ServiceNow GRC Software Implementation
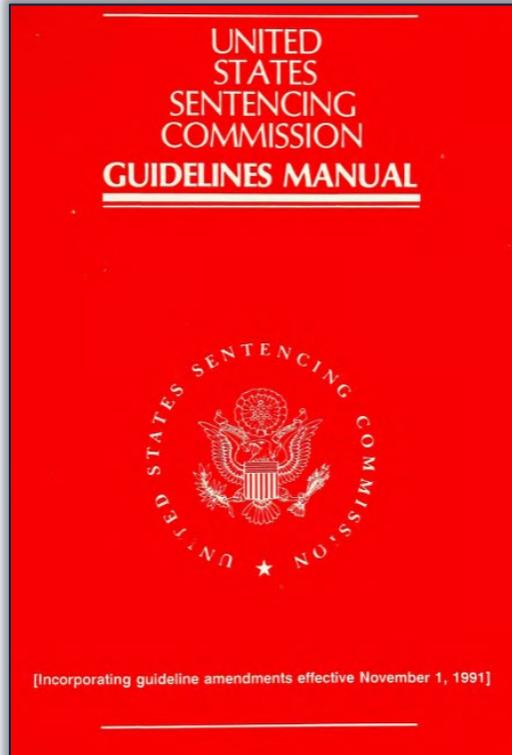
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The ServiceNow GRC Platform is ready!

Audit & Advisory Services is excited to announce that the University is going live with our new Governance, Risk and Compliance (GRC) software!

- In 1991, U.S. Sentencing Commission issued the first guidelines for an effective compliance program.

- These guidelines have been updated numerous times over the last 34 years.

- Periodically, the Department of Justice (DOJ) provides interpretation and actionable guidance related to these sentencing guidelines.

- The most recent DOJ update was in September 2024.

- Audit & Advisory Services (AAS) frequently refers these guidelines and interpretations when considering changes, improvements, etc. to its University-wide compliance program.

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The DOJ asks three question when evaluating the effectiveness of a compliance program:

1

Is the compliance program well designed?

2

Is the program adequately resourced & empowered to function effectively?

3

Does the compliance program work in practice?

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1

Is the compliance program well designed?

The DOJ has identified specific areas of compliance that that should be in place and adequately managed. These include:

- ✓ Risk Assessment
- ✓ Policies & Procedures
- ✓ Training & Communications
- ✓ Third Party Risk

- ServiceNow GRC has the ability to manage all of these.

- The Risk Assessment module will be implemented during FY 2026.

- The Policy and Third Party Risk modules may be utilized in the future.

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2

Is the program adequately resourced & empowered to function effectively?

The DOJ has identified ways for a compliance program to demonstrate it is not just a "paper program."

- **Commitment by Senior & Middle Management**
  - *Oversight*: The GRC platform provides an enterprise-level oversight by AAS as well as division-level oversight by designated Compliance Leaders.

- **Autonomy & Resources**
  - *Data Resources & Access*: The GRC platform provides relevant sources of data to allow for timely and effective monitoring and testing of policies and controls.

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3

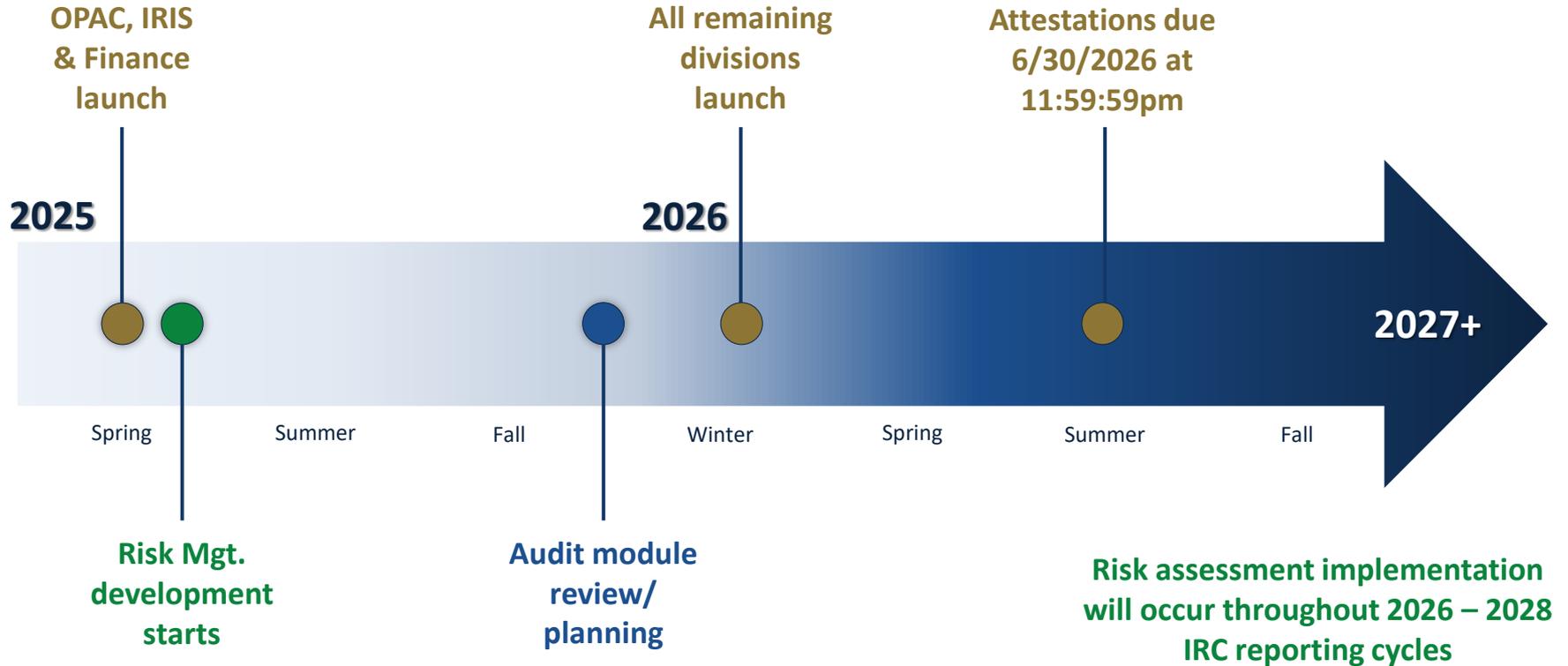Does the compliance program work in practice?

