OUTLIERS: GOING BEYOND TRANSACTIONAL ANALYSIS

Twenty-First World Continuous Auditing & Reporting Symposium Rutgers Business School November 6, 2010

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Hewlett-Packard P Internal Audit



AGENDA

- HP's Approach to Continuous Auditing/Continuous Monitoring

10/29/2010

- Application Risks
- Financial Processing
- Getting to the Outliers

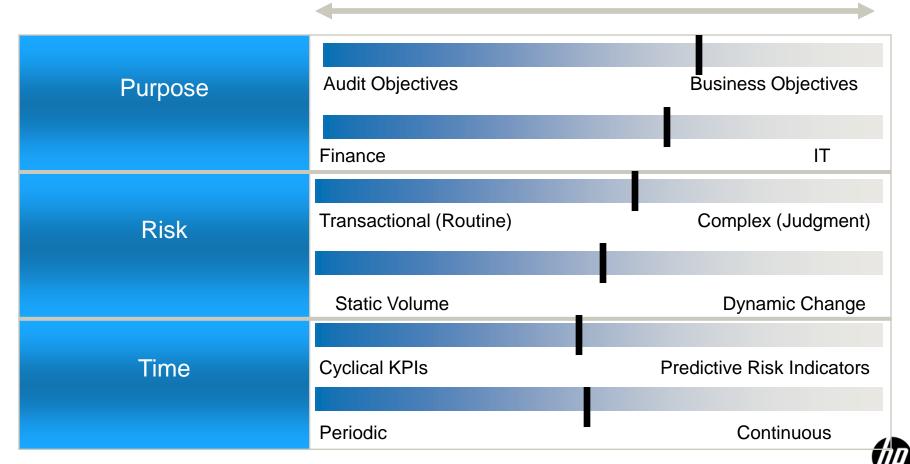




FROM NOISE TO KNOWLEDGE:

Considerations for Persuasive Monitoring

Gain a sense of purpose, risk and time to tune outliers that are persuasive AND economically useful.



OUR APPROACH FOR MEASURING RISK

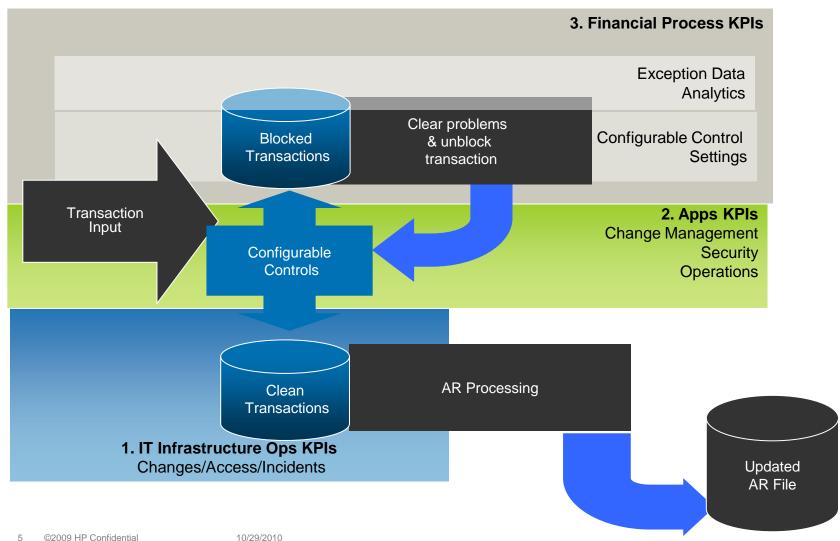
- Indicators exist at various levels in the organization:
 - ✓ IT Infrastructure Operations
 - Applications
 - ✓ Financial Processes
- How does HP Internal Audit assess these controls by area?





ACCOUNTS RECEIVABLE (AR) CYCLE

3 Areas of Indicators





CONTINUOUS AUDITING & MONITORING MODEL

Aligning IT and Business Objectives Provides a View to Emerging Risk

Governance Continuous Monitoring Tools and Methodology **Financial Process Risk** IT Infrastructure Risk **Application Risk** Release & Config Mgt Change Management Automated Controls Transport Frequency & Changes from Baseline Volume Security conditions Transaction Data Identity Management Granting Access Credit & Collections Revoking Access Account Receivables Segregation of Duties P-Card Periodic Reviews Manual Journal Entries Incident Management Fixed Assets Operations processing • HP Service Center **Tickets** Accepted Assurance Frameworks



Application Risk CHANGE MANAGEMENT IN SAP

Governance

Continuous Monitoring Tools and Methodology

IT Infrastructure Risk

- Release & Config Mgt
- Identity Management

Incident Management

Application Risk

- Change Management
 - Transport Frequency & Volume
- Security conditions
 - Granting Access
 - Revoking Access
 - Segregation of Duties
 - Periodic Reviews
- Operations processing
 - HP Service Center Tickets

Financial Process Risks

- Automated Controls
 - Changes from Baseline
- Transaction Data
 - Credit & Collections
 - Account Receivables
 - P-Card
 - Manual Journal Entries
 - Fixed Assets

