Moving Beyond Risk Assessment: Measuring the Effectiveness of Risk Mitigation Strategies

2024 Compliance Symposium Texas Tech University Health Sciences Center

Christine Packard Assistant Vice President, Enterprise Risk Management





- Overview of the University of Massachusetts System
- Overview of UMASS Systemwide ERM Program
- Moving Beyond Risk Assessment
- Overview of Mitigation Assessment
- Conclusion and Take Aways
- Questions?

About UMass

- Ranking
- Campuses
- Students
- 74,000 students

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- **New Graduates**
- Alumni
- Employees
- Research
- Budget

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\$813M

3rd largest in MA ٠

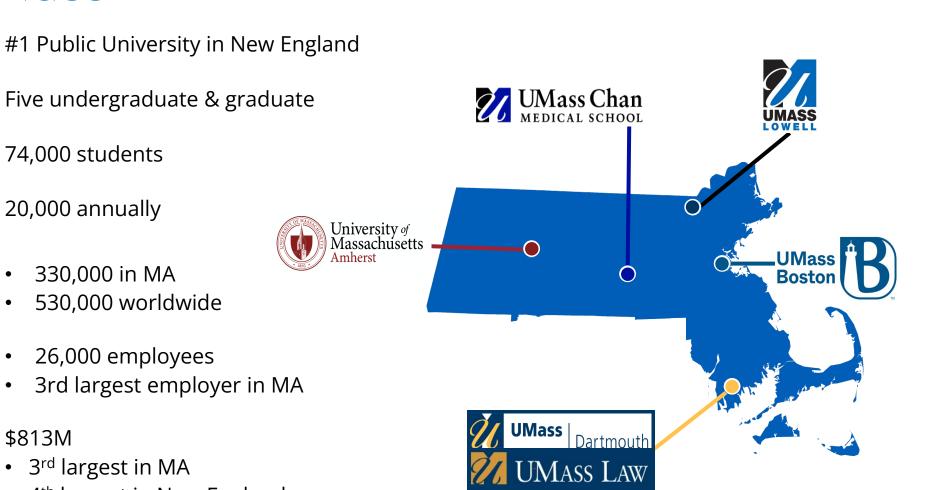
20,000 annually

330,000 in MA

530,000 worldwide

26,000 employees

- 4th largest in New England
- \$4.3B annually



Economic Impact \$8.3B across Massachusetts

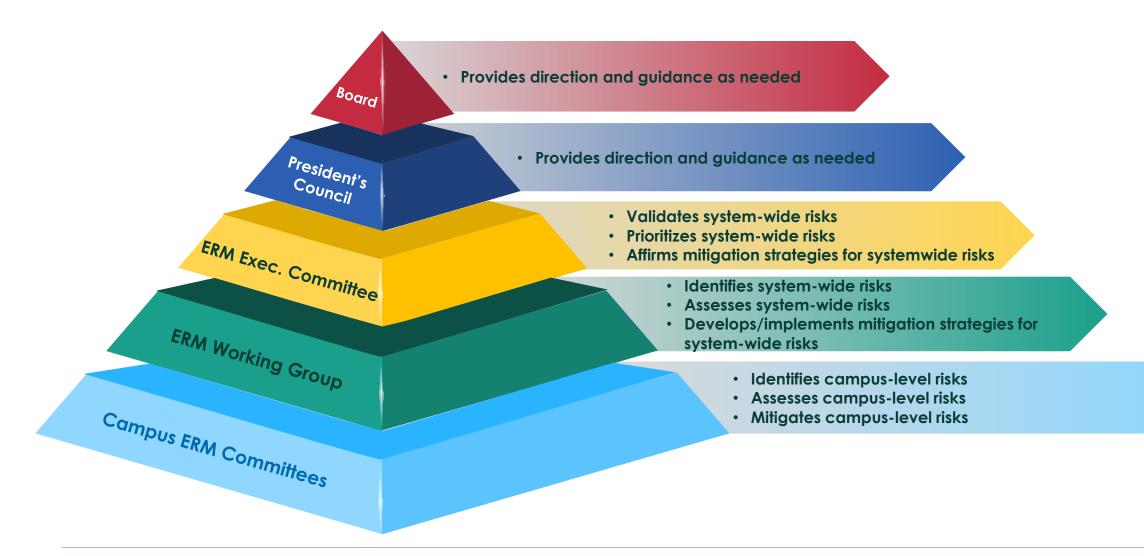
UMass Systemwide Enterprise Risk Management Program