The DOJ has identified ways for a compliance program to demonstrate it has evolved over time to address existing and changing compliance risks.

- **Continuous Improvement, Periodic Testing & Review**
  - A hallmark of an effective compliance program is the actual implementation of controls in practice.
  - The GRC platform provides the ability to:
    - ✓ Implement controls
    - ✓ Attest to control compliance
    - ✓ Enable continuous monitoring
    - ✓ Periodically audit controls.

SERVICE NOW BENEFITS

✏️	**Reduction in Manual Work**	• No more copy/paste or manual updates. • Scheduled tasks replace reminders & repetitive actions.
🎯	**Accuracy and Error Reduction**	• Fewer typos, overwriting data, etc. • Standardize processes.
🔒	**Improved Security & Access Control**	• Granular permissions: who can view/edit, etc. • Audit trails to track changes.
📈	**Improved Reporting & Transparency**	• Dashboards update in real-time. • Integration with tools like Tableau if needed.
👥	**Multi-User & Collaboration Friendly**	• Multiple users can interact with the system without risking overwriting each other's work.
🧩	**Integration with Other Systems**	• Connects with other ServiceNow platforms. • Single point of entry for employees.

TIMELINE

OPAC, IRIS & Finance launch

All remaining divisions launch

Attestations due 6/30/2026 at 11:59:59pm

2025

2026

2027+

Spring Summer Fall Winter Spring Summer Fall

Risk Mgt. development starts

Audit module review/ planning

Risk assessment implementation will occur throughout 2026 – 2028 IRC reporting cycles

<u>Glossary</u>

- **Control** – a general statement regarding the University's compliance efforts for a specific regulatory requirement.

- **Additional information** – the steps Notre Dame takes to ensure compliance with the control

- **Attestation** – short series of question which assess the control's compliance; completed annually and should be a reflection of the preceding 12 months

- **Evidence** – documentation (websites or file uploads) to directly support the information listed in the *Additional information* section; should be a reflection of the 12 months immediately preceding the attestation completion.

Job Aids

- **Available at:**
  https://auditservices.nd.edu/compliance/servicenow-grc/job-aids/

- **Includes:**
  - ✅ How to Complete a Compliant Attestation (*for attesters*)
  - ⛔ How to Complete a Non-Compliant Attestation (*for attesters*)
  - 🔍 How to Review a Compliant Attestation (*for Compliance Leader*)

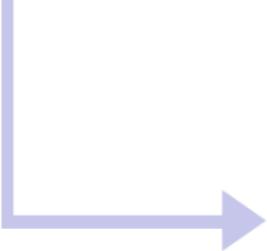## ServiceNow GRC Control Attestation Quick Guide

1. Go to the Employee Service Center (https://nd.service-now.com/esc/)
2. Click on GRC Tasks.
3. Click on the Task Icon.

OR

1. You will receive an email for each control you need to attest to.
2. Click on the hyperlink.
3. You will be directed to the attestation form.

Answer yes or no to the question:
To the best of your knowledge, has this control been performed?

Upload a PDF, enter a URL or provide both to demonstrate evidence of compliance.

Click Submit, then OK and you are done!

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