Paper 025-2011

Global Risk Management: How SAS[®] Enterprise GRC Manages Nonfinancial Risk in a Distributed Enterprise

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ABSTRACT

SAS Enterprise GRC (governance, risk management, and compliance) is a SAS solution to help customers automate the management of nonfinancial risks (for example, strategic risks, operational risks, reputational risks, and so on), compliance, and internal audit processes. This paper depicts the scenario of a global bank with several branches in different countries (U.S., China, Saudi Arabia, and Japan): HQ sets up a multilingual environment; clerks in local offices input loss data in different languages; language-specific e-mail messages are sent in the approval process; the loss data are collected and assembled in HQ and finally generated into different language reports.

INTRODUCTION

WHAT'S GRC?

GRC is an integrated, holistic approach to organization-wide governance, risk, and compliance, ensuring that an organization acts ethically correct and in accordance with its risk appetite, internal policies and external regulations through the alignment of strategy, processes, technology, and people, thereby improving efficiency and effectiveness. This definition is translated into a frame of reference as below.

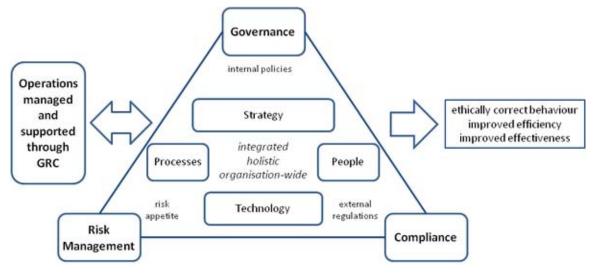


Figure 1. Frame of Reference for GRC Research

Nonfinancial risk such as operational risk is an important aspect of GRC management.

WHAT IS GRC SOLUTION?

GRC solution is a type of application used to automate the management of governance, risk management, and compliance data. There are many challenges for a GRC solution used in a distributed enterprise, including the following:

- Clerks in different countries hope to see the product with their own languages.
- Clerks in Saudi Arabia hope to see layout of the product rendering from right to left.
- Clerks in different countries can use date, time, number, and currency formats with local conventions.
- Clerks in a branch are permitted only to manipulate data within their own region.

- Internal control rules in different countries are also different. Clerks should be able to customize workflows to fit various rules.
- Different branches have different business structures.

WHAT IS SAS ENTERPRISE GRC?

SAS Enterprise GRC is a user-friendly, Web-based GRC solution by SAS that automates the management of governance, risk, and compliance data across the enterprise within a single integrated platform.

SAS Enterprise GRC facilitates the entry, collection, transfer, storage, tracking, and reporting of operational losses, gains, recoveries, and key risk indicators (KRIs) that are drawn from multiple locations across an organization.

It can also be used to do the following:

- Conduct audits
- Manage policies
- Conduct risk and control assessments
- Test controls
- Investigate incidents
- Create and track issues and develop action plans
- Scenario analysis

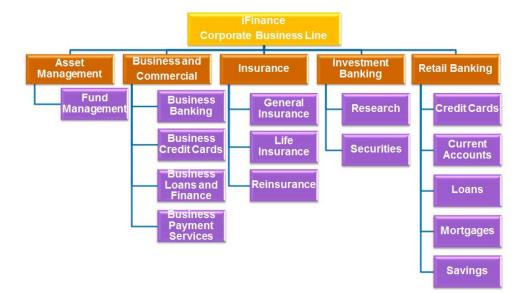
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S/	AS Ente	rprise GRC • Inc	idents				Object ID	All Objects		Go	S sas
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Figure 2. Screenshot of SAS Enterprise GRC

SAS Enterprise GRC is powerful and able to support multiple-language deployment and implementation for a distributed enterprise very well. Let us see it from the following scenario.