Program Structure

University of Massachusetts

Footer as Needed

<u>UMass ERM Governance Structure</u>



<u>Two-Year ERM Program Cycle</u>



How the Systemwide ERM Program Functions

- Identify and assess risks with systemwide implications
- Support informed decision-making
- Facilitate systemwide coordination on risk identification and assessment
- Assist in identifying risk owners
- Facilitate coordination of mitigation activities for crisis response
- Facilitate the assessment of effectiveness of mitigation activities on risk



- Own risk
- Own risk mitigation strategies
- Implement risk mitigation strategies
- Own compliance review or monitoring
- Own campus ERM programs or plans

UMass Systemwide Enterprise Risk Management Program

Risk Assessment Process

University of Massachusetts

Footer as Needed

<u>Risk Assessment Process</u>

- Focused on systemwide impacts
- Evaluates inherent exposure* of the University to the risk
- Rates risks across three factors
 - <u>Likelihood</u>*: Could the University system experience this risk?
 - <u>Consequence</u>*: How much would the University system be impacted by this risk?
 - Service/Operations Disruption
 - Financial
 - Legal/Compliance

- Workforce
- Reputation
- Life Safety
- <u>Urgency</u>: How soon does the University system need to prioritize this risk?
- Generates an Inherent Risk Score for each risk

*Risk assessment does not account for mitigation strategies in the evaluation of likelihood and consequence

Could the UMass system experience this risk?

Rating Value	Rating	Description		Probability of Occurrence		Rate of Occurrence
4	Certain or Almost Certain	HIGH Almost certain to occur, expected in most circumstances	OR	>75%		more than 2x per year
3	Likely	MEDIUM HIGH Likely to occur or will probably occur		50 to 75%	OR	1-2x per year
2	Possible	MEDIUM Possible, this could occur				once every 2-5 years
1	Unlikely	LOW Unlikely, not expected to occur		Up to 25%		more than 5 years

<u>Consequence Factor</u>: Assessed by the ERM Working Group

How much would the UMass system be impacted by this risk?

