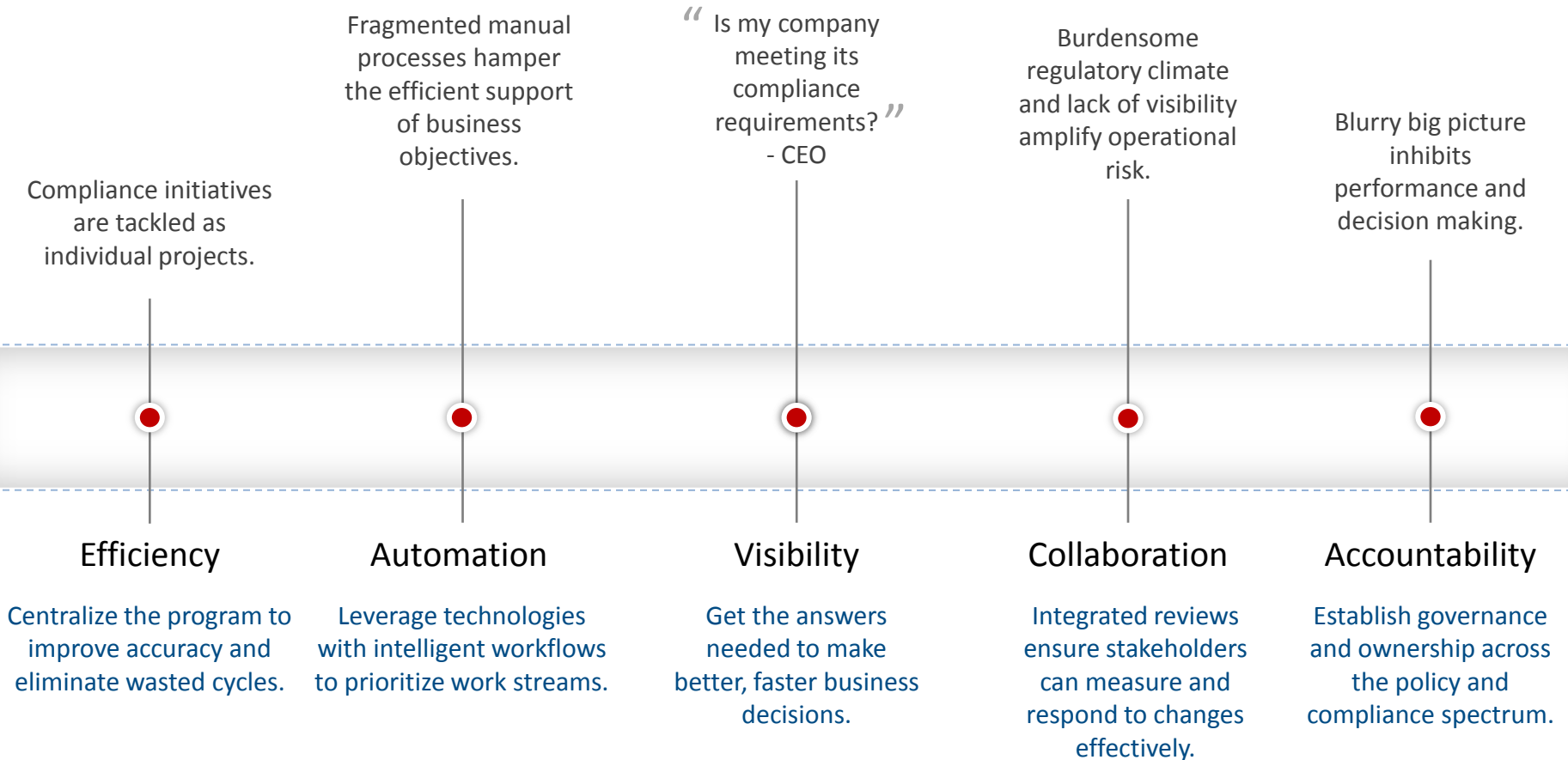
How will operations manage the transactions and infrastructure to gather the right “feedback” data?

What data is needed to be fed up the “stack” to provide to management?

How will management decide if things are operating as expected? What is the process to adjust the environment based on the feedback?



# Positive Business Outcomes





trust

in the digital world