

# Enterprise Risk Management

2021 Massachusetts Trustees Conference | October 27, 2021

# Agenda

- ❖ Introductions
- ❖ Overview of Enterprise Risk Management (ERM)
- ❖ ERM Panel Discussion
  - ❖ Amanda Robbins: Sexual Misconduct on Campus
  - ❖ Christine Packard: UMass COVID Response
  - ❖ Peter Scavotto & Paul Rigby: Cyber Security
- ❖ Questions & Answers

# Session Description

Higher education has faced changes over the last two years, both challenging and rewarding - many of which pushed our Enterprise Risk Management (ERM) systems to react, reevaluate, and in many instances, reorganize and/or reinvent.

From the continued risk of cyber security to the "new normal" of COVID to the implementation of stronger sexual misconduct laws in the Commonwealth, institutions now, more than ever, need to focus on new and evolving risks.

This workshop will explore elements of institutional risk management and the responsibility of boards of trustees in oversight and implementation in an ever-changing risk environment.

# Enterprise Risk Management

A practical definition of ERM from *Risk Management: An Accountability Guide for University and College Boards* (AGB Press, 2013):

ERM is a business process led by senior leadership that extends the concepts of risk management and includes:

- ❑ Identifying risks across the entire enterprise
- ❑ Assessing the impact of risks to the operations and mission
- ❑ Developing and practicing response or mitigation plans
- ❑ Monitoring the identified risks, holding the risk owner accountable, and consistently scanning for emerging risks

# Risk Management Process

Operational  
Analysis

Vulnerability  
Assessment

Risk  
Reduction  
Solutions

Implementation  
Plan



# Strategic Risk Management Plan

- ❑ 1-5 year Risk Management Master Plan
- ❑ Based on real-life vulnerabilities and risk-based solutions
- ❑ Associated costs included
- ❑ Priorities weighed and set in a comprehensive and clear manner
- ❑ Easy to understand and justify to leadership
- ❑ Since it is a multi-year plan, performance metrics are essentially already built in
- ❑ Revisit your plan annually or every 2 years to adjust as needed and to show progress

# Trustee Engagement in ERM: 2016 Task Force Recommendations

## Finding: Strategic Planning Process at the Institution Level

- Campus safety and violence prevention should be incorporated into each institution's strategic planning process.

Engagement at the institution level should include buy-in and commitment from the Board of Trustees as well as Senior Leadership. Too often it is sidelined from the core planning; it must be elevated and recognized as a shared responsibility.

## Recommendation: Elevate Board of Trustees Engagement

- The Board of Trustees for each institution carries a level of responsibility for managing and mitigating risks, as an important part of their overall fiduciary duty. Trustees need to be engaged in some level of oversight through the higher level strategic planning process to help make critical decisions related to initiatives and budget priorities.

To this end, Trustees are encouraged to form campus safety and violence prevention committees, and receive regular updates on applicable issues, to enhance accountability for the quality of campus life at all levels of the institution.

# Board Responsibility: AGB Recommendations

The Board's responsibility for risk management has four components:

- ❑ Establishing ERM as an institutional priority
- ❑ Considering the institution's tolerance for risk
- ❑ Calling on senior administrators to establish a process for identifying, prioritizing and monitoring risk, with formal assignment of responsibility for risk assessment and management to an appropriate individual or office
- ❑ Monitoring the plan's implementation through regular, formal reporting to the board or an appropriate board committee by the appropriate senior administrator



# Panel Discussion

## Panelists:

- ❖ **Amanda Robbins:** ERM & Sexual Misconduct on Campus
- ❖ **Christine Packard:** UMASS ERM & COVID Response
- ❖ **Peter Scavotto & Paul Rigby:** ERM & Cyber Security

## Questions for the audience to consider:

- ❖ How frequently is institutional risk discussed at board meetings?
- ❖ What are the risks at your institution that you should be engaged in addressing?
- ❖ Are you receiving information on the topics being discussed?
- ❖ Are you asking for the information being discussed?