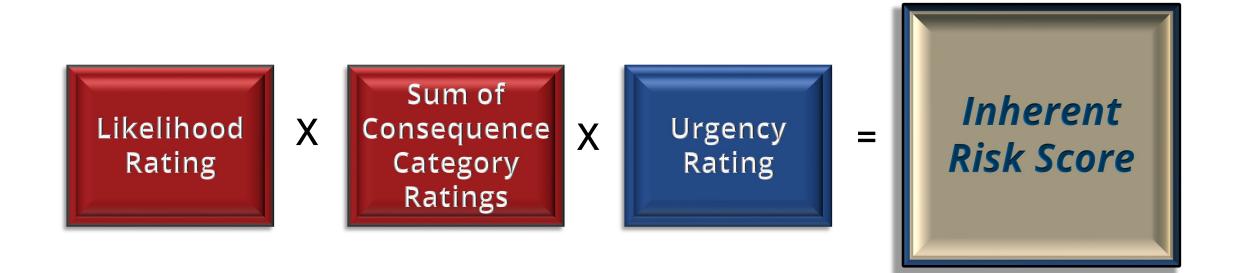
Rating Value	Rating	Service Disruption, Process Impact on Operations	Financial Impact	Legal / Compliance	Workforce	Reputation	Life Safety
			State appropriation reduction of more than 15 percent	Increased state or federal regulatory scrutiny for additional campus(es)	Inability to recruit or retain employees with essential knowledge, skills and abilities	Negative national media coverage or negative social media activity ("viral") for multiple days	
	High	Serious disruption to or failure of service AND/OR	AND/OR Loss of revenue or increase in expenses of greater than 15 percent or combination of both	AND/OR External agency sanctions such as debarment or civil and/or criminal liability	AND/OR Work culture is defined by excessive internal conflict or widespread negativity	AND/OR Tangible, long-term impacts to enrollment (more than one cycle), philanthropy and	Fatality or permanent
		Significant impacts to more than two campus	AND/OR Need to use stabilization fund	AND/OR Litigation exposure with significant financial (\$10M+), reputational or precedent exposure	AND/OR Inability to collaborate across the system or limited information sharing and cooperation	public support <i>AND/OR</i> Significant personnel actions	disability of one or more people
			AND/OR Impacts to all campuses	AND/OR Substantial audit findings	AND/OR Low level of trust among colleagues	AND/OR Widespread internal reaction	
			State appropriation reduction of 10-15 percent	Restrictions or requirements placed on the University's operational activities	Difficulty recruiting or retaining employees with essential knowledge, skills and abilities	Negative regional (northeast) media coverage or some negative social media	
3	Medium	Moderate disruption to service	AND/OR Loss of revenue or cost increase of 5-10 percent, or combination of both (est.	AND/OR Substantial (\$1M+) regulatory fines and/or response costs	AND/OR Work culture experiences frequent internal conflict or significant	activity AND/OR Tangible, short-term impacts to enrollment	Serious injury of one or more
		Significant impact to one campus	\$175M - \$350M) AND/OR	AND/OR Moderate audit findings	AND/OR Significant obstacles to system-wide collaboration	(one cycle), philanthropy and public support	people
			Impacts to BDL or UMA or UMMS	AND/OR Litigation with substantial financial (\$1M - \$10M), reputational or precedent exposure	AND/OR Decreased information sharing in many circumstances	AND/OR Significant internal reaction	
				Regulatory fines (less than \$1M)	Minor impact to recruitment or retention		
		Minor impact on service AND/OR	Between \$5M and 1 - 5 percent revenue loss or expense increase or combination of both (est. \$5M to \$175M impact)	AND/OR Minor audit findings AND/OR	AND/OR Work culture experiences some internal conflict or negativity	Negative local media coverage or minimal social media activity	Minor injury to
2	Low	Some impact to more than one	AND/OR	Litigation with financial (less than \$1M), reputational or precedent exposure	AND/OR Challenges with system-wide collaboration	AND/OR Moderate on-campus/internal reaction	more than one person
	campus	Impacts to up to two campuses	AND/OR Internally-imposed consequences or requirement for formal corrective action	AND/OR Decreased information sharing and cooperation in limited circumstances	moderate on-campus/internal reaction		
1 Negligible				No to minimal impact to recruitment or retention			
	Negligible	Annoyance	Less than \$5M impact	No to minimal impact	AND/OR No to minimal impact to workplace culture	No to minor internal reaction	No impact or minor injury to individual
				AND/OR No to minimal impact to system-wide collaboration or information sharing		marriadal	

<u>Urgency Factor</u>: Assessed by ERM Executive Committee

How soon does the UMass system need to prioritize this risk?

Rating Value	Rating Timeframe			
3	High	Within the next 12 months		
2	Moderate	1-3 years		
1	Low	More than 3 years		

Inherent Risk Score Calculation



Assessed by ERM Working Group

Assessed by ERM Executive Committee

FY 2024 Systemwide Risk Registry

Priority Risks

Rank	Risk	Rank	Risk	Rank	Risk
1	Enrollment	11	Information Privacy	21	Alcohol and Substance Abuse
2	Information Security	12	All-Hazards Planning and Response Capabilities	22	Fraud, Waste, Abuse
3	Facilities and Deferred Maintenance	13	Labor Relations	23	Crisis Communication Coordination
4	Financial Sustainability	14	Data Management	24	Uninsured Loss
5	Student Health & Mental Health Support	15	Vendor Risk Management	25	Multi-State Payroll Taxation
6	Artificial Intelligence	16	Sexual Assault Policies and Response Procedures	26	Multi-State Business Taxation
7	International Activities	17	NCAA Regulations	27	Employment Laws and Regulations
8	Research	18	IT Disaster Recovery	28	Policies/Procedures Regarding Minors on Campus
9	Diversity, Equity, Inclusion and Accessibility	19	Continuity Planning	29	Academic Quality and Standards
10	Attract, Recruit, Retain Faculty and Staff	20	Environmental and Public Health, & Safety Regulations	30	Oversight of Student Organizations