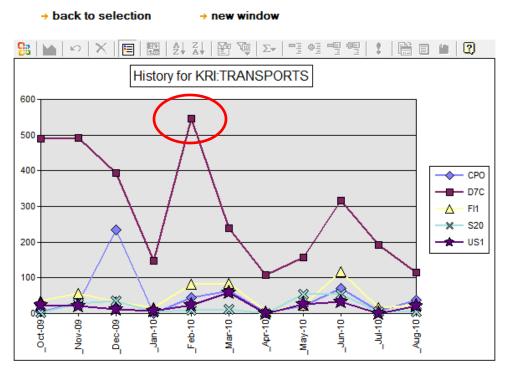
Accepted Assurance Frameworks



SAP TRANSPORT REPORT

Changes: Trending Frequency and Volume

History Report for TRANSPORTS (Area:MAINTENANCE)



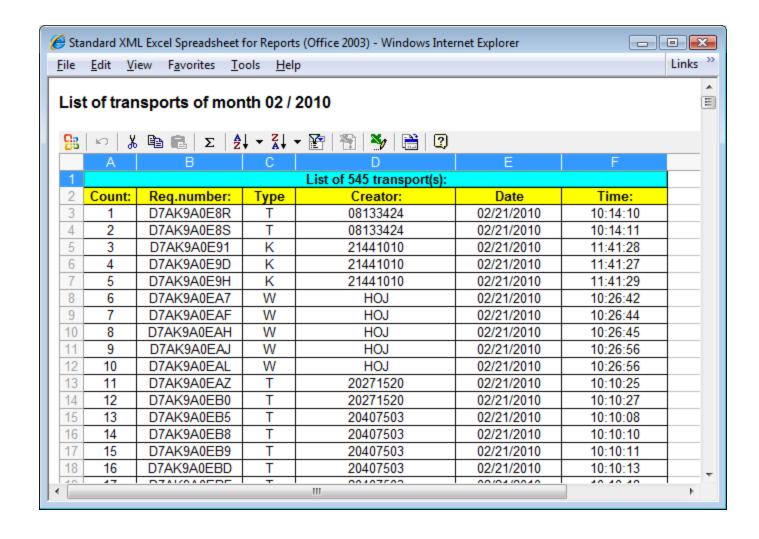
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I	CPO	4	30	235	0	45	64	3	22	71	6	
I	D7C	489	493	393	148	545	240	108	156	316	193	
I	FI1	35	57	33	17	83	84	8	23	117	16	
I	S20	3	27	35	5	9	12	1	54	53	4	
I	US1	23	22	11	7	23	58	1	25	32	1	
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SAP IRANSPORT DETAILS

10/29/2010

Changes: Detail for Testing Move to Production **Process**





Application Risk SECURITY CONDITIONS

Governance

Continuous Monitoring Tools and Methodology

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Accepted Assurance Frameworks



GRANTING ACCESS: SELECT YOUR SAMPLES

Changes in Security: Testing for Authorization

•From the KPI home page: Reports -> User Changes

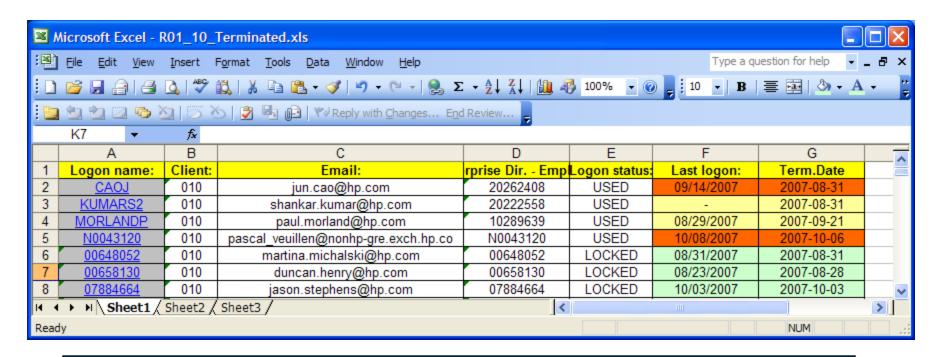
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1	No: Logon name: Client: Email: Logon type: User group: rprise Dir Emp Logon sta										
2											
3	1	00012359	100	regina.hunter@hp.com	DIALOG	7H-TIS	00012359	USED			
4	2	<u>00015617</u>	100	steve.rianda@hp.com	DIALOG	3C-PURCHASIN	00015617	USED			
5	3	<u>00036143</u>	100	barbara.edwards@hp.com	DIALOG	3C-PURCHASIN	00036143	USED			
6	4	<u>00088546</u>	100	miguel.rosado@hp.com	DIALOG	4-SPARES	00088546	EXPIRED1			
7	5	00092828	100	tami.sutton@hp.com	DIALOG	6-MFG	00092828	USED			
8											
9							1 Deleted use	ers in 04/2008 o			
10	183	<u>DAVIDWH</u>	100	david.white2@hp.com	DIALOG	1-MFG	00471669				
11						23	Users with new I				
12	184	<u>00232650</u>	100	francisco.montes@hp.com DIALOG Z-BASIS 00232650 USEI							
13	185	<u>00489938</u>	100	eladia.velez@hp.com	DIALOG	4-MATLENG	00489938	LOCKED			
14	186	20372398	100	richard.green@hp.com	DIALOG	6A-MFG	20372398	USED			
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REVOKING ACCESS: TERMINATED USERS

