Streamlining User Access Reviews for More Effective, Sustainable Compliance

Recently, a European-based insurance and financial services provider faced a number of critical issues involving the Sarbanes-Oxley Act (SOX). As a multi-national company, it needed to fully demonstrate SOX compliance. This included the proper certification of access privileges for users in their North American subsidiaries. However, a preliminary audit by the company showed that user entitlement data was only 70% accurate, with many accounts improperly allocated to current users.

In many respects, these issues were a result of the company’s growth and success. As with many rapidly growing organizations, the company had developed a large and complex IT infrastructure, including a mainframe environment, several IBM® AS/400® applications and a number of homegrown applications. These elements were integrated across heterogeneous platforms, networks and data stores. A recent acquisition added more complexity. The sheer size of this infrastructure made compliance with various SOX requirements a significant challenge.

Manual processes also increased compliance risk. For access control, the company had been transferring information, one account at a time, to a centralized Lotus Notes® database. In addition, reviewers had to manually consolidate three different AS/400 reports on account certification. Revocation of access privileges was also based on manual processes, with no audit trail in place for verifying results. Clearly, a manual approach to compliance was no longer adequate.

To better meet their compliance requirements, the company chose SailPoint’s identity governance solution that includes automated access control, reporting and audit.

In the first phase of deployment, the company achieved the following critical milestones:

- Addressed SOX-related issues by improving the overall access review process
- Created a centralized repository for 40,000 user accounts
- Automated access review and certifications for 9,000 users
- Reduced time spent on access certifications from months to days
- Increased accuracy of user and entitlement data
- Gained a consolidated view of user entitlements across applications
- Improved reviewer and executive decision-making
A solution for complex environments

Based on detailed requirements and vendor evaluations, the customer selected SailPoint because of its ability to manage complex environments in an efficient, cost-effective manner.

For example, the company’s legacy environment included over one million lines of code supporting Remote Access Control Facility (RACF) files for 30,000 user accounts. Using a flexible framework to aggregate and correlate data from multiple accounts, the SailPoint solution was able to fully automate the certification of these RACF files, as well as accounts from two AS/400 applications and several in-house applications.

The company also liked the fact that SailPoint’s technology integrates with applications in read-only mode. This meant that the deployment team could read data from any number of sources without IT personnel and application owners having to grant and manage separate access rights. This saved the IT department valuable time and helped streamline the deployment.

As an added benefit, SailPoint fully supported the integration of data from a recent acquisition. This new company had different applications, data structures and business processes. Once again, the flexibility of the SailPoint solution made short work of aggregating and consolidating data from multiple sources across complex environments.

When provisioning isn’t enough

Many organizations consider provisioning systems for compliance and access control needs. However, provisioning systems can be too complex and costly to deploy to large numbers of business applications across the enterprise. Oftentimes provisioning tools have been designed for technical users and do not provide business-friendly interfaces needed to support compliance tasks. In addition, provisioning systems often lack visibility into fine-grained entitlements and access privileges required to enforce compliance policy. As a result, provisioning is not the best option for meeting compliance requirements.

Based on these facts, the financial services customer selected SailPoint’s solution as the right approach for their specific needs of governance and access control. As an added benefit, this choice gave them a more rapid deployment with faster time to results than they would have realized from another approach.

Automation for 40,000 accounts

The SailPoint solution helped the customer to quickly and easily aggregate, correlate and cleanse data for 14 SOX-relevant applications in just 21 days. It also fully automated review and certification by People Managers for 9,000 users through a unified user interface. In all, 40,000 user accounts were consolidated and mapped directly to the individual users or marked as system accounts. And, to minimize training needs for business users, SailPoint’s business-oriented user interface provided easy-to-understand reports with clear actions needed to perform certifications.

An additional challenge facing the company was the difficulty of understanding the cryptic formatting of RACF entitlements. Using SailPoint, the customer was able to translate RACF codes into business-friendly descriptors and reduce the number of items that required certification, making the review process more efficient and effective for business managers.

Access certification reports make it easy for reviewers to approve or revoke privileges associated with business roles, individual entitlements and policy violations.

Improved data accuracy

With SailPoint’s automated compliance management solution, accuracy of user and entitlement data has increased dramatically through the elimination of bad account data and the association of service accounts to specific users within the organization. The company has been able to convert unreliable manual processes into fully automated workflows with complete reporting and status monitoring. The time spent on access
certifications has been dramatically reduced, allowing the business to focus on higher priority issues. The company has also gained a complete view of user entitlements across applications, enhancing reviewer and executive management decision-making.

On the business side, the company’s managers appreciate how SailPoint’s solution gives them more control over compliance issues. Out-of-the-box reports provide improved visibility and the proof necessary for end-of-period control verification. Time-consuming, error-prone manual processes are completely eliminated. And remediation requests can be sent directly to administrators and tracked via the compliance dashboard in the product.