Using Risk Assessment Data

FY24 Risks Ranked Based on Highest Legal/Compliance Exposure

Listed by highest legal/compliance exposure, then by Inherent Risk Score; priority/top 10 risks bolded/italicized

High

- Information Security
- Research
- Diversity, Equity, Inclusion & Accessibility
- Employment Laws & Regulations
- Academic Quality & Standards

Medium

- *Facilities & Deferred Maintenance*
- Student Health & Mental Health Support
- ArtiJ cial Intelligence
- International Activities
- Information Privacy
- All Hazards Plans & Response Cap.
- Vendor Risk Management
- Sexual Assault Policies & Response Procedures
- NCAA Regulations
- Env. Health, Pub. Health, & Safety Regs
- Alcohol and Substance Abuse
- Fraud, Waste, and Abuse
- Multi-State Payroll Tax
- Multi-State Business Tax
- Policies/Procedures Minors on Campus

Low/Negligible

- Enrollment
- Financial Sustainability
- Attract, Recruit, Retain Faculty/StaÏ
- Labor Relations
- Data Management
- IT Disaster Recovery
- Continuity Planning
- Crisis Communications Coord.
- Uninsured Loss
- Oversight of Student Organizations

UMass Systemwide Enterprise Risk Management Program

Moving Beyond Risk Assessment

Moving Beyond Risk Assessment

- Understanding risk exposure is very beneficial
- Equally important if not more so is understanding:
 - What are we doing about our risk exposure?
 - How effective are those risk mitigation strategies in reducing our risk exposure?

Goals of the Mitigation Assessment Program

- Document risk mitigation strategies for *transparency*
- *Correlate* assessment of risk mitigation strategies to a risk's assessed inherent risk exposure
- Demonstrate the impact of mitigation strategies on risk exposure

