Case Study: Start Up Real Estate Management Company Builds SOX Compliant and Scalable D365FO Security Framework in Expedited Timeframe

Our client is a national manager of distinctive, independent assisted living and memory care communities throughout the U.S., established less than two years ago and which has grown to manage more than 100 retirement communities caring for more than 5,500 residents across 28 states.

To accommodate the company's rapid growth, the organization implemented Dynamics 365 for Finance and Operations (D365FO) on an accelerated timeline to rapidly establish a business management platform. However, this forced the team to rely only on the standard security roles delivered with the application 'out of the box' which inherently contained critical and high-risk segregation of duties (SoD) conflicts.

This was not going to work for much longer. Due to the amount of revenue under management for a large public real estate investment trust (REIT), they soon needed to comply with Sarbanes-Oxley (SOX) and external audit requirements, including controls over security access in D365FO. They needed to quickly find a solution that would integrate well within their D365FO environment and provide detailed audit reporting, SoD visibility, and scalable task-based roles for future growth.

Solution
Clearer Identification of Conflicts and Faster Issue Remediation

The customer acquired Fastpath Assure® and asked for implementation partners that could support them and solve their problem within the timeframe allotted. They reached out to Protiviti, a global consulting and internal audit firm, to assist with the Fastpath implementation, the security redesign build process, and establishment of governance processes to protect their new security architecture.

Analysis in Brief

Company Profile
This company is a national manager of distinctive independent, assisted living and memory care communities throughout the USA, experiencing rapid growth across 28 states.

Business Situation
The out of the box roles that came with the customer's D365FO environment contained high-risk Segregation of Duties (SoD) conflicts. In order to meet stringent SOX requirements, they needed help redesigning their security framework, and implementing software and associated processes to minimize application security risk.

The customer's management team understood how critical it was to have the software and the governance processes in place, in order to effectively accomplish their objectives and sustain their security model going forward. Additionally, they wanted a team with the right experience executing these types of projects to help deliver within their expedited project timeline.

In order to deliver the project requirements, Protiviti recommended which Fastpath modules needed to be implemented to support the immediate project objectives. Fastpath has been Protiviti's GRC, audit, and compliance tool of choice for the Microsoft Dynamics suite of products because of their leadership in the space and experience with the Microsoft ERP solutions.

To start building a compliant D365FO security architecture, a SoD risk framework had to be established and configured within the Fastpath software. The framework provided the rules for how the new roles can be built. Once the ruleset was configured within Fastpath Assure, the team used the solution to help build security roles that aligned and complied with the SoD framework, designed processes for managing their new risk framework, and implemented the new roles throughout the organization.

By relying on Fastpath Assure, Protiviti streamlined the iterative build, test, analyze, and modify processes. This made it easier to quickly build scalable task-based roles that were free of SoD conflicts, and still provided a flexible security framework enabling the customer to grow and change over time.

Results
Measurable KPIs around Role Design and Issue Remediation

Over the course of 15 weeks, Protiviti built an application security framework with the assistance of Fastpath Assure to support the customer's need to comply with SOX regulations, design a security framework focused on the right of least privilege, and drive business ownership of security roles and risks. By building and validating a customized SoD ruleset within Fastpath, and then using the solution for SoD risk analysis, Protiviti rapidly created task-based roles that ensure appropriate access and proper control throughout their D365FO environment.

Before the redesign, the customer had almost 50 critical SoD role conflicts and over 1,200 user conflicts. After partnering with Protiviti and deploying Fastpath with the customized SoD ruleset, all roles are now free of unmitigated SoD conflicts and the total number of conflicts at the user level has been reduced by over 97% (the remaining 3% are accepted and mitigated through compensating controls).

Analysis in Brief

Solution
Customer chose to:
- Partner with Protiviti, a global consulting and internal audit firm, to assist with the Fastpath implementation, security redesign and governance process design for D365FO.
- Implement Fastpath Assure per Protiviti's recommendation for greater visibility into SoD conflicts which reduced time-to-issue identification and remediation.

Benefits
- Rapidly created task-based roles to ensure appropriate access and proper control throughout D365FO.
- Improved visibility into SoD conflicts and made it easier to remediate issues.
- Made all roles free of critical SoD conflicts.
- Considered 56% more risks with customized SoD ruleset, rating 169 risks at the appropriate criticality.
- Reduced user System Administrator access to only appropriate individuals.

The ruleset is more comprehensive with the addition of 69 custom objects that would not normally be captured in the out-of-the-box Fastpath ruleset. Lastly, the number of non-system users who are assigned the System Administrator role has also been reduced from 10 users to 4, making sure that only the right individuals have this elevated level of access.

Moving forward, key individuals within Internal Audit, IT, and the business at the customer have been trained on how to leverage Fastpath as well as the new governance processes. Thanks to a collaborative approach and good work from the customer, Protiviti, and Fastpath, they're now able to realize and manage SoD risks into the future.

About the Customer

This customer is a national manager of distinctive Independent, Assisted Living and Memory Care communities across the United States. They are driven by integrity, a passion for delivering superior service and financial returns. Established in 2017, they currently manage more than 100 retirement communities across 28 states.

About Protiviti

Protiviti is a global consulting firm that provides consulting solutions in finance, technology, operations, data, analytics, governance, risk and internal audit to their clients through a network of more than 75 offices in over 27 countries. Serving over 60 percent of Fortune 1000® and 35 percent of Fortune Global 500® companies, they also work with smaller, growing companies, including those looking to go public and government agencies. Protiviti is a wholly owned subsidiary of Robert Half (NYSE: RHI). Founded in 1948, Robert Half is a member of the S&P 500 index. www.protiviti.com

About Fastpath

At Fastpath, our mission is to deliver software solutions that seamlessly empower our clients to take control of their security, compliance and risk management initiatives.

If you are spending countless hours preparing for your audits, struggling to comply with legislative requirements like Sarbanes Oxley (SOX), HIPAA, FDA, or just need help reviewing who has access to what within your ERP, Fastpath can help. Fastpath's suite of tools can help your company with risk analysis, access certification, role management, compliant user provisioning, emergency access management, and continuous monitoring.

Our tools work across many applications and platforms including SAP, Oracle EBS, Oracle Cloud, Microsoft Dynamics (365, AX, GP, NAV, SL and CRM), NetSuite, Sage Intacct, Workday, Workiva, SailPoint, JD Edwards, PeopleSoft, Salesforce, SailPoint, ServiceNow, Coupa and Acumatica. www.gofastpath.com

Contact us to learn more about our solutions or to request a customized product demonstration.