### A SCENARIO OF A GLOBAL BANK

iFinance, a global bank, owns branches in four countries, including the U.S., China, Saudi Arabia, Japan, and headquarters in the U.S. iFinance uses SAS Enterprise GRC to manage loss incidents, including the process of creation, investigation, validation, and reporting.



iFinance has various business lines as Ffigure 3 shows.

### Figure 3. iFinance Corporate Business Line

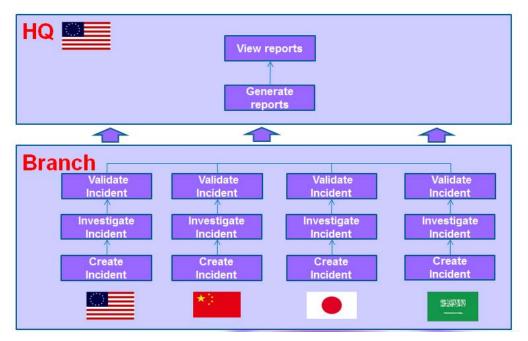
In 2010, a rogue trader in the U.S branch uses insider information to make trades on securities. iFinance is fined \$200,000 by Securities and Exchange Commission accordingly. Similar incidents also occur in the China, Japan, and Saudi Arabia branches. They are fined 200,000 Chinese Yuan, 200,000 Japanese yen, and 200,000 riyal respectively.

Branch	Loss Amount
U.S.	200,000 Dollars
China	200,000 Chinese Yuan
Japan	200,000 Japanese Yen
Saudi Arabia	200,000 Riyal

Let us see how iFinance makes use of SAS Enterprise GRC to manage those incidents.

#### **INCIDENT MANAGEMENT PROCESS**

This is a chart to show the management process of how incidents are tracked and reported.



**Figure 4. Incident Management Process** 

The incident management process is completed using the following five-phase steps in SAS Enterprise GRC:

1. Setup Environment

The administrator in headquarters is responsible for setting up a multilingual environment and preparing all data, such as all types of workflows and thresholds in SAS Enterprise GRC.

2. Create Incident

Incident creators in each branch discover an event has occurred and create an incident.

3. Investigate Incident

Incident investigators in each branch accept the incident, investigate the incident, and provide details about the following items:

- financial and nonfinancial effects
- recoveries
- allocations
- causes
- · failed controls

One or more investigators can be involved in this stage to capture the required data. After all information has been gathered by all parties, the incident is sent for validation.

4. Validate Incident

Incident validators in each branch review and validate the incident. One or more validators can be involved in this stage. The validation process repeats until the responses have been verified at all workflow stages. After all required validators have approved the incident details, the incident is fully validated.

5. View Report

The reports are generated and viewed by managers. Please note that clerks in the U.S., China, Japan, and Saudi Arabia will create, investigate, and validate incidents respectively. Let us look at each step in detail.

## 1) SETUP ENVIRONMENT

First of all, the administrator in headquarters sets up the environment and prepares all the data, including users to log in, exchanges rates, and workflow. After all the data is ready, they can be viewed in Web pages.

1. Users

Here is the Web page to view users. Users with different roles are listed.

Users Ţ	]			
	User ID △	E-mail Address		Title
1	Deanna	deanna@orionstar.com	Deanna - Administration	
2	Gloria	glory@orionstar.com	Gloria - Allocation and Recovery Approval, Cause Ma	
3	Lisi	lisi@orionstar.com	Lisi - Incident Investigation	
4	Mike	mike@orionstar.com	Mike - Central Risk Management	
5	Robert	robert@orionstar.com	Robert - Incident Management Validation	
6	Victor	victor@orionstar.com	Victor - Incident Creation	

### **Figure 5. View Users**

#### 2. Exchange rates

As the base currency is the euro, exchange rates are provided to convert from US dollar to euro, from Chinese Yuan to euro, from Japanese yen to euro and from rival to euro. Their usage will be introduced later.