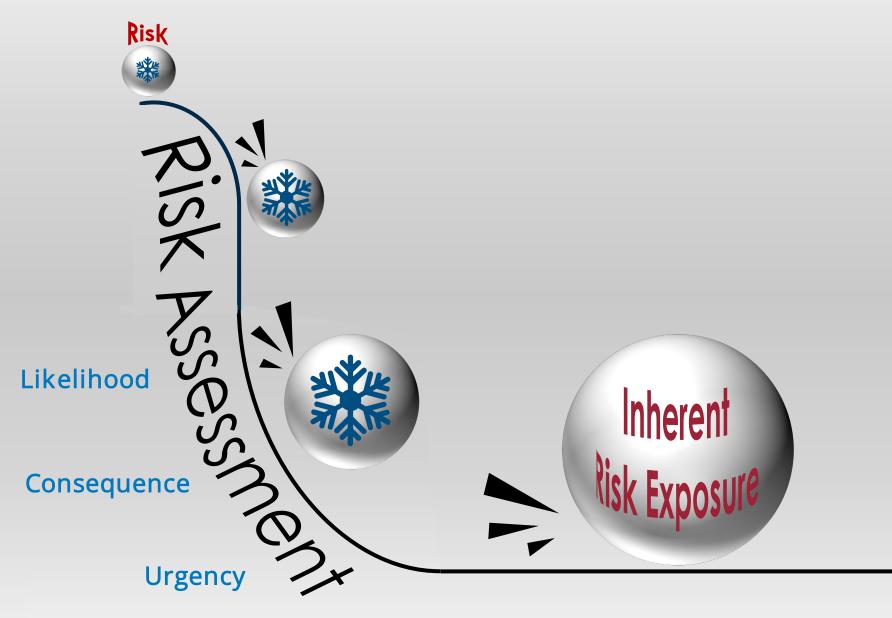
Transparency

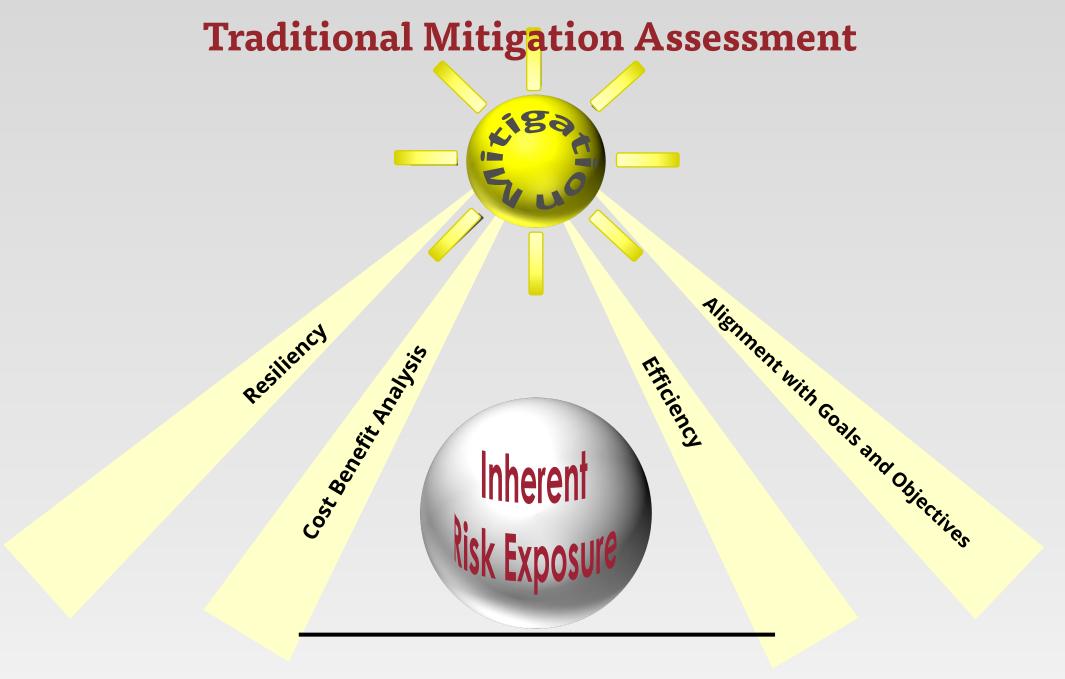
- Create a common operating picture for the University system
- Increase awareness of the University's risk exposure and risk mitigation strategies
- Ground-truth the degree of risk exposure

Correlation

- Traditional mitigation assessment considers important organizational factors, but these factors do not directly correlate to risk exposure
- Need to identify the impacts mitigation measures have in reducing the exposures identified in the risk assessment process

