



24th XBRL International Conference

“Transparency: with Available, Reliable, Comparable and Re-usable Data”

**March 20-22, 2012
Abu Dhabi, UAE**

Project Implementation Track

The Bermuda Monetary Authorities: project Rain

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Wednesday, 21 March 2012



AGENDA

- ▶ Brief Overview of the Project
- ▶ Governance Structures & Execution Frameworks
- ▶ Project Planning and Portfolio management
- ▶ Approach / Methods
- ▶ Lessons Learned

The 2008 – 2013 IT Strategy

Key Findings

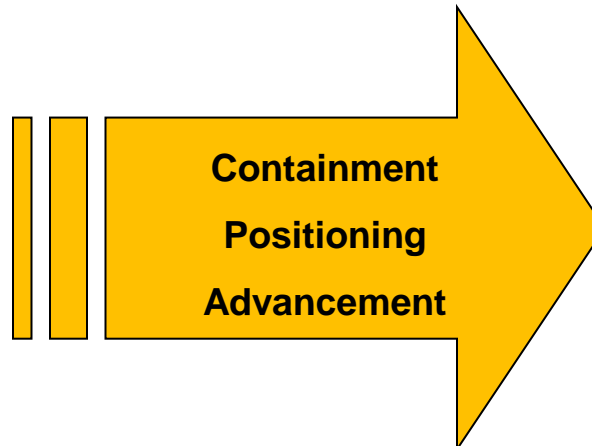
- ❖ Paper Management versus Paper Reduction
- ❖ Project Based Environment without a Project Execution Discipline
- ❖ Information sensitive environment without the structure to support it

Strategic AIM

- ❖ The restructuring or redirecting of the Information Technology delivery towards a customer centric model.
- ❖ The fostering of best practice Information Technology governance and management approaches.
- ❖ The delivery of a flexible, “holistic” information management tool set that increases the overall efficiency and effectiveness.

Primary Initiatives

- ❖ Reinvent the Infrastructure
- ❖ Develop the team
- ❖ Project RAIN
- ❖ ERICA



Vision: The seamless and efficient flow of information amongst all stakeholders within the regulatory supervisory process.

- ❖ Information reuse is maximized.
- ❖ Stakeholders are focused on their core competencies.
- ❖ Information is used to create value for all stakeholders

Vision:

Information reuse is maximized.

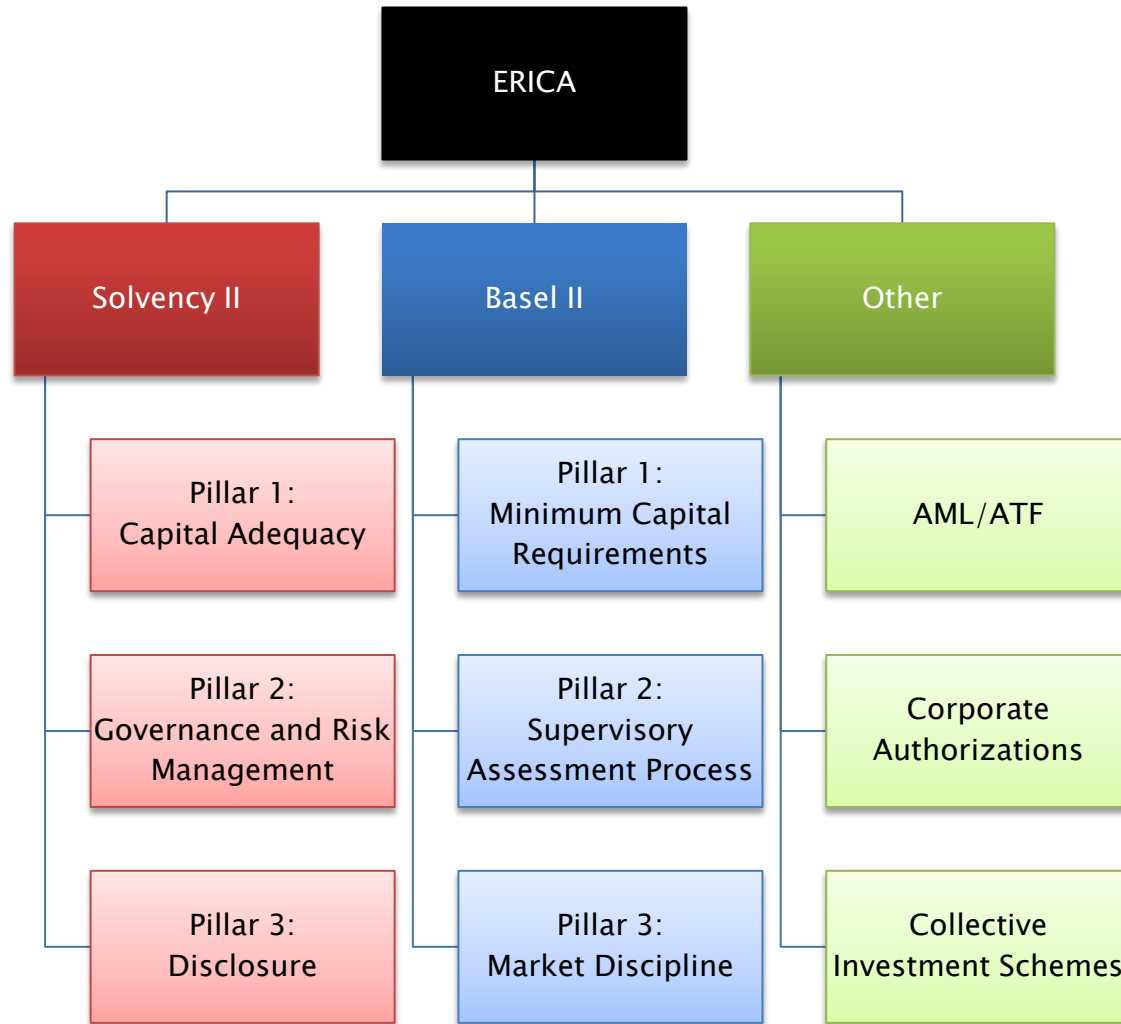
- ❖ Stakeholders are focused on their core competencies.
- ❖ Information is used to create value for all stakeholders

Critical Success Factors

- Adequate human resources
- Adequate finances
- Executive support through the change cycle
- Effective IT Delivery

