

The
stakes are
high. The rules
of the game have
changed, and doing business
will never be the same again.

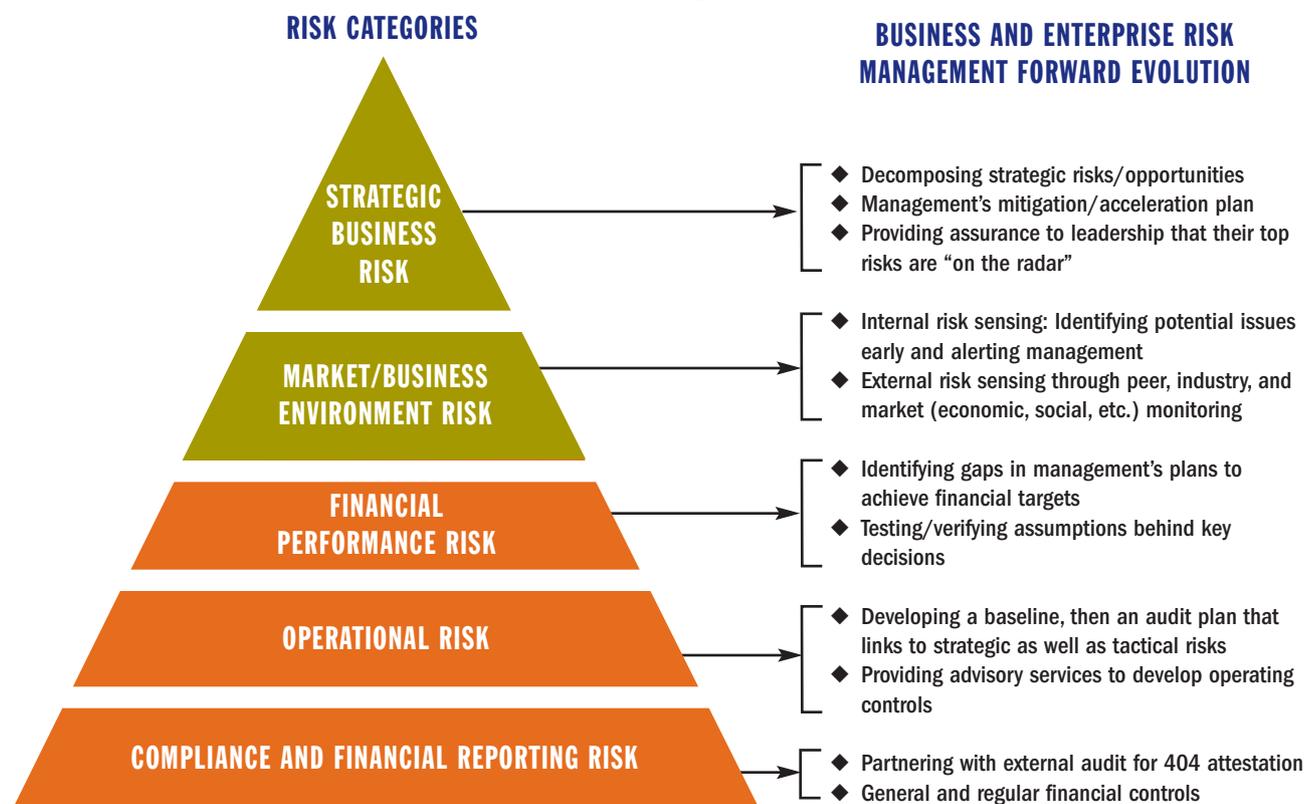
Companies must achieve great business
results and exceed their stakeholders' expecta-
tions, but *how* a company actually achieves those
results is just as important to its long-term success.

Companies must demonstrate that they have strong internal
controls, maintain integrity at all times, and manage enterprise-wide
business risks. The price for mistakes and surprises is steeper than it has
ever been, and unexpected "surprises" can have swift corporate and personal con-
sequences. Organizations that meet these significantly increased marketplace expecta-
tions will prosper. Those that can't will surely lag behind and possibly even fail.