Assessment of Risk Exposure

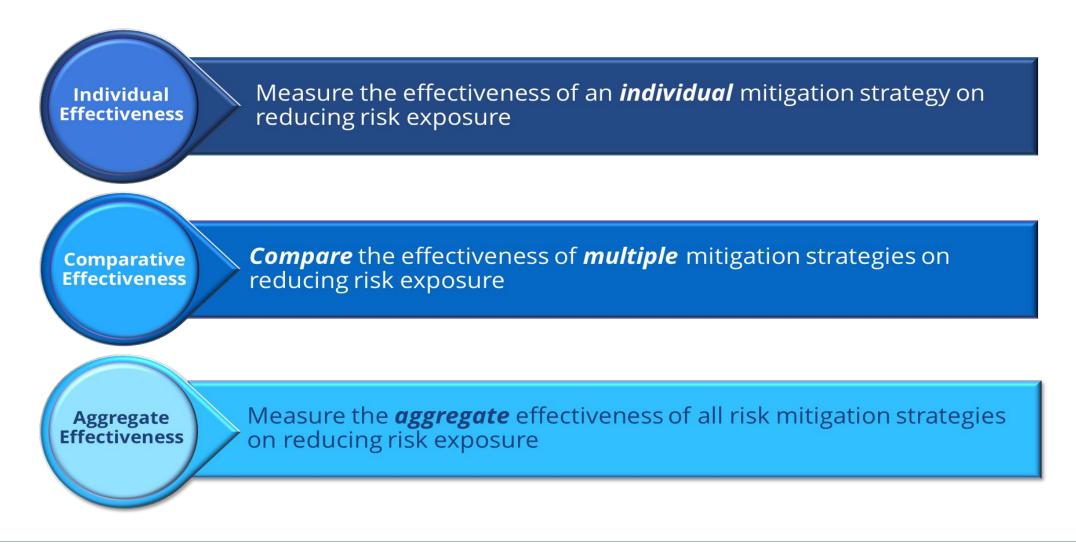




Correlation of UMass Risk Assessment and Mitigation Assessment



Demonstrate Impact of Mitigation Strategies



UMass Mitigation Assessment Tool for Reducing Risk Exposure



- Excel-based tool
- Enables documentation of mitigation strategies for each systemwide risk in a central repository
- Facilities the assessment of mitigation strategies
- Generates data on the impact of mitigation strategies

Focused mitigation assessment on top 10 FY22 risks for MATRX pilot.

What MATRX Does and Does Not Accomplish



- Provides transparency on risk mitigation strategies
- Demonstrates progress on mitigating risk or depicts areas that may require additional attention
- Enables more robust discussions on risk and risk mitigation
- Demonstrates movement in addressing risk



- Does not track key performance indicators
- Does not define risk tolerance
- Does not define specific follow-on actions needed
- Does not conclude satisfaction or dissatisfaction with status of addressing risk

UMass Systemwide Enterprise Risk Management Program

Overview of Mitigation Assessment

Mitigation Assessment Process

For each Top 10 FY22 risk, the ERM Program worked with risk partners to document and assess mitigation strategies

- 1. Initial Data Capture for each strategy
- 2. Assessment of each mitigation strategy
- 3. Compilation of results



Initial Data Capture

- All data is provided by risk mitigation partner(s) conducting the mitigation assessment
- Members of the ERM Governance Structure help identify partners for each risk

Data Point	Description	Purpose
Title	Title of mitigation strategy being documented/assessed	Unique Identifier
Description	Brief description of mitigation strategy	Understand what the strategy is and does
Туре	 Operational: Everyday or regularly occurring activity Project-based: Initiative or project with finite timeframe 	Understand if strategy is ongoing or timebound
Status	 Proposed: Strategy is not yet approved/funded Planned: Strategy is approved/funded, but not yet implemented Ongoing: Strategy is underway Complete: Strategy has concluded 	Determines whether strategy is included or excluded from one or more mitigation assessment calculations
Implementation Level	 Fully: Mitigation strategy is fully implemented Partially: Mitigation strategy is not yet implemented at full capacity and/or across the system N/A: Not applicable or not yet implemented 	Determines whether weightings are applied to the mitigation assessment calculation



Mitigation Assessment: Consequence

What effect does or would the mitigation strategy have on each of the following risk consequence categories*?

- Service/Operations Disruption
- Finance
- Legal/Compliance

Workforce

• Reputation

• Life Safety

Rating	Description
Significant Effect	Greatly reduces the University's exposure in this risk category.
Moderate Effect	Somewhat reduces the University's exposure in this risk category.
Little to No Effect	Neutral; provides little to no reduction in the University's exposure in the risk category.
Adverse Effect	Creates additional/increases exposure in the risk category.

* Consequence categories align with the consequence categories used in the <u>risk assessment process</u>.