Conditions in Employment: Changes in Security



Red: Last Logon after termination date

Yellow: Active, but no logon after termination

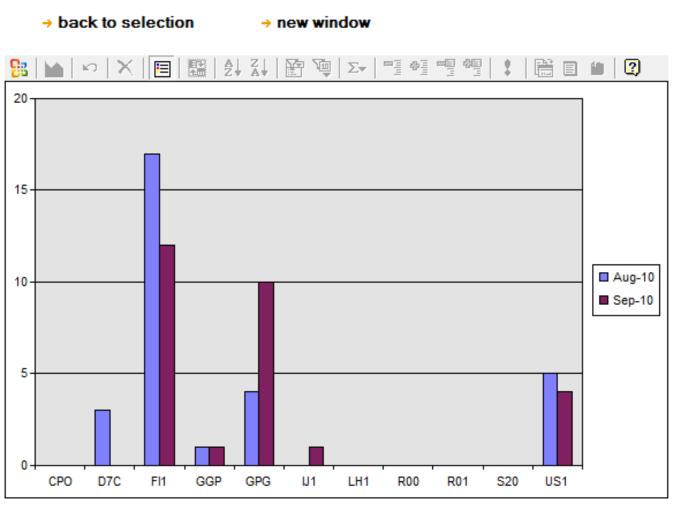
Green: Inactive and no logon after termination



SAP TERMINATED USER COMPARISON

Conditions: Termination Trend

History Report for TERMINATED (Area:USER)

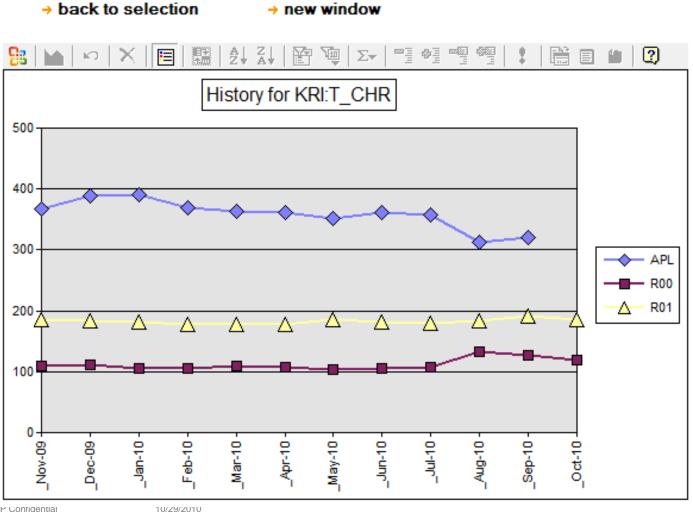




SAP Users with Unblock Transaction Capability Trend

APL: Asia Pacific R00: Americas R01: EMEA

History Report for Credit Hold Release (VKM1,VKM2) (Area: TRANSACTION)





Application Risk OPERATIONS PROCESSING

Governance

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Incident Management

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 - •HP Service Center
 - **Tickets**

Financial Process Risk

- Automated Controls
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Accepted Assurance Frameworks



OPERATIONS PROCESSING

10/29/2010

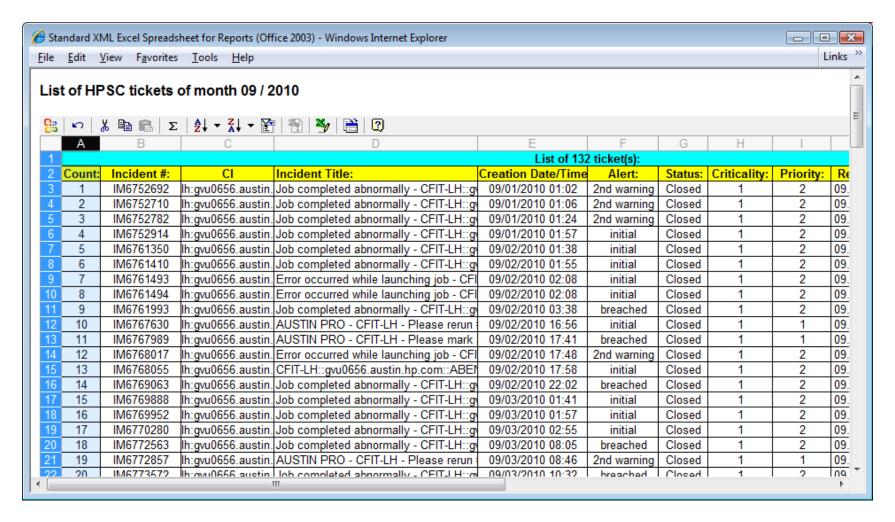
Incident/Error Management Flux from Prior Period