	Effective From V	Exchange Rate To Curre	ncy From Currency
	April 1, 2011 12:00:00 AM EDT	1.3616 <mark>0</mark> USD	EUR
2	April 1, 2011 12:00:00 AM EDT	9.04311 0 CNY	EUR
3	April 1, 2011 12:00:00 AM EDT	5.1062 <mark>0</mark> SAR	EUR
4	April 1, 2011 12:00:00 AM EDT	112.8758( 0 JPY	EUR
5	March 1, 2011 12:00:00 AM EST	1.3616 <mark>0</mark> USD	EUR
5	March 1, 2011 12:00:00 AM EST	9.0431 <mark>1</mark> 0 CNY	EUR
7	March 1, 2011 12:00:00 AM EST	112.8758 0 JPY	EUR
8	March 1, 2011 12:00:00 AM EST	5.106200 SAR	EUR

### Figure 6. View Exchange Rates

3. Workflows

Workflow determines business processes. Business processes in different countries are different. Their usage will also be introduced later.

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	)						Add I	Management Validation Stage   Add Risk V	/alidation Stage.
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**Figure 7. View Workflows** 

# 2) CREATE INCIDENT

After the environment is ready, incident creators in each branch will enter loss incident in this Web page.

Incident creators specify the detail information of the incident, including a short description of the event, discovery date, and estimated amount, in SAS Enterprise GRC.

SAS Enterprise GRC • C	reate Inciden	t
Save and Submit for Investigation	Cancel	
Sections		
Create Investigate	Validate	
* Management Organization: * Geography:		ent Banking > Securities merica > United States
😑 * Details		
Event Type:	Loss/Profit	
Summary Description:	Internal Fraud	
[•] Discovery Date:	12/3/2010	🝙 (mm/dd/yyyy)
Start Date:	12/3/2010	(mm/dd/yyyy)
End Date:	12/3/2010	(mm/dd/yyyy)
Estimated Amount:	200000	USD -
Estimated Amount (EUR): * Customer Complaint: Steps Taken:	149,611.01 © Yes 💿 No	
Attachments for Steps Taken:	[ Add]	

### **Figure 8. Create Incident**

1. Graphical user interface

When the American clerks login, they can view the English Web page (1). The Chinese (2), Japanese (3), and

Arabic ④ clerks can also view Web pages with their native languages. For the Arabic Web page, please note that what has changed is more than the language. Layout of the whole webpage renders from right to left in accordance with their convention.

Furthermore, clerks can also input data (5) in their native languages.

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and Submit for Inves	tigation Cancel			保存并提交以供调查	取消		
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Details				□ '详细信息			
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d Date:	12/3/2010	(mm/dd/yyyy)		结束日期:	2010-12-6	(yyyy-mm-dd)	
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Figure 9. Four Various Languages

#### 2. Currency conversion

The estimated amount of loss incident can be specified in the local currency. It need be converted into the base currency for reporting purposes. Exchange-rate data used for this conversion have been prepared in advance by the administrator.

When a clerk in the U.S. branch enters a monetary value in dollars, the value is automatically converted to the corresponding amount in the base currency (euro). When a clerk in the China branch enters a monetary value in CNY, Chinese yuan, it is converted automatically.

Actually, losses can be entered in any currency. However, for reporting purposes, the amount must be reported in the base currency. The euro is the base currency in this example. The base currency is specified and configured when setting up the system.

Event Type:	Loss/Profit	-	
Summary Description:	Internal Fraud		
Discovery Date:	12/3/2010	(mm/dd/yyyy)	
Start Date:	12/3/2010	(mm/dd/yyyy)	
End Date:	12/3/2010	(mm/dd/yyyy)	
Estimated Amount:	200000	USD -	
Estimated Amount (EUR):	149,611.01		
Customer Complaint:	🔍 Yes 🛛 🔍 No		
Steps Taken:			
Attachments for Steps Taker	. Inda 1		