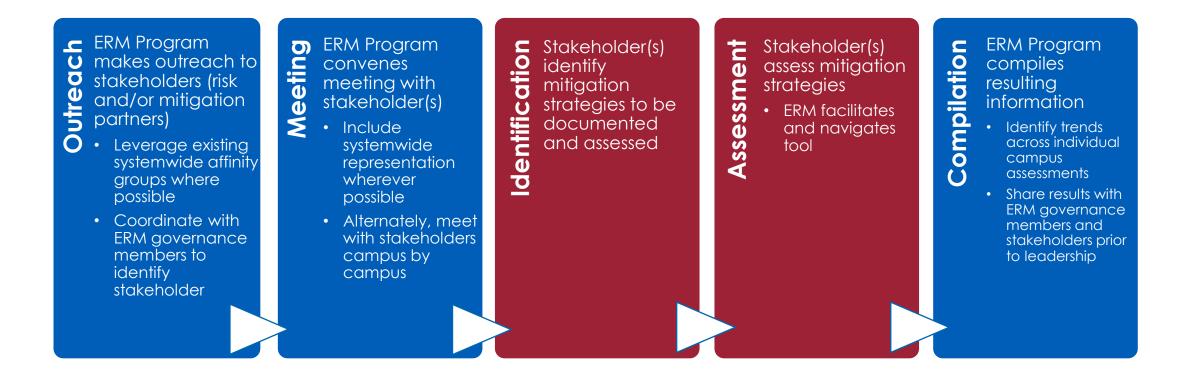
Mitigation Assessment: Likelihood

Does or would this risk mitigation strategy impact the likelihood of the risk occurring?

Rating	Description			
Decreases Likelihood	Improves: Mitigation strategy has decreased the likelihood that the risk will occur.			
No Impact	Neutral: Mitigation strategy has no impact on the likelihood that the risk will occur.			
Increases Likelihood	Worsens: Mitigation strategy has increased the likelihood that the risk will occur.			



Risk Partner Engagement Process



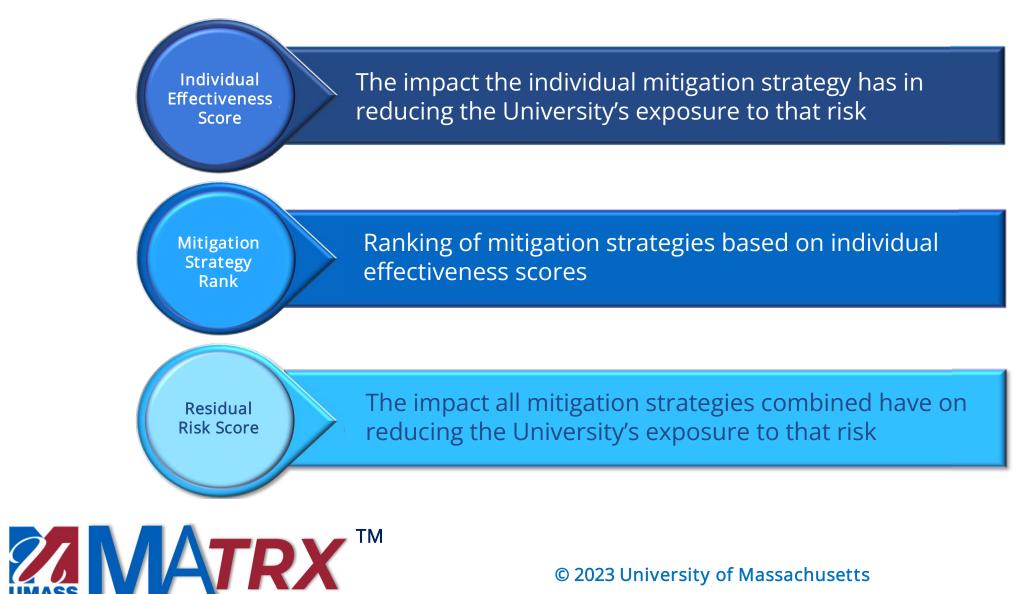
ERM

Risk Partners

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Mitigation Assessment Results



Individual Effectiveness and Rank

Mitigation Assessment Results: International Activities Risk (FY22)

Rank	Mitigation Strategy as of June 30, 2023	Implementation Level
ſ	Travel Registry	Fully
2	New Travel Policies and Standards	Fully
3	Systemwide International Employment Guidelines	N/A
4	Business Travel and Expense Policy and Standards	Fully
	International Travel Accident and Sickness Services and Insurance	Fully
5	International Tax Advisory Services	Fully
6	International Employment Issues Evaluation	Fully
7	International Hires Pilot	Partially

8 Strategies

Scale: Assessed Systemwide Impact of Mitigation Strategy by Rank

	More Impact
1 2 3	
4 5 6 7	Less Impact

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Negative Impact

Mitigation Assessment Results: Facilities & Deferred Maintenance Risk (FY22)