			HP KRI In	formation Syste	m - Data E	ntry		
Business Group	GO+IT-AI	Sysid	LH1		Installatio	on	002010	9862
Year	2010 🕶	Month	September ▼		Client		100 (L	H Production)
Detail Level	Low - 1	Medium - 2	3		Last Data	a Pull:	2010-1	0-08
→ edit data	→ reset system	→ close window	→ help					
AREA	GROUP	ITEM		SITEM	UNIT	LAST	CUR.	COMMENT
	IT Operations	(Openview Tickets		#	83	132	
	Downtime		Availability			100	100	
		Actual Downtime			hours	0	0	
		Elapsed Planned Downtime			hours	0	0	
Ountries Assettabilities		Elapsed Unplanned Downtime			hours	0	0	
System Availability	Calls	Pri 1 calls raised in month			#	2	8	
		Pri 2 calls raised in month			#	6	20	
		Pri 1 calls outside agreed turnaround			#	0	0	
		Pri 2 calls outside agreed turnaround			#	0	0	
	Outages	U	nplanned Outages		#	0	0	
Change Management			Open Tickets		#	1	3	
		Number of Change Requests			#	8	10	
		Delayed moves to production			#	0	0	
	_	No o	of Transports in e070		#	115	88	
Maintenance	Transports							



DETAIL LIST OF OPENVIEW TICKETS

Incident/Error Management Detail Testing





AUTOMATED (APPLICATION) CONTROLS

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Accepted Assurance Frameworks



KEY OBJECTIVES

- Extract application control data directly from SAP systems
- Create a benchmark report 2. comparing current application controls data with the previous audit
- Evaluate the impact of all changes to 3. determine if retesting is required
- Get buy-in from external audit for 4. benchmarking approach

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BENCHMARKING AUTOMATED CONTROLS

Conditions: Comparing a Configurable Value to a Baseline Period

Procure-to-Pay Controls

- All controls
- Standard Configuration (00)
- Vendor Master Data (01)
- Material Master (02)
- Purchase Information Record (03)
- PIR fields (04)
- 2-way match (05)
- Goods Issue (06)
- 3-way match (07)
- Disbursement Cycle (08)
- Purchase Price Variance (09)
- Cycle Count (11)
- Standard Revision (12)





BENCHMARKING AUTOMATED CONTROLS

Conditions: Comparing Configurable value to a Baseline Period, ctd.

Customer-to-Cash Controls

- All controls
- Customer Master (01)
- Material Master (02)
- Pricing (03)
- Backlog Re-pricing (04)
- Incompletion Procedure (05)
- Credit Filter (06)
- Account Determination (07)
- Transit Time Delay (08)
- Invoice only after PGI (09)
- Invoice requires PGI (10)
- AR aging (11)
- EDI Payments (12)
- Lockbox Payments (13)

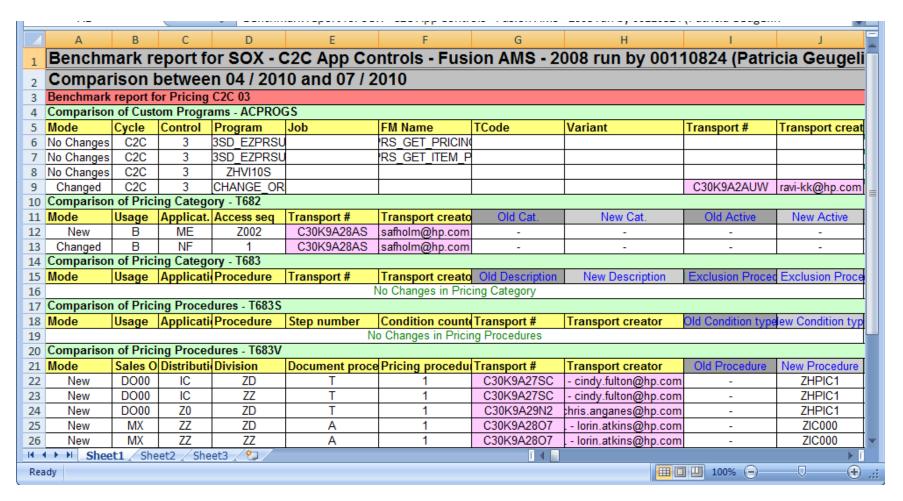




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BENCHMARK REPORT

Conditions: Details for Pricing





FINANCIAL PROCESSING

Governance

Continuous Monitoring Tools and Methodology

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Financial Process Risks

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Accepted Assurance Frameworks



FINANCIAL PROCESS MONITORING

- Today's illustration: Global Credit & Collections Process
- Diverse Team: HP's "Top Talent in Finance." Contributors came from across **HP** finance



 Objective: Understand organizational objectives and risks in order to gain an ongoing view to how those risks are managed. Develop an elegant set of metrics with easily identified outliers for selfassessment and IA follow-up.