Figure 10. Convert from U.S. Dollar to Euro

Details		
Event Type:	Loss/Profit	•
* Summary Description:	Internal Fraud	
* Discovery Date:	12/3/2010	(mm/dd/yyyy)
Start Date:	12/3/2010	m (mm/dd/yyyy)
End Date:	12/3/2010	(mm/dd/yyyy)
Estimated Amount:	200000	CNY -
Estimated Amount (EUR):	22,116.31	
Customer Complaint:	O Yes 🔍 No	
Steps Taken:		
Attachments for Steps Tak	en: [ Add]	

Figure 11. Convert from Chinese Yuan to Euro

#### 3. Security mechanism

As we know, in a distributed company, the loss data in one branch are confidential even for other branches. This is to say, clerks in the headquarters and branches can manipulate loss data only within their permission. Access control in geography dimension can be leveraged to implement this.

This screenshot shows that clerks in the headquarters are permitted to view and manipulate the four incidents from all branches. However, American clerks are permitted only to manipulate data in U.S. branch and Chinese clerks are permitted to manipulate data only in the China branch. That is logical and necessary.

Actually, SAS Enterprise GRC offers three types of security to meet the complicated and flexible requirements in the real world: authentication, identification, and authorization.

SAS EII	terprise GRC • I	nciuents			Object ID	All Objects	🖝 Go	<b>S</b> .sa
lome Inci	ident Management R	isk Managem	ent Sce	narios   Control Testing	Audit Managemen	t Policy Mana	gement K	(RI
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Figure 12. Access Control - Headquarters

								Incident Creation   Preferences   Help
SAS Enterprise GRC • Inciden	LS						0.19(92)	Aroquera 🖬 🖙 SS3
Some Incident Management Risk Manag	ement Issues and Action Plans B	usiness Structure   Financial Data						
incidents Financial Effects Direct Reco	verles Insurance Recoverles							
B Filter by Operational Area								Edit   Clear   Favorites+
Management Organization: (None Se								
Geography: (None Se								
ocoli abult. (increat the	ected							
Incidents 🗉	<b>`</b>							Create Incident
Event ID Summary Description	Event Type Discovery Date	Estimated Amount Currency	Status	Issue Threshold Exceeded	Issues	Input Date	Investigator	Creator
1 13100 Internal Fraud	oss/Profit Nov 29, 2010	200,000.00 USD	Fully validated No		0 14	lov 29, 2010	Wendy - Incident Investigation	Victor - Incident Creation
5 9 Rows 1 to 1 of 1 3 3								

Figure 13. Access Control – U.S. Branch

	注册 Zhaoliu - Incident Creation   参数选择   相較
SAS Enterprise GRC • 特定事件	nao anna e Ha SSS
上京 特定事件管理 风险管理 网络和行动计划 金条结构 财务数据	
特定事件 财务教明 直接退任 保险退任	
= 被操作区域过滤	编辑(清歌)收耀天-
管理组织: (术选用) 地理位置: (术选用)	
特定事件 🗉	创建特定事件
事件10 汇总说明 事件考理 发现日期 估计金额 货币 铁态 已	出阿瑟姆伯 阿麗 输入日期 胃炎者 付款者
1 13120 内部推诈 损失/收益 2010-11-29 200,000.00 GBP 已完全核准 否	0 2010-11-29 Lisi - incident investigation Zhaoliu - Incident Creation
至21-1程(具1程) 32	

Figure 14. Access Control – China Branch

## 3) INVESTIGATE INCIDENT

After incident creation, an alert notification e-mail is automatically sent to an incident investigator to alert that an incident is ready for investigation.

1. Alert notification e-mail

Clerks in the U.S. can receive English alert notification e-mail. Likewise, clerks in China can receive Chinese alert notification e-mail.

Furthermore, the e-mail content is based on a template and is also customizable for different countries. So the clerk can configure not only the language of the e-mail but also the content for various countries.