7 Strategies

More Impact

Scale: Assessed Systemwide Impact of Mitigation Strategy by Rank

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Rank	Mitigation Strategy as of June 30, 2023	Status	Mitig
1	Reaching/Maintaining Keep Up Targets	Partially *	
	Reaching/Maintaining Catch Up Targets	Partially *	
	Annual Update of Campus Deferred Maintenance (Gordian)	Fully	
	Capital Policy & Standards	Fully	
2	Reporting – Biannual Capital Plan	Fully	
	Reporting – Quarterly Capital Reporting Including Keep Up and Catch Up	Partially	
3	Tracking Spending Against DCAMM Contracts	Partially	

* The impact of these strategies would be significantly greater if these strategies were fully implemented. See scale.

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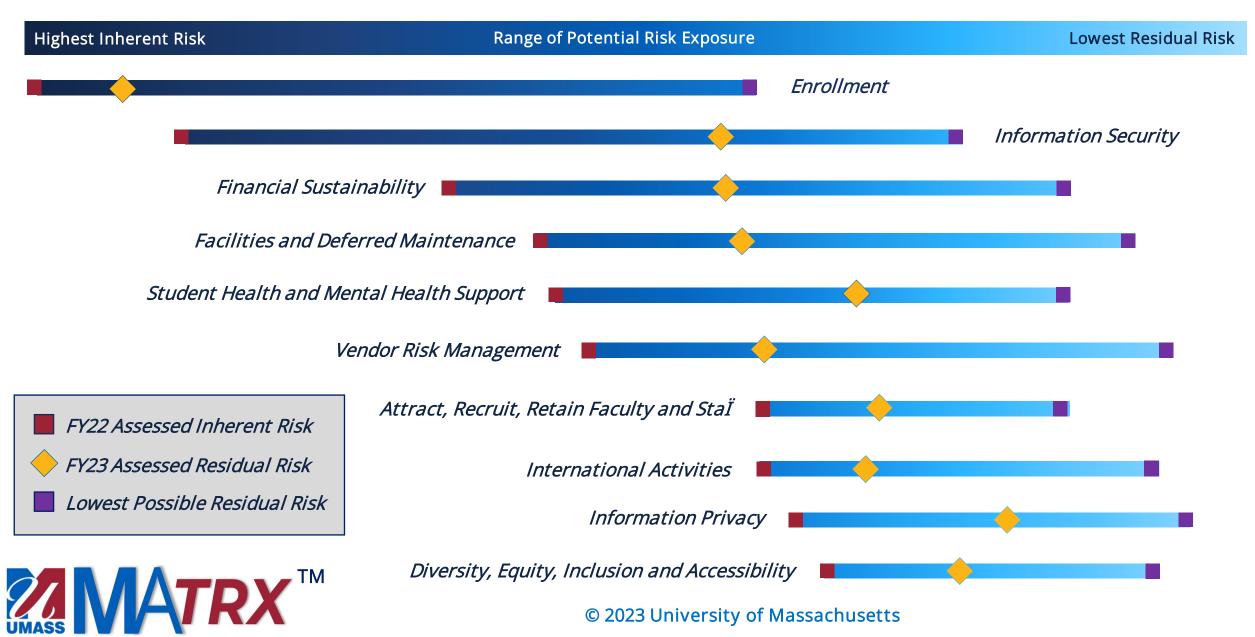
Implementation

Less Impact

3

Residual Risk

FY22 Risks: Movement in Reducing Risk Exposure



Conclusion & Take Aways

- Aligning assessment of risk mitigation strategies to risk assessment methodology allows for contextual comparison of risk exposure and risk mitigation
- Transparency on risk mitigation strategies and visibility on progress in reducing risk exposure is empowering
- Volume of mitigation strategies have intuitively been implemented around highest areas of risk exposure
- ERM can be a cornerstone for creating risk-informed priorities and strategies

Questions?

Christine Packard Assistant Vice President Enterprise Risk Management <u>cpackard@umassp.edu</u>

