INTERNAL AUDIT

Project Advisory
Memorandum

Centerpoint Roles
Redesign Implementation

December 1, 2020

Project Advisory Memorandum

Background

Past internal audits noted instances of inadequate segregation of duties and excessive access permissions that were not adequately monitored. As a result of the complexity of the Oracle permission hierarchy and role design, individuals were assigned to conflicting roles that did not properly segregate duties and/or exceeded the minimum necessary to perform the user's job responsibilities. In addition, activities performed by these users were not specifically logged or monitored.

In response to these audit findings, Citizens sought a vendor with extensive Oracle Fusion Cloud Applications experience to verify and validate the implementation and configuration of specific Centerpoint roles, recommend custom roles and assist in the design of the custom roles. Ernst and Young (E&Y) was selected to perform the work and the Roles Redesign Project kicked off in November 2019.

Objective and Scope

Internal Audit (IA) was requested to participate in the project. The objective of our participation was to test the redesigned and new roles created by E&Y, and to provide reasonable assurance that the roles addressed the inadequate segregation of duties which had been noted in the previous internal audits.

We focused our testing on the following redesigned or new roles created by E&Y and Citizens' IT Centerpoint Support team:

- CPIC Procurement Configuration
- CPIC Procurement Inquiry (View only role)
- CPIC Financial Configuration
- CPIC HCM Payroll View Only
- CPIC HCM Specialist View Only
- CPIC Auditor (View only role)
- CPIC Buyer (Role requested by the business unit and not related to an audit finding. This role was created by Citizens' IT Centerpoint Support team)

Results

Results from our work include:

- An evaluation of the permissions of the four roles which were intended to only provide a 'View Only' capability: CPIC Procurement Inquiry; CPIC HCM Payroll View Only; CPIC HCM Specialist View Only; and CPIC Auditor. Our work indicated that the roles were appropriately designed, and we noted no exceptions with the permissions assigned to the 'View Only' roles.
- A role assessment to identify all users who had been assigned one or more of the redesigned or new roles, and then determine if there were any segregation of duties conflicts for those users, based on other roles that they had also been assigned. IA noted no exceptions for the CPIC Procurement Configuration, CPIC Procurement Inquiry, CPIC Auditor, and CPIC Buyer roles.

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- During the project, business management decided not to implement the CPIC HCM Payroll View Only and the CPIC HCM Specialist View Only roles due to the need to utilize uncommon masking mechanisms that could adversely impact normal operations. Therefore, these roles were not tested by Internal Audit. Instead of implementing these roles, the business chose to continue to use the roles which were included in a risk acceptance acknowledgement and for which a monitoring process is in place.

- Our evaluation of the CPIC Financial Configuration role resulted in the identification of a segregation of duties conflict. This exception was resolved by the IT Centerpoint Support team and the business unit management by removing a permission which had caused the conflict.

- While working to resolve this segregation of duties conflict, the IT Centerpoint Support team discovered four previously unidentified roles that contained a permission which would allow business process workflows in all Centerpoint modules to be modified. The roles were Human Capital Management Application Administrator, CPIC Procurement Configuration, Application Implementation, and CPIC Financial Configuration. These roles are assigned to 14 business personnel. Further analysis indicated that the system module through which the business process flow modifications could be made does not provide a logging or monitoring ability, and therefore the nature of the change or the person making a change would be indeterminable.

Conclusion

The permission which would allow the modification of business process workflows in all Centerpoint modules is considered a high-risk matter and the permission must be removed from the roles in which it is included. IA recommended that the Centerpoint Governance Committee determine an expeditious approach for removing the permission from the roles and implement a new process for requesting changes to business process workflows within Centerpoint.

Following our discussion with business and IT leadership, this permission was removed from roles in production on November 25, and we validated the removal of the permission. A new process was implemented whereby changes to workflows will be requested by an incident ticket in myService, which will be routed to the IT Centerpoint Support team.

Internal Audit would like to thank management and staff for their cooperation and professional courtesy throughout our participation in the project.

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