<ul> <li>Victor(Guowei) Jiang</li> <li>ent: 2010/12/8 (周三) 15:21</li> <li>Wictor(Guowei) Jiang</li> </ul>	
特定事件 13200(内部欺诈)已由"Zhaoliu - Incident Creation"创建和提交, 查。	以便进行调
这是系统生成的邮件。请勿回复该电子邮件。	

Figure 16. Chinese Alert Notification Mail

2. Business line

The incident investigator investigates the whole event and inputs information such as a detailed event description, actual loss amount, and root cause.

The incident investigator will enter the business line where the incident happens in this Web page. In the left graph, a U.S. incident investigator selects the geographic area, and then the relevant five business lines in the U.S. branch are shown. Similarly, in the right graph, the two business lines in the China branch are shown for a Chinese incident investigator. It is reasonable to show business lines within the branch rather than showing all.

SAS Enterprise GRC • Operational Point	SAS Enterprise GRC • 操作点
Geography: Americas > North America > United States	地理位置:亚洲 > 中国
Dimension: *Business Line	维: *业务线 ▼ 搜索
<ul> <li>Internal Business Lines</li> <li>iFinance</li> <li>Asset Management</li> <li>Business and Commercial</li> <li>Insurance</li> <li>Investment Banking</li> <li>Retail Banking</li> </ul>	<ul> <li>□ 业务线</li> <li>□ iFinance</li> <li>④ □ 投资银行业务</li> <li>④ □ 零售银行业务</li> </ul>

### Figure 17. Different Business Lines in U.S. and China

#### 3. Date and number format

The graph above is an English Web page. Below is an Arabic one. They show different date formats. The date format in the U.S. is month/day/year, while it is year/month/day in Saudi Arabia. Similarly, the number format is different as well.

Dates and Amounts		
* Discovery Date:	12/3/2010	📺 (mm/dd/yyyy)
Start Date:	12/3/2010	(mm/dd/yyyy)
End Date:	12/3/2010	📺 (mm/dd/yyyy)
Estimated Amount:	200,000.00	USD 👻
Estimated Amount (EUR):	149,611.01	_
Maximum Potential Amount:		EUR -
Maximum Potential Amount (EUR):	0.00	

Figure 18. Date and Number Format in U.S.

		🖃 * التواريخ والميالغ
(yyyy /mm /dd ) 📰	2010/12/7	* تاريخ الاكتشاف:
(yyyy /mm /dd ) 🔢	2010/12/7	تاريخ البداية <mark>:</mark>
(yyyy /mm /dd ) 📷	2010/12/7	تاريخ التهاية <mark>:</mark>
▼ SAR	10,	• الميلغ المقدر:
	11111.01	الميلغ المقدر (EUR):
✓ EUR		الحد الأقصى للميلغ المحتمل:
	.,	الحد الأقصى للميلغ المحتمل (EUR):

Figure 19. Date and Number Format in Saudi Arabia

# 4) VALIDATE INCIDENT

After investigation, an alert notification will be sent to an incident validator. Moreover, the notification will also appear in the task list in the home page. This is the Web page to validate incident.

SAS Enterprise GRC •	Event • Internal Fraud					
Event .	Save Apply Validate Return from Valida	tion Cancel				
Effects						
Recoveries						
Allocations	Create => Investigate => Validate					
Causes		lidate				
Failed Controls						
	* Discovery Operational Point					
	* Management Organization: iFinance > Inv					
	* Geography: Americas > No	rth America > United States				
	* Event Operational Point					
	* Risk Event Type: Internal Fraud	> Theft and Fraud > Insider trading				
	* Management Organization: iFinance > Inv	estment Banking > Securities				
	3 1 3	rth America > United States				
	* Product: Securities					
	Process Type: (None Selecte	1)				
	Standard Risk Event Type: Internal Fraud	> Theft and Fraud				
	□ * Descriptions					
	Event ID: 13247					
	* Security Clearance: Avail	able to everyone				
	* Event Type: Loss/	Profit 🔹				
	Overall Classification: None					
	* Incident Title: Inside	r Trading				
		al Fraud				
		yees used insider information on investment ng deal to trade securities.				
	Attachments for Event Description: [ Add.	.]				
		. No				

Figure 20. Validate Incident

The result of the investigation will be validated. If the result is not approved, it can be returned for re-investigation.