BMA 2013

Project RAIN Scope



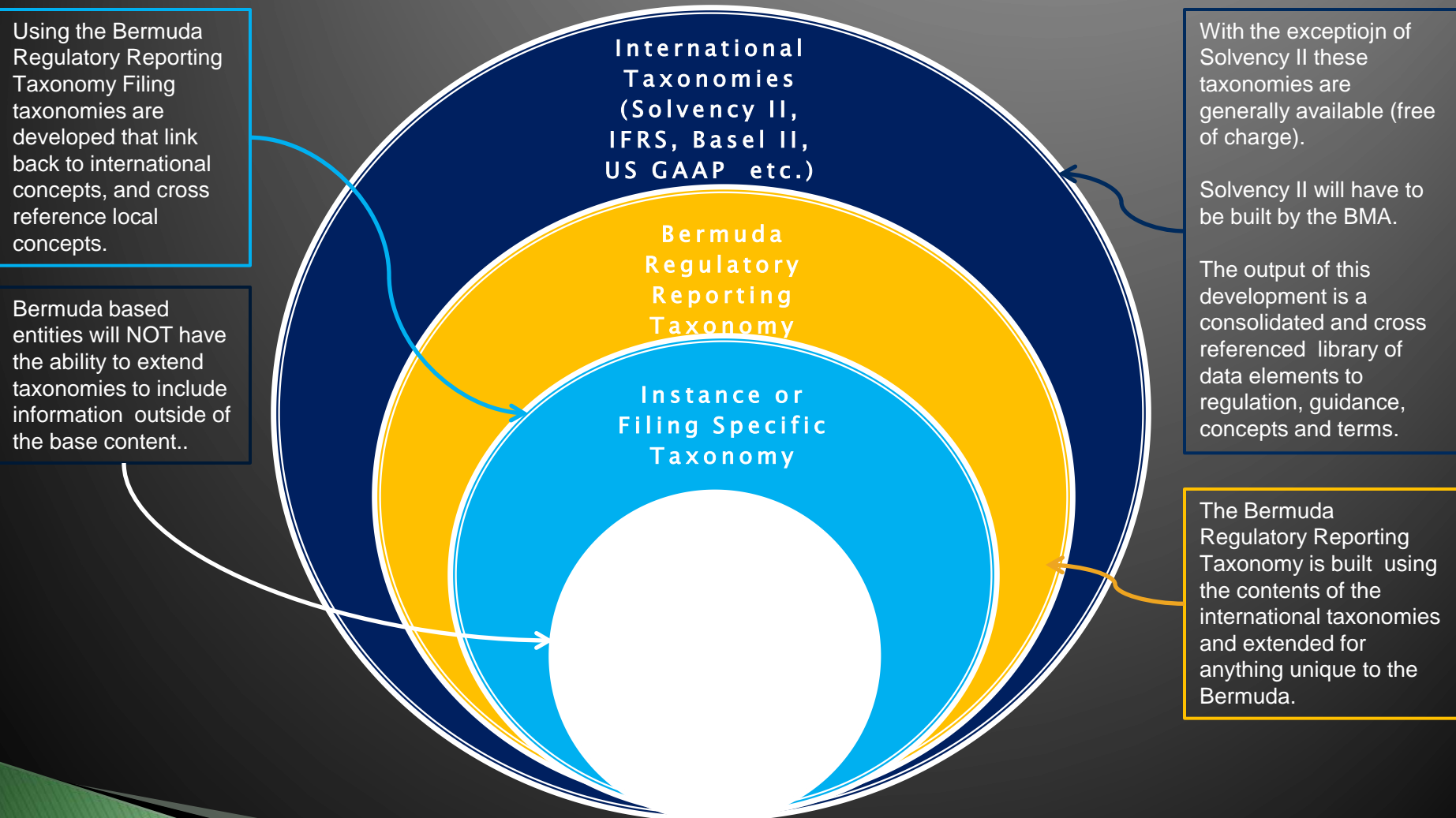
Project RAIN

Project RAIN Objectives

It is envisaged that Project RAIN will facilitate:

1. Improvements in the accuracy and quality of the Authority's information
2. A reduction in overall operational costs
3. An agile regulatory framework that is able to very quickly adapt to changing regulatory needs
4. Deeper intra-sector analysis as well as cross sector analysis;
5. Wider systemic modeling opportunities;
6. Reductions in the effort it takes to complete regulatory filings
7. Enhanced supervision
 - A. Shifting resources from front end data capture and routine analysis to more substantive analytical activities
 - B. Broader sector coverage and improved cycle times
8. Enhancement in the Authority's Business Continuity Position

BMA Taxonomy Development Approach



Current Adoption Approach

1. BMA provided XBRL enabled excel, word, and PDF templates and Web Interface



The BMA will provide submission options using the BMA RAIN portal and via XBRL embedded word documents, excel workbooks, and PDF templates

2. Bolt-on via Outsourcing or internal Utility



Printers and other third party service providers provide outsourced solution for mapping the disclosure elements on the financial statements and note disclosures (in block text) to the BMA Taxonomy

3. Bolt-on via Internal Process



XBRL can be adopted by companies at the “highest” reporting level (i.e. consolidated) solely for purposes of complying with regulatory requirements. However, potential XBRL process enhancement benefits are not fully realized.

4. Embedded Processes



- Enables automation of currently manual assembly and review processes
- Requires companies to assess information needs and provides an opportunity to eliminate inefficiencies in current compliance and reporting processes.
- Enables process enhancements that lead to more timely higher quality data for decision making purposes
- Maximizes benefits of XBRL to preparers and internal users of financial and non-financial information.

Accomplishments

2011

- ❖ BSCR Class 3A, Groups, Long Term, Dual License, CISSA
- ❖ Investment Funds
- ❖ Enhanced Bermuda Regulatory Reporting Taxonomy (BRRT)
- ❖ Solvency II Taxonomy
- ❖ IFRS for Insurance Taxonomy

Advancement

2010

- ❖ BSCR Class 4+3B
- ❖ Base Insurance Analytics Portal (Ratio Analysis)
- ❖ ERICA Core Development
- ❖ Base Bermuda Regulatory Reporting Taxonomy (BRRT)