CREDIT & COLLECTIONS MONITORING:

Transaction Data: Business Fundamental Tables

BFT metrics cover Cost, Financial, Performance, Efficiency,
 Compliance, Personnel, Program Development, Global Initiatives, etc.

		HP Glo	l Collect	ions: F	Y10 Busir	ness F	undan	nentals					
Performance Category	Q1 Goal	Q2 Goal	Q3 Goal	Q4 Goal	Nov'09	Dec'09	Jan'10	Feb'10	Mar'10	Арг'10	May'10	Jun'10	Jul'10
	is (except the c	cost metrics) are in	millions										
Cost Metrics: Glo	nal C&C Only,	(Excludes Region	nal Data)										
ASPIRE- GLOBAL C&C,													
(thousands)	\$1,118	\$712	\$694	\$702	\$373	\$373	\$373	\$237	\$237	\$237	\$231	\$231	\$231
FLASH- GLOBAL C&C, (thousands)	\$1,059	\$65 4	\$660	\$681	\$353	\$353	\$353	\$218	\$218	\$218	\$220	\$220	\$220
ACTUALS- GLOBAL C&C, (IIIOGSalids)	φ1,055	- POJ-1	\$000	\$001	\$333	\$333	\$100	Ψ2.10	Ψ2.10	Ψ210	\$22 0	ΨZZU	ΨΖΖΟ
(thousands)	\$987	\$622	\$647	1 '	\$154.5	\$204.2	\$628.7	\$219.4	\$209.3	\$192.9	\$199.3	\$224.7	\$223.5
Global Team Cost / Headcount,	i '		7										
(thousands)	\$31.3	\$20.0	\$21.1	<u> </u>	\$4.68	\$6.4	\$20.3	\$7.1	\$6.8	\$6.2	\$6.4	\$7.2	\$7.5
Global Cost / Aspire %	<= 100%	<= 100%	<= 100%	<= 100%	41.5%	54.8%	168.7%	92.4%	88.2%	81.3%	86.1%	97.1%	96.6%
WW Cost (thousands)	\$9,756	\$9,252	\$8,816		\$3,391	\$3,123	\$3,242	\$3,331	2,933	2,988	2,657	3,275	2,885
HPCO Revenue (thousands)	\$31,176,749	\$30,849,536	\$29,964,623		n/a	n/a	\$31,176,749	n/a	n/a	\$30,849,536	n/a	n/a	\$29,964,623
ACTUALS Cost of Credit as a % of										, ,			,-,,
Revenue	0.0313%	0.0300%	0.0294%		n/a	n/a	0.0313%	n/a	n/a	0.0300%	n/a	n/a	0.0294%
Global Revenue / Headcount,			'	1 1	1	1							
(millions)	\$1,005.7	\$995.1	\$998.8	 '	n/a	n/a	\$1,005.7	n/a	n/a	\$995.1	n/a	n/a	\$998.8
Global Team Total Headcount, (ETW Included)	33	33	33	33	33	32	31	31	31	31	31	31	30
WW C&C Headcount (ETW		33	33	33	33	JZ	31	31	31	31	Ji	31	30
included)		865	854		888	882	880	863	876	857	843	855	863
HP Revenue / WW Headcount,					· ·								
(millions)	\$35.4	\$36.0	\$34.7		n/a	n/a	\$35.4	n/a	n/a	\$36.0	n/a	n/a	\$34.7
				<u></u> /									
Financial Metrics : G	ilobal C&C On	ily, (Excludes Reg	jional Data)		Nov'09	Dec'09	Jan'10	Feb'10	Mar'10	Apr'10	May'10	Jun'10	Q3FY09
OPEX (Net Bad Debt), \$M	14.8	11.3	-14.7	!	n/a	n/a	14.8	n/a	n/a	11.3	n/a	n/a	-14.7
▶ ▶ Global / Americas / EMEA	10-1-0-16		/ C= +:	O Effe-i	, DET		10				<		



Days Sales Outstanding

12/29/2009

Delays of payment is a symptom of inaccuracy

"Hackett analysis finds that a typical \$10 billion company can generate more than \$35.8 million/year in bottom-line savings if they achieve world-class performance in this area by reducing Days Sales Outstanding (DSO) - a standard measure of how quickly companies get paid by their customers. One key strategy of world-class companies in this area has been to dramatically lower billing error rates in order to eliminate any reason for delayed payment. In addition, these world-class finance organizations have made significant improvements in their Invoice-to-Cash procedures, driving higher levels of efficiency and effectiveness."

