

What Does SOX Mean to Project Managers?



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SOX-Driven Controls

Project Managers are accountable for ensuring these controls are in place for the project and project deliverables

- Change Management
- Segregation of Duties
- Protection of Data



Change Management

- Charter must clearly define authorization for the project
 - Project Stakeholders
- Application/Process change management process must clearly authorize who can approve changes to the current production state
 - Account level Change Control Boards
- Project Change Management process in place for approving changes to the project scope, schedule and budget
 - Project/initiative level change control



Segregation of Duties

- Project Manager is accountable for maintaining segregation of duties within project lifecycle and ensuring SoD framework is appropriate for post-project support
 - Developers separate from Deployers who are separate from Production Support
 - Testers do not have write access to code
 - SoD Implementation often complicated by technology limitations
 - Increases minimum size and cost of project → Bundle!



Protection of Data

- Project Managers ensure application is designed to protect data
 - No user direct access to database
 - Program includes mechanisms for correcting data (as opposed to Data Corrections)
 - Data Correction process with authorized approvers (where absolutely necessary)



Bottom Line:

These are already part of PMBOK
and best practices!!