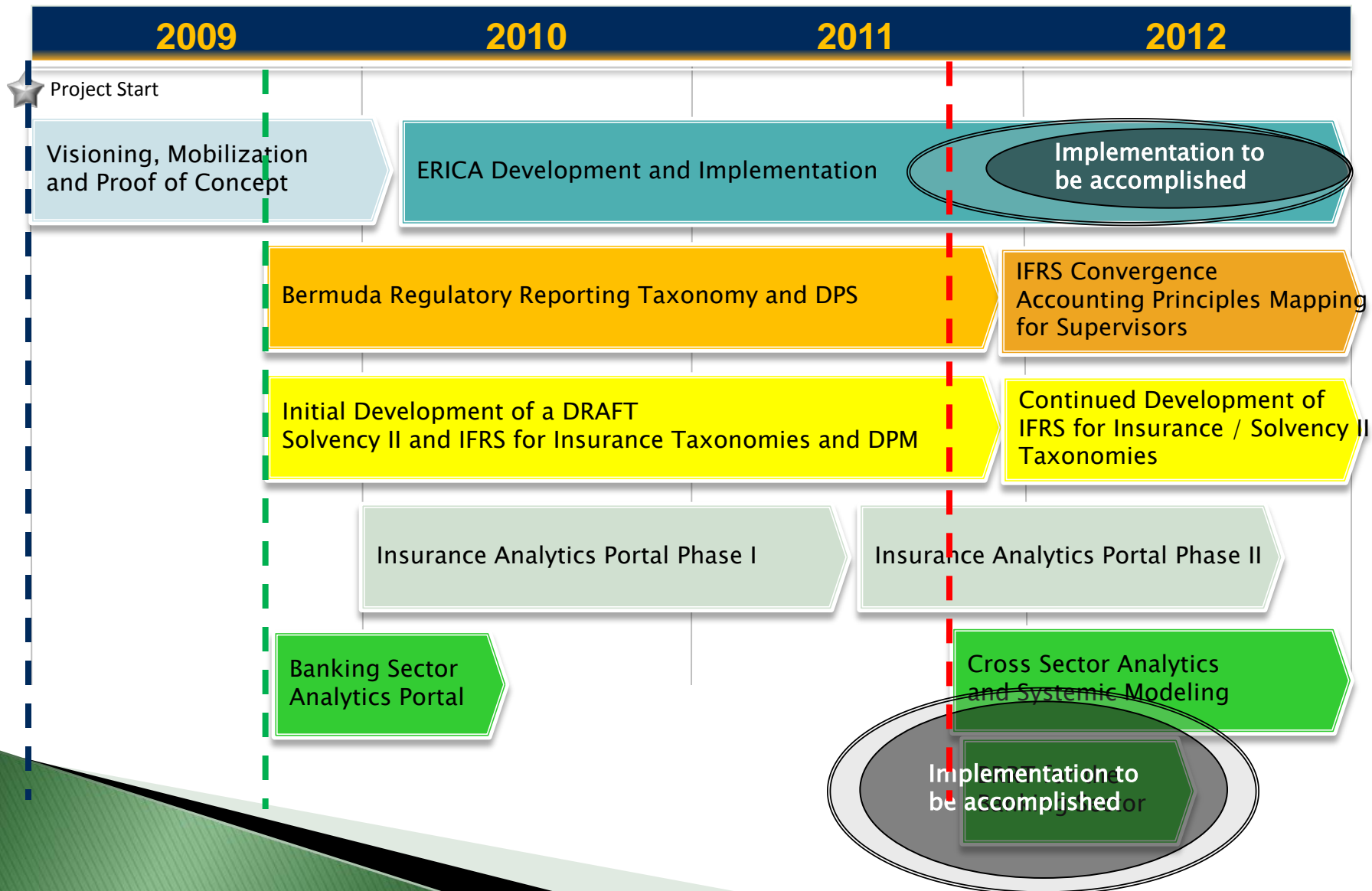
Positioning

2008/2009

- ❖ Infrastructure redevelopment
- ❖ Corporate Authorizations (Business Registry)
- ❖ Banking Sector Statutory Return (Basel II)
- ❖ Banking Digest (Analytics Portal)
- ❖ Team development
- ❖ IT Governance and Controls

Containment

Project RAIN Current Status



Project RAIN Milestone Map as at May 1, 2010

	Yr. 2010												Yr. 2011											
Project	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Economic Balance Sheet						DP			Market response on DP															
Eligible Capitals/Own Funds	Market response on CP							Trial Run Planning CA & CIB			Legislation Process	Legislation in effect for CA & CIB												
Standardized Capital Model (BSCR)				Trial Run on CIB		Report on Trial Run Results					Secondary Legislation CIB	Legislation in effect for CIB BSCR												
Internal Model	Cybernet started								CA Pilot Preliminary Report			CA Pilot completion			GN on CIB									
Long-term Business			Market response on DP	Data Call			DC Report	CP & Draft Legislation			Legislation Process													
Special Purpose Insurers																								
Code of Conduct, Governance and Internal Control		Update new Codes to BOP						New Codes in effect on July 1st																
Own Risk and Solvency Assessment (ORSA)				CP & Draft Legislation		Legislation Process						Legislation in effect for CA & CIB				Trial Run CA & CIB		Report on Trial Run Results						
Authorization*			Data Cleanup	Material Change Procedures written			GN on Material Change			Annual Update of Information Bulletin														
Disclosure and Transparency				CA/IB Annual Update in ORSA CP		Update included in ORSA Legislation						Legislation in effect for CA & CIB											Legislation in effect for CA & CIB	
Groups		CP	Primary Legislation	Primary Legislation in effect		Secondary Legislation Process		BMA OS on Group BSCR			Report on BMA OS	Secondary Legislation in effect for CA & CIB				Green Trial Run on CA & CIB								
Supervision			SUPV Staff Training on Groups	SUPV Staff Training on Code of Conduct		SUPV Staff Training on CA Internal Model					SUPV Colleges				SUPV Staff Training on Groups GAAP & IFRS Filing							SUPV Colleges	Completion of SUPV Staff Training on CA & CIB	
Enforcement and Approved Persons									CP & draft legislation		Legislation													
Advocacy		Receives response to CP 10	Launch Advocacy Website	Technical Meeting with CDOPS			Publish Revised Roadmap			Possible start of 3rd Country Assessment														
Scope/Equivalence		Internal Gap Report 1		First Draft of External Gap Report (By PoC)	Internal Gap Report 2	External Gap Report		Internal Gap Report 3			Internal Gap Report 4			Internal Gap Report 5			Internal Gap Report 6			Internal Gap Report 7		Internal Gap Report 8		
Training & Resourcing				Groups Training		Code of Conduct Training					LAA Workflow Tools Training			Market Training on Groups GAAP & IFRS Filing		Groups, CISA, BSCR Tools Training		Supervisory Workflow Training						
Implementation (Project RAIN enfling)			BSCR CA & CIB			Solvency II Taxonomy started	Internal Module Infrastructure	Taxonomy Library and Data regeneration	Taxonomy Recalculation Process Started			LAA Workflow	Groups 4+ IB Long Term, CISA 4+ IB			Groups 3A+Cap, BSCR 3A+Cap, CISA 3A+Cap	Supervisory Workflow					Risk, Capital & Solvency Ad Hoc Analysis		
Commercial 3As (part of Authorization Project)		Initial Market Census		CP on ORSA Like	BSCR-SME Data Call	DC Report, CP on BSCR-SME					Market response on BSCR-SME CP		CP on Groups & Enhanced Disclosure				Trial Run on BSCR-SME & CISA Like		ICM GN Report on BSCR & CISA Like Trial Run Results			BSCR-SME Legislation Process	BSCR-SME & CISA Like Legislation in effect	
Banking							Workflow Tool RFP Closed	Workflow Tool Implement	Workflow tool Technical Training		Tools Training RTI	PR				Tools Training Supervisory Process	Building Supervisory Process Workflow						Risk, Capital & Solvency Ad Hoc Analysis	
Collective Investments					DP	CP Issued			CP Pilot		NAV, QIL Trust					Tools Training Supervisory Process	CIS & Trust Supervisory Process Workflow	Building Submitt					Risk, Capital & Solvency Ad Hoc Analysis	
AML/ATF		Need Matrix, Investment Signs, Tool	Non-Licensed, Insurance,	Investment Operations, Banks, Money Service Providers																				
Corporate Authorization										Corporate Auth. Webdevelopment						Corporate Auth. Submitt								

Remarks:

GN = Guidance Note

Comm = Communication

ICM = Internal Capital Model

DP = Discussion Paper

DC = Data Call

CISA = Commercial Insurer Solvency Assessment

CP = Consultation Paper

QIS = Quantitative Impact Study

RED = Supported by RAIN Phase I

RED = Supported by RAIN Phase II

RED = Supported by RAIN Internal Models



Project Portfolio Management (PPM)

- PPM is the process and framework to maximize the value of a collection of projects (the portfolio) for an acceptable level of risk
- Leading enterprises are adopting portfolio management techniques to gain benefits
- Project portfolio management (PPM) is a 5-step process for prioritizing and managing a collection of initiatives



- Process is not purely sequential, but has feedback loops throughout



Step 1: Define proposed investments in a comprehensive, uniform format



- Determine whether to use one- or two-stage evaluation
- Gather comprehensive data about each proposed and current investment and document using a uniform format

PRELIMINARY PROPOSAL

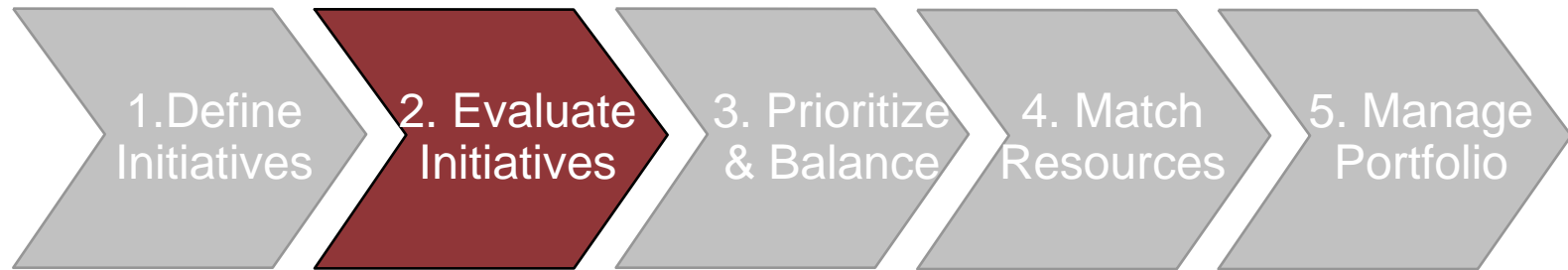
1. Project name/description
2. Business need/objectives
3. Project sponsor
4. Rough cost estimates
5. Rough benefits estimates
6. Fit with business/IT strategies

BUSINESS CASE

1. Project name/description
2. Business need/objectives
3. Project sponsor
4. Alternatives
5. Assumptions
6. Cost estimates
7. Benefits estimates
8. Fit with business/IT strategies
9. Implementation strategy
10. Infrastructure requirements
11. Risk factors
12. Project schedule



Step 2: Create an objective framework to make prioritization decisions



- Use logical investment categories to allocate resources
- Choose clear, objective evaluation criteria
- Factor-in risk so initiatives can be compared fairly



Use clear, objective evaluation criteria

- Use a combination of financial and non-financial measures



Focus area	Evaluation criteria	Definition
Value	Business value	The expected business benefits of the investment, usually expressed by business value metrics, such as time-to-market, customer satisfaction, product quality
	Financial return	The expected return from the investment; usually a calculation based on the degree to which the planned benefits exceed the estimated investment cost
Alignment	Strategic fit	Degree to which the investment supports the enterprise's strategic business objectives
	Technical fit	Degree to which the investment fits with the enterprise's technical architecture
Risk	Implementation risk	The risk of implementation being more expensive or taking longer than planned, or of not completing
	Operational risk	The risk of not getting the planned benefits from the investment
Other	Resource Availability Implementation schedule Cash flow requirements	



Use clear, objective evaluation criteria

(cont'd)



- Use traditional financial measures as one of multiple criteria

Measure/Format	Definition	Desired Outcome	Pros	Cons
Return on Investment (ROI)/ Percent	Comparison of total return to total outlay	Higher than equivalent risk investment	Simple to compute and understand	Does not indicate the magnitude of the investment Ignores time value of money
Payback Period/ Months/Years	Elapsed time until outlay is paid back	The shorter the better	Simple to compute and understand	Ignores time value of money
Net Present Value (NPV)/ Cash Amount	Current value of future cash flows discounted at risk-adjusted cost of capital	Above 0, the larger the better	Indicates the magnitude of the return Recognizes the time value of money	Poor measure when investment may have a wide array of outcomes
Internal Rate of Return (IRR)/ Percent	Rate of return from future cash flows	Higher than risk-adjusted cost of capital	Recognizes time value of money	Does not indicate the magnitude of the return

- **Cost estimates should cover full life-cycle costs**
- **Maintain a project repository**

Use clear, objective evaluation criteria (cont'd)



- Use traditional financial measures as one of multiple criteria

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- Ensure cost estimates cover full life-cycle costs
- Maintain a project repository

Factor-in risk so initiatives can be compared fairly

- A uniform set of risk types is useful for scoring

Types of risk	Definition
Business/ Economic	Risk that business changes sufficiently so that planned benefits are not attained or the initiative is not used
Organizational	Risk that organizational changes preclude the full use of and benefit from the project
Technological	Risk that the technology selected does not live up to expectations or is not well-suited to its intended use
Execution/ Implementation	Risk that the organization cannot implement the project on time and within budget, or that it fails to develop a workable solution
Complexity	Risk of failure due to the magnitude of the complexity involved because of its scale, the degree of change require, or the number of parties involved
Operational	Risk that the operating costs of the new system grow to be uneconomic

- **Many techniques are available for factoring risk into the evaluation process, as well as for mitigating risk**



Step 3: Prioritize initiatives...



- Investment categories can be used to group initiatives with similar characteristics
- Scoring model should reflect management

Evaluation Criterion	Score	Weight %	Weighted Score
Return on investment	8	50	40
Strategic fit	7	30	21
Probability of success	5	20	10
Project Score			71

Step 4: Match prioritized initiatives to resources and reprioritize



- Match initiatives to resources until the resources are exhausted

Initiative Name	Weighted Score	Estimated Cost (\$ M)	Cumulative Cost (\$ M)
Initiative M	Mandatory	2	2
Initiative F	80	25	27
Initiative C	74	11	38
Initiative J	71	31	69
Initiative A	60	9	78
Initiative E	53	13	91
Initiative D	50	20	111

New initiative budget: \$80M

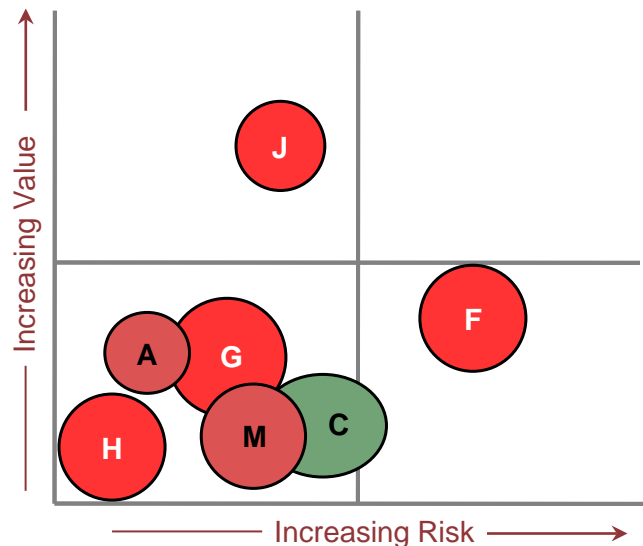
Deferred initiatives

- Put remaining projects “on hold” for future review or consider adding external resources
- Re-schedule to accommodate other constraints