The Hackett Group



TREND IN COLLECTION – JULY 2010

Transaction Data Outlier Trended

Region	Total A/R (in USD Billions)	% of Current A/R	DPD % above 90 days	Days Sales Outstanding (DSO)	Collection Effective Index	
	July 10 Jun 10	July 10 Jun 10	July 10 Jun 10	July 10 Jun 10	July 10 Jun 10	
World Wide	14.85 13.46	88.4% 1 84.5%	1.4% 1.6%	40.9 1 38.2	86.9% 83.1%	
AMS	6.65 16.37	87.1% 1 82.8%	1.4% 1.6%	41.8 1 41.8	85.4% 80.2%	
APAC	2.44 1 2.07	87.8%	2.1% 2.6%	36.6 32.0	87.9% 87.7%	
EMEA	5.75 1 5.01	90.1% \$5.6%	1.1% ↓ 1.1%	42.1 1 37.2	88.3% 84.3%	

In EMEA, DSO changed significantly on account of (1) EMEA Retail, (2) Austria, (3) Turkey, (4) Greece, (5) EMEA OEM, (6) HPITBV Africa and (7) Egypt

In APJ, DSO changed significantly on account of (1) Japan, (2) Philippines, (3) Taiwan, (4) Vietnam and (5) AEC



Trend in Blocked Orders (BO) – July 2010

Transaction Data Outlier Trended

Region	Manual Sales Orders %	TAT for Manual Sales Orders (Hrs)	Manual Shipment Orders %	TAT for Manual Shipment Orders (Hrs)
	July 10 Jun 10	July 10 Jun 10	July 10 Jun 10	July 10 Jun 10
World Wide	3.5% 4.6%	22.4 615	9.0% • 9.8%	55.4 62.1
AMS	2.6% 2.3%	24.1 25.3	8.6% 1 4.3%	21.0 1 29.1
APAC	3.5% ↓ 4.4%	10.8 1 8.1	7.2% 9.8%	63.6 1 60.6
EMEA	5.0% 8.4%	23.5 486.1	21.9% 14.5%	49.1

The countries responsible for increase in percentage of Manual Shipment Orders are (1) Russian Federation, (2) Luxemburg, (3) France and (4) Netherlands



Credit – Countries with High and Very High instances of Customer Credit Review Non Compliance and Blocked Orders for July 2010

Very High % of CCR Non Compliance (More than 10%)	1. Chile (17.11%, 7.95%) 2. Puerto Rico (11.29%, 5.77%)	 Argentina (23.02%, 17.33%) Venezuela (21.34%, 22.35%) Vietnam (18.26%, 50.0%) Ecuador (12.50%, 34.31%) Colombia (12.28%, 12.92%) Costa Rica (12.00%, 50.00%) New Zealand (10.08%, 16.62%)
High % of CCR Non Compliance (5% to 10%)	1. China (8.09%, 7.68%) 2. Kazakhstan (6.42%, 6.78%)	1. Mexico (9.22%, 10.54%) 2. Singapore (6.07%, 17.20%) 3. Hungary (5.94%, 15.89%) 4. Philippines (5.58%, 11.84%)
	High percentage of Blocked Orders (5% to 10%)	Very High Percentage of Blocked Orders (More than 10%)

(1) Argentina, (2) Chile, (3) Colombia, (4) Ecuador, (5) Hungary, (6) Mexico, (7) Puerto Rico, (8) Venezuela and (9) Vietnam has been in High Risk 25 Countries for the Accounts Exceeding the Credit Limit since last one Quarter



RELATING TRANSACTIONAL AND SECURITY METRICS

HP Internal Audit



TOP MANUAL JOURNAL ENTRY USER-IDS

Compare Transaction data with Conditions to Cross-instance

U	User No User Name		No. of Months the User came in top 20 by MJV Amount posted within the last 12 months	Existing SOD conflicts within GL accounting system (LH1)	Cross-App SOD conflicts of GIL accounting on LH1 with functions on other SAP applications
#/20	370180	Santosh Hegde	12	GL-Accounting and Bank Statement	-
#/HP	РВТСН	НРВТСН	12	no dialog user	no dialog user
#/20	150696	Sharon Ogink	12	GL-Accounting and Bank Statement	-
#/20	410557	Preethesh NR	12	-	-
#/20	224564	Lavita Pinto	12	GL-Accounting and Bank Statement	-
#/20	382854	Ganesh Shripad Hegde	12	GL-Accounting and Bank Statement and Change Quotes and Flag Invoice	-
#/20	284010	Balasubramaniyum S	12	GL-Accounting and Bank Statement	-
#/20	322958	Gappanna B K	10	GL-Accounting and Bank Statement and Change Quotes and Flag Invoice	-
#/20	382668	Matthijs Vloten	10	GL-Accounting and Bank Statement	-
#/20	434021	Deepak GV	10	GL-Accounting and Bank Statement	-
#/00	132614	Jeroen Brinkhof	9	GL-Accounting and Bank Statement	-
#/20	366031	Jayantie Birdja	9	GL-Accounting and Bank Statement	-
#/00	565561	Kelly Chang	8	-	GL-accounting on <i>LH1</i> and Invoicing on <i>D7C</i> and Invoicing on <i>PJ1</i>
#/20	411259	Rajiv Kumar D	7	-	-
#/20	285789	Bhuvaneswary K	7	GL-Accounting and Bank Statement	-
#/20	431081	Jayashree CN	6	-	-
#/21	340428	Rahul Vishwakarma	5	-	-



12/29/2009

OUTLIERS DRIVE OUTCOMES THAT MATTER

- ✓ Fail Better: Start with business objectives rather than audit objectives
- ✓ Align diverse sources:

Incident logging

Configurable conditions

Transactional data

- ✓ Isolate predictive outliers across multiple indicators
- ✓ IT Indicators tend to lead financial indicators
- ✓ The most persuasive indicators address root cause and are accompanied by action



Outliers clarify which questions to ask first about were to go next.