# Campus Sexual Misconduct Law

Amanda Robbins

MA Department of Higher Education

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# The MA Campus Sexual Misconduct Law

- Focused on campus responses to sexual violence
- Applies to both public and private IHEs
- Effective Date: August 1, 2021
- Two major sections:
  - Campus Climate Surveys (G.L. c. 6, §168D)
  - IHE Policies, Procedures & Reporting (G.L. c. 6, §168E)

# Campus Climate Surveys

## M.G.L. c. 6, § 168D

**Mandatory Climate Surveys:** “Each institution shall conduct a sexual misconduct climate survey of all students at the institution not less than once every 4 years.”

- Law creates **27 Member Task Force** to assist in development of the surveys
  - Co-chaired by DHE and DPH
  - 21 members appointed by the Governor; 2 appointed by legislature; 4 ex-officio
  - Broad stakeholder representation -- IHEs, students, advocates, legislators, researchers
- Task Force must develop **model questions and related recommendations** to submit to DHE Commissioner for review and approval by **January 1, 2022**
- Commissioner will submit model questions to all IHEs for use
- IHEs may develop and use their own survey – must meet DHE quality standards and includes the subset of model questions

# IHE Responsibilities Regarding Campus Climate Surveys

All IHEs located in the Commonwealth and authorized to grant degrees shall:

Conduct a sexual misconduct campus climate survey of all students “not less than” once every 4 years.

Within 120 days after completion and analysis of a sexual misconduct climate survey each IHE shall post a summary of the results on the IHE’s website.

# IHE Policies, Procedures & Reporting

## M.G.L. c. 6, §168E

Relating to IHE efforts to prevent and respond to sexual misconduct:

- Provide regular prevention & awareness programming for students and employees
- Provide training to officials involved in response, investigation and disciplinary processes
- Designate confidential resource providers
- Provide options for anonymous reporting
- Include amnesty provisions
- Require MOUs with community-based sexual assault crisis service centers and domestic violence programs (with DHE waiver process)
- New annual reporting requirements - for IHEs and DHE
- Require MOUs with local law enforcement agencies

# Trustee Role: Campus Sexual Misconduct Law

Questions to ask/Information to seek:

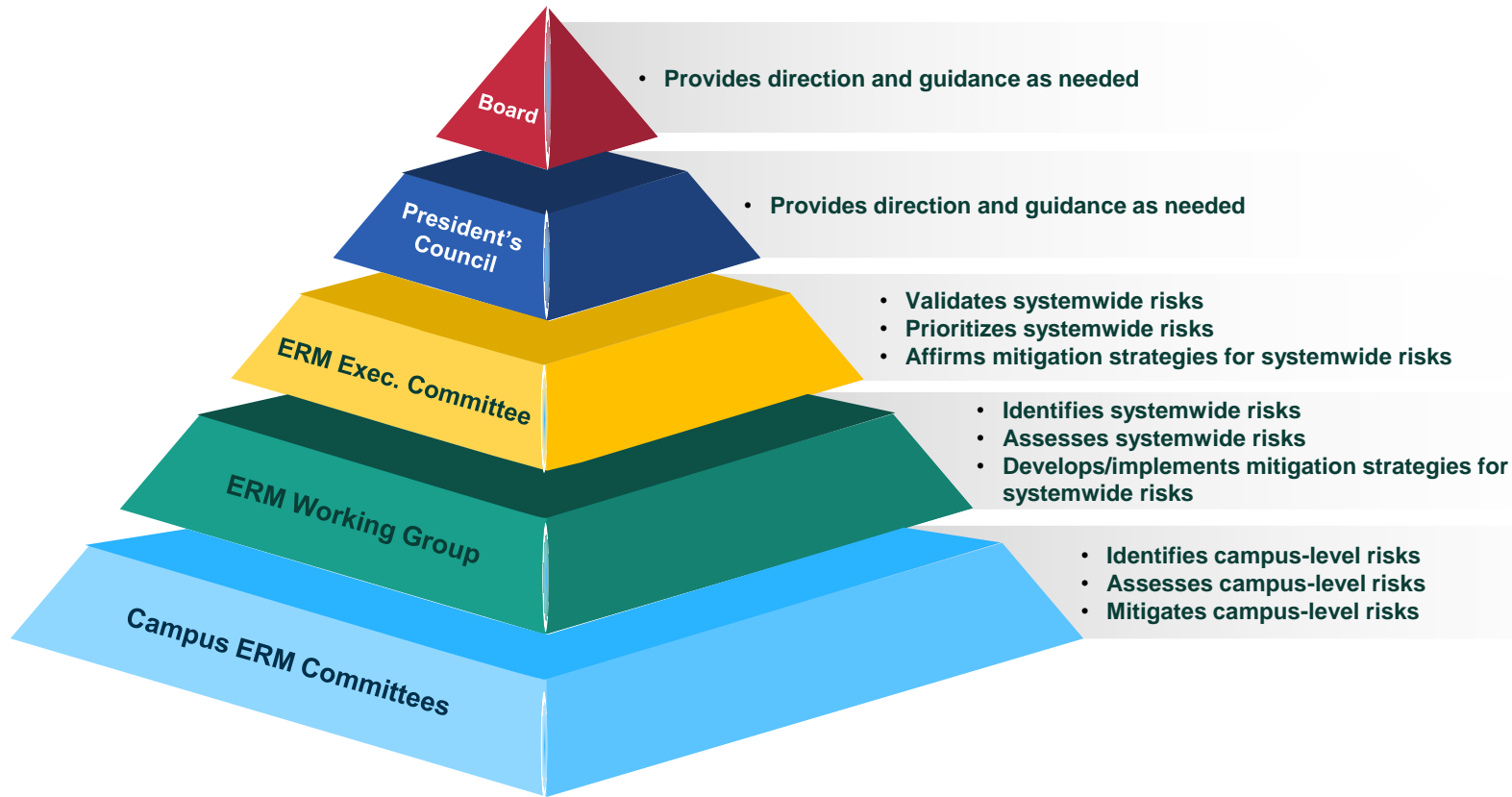
- Have you received a briefing of the law an initial institutional plan to address the components of the law?
  - ✓ Campus climate surveys
  - ✓ Police MOUs
  - ✓ Rape Crisis Center MOUs
  - ✓ Annual Reporting
  
- How can you use your position as a Trustee to further and support the achievement of these initiatives?

# UMass ERM & COVID Response

Christine Packard  
UMASS President's Office



# UMass System-wide ERM Governance Structure



# Intersection of COVID-19 and UMass System-wide Risks

*Accounts for nearly 1/3 of the UMass System-wide Risk Registry*



# ERM as an Operational Tool for System-wide COVID-19 Response

## System-wide Coordination

- Information sharing
- Decision-making
- Response and Mitigation Activities
- PPE Acquisition
- Asset/Facility Use Requests

## System-wide Standards

- Asymptomatic Testing
- Fall Operations Checklist
- Spring Operations Checklist

## Enterprise Risk Management

## External Coordination

- Higher Ed Reopening Working Group
- Executive Office of Education
- Department of Higher Ed
- MEMA
- Legislature

## System-wide Impact Assessment

- Financial
- Human Resources
- Health and Safety
- Enrollment
- Cash Flow

# COVID-19 Systemwide Response Coordination

Group	Members	Frequency
Senior Leadership	President Meehan, Chancellors, UMPO Senior Staff	Daily
Administration and Finance Leadership	UMPO, Vice Chancellors of A&F from each campus	2-3 times per week
Human Resources Leadership	UMPO, HR Director from each campus	2-3 times per week
Health and Safety Staff	UMPO, EH&S and/or emergency management from each campus	Once per week
Bursars and Controllers	UMPO and each campus	2-3 times per week
Communications	UMPO and each campus	Daily
Facility Directors	UMPO and each campus	Weekly
Executive Office of Education and Department of Higher Education	UMPO and other higher education segment leads	Daily