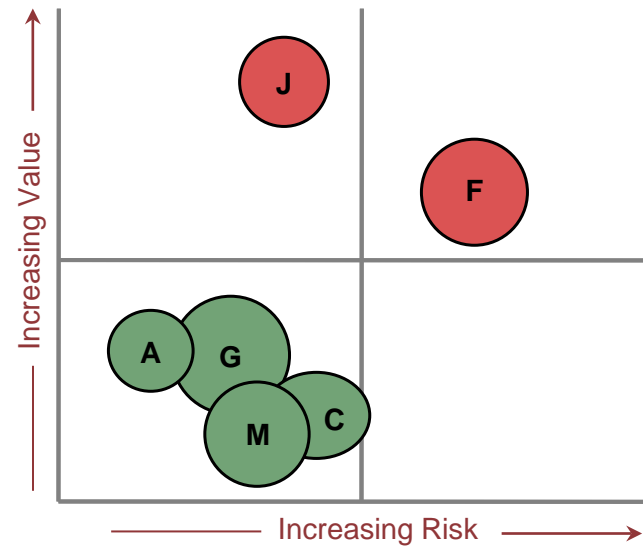
Step 5: Actively manage current portfolio toward target state

5

- Manage portfolio to optimize the return for an acceptable level of risk



As-Is Portfolio



Target Portfolio

Size of circle = Project cost

Color = Project health ● On target ● At risk ● In trouble



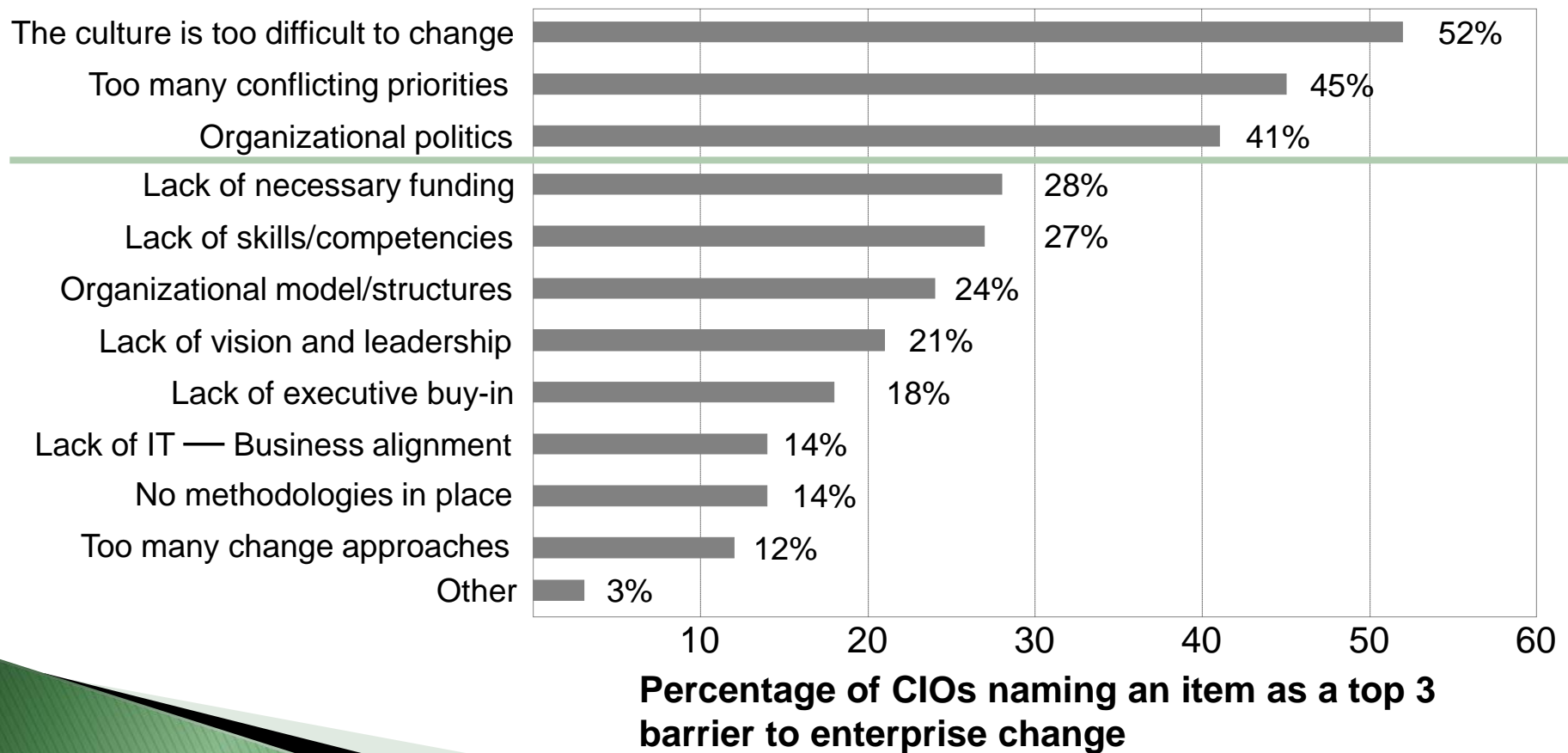
Key Considerations

1. Establish governance and clear accountabilities
2. Allocate sufficient resources to support the process
3. Ensure the process is disciplined, consistent, and sustained
4. Develop an objective prioritization framework
5. Maintain communication and education programs
6. Support decision-making with tools that make compliance easier



CIOs Understand That the Biggest Barriers are on the 'Soft Side,' but They Need to do More About It

CIO views on the barriers to enterprise change

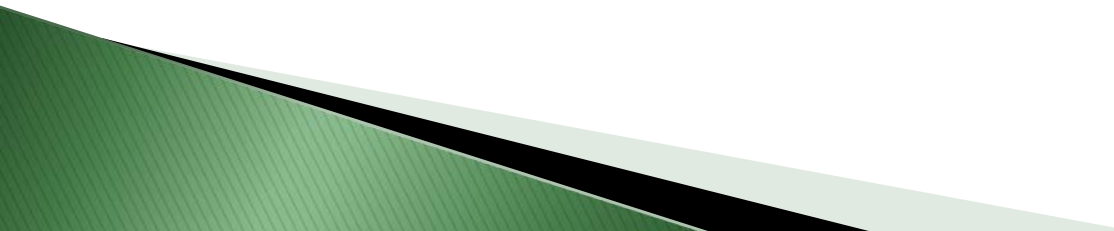




Findings

- ▶ CIOs know that the "soft side" change issues are the toughest, and it's the thing they're putting the least effort into.
- ▶ Soft side issues are predictable, so they can be managed — CIOs must learn to do so.