ENTERPRISE RISK MANAGEMENT AT UNITEDHEALTH GROUP

BY PATRICK J. STROH, CMA, PMP

Figure 1: UnitedHealth Group Total Risk Management vs. Financial Risk Management



Adapted from audit director roundtable research from the Corporate Executive Board.

Given this permanent white-water environment, it's no wonder that Enterprise Risk Management (ERM) has become such a hot topic in the past couple of years. These ever-increasing expectations require a level of risk management discipline and capability not found in many organizations. This isn't the latest management fad, and it extends well beyond Sarbanes-Oxley Act (SOX) compliance. ERM is quickly becoming the new minimum standard, and it may very well be the key to survival for many companies. At the very least, it's a significant source of competitive advantage for those that can demonstrate a strong ERM capability and discipline. So push beyond Sarbanes-Oxley and external compliance activity to be more strategic and value added in your risk management focus and capability. Your risk management focus should be facilitative and consultative within your organization to generate prosperity in an environment that has many organizations scrambling and reacting.

AN ERM EXECUTIVE PRIMER

What is ERM? With more than 1,000 books readily available on the subject, you can probably guess there are many definitions. But I will describe it here according to the way we are implementing ERM at UnitedHealth

Group. At UnitedHealth Group, ERM is a discipline and an embedded philosophy, not a tool, technique, or algebraic formula. Similar to a traditional SWOT (strengths, weaknesses, opportunities, and threats) analysis, ERM is meant to identify risk factors in a business, then assess their severity, quantify the magnitude, and mitigate the downside exposures while capitalizing on the upside opportunities. ERM can also be defined as an enterprise composite of risk ranging from compliance and financial reporting risks to financial performance risks to strategic business risks. See Figure 1 for a risk pyramid.

ERM approaches vary by industry. In highly regulated industries, such as banking and energy, risk management is highly quantifiable and deals with financial modeling, hedging, insurance utilization, and the like based on either industry's natural risk environment. Alternatively, some industries haven't bought into ERM yet, coming off the throes of SOX compliance and without a formal requirement driving the need for ERM. Although SOX goes a long way in examining risk in the bottom three categories of the risk pyramid, it does little for the top two. And it's the top two categories—strategic business risk and market/business environment risk—that provide the most value creation to a company and its sharehold-

ers, so they should command the greatest expenditure of resources. But you can't achieve the top two categories without addressing the bottom three first. Now that many of you have addressed the base of the pyramid via SOX efforts, why not redeploy some of those resources and leverage their knowledge to help develop ERM?

A closer look at ERM from the risk pyramid shows that it is strategic in nature. ERM can be used as an organizing methodology or umbrella for institutionalizing or supporting strategic planning efforts, quality initiatives, balanced scorecarding and performance measurement, business process reengineering, and more. Done right, ERM provides an enterprise view that shows how and where a company is mitigating its risks and exploiting its opportunities across the business segments. The goal isn't simply to report and monitor but to drive value.

So what does ERM mean to a business's leaders?

1. ERM provides a framework for discipline. It's a methodology that enables management to deal effectively with uncertainty and the associated risks and opportunities and to assess variability around target performance levels in order to enhance value and provide transparency to shareholders. Accountability in this methodology is clear and consistent.

