

# GLBA Delivery Remediation

## Intervention management to address regulatory enforcement actions

### Business Situation

A large US bank embarks on a 3 year programme to design, build and implement Non-Public Personal Information (NPPI) controls across the bank and resolve non-compliance issues related to the Gramm–Leach–Bliley Act (GLBA) in Information Security, Records Management, Vendor Management, Data Protection, Business Continuity, Physical Security, Risk Assessment and Governance.

### Project Overview

Ruota Consulting was engaged to project manage, resolve and remediate significant GLBA programme issues, including technical and non-technical project quality issues and delivery delays. In addition, there was a need to understand whether GLBA requirements were fully understood and incorporated into project delivery plans across all programme areas.

### Solution

- Designed, developed and implemented a programme management delivery structure to ensure all GLBA projects were governed and controlled in a consistent manner and that Executive reporting was able to articulate status, challenges and escalated decision requirements.
- Provided project management capability for areas requiring remediation and ongoing management
- Created an End-to End Roadmap demonstrating the journey to GLBA remediation and ongoing sustainability
- Defined ongoing sustainability requirements for the bank to help lift the unsatisfactory ratings from the Federal Deposit Insurance Corporation (FDIC) and Office of the Comptroller of the Currency (OCC)
- Provided ongoing management and reporting post remediation to ensure ongoing sustainability requirements where proactively monitored and governed, getting the bank to 'business as usual'

### Benefits

- Assured GLBA deliverables were satisfactory for executive and regulatory review
- Ensured the bank was able to lift their 'unsatisfactory' rating from the FDIC and OCC to 'satisfactory', thereby meeting regulatory compliance requirements
- Provided control and direction across multiple projects being delivered in silos - projects delivered on time and to the correct level of quality
- Proactive and timely resolution of critical issues to address FDIC and OCC requirements minimising unnecessary regulatory involvement