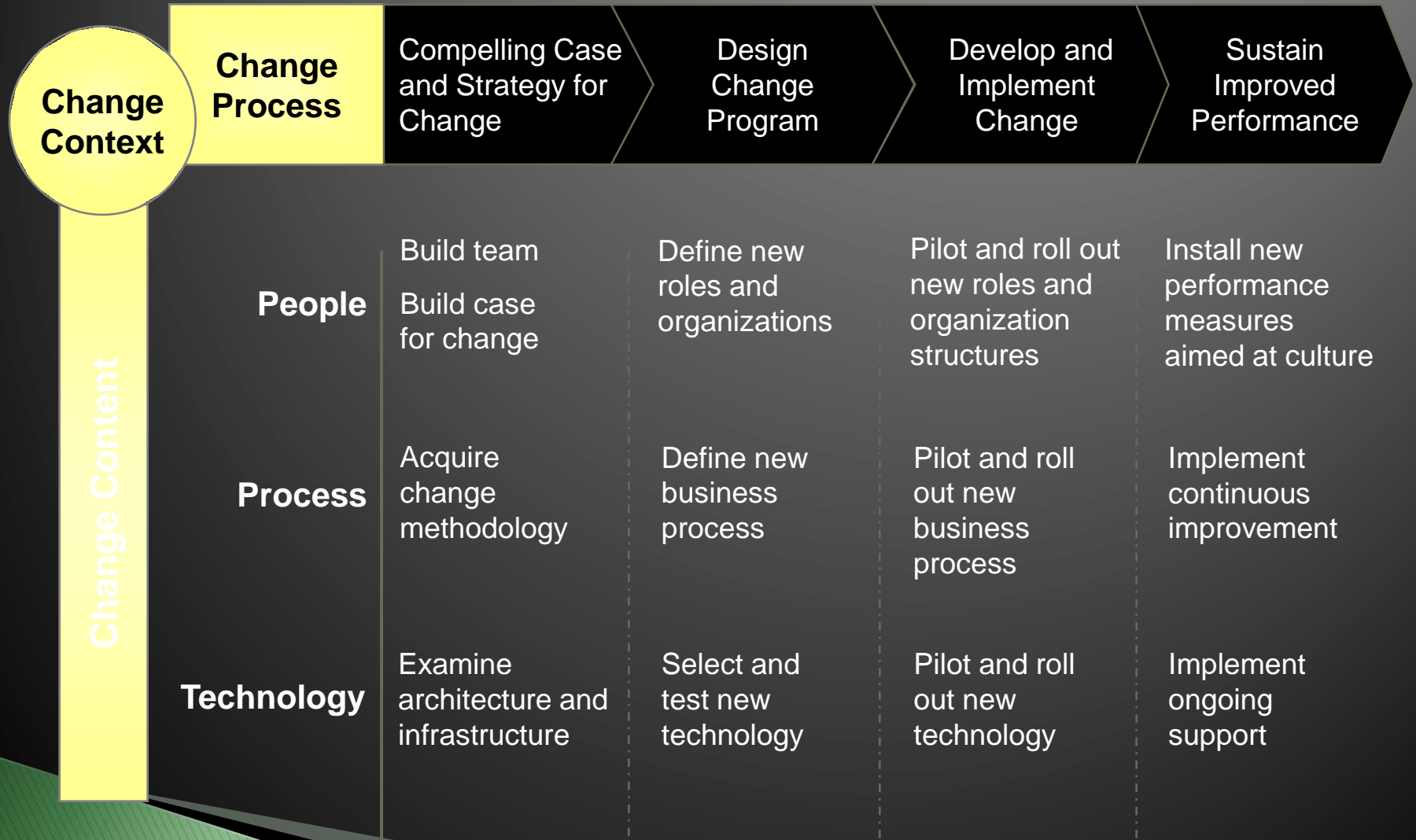
Client Issues

- ▶ 1. What capabilities must CIOs acquire to succeed in enterprise change?
 - ▶ 2. What kinds of teams must CIOs build to succeed in enterprise change?
 - ▶ 3. How should CIOs communicate about enterprise change, within and outside the IS organization?
 - ▶ 4. What steps should CIOs take to overcome change obstacles and ensure that the enterprise sustains its ability to change?
- 

“Nothing is easy to the unwilling.”