QUESTIONS?

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Appendix

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CONTINUOUS MONITORING TOOLS*

- Alignment is the Key:
 - Incidents, change, and configurables give pervasive results across audit objectives
 - Transaction data gives precise results specific to the business objective

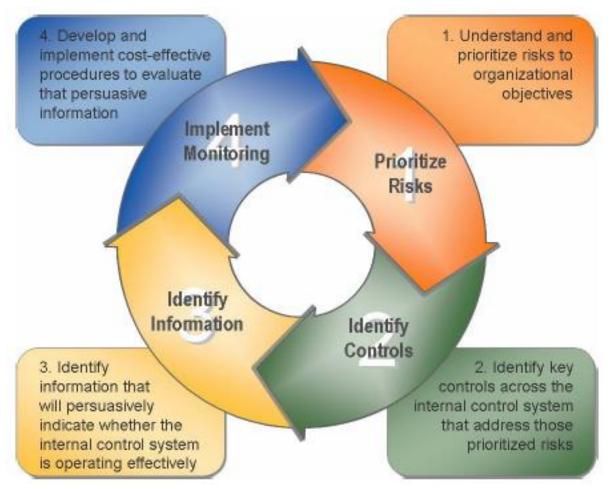
- Balance a suitable mix of logging, configuration and transaction data to give the

most persuas IT OPERATIONS	ive conclusion APPLICATION S	ons, that are FINANCIAL PROCESSES	economica TOOL	lly useful DEFINITION
			Transaction data	Comparing processed transaction (or master file) data against a set of control rules established to highlight exceptions and/or identify instances in which the controls over a process or system are not working as intended.
			Conditions	Examining application or infrastructure configuration settings/parameters and comparing them with a baseline or with previously established expectations. An example could include tools that monitor system access controls.
			Changes	Identifying and reporting changes to critical resources, data or information, making it possible to verify that changes are appropriate and authorized.
			Processing integrity	Verifying and monitoring the completeness and accuracy of data as it progresses through various IT processes and systems.
			Error management	Monitoring the volume and resolution of activity in suspense areas, error logs or exception reports, typically as part of an application system.

*SOURCE: The Committee of Sponsoring Organizations of the Treadway Commission (COSO): Guidance on Monitoring Internal Control Systems. Vol II: Application. Durham, NC. 2009: 53-54.



COSO Monitoring Design & Implementation Progression



Source: COSO, Guidance on Monitoring Internal Control Systems, Volume I, p. 7.



Interconnected EXECUTION

Audit Engagement

Planning

- Coverage
- Send Audit Notification Letter -

Audit Prep

- Predetermine ABU- Conduct overview meeting with auditee
 - Scope and risk adjust audit
 - Send Engagement Letter to auditee
 - Send information and data requests
 - Conduct process mapping

Fieldwork

- Opening meeting
- Process testing
- Data Testing
- **Draft Audit Issue &** Recommendation (AIR)
- Closing meeting

Reporting

- Obtain management responses
- Issue draft report
- Issue final report and executive summary

Follow-Up

- Customer Survey
- Issue follow-up

Results Based Considerations

Enhanced Control Design Walkthroughs

Continuous Auditing/Continuous Monitoring

Other Assurance Providers





Collaborate with Audit Leads to move from Ad-hoc to Continuous Monitoring

- 1. Acquire data and conduct analysis in connection with audit engagements
- 2. Learn KPIs from the audit results

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- 3. Determine periodic analysis with sufficient detail to inspect when warranted
- 4. Advance Continuous Monitoring to compliance community

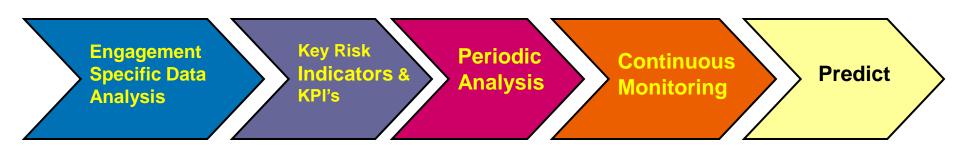




Collaborate with Audit Leads to move from Ad-hoc to Continuous Monitoring

- 1. Acquire data and conduct analysis in connection with audit engagements
- 2. Learn KPIs from the audit results
- 3. Determine periodic analysis with sufficient detail to inspect when warranted
- 4. Advance Continuous Monitoring to compliance community
- 5. Predict and pre-empt emerging risk

