Using BPM to Drive Payment Card Industry (PCI) Compliance

The Opportunity. With increased regulations impacting the financial services industry, our client began to prepare for a multi-year PCI compliance initiative. As a critical first step, the global credit union sought to inventory all of its business processes using Card Holder Data (CHD)—establisshing a baseline for future remediation and PCI compliance activities.

The Client. A global credit union that provides a wide range of financial services to over four million members associated with the U.S. Department of Defense.

The Obstacles

Our client realized it could not proceed towards compliance until it gained a comprehensive business process view of where CHD was being used and stored across the organization. Without an enterprise-wide process and systems inventory focused on CHD, the credit union could not understand the full scope of operations impacted nor effectively plan for remediation.

The Acceleration

Celerity rapidly engaged with the client to create a more structured Business Process Management (BPM) environment and understand the full scope of operations involving CHD across the organization. But before the Celerity team could truly get started on the project, we needed to help the client understand and map out the scope of work involved.

Over the course of five months, our BPM project team performed:

- **Scope Analysis & Baseline Development.** To help the credit union get its arms around the scope of its operations involving CHD, we initially worked with select business leaders and stakeholders to determine the best approach for engaging with 100+ managers and directors from every major operating division.

  We established a baseline and standards for the exact type and level of data we needed to capture to inform future planning and remediation phases. Our team then designed an innovative deliverable package to be submitted after each business area review. The package included: (1) a written interview summary that highlighted business processes, inputs and outputs, and technologies used (2) a pictorial description of the processes and (3) a metadata repository of all processes with CHD impacts identified.

- **Stakeholder Interviews & Process Analysis.** Armed with a standard process and clear understanding of the exact data needed to inform PCI compliance efforts, Celerity’s BPM team set out to interview more than 100 stakeholders from the eight operating divisions.
Using BPM to Drive Payment Card Industry (PCI) Compliance

We used Business Process Modeling and Notation (BPMN) 1.2—an industry-recognized standard and methodology for creating consistent process diagrams—to create a visual description of the business process flows, illustrating where CHD is currently used. We created an asset inventory matrix that tracked all the metadata associated with each process step, identified the impact CHD had in each step, determined impacts to business operations and highlighted any critical compliance issues.

• **Deliverable Reports & Remediation Requirements.** We submitted individual report packages to each project team and business area to review. Once revised and finalized, the CHD inventory of processes and technology was complete for that area. In total, the Celerity team delivered over 90 in-depth report packages—providing an enterprise-level view of each and every area the client needed to inform PCI compliance remediation efforts.

**Lasting Results**

Celerity provided the credit union with the solid foundation needed to effectively plan for future remediation and PCI compliance, while ensuring minimal impacts to its business operations. In addition, our BPM team and solution:

• Delivered several “quick wins” that increased process efficiency and alignment outside the project scope
• Provided a roadmap for building out the PCI program across the organization, enabling technology teams to perform the next level of IT analysis and technical remediation
• Developed and submitted more than 90 deliverable reports with relevant interview summaries, 346 process flows and 1,221 entries in the CHD matrix
• Enhanced card holder protection for our client’s members
• Raised awareness about PCI across the organization, effectively supporting change management activities

**Tools and Techniques**

- BPMN 1.2
- MS SharePoint
- MS Visio

**About Celerity**

Celerity is a business acceleration consultancy devoted to helping companies and government agencies break through key stuck points and solve critical problems. We deliver proven solutions in four main areas: technology adoption and integration, business process efficiency, strategy and alignment and talent.

**CONTACT**

Sanam Boroumand  
*BPM Practice Director*  
bpm@celerity.com

8401 Greensboro Drive, Suite 500  
McLean, Virginia 22102  
P. 703.848.1900  F. 703.848.2139  
WWW.CELERITY.COM