Validation is based on internal control rules. Different branches might have different internal control rules. The rules define who should validate it and define the number of validation stages.

For example, in the China branch, an incident is validated by local clerks if the loss amount is less than 10,000. Otherwise, it is validated by HQ. In the U.S. branch, an incident is validated only by local clerks no matter what the amount is.

The difference of internal control rules is implemented via customizable workflow in SAS Enterprise GRC.

i Operational Point (Chin	a)							Edit   Clear   Favorites
Risk Event Type:	(None Selected)							
Management Organizatio	on: IFinance > Investment Banking >	Securities						
Geography:	Asia > China							
Product:	(None Selected)							
Process Type:	(None Selected)							
	es							Edit Validation Stages
elidation Stages (2)	ies Name	Validation Stage ID	Source System	Applies to	Stage Type	Minimum Threshold	Naximum Threshold	Edit Validation Stages Validators
urrent Validation Stag alidation Stages (2) Kage Validation Stage for S	-2411	Validation Stage ID 10080	Source System Monitor	Appilies to Near Misses, Gains, Losses	Stage Type Management Validation	Ninimum Threshold	Maximum Threshold 10,000.00	Edit Validation Stages. Validators 张트 - Incident Management Validation

Figure 21. Workflow in China

∃ Operational Point (US)							Edit   Clear   Favorites
Risk Event Type:	(None Selected)						
Management Organization	iFinance > Investment Banking > Secu	rities					
Geography:	Americas > North America > United St	ates					
Product:	(None Selected)						
Process Type:	(None Selected)						
	\$						Edit Validation Stages
urrent Validation Stage (alidation Stages (1) Stage		tion Stage ID Source System	n Applies to	Stage Type	Minimum Threshold	Maximum Threshold	Edit Validation Stages Validators

Figure 22. Workflow in the U.S.

## 5) VIEW REPORT

Clerks in the U.S, China, Japan, and Saudi Arabia have finished their workflows. The reports, including data in all branches, can be generated at this time.

In the left graph, various languages are displayed in one report. That is useful when different branches use different languages to enter data.

In the right graph, the title and column title are Chinese whereas they are English in the left graph. That means the language of the title and column title can also be changed and would be useful if the headquarters is located in another country and managers want to view report in their native language.

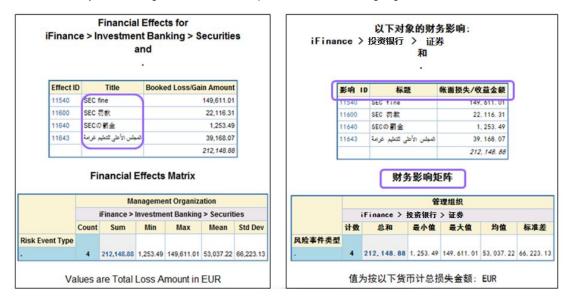


Figure 23. Multilingual Support in Report

The amount is reported in the base currency (the euro). As mentioned above, exchange rates are used to convert from four currencies to the euro. Then the loss amounts from four branches are collected and aggregated.

Branch	Loss Amount	Loss Amount (Euro)
U.S.	200,000 Dollars	149,611.01
China	200,000 Chinese Yuan	22,116.31
Japan	200,000 Japanese Yen	1,253.49
Saudi Arabia	200,000 Riyal	39,168.07
Total		212,148.88

Managers in headquarters are able to view the report, including data from all over the Enterprise. Moreover, managers in each branch are also able to view the report, including data in their own branch. The report at the top left corner is for the U.S branch. Only data within the U.S. branch appear. The reports for China, Japan, and Saudi Arabia branches are also listed.



