Case Study | Shared Services Setup of Key and Non-Key GLBA Control Testing for a US Regional and Community Bank

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Shared Services Setup for Testing of Key and Non-Key GLBA Controls for a US-Based Regional and Community Bank

Client Introduction

A leading US-based Regional and Community bank of USD 122 billion in asset size that offers services to retail consumers, corporations, and non-profits through traditional and digital banking.

Problem Statement

The bank had a deadline to **complete the testing of key controls for the Gramm-Leach-Bliley Act (GLBA)** before the internal due date to meet MRIA requirements and establish a Shared Services Setup for ongoing testing as a part of the exercise.

Key requirements:

- Hire a team of ~25 qualified testers, supervisors, and managers in 3-4 weeks based in Atlanta, GA.
- Onboard and train the team in one week.
- Help control owners review controls, draft control descriptions, test the scripts, and make decisions.
- Test ~150 key GLBA and non-key controls as a part of the 1st line-of-defense (information technology ITO and
- operations controls).
- Conduct the test of design, including the test of one.
- Conduct the test of effectiveness.
- Management reporting to the stakeholders.
- Review and provide recommendations on the Enterprise Control Management Program (ECMP) – IT document.

Solution Offered

- Leveraged our **Talent Acquisition engine** accelerated by **ClearedTalent™** to hire professionals from a **pre-vetted talent community.**
- Completed the **staffing of ~25 qualified control testers, supervisors, and managers** with hands-on expertise and proficiency in testing the IT and operations controls and upskilled them within the timeline.
- **Coordinated with Control Owners** to review each control's evaluation against ECMP requirements and determined the controls.
- **Conducted Quality Control (QC)** before testing based on the feedback received from Control Owners.
- Determined **control adequacy** and evidence.
- Developed a **customized randomizer tool** for sampling the controls.
- Conducted GLBA **peer-to-peer QA testing** on 50% of the controls enabled by pre-defined QA checklists to demonstrate performance attributability.

Business Outcomes

- Successfully met the internal audit obligations and established Shared Services setup.
- Tagged **52 GLBA controls** for retirement within the first 60 days.
- Continual updating of **ECMP document** and QA/QC methodology.
- Leveraged best practices from a Shared Services and Enterprise Risk Management perspective, such as:
    - **Knowledge dissemination** based on existing digital knowledge repositories powered by **Fluent** *(proprietary digital knowledge management solution)*.
    - **Reporting of Service Levels** as well as Control Effectiveness measures amongst others through **Factum** *(proprietary digital dashboarding system)*.
    - **Optimization of Control Testing** and subsequent digitization by "Overlap Identification" and subsequent **RPA implementation powered by Uipath** - **~ 10 % efficiency benefits** through Non-Value Add elimination in the testing processes.