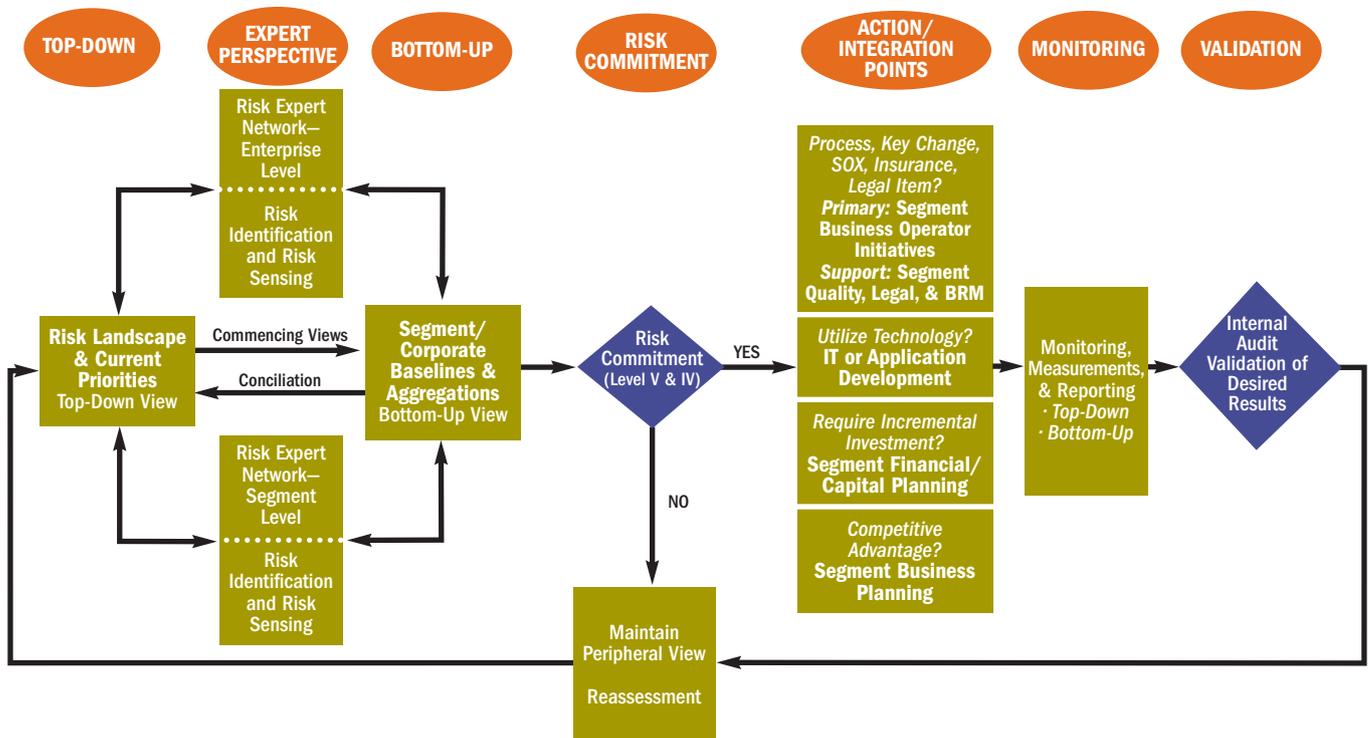
2. ERM drives value through knowledge. Today's executive leaders want to ensure stability of their companies

in the long term and manage performance in the short term. Using an ERM model and process isn't about being an alarmist and raising risk issues unnecessarily—it's about taking known, calculated levels of risk consistent with management/board tolerances to maximize shareholder value. By itself, risk isn't a bad thing; most companies are paid to take risks. But failure to recognize risks and to mitigate known risks within an acceptable risk tolerance is bad. Those failures create vacancies at the executive leadership level.

ERM AT UNITEDHEALTH GROUP

UnitedHealth Group Incorporated is a diversified, *Fortune* 40 health and well-being company dedicated to making the healthcare system work better. The company provides a full spectrum of health benefits, services, and resources as well as data and analytic tools and services to all sectors of healthcare in order to advance meaningful analysis aimed at improving clinical and financial performance. UnitedHealth Group functions through six operating businesses: UnitedHealthcare, Ovations, AmeriChoice, Uniprise, Specialized Care Services, and Ingenix. In our implementation and evolution to ERM at UnitedHealth Group, we believe you have to implement Business Risk Management (BRM) within the businesses and operations of the company before you can achieve ERM.

Figure 2: Enterprise Risk Management—Driving Results



Enhance Enterprise Governance and Risk Management Culture

UnitedHealth Group's Business Risk Management program and discipline have enhanced and continuously strengthened enterprise governance processes, including adherence to internal/external requirements, and have helped to establish a risk management culture within the organization. Bill Bojan, vice president of Business Risk Services and the company's general auditor, explains, "Our vision for the Business Risk Management discipline is that it must be an integral part of UnitedHealth Group's culture, decision-making processes, and governance processes, providing meaningful contribution toward fulfilling UnitedHealth Group's mission of making the healthcare system work better." Figure 2 shows the integration of business risk into other functional areas and how the top and bottom of the organization work together to understand and address the business risk landscape.

