



AVATAR

STRATEGIC PARTNERS

CASE HISTORY – COMMONHEALTH IT SARBANES-OXLEY COMPLIANCE

The IT Department formalizes its processes for compliance and quality and posts evidence of compliance in a portal, so auditors can work without distracting IT managers.

SITUATION

CommonHealth, a WPP organization with 14 operating companies and some 600 employees, must prove compliance with Sarbanes-Oxley. The IT department has been provided with 34 control points covering IT policies, security, operations, and development practices by its parent company, WPP, and it must undergo two preparatory internal audits and the audit of record by an outside auditor. The CIO knows that some processes about which evidence is required are formally documented, some are not, and some are not fully thought out. Further, IT Managers are busy, and the CIO does not want auditors distracting them for weeks at a time while the audits are underway. In addition, the CIO takes a progressive stance on process quality, deciding that all applications, operating systems, and equipment should be managed similarly, regardless of their SOX-relevance; evidence need only be collected where SOX-relevant, however.

OBJECTIVE

- Prepare the IT Department for its Sarbanes-Oxley audit for the control points defined by the parent company.
- Minimize the effects of the auditors' activities on the ongoing operation of the department during audits.
- Minimize the effort required to continuously provide evidence used in audits.

APPROACH

- Map the processes required to meet the control points, and work with the IT managers to develop processes that were not fully in place. Develop the maps over a series of interviews and review cycles.
- Create a SharePoint Portal organized to house process descriptions, evidence templates, and evidence needed for compliance.
- For auditors, develop documents to guide them through the process maps and to correlate the evidence to the process.
- Create a manager's schedule for evidence collection and reporting.

RESULTS

- Results of preparatory audits and audit of record were significantly better than a large fraction of peer company IT audits.
- IT Managers were minimally distracted during the audit, permitting operations to continue undisturbed.
- The portal provided an open repository for internal managers to track compliance on an ongoing basis.