

In an era characterized by a complex regulatory landscape and demanding audit standards, bank financial processes must meet generally accepted standards of internal control and comply with the Sarbanes-Oxley statute. This responsibility is not discretionary, and the consequences of non-compliance may be significant.

The Challenge

The goal for both Finance and Internal Audit is to ensure the bank has processes with proper systems of internal control that comply with statutory rules. A related goal is that Internal Audit must perform its attest work in an efficient manner. This goal also applies to the finance organization.

A common challenge to achieving these goals is the uncontrolled environment where Excel is used to create dimensional tables/files for various financial purposes. These files include product description tables, loan account type tables, charge-off tables, impaired loans tables, etc. and other files used in financial reporting. The tables are stored on local computers, and in some cases, there are multiple and different copies of the same table. Changes to the tables are typically controlled by various analysts using excel without any process for tracking and controlling changes. The consequences are Internal Control (IC) risk, noncompliance, inefficiency in the underlying manual processes, and difficulty performing internal and external audits.

Audit Compliant Solution

To resolve these issues, CT Global created a solution -- Audit compliant Finance Data Portal. This portal stores and controls all data needed for table updates, reporting and analysis. The portal is fully auditable and prevents individual analysts from manually changing data. Only designated users with the appropriate level of security can access the portal and the specific tables within the portal. Users are designated as either administrator, super user, designated or auditor. All changes to table are logged and time stamped. PDF files can be printed for logs. The portal is a single auditable source of accurate data available to all users and replaces the multiple versions of dimension tables and excel files previously used.

The table below lists some of the capabilities / functions of the audit compliant portal for the Administrator as well as key stakeholders such as finance and internal audit.

Create Roles	Manage Roles	Manage Tables
User Profiles	Manager User Groups	Access Controls – User & Table Level
User Groups	Manage Users	Administrator’s Dashboard
	Manage Permissions	Add / Delete Tables
	Add User Groups & Users	Add Records
		View & Download Access Logs
		Access Logs by User & Table

*Permissions Granted to Each User Group Using the CT Global SOX Portal

Design and Documentation

Our solution includes:


- 1 An interactive website using SAS stored processes which allowed users to update and add to the tables at a central location in- stead of multiple excel sheets.
- 2 A central logs table where each record that is added, edited, or deleted by authorized users / personas is recorded.
- 3 Access controls used to mitigate risks. Authorized users including internal audit department and external auditors able to access tables, download them in xls and/or pdf format and review logs of all changes made by authorized users.
- 4 Rigorous User Acceptance Testing (UAT) with finance, business users, the Internal Audit Department, and external auditors.
- 5 Documentation, Training & Knowledge Transfer – documentation is developed for Administrators, internal user personas as well as for internal and external auditors.

Permissions/ User Group	View & Download Tables	View & Download Logs	Add/Delete Rows	Create/Delete Tables	Set Permissions
Administrator	✓	✓	✓	✓	✓
Super User	✓	✓	✓		
Auditor	✓	✓			
Data Consumer	✓				

Key Benefits

- Meet Internal Control (IC) objectives. Our solution addresses access control and segregation of duties. Access to the secure SOX Portal is set for each user group by the Administrator. Each user group can view a subset of the tables. Segregation of duties is addressed as different user groups have access to different sets of reports. Only specific users that have permission can add or delete records. Supervision is also addressed through documentation of which authorized users made what changes, therefore obviating the need for manual supervision.
- Documentation for external auditors and dedicated Auditor User Group reduces audit time and audit fees.
- Eliminate reliance on excel.
- Reduce manual processes – free up time for finance analysts.
- Improve accuracy and reduce rework.

The Power of the Partner

 CT Global Solutions is a strategic SAS partner that helps turn your data into profits. A gold alliance partner for nearly 20 years, CT Global has demonstrated domain expertise in profit analytics, decision analytics, and demand and supply planning optimization. CT Global puts SAS to work and amplifies its value to MAKE EVERY DECISION COUNT.

SAS is the leader in analytics. Through innovative software and services, SAS empowers and inspires customers around the world to transform data into intelligence. SAS gives you THE POWER TO KNOW®. 92 of the top 100 companies on the 2018 Fortune Global 1000® use SAS, [see their stories here.](#)



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