Lessons learned

Based on its deployment experience, the company gained valuable insight about meeting compliance requirements, including:

**Simplify for business users**
Compliance is a cross-functional task that involves IT, audit and business users from across the organization. A solution that is too technical can quickly derail adoption by business users. Therefore, a solution needs to be adopted that meets the needs of business users while providing the flexibility needed by more technical IT users.

**Automate, automate, automate**
Only automation will help ensure full ROI and cost savings, especially for larger organizations managing tens of thousands of accounts. Automation can also help ensure that managers can accurately assess and update user accounts.

**Look for an easy-to-deploy solution**
The business value of a compliance solution is always influenced by the time and resources required for its deployment. Choose a solution that can be deployed in an efficient and timely manner.

**Choose a solution based on specific needs**
Every company has to address specific needs along the road to compliance. A company should start with thorough, enterprise-wide assessment, and then choose a solution that is appropriate for its size, business model, budgetary goals and IT infrastructure.

**Provisioning is not always the first step**
For compliance, a focused strategy based on the immediate needs for access control and account visibility is more efficient and cost-effective than a large, enterprise-wide provisioning system which can be costly to deploy.

**Featured SailPoint Capabilities**

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<thead>
<tr>
<th>FEATURE</th>
<th>FUNCTION</th>
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<tbody>
<tr>
<td>Identity Data Aggregation</td>
<td>Aggregates technical identity data scattered across multiple enterprise systems and transforms it into a centralized, easily understood and business-relevant format that's accessible and actionable.</td>
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<tr>
<td>Identity Data Correlation</td>
<td>Correlates user identities across systems and applications using rule-based algorithms.</td>
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<tr>
<td>Consolidated Certification Reporting</td>
<td>Centralizes access data, including entitlements, roles and policy violations, across the organization and formats it into easy-to-read certification reports.</td>
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<tr>
<td>Automated Workflow</td>
<td>Automates certification process for routing certification requests, including approvals, delegations and remediation requests.</td>
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<td>Business-oriented Certification Process</td>
<td>Enables organization to distribute certification decisions to business users by simplifying the presentation of complex IT access data.</td>
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<tr>
<td>Closed-loop Remediation</td>
<td>Ensures continuous compliance by sending automatic revocation requests to an automated or manual user provisioning system and validating changes occurred.</td>
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<tr>
<td>Risk-aware Certifications</td>
<td>Elevates identity risk scores for users who have not had timely certification reviews.</td>
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A look ahead

Looking ahead, the company plans to expand coverage with SailPoint to include all SOX-relevant applications. They also plan to enhance their compliance performance further by adding application-owner certifications and by automating the enforcement of corporate access policies through cross-application Separation-of-Duty (SoD) rules. To effectively align IT compliance efforts with the business process, they plan to add business context to their entitlement data with role creation and ongoing role lifecycle management.

When the customer does decide to deploy a user provisioning system, they will certainly benefit from having already cleansed and correlated all of their identity data with SailPoint. By starting a provisioning implementation with a baseline of consistent, reliable identity data, customers have significantly accelerated their deployment phase. In addition, once the provisioning system is in production, SailPoint will seamlessly integrate with it to automate the remediation of access privileges revoked during a certification while also providing the closed-loop validation that the changes have been correctly implemented.

This global leader in financial services considers SailPoint a strategic solution for both helping them to improve their compliance efforts and for delivering tangible benefits that affect the bottom line of the organization.

The SailPoint advantage

SailPoint is dedicated to helping organizations manage the business of identity. Our innovative approach to identity management streamlines compliance efforts, strengthens internal controls and improves identity governance.

Take a risk-based approach to identity governance
SailPoint’s understanding of risk is unsurpassed and runs throughout the solution. Taking a risk-based approach to governance and compliance allows organizations to prioritize and focus internal controls and audits ultimately reducing compliance costs and resource burdens. By assessing and measuring risk over time, organizations can demonstrate that identity controls actually reduce corporate exposure and liability.

Gain visibility into the identity environment
The centralized view of identity data that SailPoint exclusively provides can improve decision-making and produce the transparency businesses need to reduce potential security and compliance exposures and liabilities. Executives can confidently address the stringent reporting requirements of auditors and compliance staff.

Bridge the gap between business and IT
Successful governance, risk, and compliance (GRC) initiatives demand collaboration across both business and IT stakeholders. SailPoint breaks down language barriers so organizations can communicate effectively across constituencies and achieve greater success together.

Work smarter through actionable identity intelligence
Only SailPoint applies a business intelligence approach to identity management. Transforming technical IT data into meaningful information gives managers the business context they need to make better decisions, and ultimately, to be more accountable.

About SailPoint

As the fastest-growing, independent identity and access management (IAM) provider, SailPoint helps hundreds of the world’s largest organizations securely and effectively deliver and manage user access from any device to data and applications residing in the datacenter, on mobile devices, and in the cloud. The company’s innovative product portfolio offers customers an integrated set of core services including identity governance, provisioning, and access management delivered on-premises or from the cloud (IAM-as-a-service). For more information, visit www.sailpoint.com.

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