

# Office of the Internal Auditor

# Advisory Memorandum

November 2023

Identity Governance and Administration (IGA) and Access  
Management (AM) Implementation





## Advisory Memorandum

### Background

As part of Citizens' ongoing operations, there is a need to manage access to its systems by employees, vendors, independent adjusters, and agents efficiently and securely. Access management has evolved in recent years to support enhanced cybersecurity practices.

According to Gartner, "modern identity and access management (IAM) reflects the evolution of securing an enterprise by providing the right people with the right access at the right time, in addition to predicting, detecting, and responding if access is inappropriate." Citizens contracted with Gartner in 2019 to independently assess the current approaches to manage identities and develop a forward-looking strategy to posture the organization well for the future. Through investment in new IAM technology and aligned system and process controls, Citizens mitigate risk to the organization.

Citizens will achieve the following through the implementation of the new IAM solution and related processes. The Citizens implementation will consist of two phases: Identity & Governance Administration (IGA) and Access Management (AM). These two phases will run in parallel. IGA will rely on SailPoint for IAM and Azure Active Directory for AM. Benefits for Citizens will include:

- Reduce cybersecurity risk through least privilege and a more robust centralized provisioning platform.
- Streamline the provisioning and de-provisioning of users through automation.
- Better manage user and system identity access privileges to reduce the risk of unauthorized access.
- Enable users to access systems more easily through single sign-on.

Citizens has chosen Wipro as the implementation partner. Enterprise Operations has also hired full-time SailPoint subject matter experts to support the program.

### Objectives and Scope

Management requested Internal Audit to review and advise on the IGA and AM implementation. The scope included a review of critical controls around program and project management, encryption of data in transit and at rest, availability and capacity management, change and release management, user provisioning, least privilege, segregation of duties, periodical user reviews, and information security to ensure the program objectives were met. Alignment with cloud strategy, communication strategy and Enterprise Architecture principles were also reviewed.

### Results

The IGA and AM implementation program will be completed through three phases: planning, implementation waves (releases), and post-go-live support (warranty). Each wave (release) integrates specific solutions with the IGA solution (SailPoint) and AM solution (Azure Active Directory).

The product selection and cadence of releases appear to be designed with proper consideration of Citizens' requirements and future scalability with a move toward cloud computing solutions. Internal Audit reviewed the program's strategy and the release approach. Internal Audit also validated important components such as encryption of data in transit and at rest, availability and capacity management, change and release management, user provisioning, least privilege, segregation of



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duties, periodical user reviews, and information security are actively addressed as part of the implementation of the IGA and AM solutions. Internal Audit further confirmed that the future implementation of the IGA and AM solutions should support automation efforts in user administration. This automation should increase security practices and free up resources that should enhance the experience of Citizens employees and contractors around IT service management.

The program and its constituent waves (releases) are in progress. However, delays were encountered and are actively managed by the program. Delays and challenges around IAM implementations are typical for most organizations.

Enterprise Operations oversees the implementation program and constituent releases with consideration and active management of applicable risks. It was noted that Enterprise Operations leadership proactively addresses delays from unforeseen solution vendor and implementation partner factors. Internal Audit determined the implementation program conforms with established Citizens' processes and procedures.

This is an interim advisory memo that will continue through 2024 until the completion of the program.

We thank management and staff for their cooperation and professional courtesy throughout this advisory.



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