▶ – Thomas Fuller

Leading Change Involves Leading Change Processes, Content and Context



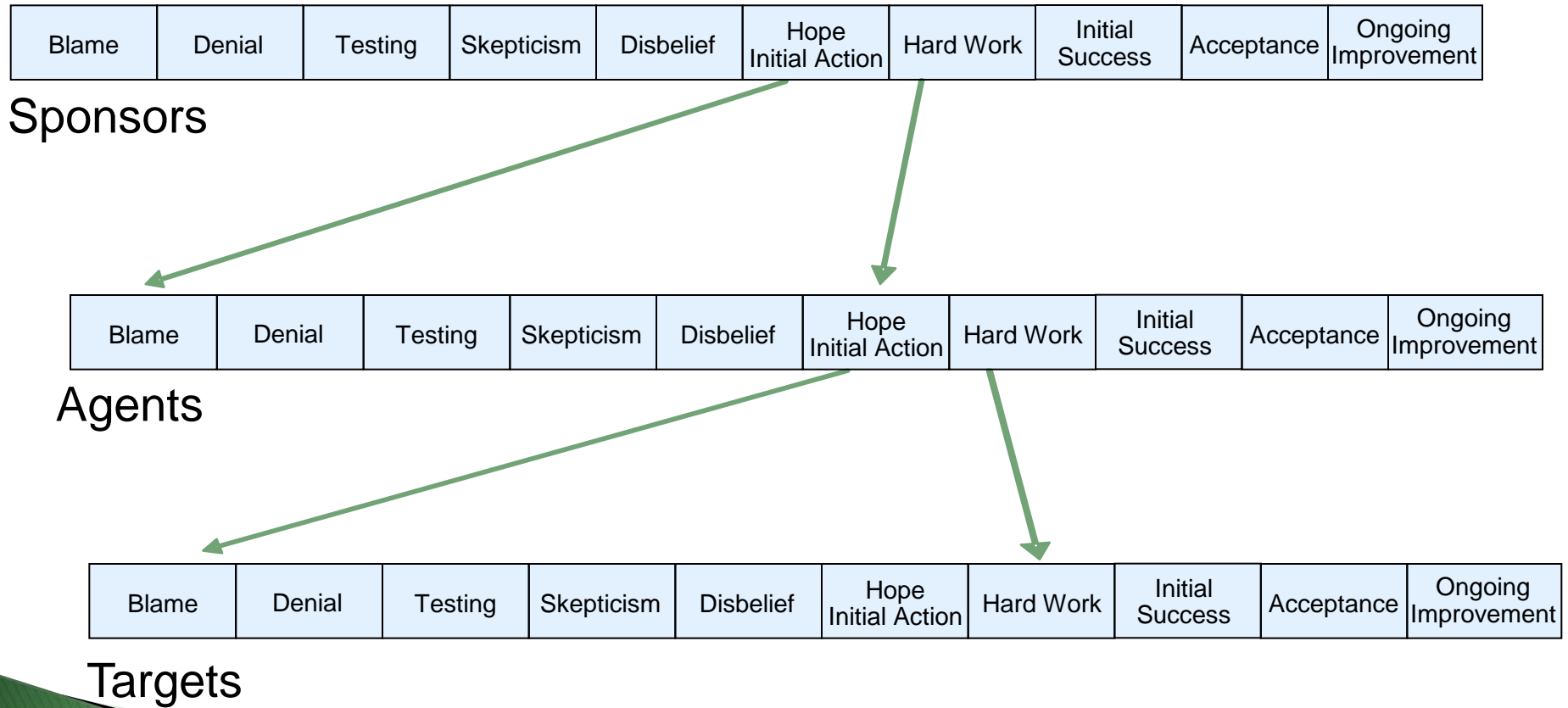


Participants in Enterprise Change Follow a Predictable Cycle of Change Resistance and Adoption

Stage	The Enterprise Context	Struggle	The Individual Response
1	Something is wrong in the enterprise.	Blame	"Yes, but its not my fault, 'they' caused it, let 'them' change.
2	Something has to be done.	Denial	"Oh, the problem is not that bad. We are doing the best we can and changing would not make it better."
3	Doing something will be hard work, there is not quick fix to address the issue.	Testing	"I am lost. I know we have to do something. I don't know how to change."
4	We have an idea that could work if we give it a chance. It's new so we are going to have to change.	Skepticism	"This is not new. I can wait it out. If I ignore it then it will go away.
5	Making this change is a priority even thought it will create some discomfort.	Disbelief	"I do not believe that this change is for real, even if others do. If it does not work out, how will it impact me?"
6	The enterprise is committed and ready to dedicate resources to implementing the change.	Hope Initial Action	"I am willing to go along, now that I can see the commitment. I hope that there will be follow-through."
7	The enterprise is taking action to implement the change and new responsibilities are clear and supported.	Hard Work	"This is not a temporary thing. I'll need to invest in learning new tools, skills and behaviors — I'm changing."
8	The early actions are yielding results. The enterprise is putting more resources behind the effort.	Initial Success	"It's working because I am part of the change. I am willing to accept additional levels of change.
9	The enterprise is making its business case for change and new ways of working are becoming standard.	Acceptance	"This is going to work and I am part of that success!"
10	The enterprise is learning from its results and making continuous improvements.	Ongoing Improvement	"I knew it could be done, I am part of the success and I am ready to change to make things better."



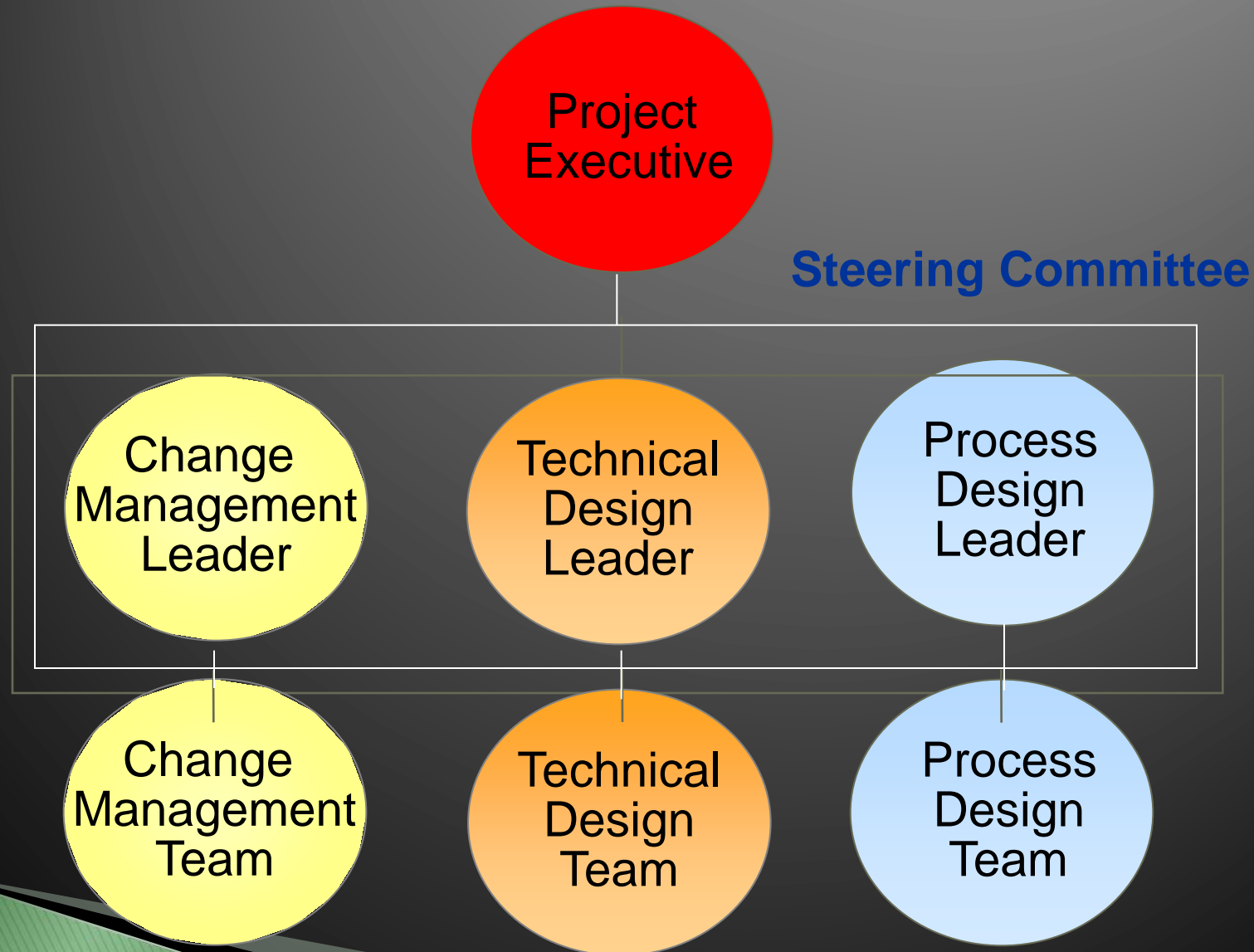
Sponsors, Agents and Targets Progress Through the Change Struggles at Different Times and Rates



▶ “Never doubt that a small group of thoughtful, committed citizens can change the world.”

▶ – Margaret Mead

CIOs Build a Multi-Disciplinary Team, Drawing on Resources Within and Outside IS



▶ “Some people change when they see the light, others when they feel the heat.”