#### Figure 24. Reports for Different Branches

Above is the scenario to process the incident. It shows the power of SAS Enterprise GRC to manage incidents in a distributed enterprise. Moreover, there are many good supports in other processes. For example, questionnairebased assessment can be performed to collect information about risks within the organization. The questionnaire is made and sent to assessors. Assessors in different countries are able to view questions and choices in their native languages. If clerks use a language without relevant translation prepared, the default language specified by the administrator will be used.

	供问题组			[###/
这个问题却获取关	F 风险可能性和影响的评估。			
1. (Q-1.1) 提供	P的对于以上风险可能性的评估。			[帮助]
	0% 到 15%	15% 到 50%	50% 到 85%	85% 到 100%
<b>現由</b> :				
2. (Q-1.2) 提供	17的对于以上风险影响的评估。			[## 25]
	小于 250k	在 250k 和 1m 之间	在 1m 和 5m 之间	大于 5m
				•
理由:				
<b>理由</b> :				
(Group-2) 风险等	疗问题血	· ·		[48.05
	疗问题血			
(Group-2) 风险偏 这个问题组获取风	疗问题血			
(Group-2) 风险偏 这个问题组获取风	好问题: 会演行。			[ 48 E2
(Group-2) 风险偏 这个问题组获取风	好何面敞 食偶好。 19的对于以上风险风险偏好的评估。			[ 48 E2

### **Figure 25. Chinese Questionnaire**

(Group-1) Risk Assessment Group			
This question group captures the likelihood and impact assessment o	f risks.		
1. (Q-1.1) Provide your assessment of likelihood for the above risk	4a		[Help]
0% to 15%	15% to 50%	50% to 85%	85% to 100%
	•	•	•
Justification:			
2. (Q-1.2) Provide your assessment of impact for the above risk.			[Help]
Less than 250k	Between 250k to 1m	Between 1m to 5m	Above 5m
	۲		•
Justification:			
(Group-2) Risk Appetite Group			
This question group captures the risk appetite.			
3. (Q-2.1) Enter your assessment of risk appetite for the above ris	<i>k</i> .		[Help]
(between 10,000.00 and 100,000,000.00)			
Justification:			

### Figure 26. English Questionnaire

## CONCLUSION

SAS Enterprise GRC supports various languages in the the graphical user interface, user data, alert notification email, and reports.

It supports right-to-left rendering, various date, time, number, and currency formats, suitable security mechanisms, and customizable workflows for a distributed enterprise.

- Multiple languages
  - Graphical user interface and user data
  - Alert notification e-mail
  - Reports
- Right-to-left rendering support
- Date, time, and number formats
- Currency
- Customizable workflow

- Security
- Diversity of business structure

In conclusion, SAS Enterprise GRC is a perfect product to manage nonfinancial risks in a distributed enterprise.

The SAS Legal Department is currently implementing SAS Enterprise GRC to manage compliance processes across a number of roles and departments at SAS. Other SAS departments – including SAS Finance and SAS Ergonomics – are beginning SAS Enterprise GRC implementations to provide standard out-of-the-box workflow, and repeatable, reportable processes for conducting audits and providing employees with ergonomic workstations. SAS Enterprise GRC has been implemented for more than 80 customers, from financial services, energy and utilities, manufacturing, and retail to public sector, and from local to distributed enterprises.

## REFERENCES

The following references or sources can be used for additional information and research activities:

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- SAS Enterprise GRC 4.3: User Guide. Available at <u>http://support.sas.com/documentation/onlinedoc/securedoc/index_egrc.html</u>
- SAS Enterprise GRC 4.3: Administrator's Guide. Available at <u>http://support.sas.com/documentation/onlinedoc/securedoc/index_egrc.html</u>

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