# Sampling of COVID Guidance, Dashboards and Reports

**UMass Weekly Surveillance Testing Report**  
Reporting Period: April 25 - May 1, 2021

	Amherst						Boston						Dartmouth					
	Total Tested	Negative	Positive	Positivity Rate	Quarantine	Isolation	Total Tested	Negative	Positive	Positivity Rate	Quarantine	Isolation	Total Tested	Negative	Positive	Positivity Rate	Quarantine	Isolation
Residential Students	6,965	6,949	16	-	10	14	244	244	0	-	-	-	262	260	2	-	4	2
Off-Campus Students	8,439	8,435	4	-	-	-	328	327	1	-	-	-	135	135	0	-	0	0
Staff/Faculty	2,802	2,801	1	-	-	-	212	212	0	-	-	-	112	112	0	-	0	0
Totals for Reporting Period	18,206	18,185	21	0.12%	10	-	-	-	-	-	-	-	-	-	-	-	-	-
Totals for Spring 2021*	275,379	273,577	1,802	0.65%	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Totals	478,484	475,976	2,508	0.52%	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	Lowell					
	Total Tested	Negative	Positive	Positivity Rate	Quarantine	Isolation
Residential Students	1,038	1,032	6	-	-	-
Off-Campus Students	800	799	1	-	-	-
Staff/Faculty	385	384	1	-	-	-
Totals for Reporting Period	2,223	2,215	8	0.36%	0	-
Totals for Spring 2021*	39,843	39,727	116	0.29%	-	-
Cumulative Totals	57,351	57,117	234	0.41%	-	-

	System-wide Totals					
	Total Tested	Negative	Positive	Positivity Rate	Quarantine	Isolation
Residential Students	8,509	8,485	24	-	14	1
Off-Campus Students	9,702	9,696	6	-	0	0
Staff/Faculty	3,511	3,509	2	-	-	-
Totals for Reporting Period	21,722	21,686	36	0.16%	14	1
Totals for Spring 2021*	327,941	325,787	2,154	0.57%	-	-
Cumulative Totals	5,667	5,650	17	0.30%	-	-

\*Spring 2021 testing numbers started beginning January 17, 2021.

Monthly Operational Status Reports for BOT

**Monthly Status Dashboard**  
UMass Campus Spring 2021 Operations  
FEBRUARY 2021

No.	Action	Status
I.	Are there any changes to your residential student population for Spring 2021?	Green
II.	Are there any changes to your COVID-19 point of contact or team?	Green
	Are there any changes to protocols for daily health monitoring of students, faculty and/or staff?	Green
	Are there any challenges with implementing campus protocols for daily health monitoring of students, faculty and/or staff?	Green
III.	Are there any changes to your surveillance testing program?	Green
	Are there any significant increases in positive cases?	Red
	Are there any challenges with implementing your surveillance testing program?	Green
	Are there any changes to the campus' isolation protocols?	Green
	Has the campus needed to increase designated on-campus isolation space?	Red
IV.	Is the campus nearing capacity for on-campus isolation space?	Green
	Are there been any changes to the campus' quarantine protocols?	Green
	Has the campus needed to increase designated on-campus quarantine space?	Green

Weekly Surveillance Testing Reports for BOT and Leadership

Daily Situational Awareness Reports for Leadership

**UMPO Senior Staff COVID-19 – End of Day Update**  
April 28, 2020

**Situation**

**COVID-19 Cases**

- Cases for COVID-19 continue to increase globally, nationally. States continues to have more cases than any other country, but a downward trend has not yet been realized.

**Cases of COVID-19**

Geographic Area	Cases (change from previous report*)	Deaths (change from previous report*)
Global	3,094,829 (+74,712)	2,222 (+1,000)
United States	981,246 (+23,371)	58,302 (+1,840)
Massachusetts	58,302 (+1,840)	1,840

\*Last report was issued 04/27/2020

- MDPH's daily dashboard can be found [here](#).
- Percentage of Positive Cases: a significant indicator of a true sustained decrease in the percentage of cases tested being Massachusetts percentage of positive cases over the previous 7 days.

**Massachusetts Percentage of Positive Cases**

Date	4/15	4/16	4/17	4/18	4/19	4/20	4/21	4/22
Percent of Positive Cases	32%	26%	27%	24%	33%	19%	25%	34%

- Weekly COVID case counts by community can be downloaded from MDPH's dashboard every Wednesday by MDPH.