▶ – Caroline Schoeder



Create a Communication Plan Keyed to the Change Struggles

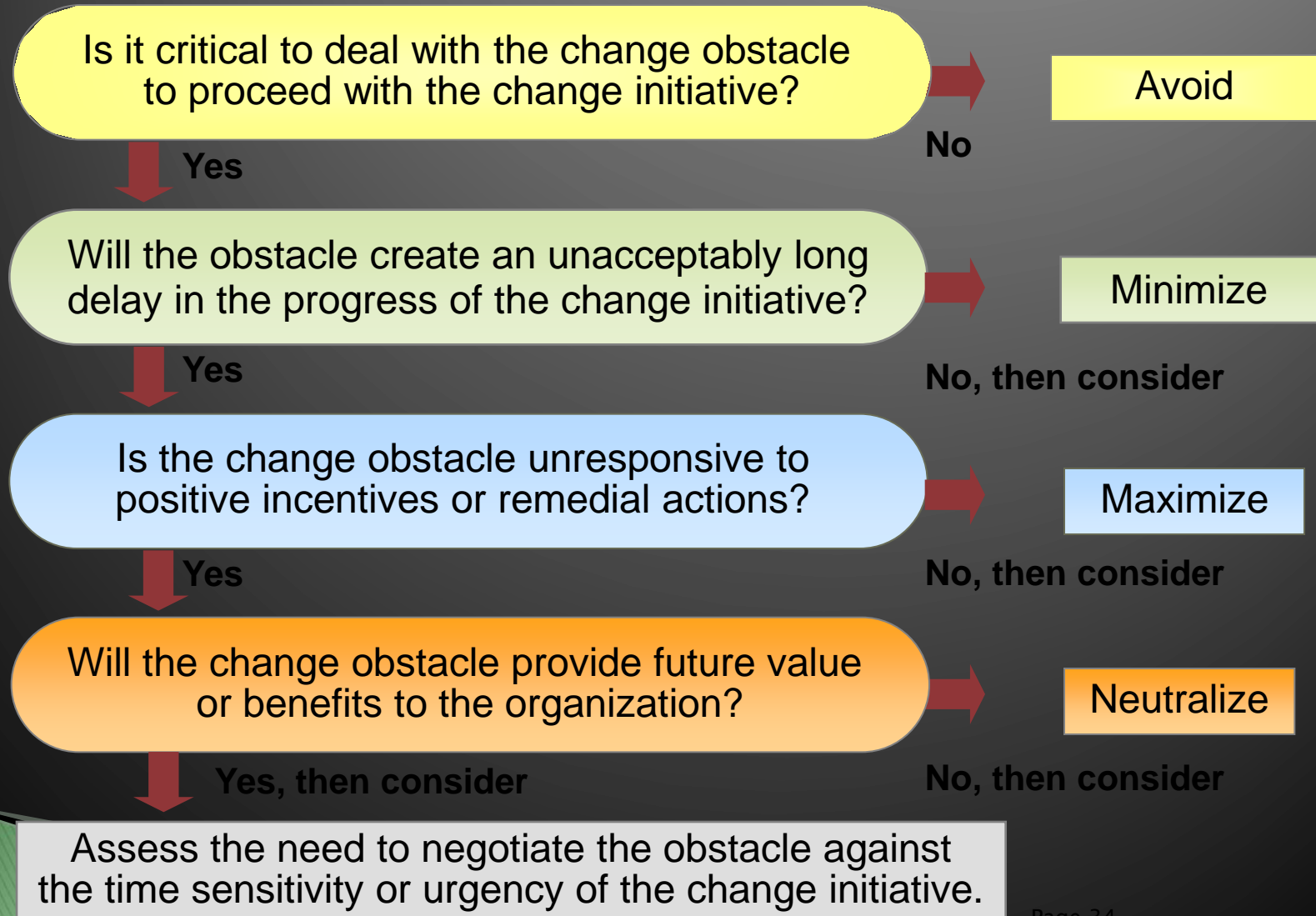
Change Struggle	Audience	Messages	Who Delivers	Channel	When Delivered	Primary Feedback Mechanisms	Supporting Materials	Accountability for Messages and Collateral
Denial	BU, department, team levels	"There is no alternative to change. All of us must be ready to change, including you and me. We will work together to define change. The results we're seeking are...The overall plan is..."	Sponsor; BU and departmental leaders; CIO	BU and departmental presentations and forums ATC, e-mail, Web site	First 60 days	Live feedback, E-mail drop for BU management, Web site	Corporate performance data, presentations	Executive team, BU leaders, CIO
	Key individuals	"You are important to our success, and we will help you succeed. Here's the role we want you to play. Are you on board?"	BU, departmental team leaders	Personal conversations	First 60 days	Personal conversations	List of key individuals	BU, departmental team leaders



Negotiate Obstacles to Change Using Four Strategies and Tactical Toolsets

Strategy	Tactics	Risks	Implications
Avoid	Communicate and Plan: Create a stakeholder map to identify potential allies, neutrals and challengers in advance.	Don't mistake an individual's enthusiasm for ability to support the change initiative.	Stakeholders may begin as allies, neutrals and challengers, but may shift positions over time. Monitor support as it evolves.
Minimize	Use "Carrots": Use performance management programs and metrics to drive change.	Performance management programs can create a negative "punishment" culture when over-applied.	Reward systems must be used in conjunction with other tools to generate high performance.
Maximize	Influence: Use influential allies to help drive the change effort throughout the organization.	Know when it is no longer possible or advisable to convert challengers to allies.	Decide how much support for the change effort is "enough."
Neutralize	Apply "Sticks": Fire or move personnel who actively resist the change program.	Elimination of staff can create a negative tone in organizations when over-applied.	Strong action is sometimes required to demonstrate the CIO's determination to proceed with the change program.

The Nature of the Obstacle and the Desired Rate of Change Determine Your Obstacle Strategy



- ▶ “If you focus on results, you will never change.
- ▶ If you focus on change, you will get results.”

▶ – Jack Dixon

- ▶ “When the music changes,
 - ▶ so does the dance.”

- ▶ – African proverb



Look Before You Change

Leadership

- Executive team members have committed personal and corp. resources to change ☐
- Executive team has articulated clear external case for change throughout enterprise ☐
- Desired outcome (response to external case) is clearly defined ☐
- CIO role is agent unless CIO has support of exec. team and necessary authority to sponsor ☐

Business/IT governance

- Governance arrangements cover all organizational units affected by change ☐
- Affected managers at enterprise and BU levels are active participants in governance ☐


Team

- “A” business and IT players are assigned full time to team ☐
- Influential supporters and resisters are identified at every level ☐
- Team includes experienced internal or external change management experts ☐

Methodology

- Change plan is based on tested change methodology whose scope includes systems, processes, and people ☐
- Two-way communication plan based on change struggles is in place ☐

Recommendations

- Start focusing on the soft side — it is the weakest link for most CIOs
 - Understand your role in enterprise change — choose wisely
 - Build a team with process, technical *and change* expertise
 - Expect obstacles and resistance and plan for them
 - Use communications targeted to the change struggles
 - Build a permanent home for enterprise change expertise
- 

Discussion



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