10/29/2010

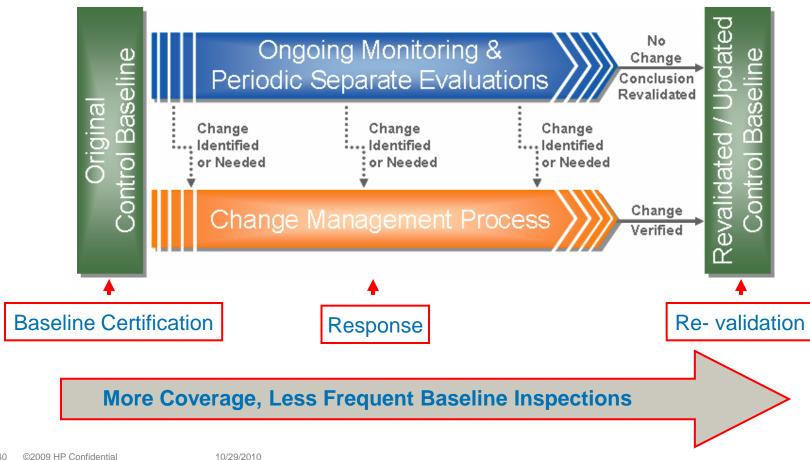




HOW CONTROL BENCHMARKING WORKS

COSO Guidance on Monitoring Internal Control Systems

Trending and comparing changes to a predefined threshold will sustain and carry forward the Baseline conclusion with minimal examination.

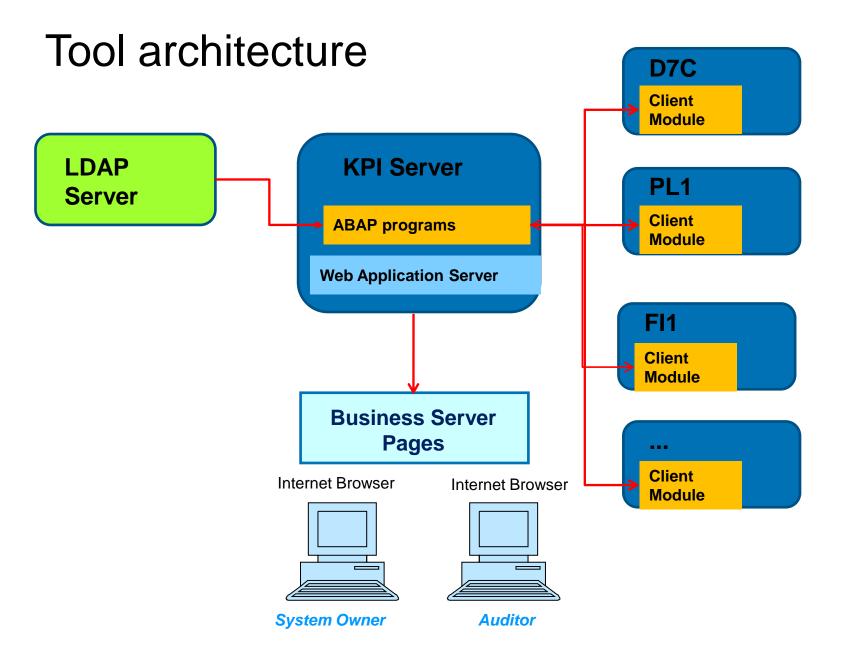




Linking IT Controls to Management Assertions

Assertion: Completeness **Assertion:** Existence / Occurrence Assertion: Valuation / Measurement Applications & **Financial Process Operating Systems Databases** ITIL Processes **Control Objectives GAIT Principles** Release & Config Change Management Accuracy Identity Security Authorization Incident Handling Completeness **Operations**



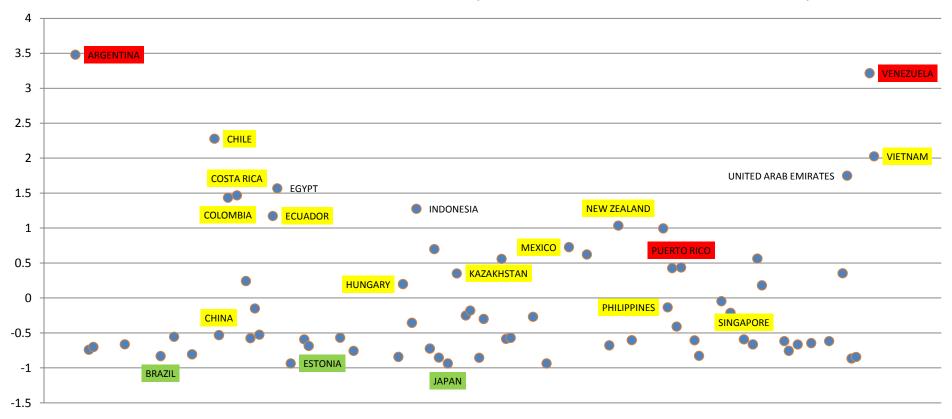




Z Test Score for Exceeded Credit Limits for July 2010

Transaction data themes corroborated with statistical analysis

Z Score for Customers with Exceeded Credit Limits (Countries with more than 50 Customer Portfolios)



Z Score for Exceeded