Number of Individuals Quarantined (as of 04/21/2020; updated on Wednesdays)

University of Massachusetts  
Spring 2021 Campus Operations  
COVID-19 Guidance and Planning Checklist

Campus Operations Guidance and Checklists for each Semester

# ERM and Cybersecurity

Peter Scavotto & Paul Rigby  
Office of the Comptroller of Massachusetts

October is Cybersecurity  
Awareness Month

# Trustee Role:

## Tone From the Top – Protecting Commonwealth Assets

- What do schools face?
  - Bad actors seeking PII, money, user credentials, research secrets
  - Malware attacks, including ransomware
  - Delivered by social engineering methods
  
- Why?
  - Higher ED known for fewer resources – money, staff, tools
  
- Help prioritize resources

# Cyber Related Attacks

The Commonwealth of Massachusetts averages 525 million pings a day from bad actors.

(Does not include Higher Education)

According to the FBI Internet Crime Complaint Center (IC3)

\$4.2 billion was lost to cyber crime in 2020

\$100 m in Mass.

(Source: *Security Management Magazine*, March 2021)



# Attacks on Higher Education

- *CASE*: Email phishing Scheme resulted in malware being launched which effected an estimated 25,000 personnel records being compromised.
- *CASE*: Email from an alleged vendor contact requesting a bank account change redirected a \$1.75m payment to a 'fraudulent bank account. Luckily all but \$10k was recovered.
- *CASE*: Social engineering attacks resulted in 9 wire transfers totaling \$800,000 to a fraudulent bank account (approximately \$127,000 was never recovered).

# Attacks on Higher Education

- **“Cybercriminals use pandemic to attack schools and colleges”** (GCN, Sept 2021)  
<https://gcn.com/articles/2021/09/15/k12-college-cyberattacks.aspx>
- **“Education sector suffers series of cyber attacks in 2021..”**  
(Open Access Government, October 2021),  
<https://www.openaccessgovernment.org/education-sector-suffers-series-of-cyber-attacks-in-2021/122465/>
- **“The Increasing Threat of Ransomware in Higher Education”**  
(Educause, June 2021)  
<https://er.educause.edu/articles/2021/6/the-increasing-threat-of-ransomware-in-higher-education>

# Trends

- Ransomware attacks trending toward data exfiltration and extortion
- Phishing is still the number one path for system/network infiltration
- Cybercrime is not as complex and sophisticated as claimed
- Best bad actors are very good social engineers
- Ransomware as a service – the Dark Web

# Trustee Role: Supporting School IT Efforts

## Questions to ask:

- Are you hearing directly from CIOs/CISOs at board meetings?
  - ✓ CIO User Group meets monthly – share ideas, tools, tactics
  
- Is communication frequent and effective across silos?
  - ✓ CIO/CISO, ICO, CFO, COO, VPs
  - ✓ Finance, Data, IT, departments
  - ✓ Are new deployments (apps/systems) thoroughly vetted by IT?
  
- Are risk assessments conducted, updated, and reported upon (Heat Maps)?
  
- What are protective and detective tools in place – are they tested?
  
- Are students and faculty on same network?
  
- Will you pay a ransom?

# Info and Tips – Whether Individual or Organization

Protect Yourself - Tips from a hacker:

1. Get a password manager
2. Freeze your credit
3. Monitor existing credit
4. Check financial accounts daily, weekly

# Resources

Statewide Contract for Data, Cybersecurity, Incident Response Services:

<https://www.mass.gov/doc/its78/download>

CTR Cyber Center – tools, tips, internal controls for MA agencies:

<https://www.macomptroller.org/ctr-cyber/>

Security Standards Self-Assessment – CTR Cyber Center:

[https://www.macomptroller.org/wp-content/uploads/enterprise-information-security-standards\\_self-assessment-questionnaire.xlsx](https://www.macomptroller.org/wp-content/uploads/enterprise-information-security-standards_self-assessment-questionnaire.xlsx)

# Questions

## **Amanda Robbins**

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