Although BRM is a corporate-driven process, it is owned and executed by the businesses and is designed to achieve the following objectives:

- ◆ **Execution under a disciplined process.** BRM takes a comprehensive approach, using organizational competencies and accountabilities to anticipate, identify, prioritize, manage, and monitor the portfolio of business risks impacting our organization in order to consistently achieve business objectives and improve shareholder value.

- ◆ **Confidence in decision making.** BRM enables managers to operate with the confidence that they understand their highest risks and have effective strategies to mitigate them.

- ◆ **Avoidance of surprises.** BRM helps to protect investors, customers, directors, executives, employees, and

other stakeholders from avoidable operational and financial surprises.

These objectives and the early introduction of BRM into UnitedHealth Group helped us achieve full and timely Sarbanes-Oxley compliance and an unqualified external audit opinion. Most significantly, Business Risk Management increases enterprise awareness of significant downside risks as well as upside risks that it can capitalize on for long-term competitive advantage by enhancing areas like quality, cost, and productivity. As such, BRM reinforces a commitment to the enterprise mission in the midst of day-to-day business activity.

Drive Value Creation, Deep Business Accountability, and Transparency

After establishing BRM in the business segments, we turned our sights to enterprise portfolio views and aggregations. We started to look at horizontal risk themes in addition to vertical risk themes in our business. Our Business Risk Management discipline evolved into Enterprise Risk Management as we began to realize more business risk transparency and value creation. Transparency is achieved via the breadth and depth of the reach, commitment, and visibility of risk management within the entire business. At an enterprise level, there are a number of monitoring committees that are highly active in managing risk and conducting future risk sensing. From the business level, each business segment establishes a "risk expert network" made up of diverse individuals with varied perspectives, experiences, and responsibilities who are responsible for articulating, challenging, and remediating risks that the business currently has or envisions.

The four value drivers of BRM/ERM for internal management are:

- 1. Awareness.** Create awareness and knowledge among all the appropriate stakeholders regarding key enterprise risks and risk management issues impacting UnitedHealth Group.

- 2. Alignment.** Facilitate alignment in situations where there isn't agreement or understanding among appropriate stakeholders about enterprise risks and risk management issues impacting UnitedHealth Group.

- 3. Resolution.** Drive to resolution all significant enterprise risks and risk management issues affecting UnitedHealth Group through effective action and engagement by all the appropriate stakeholders.

- 4. Accountability.** Establish and maintain appropriate accountability for desired results with respect to all significant enterprise risks and risk management issues impact-

Figure 3: Universe of Business Risk Types

EXTERNAL ENVIRONMENT	BUSINESS STRATEGIES & POLICIES	BUSINESS PROCESS EXECUTION	PEOPLE	ANALYSIS & REPORTING	TECHNOLOGY & DATA
1. Competitor	6. Strategy & Innovation	11. Operations—Planning	22. Leadership	29. Performance Management	36. Technology Infrastructure/Architecture
2. Legal & Regulatory	7. Capital Allocation	12. Operations—Process/Technology Design	23. Skills/Competency	30. Budgeting/Financial Planning	37. Data Relevance & Integrity
3. Catastrophic Loss	8. Business/Product Portfolio	13. Operations—Process/Technology Execution & Continuity	24. Change Readiness	31. Accounting/Tax Information	38. Data Processing Integrity
4. Medical Cost/Utilization Trend	9. Organization Structure	14. Resource Capacity & Allocation	25. Communication	32. External Reporting & Disclosure	39. Technology Reliability & Recovery
5. Customer Expectations	10. Organization Policies	15. Vendor/Partner Reliance	26. Performance Incentives	33. Pricing/Margin	40. IT Security
		16. Channel Effectiveness	27. Accountability	34. Market Intelligence	
		17. Interdependency	28. Fraud & Abuse	35. Contract Commitment	
		18. Customer Satisfaction			
		19. Regulatory Compliance & Privacy			
		20. Knowledge/Intellectual Capital			
		21. Change Integration			

ing UnitedHealth Group.

The results are risk awareness, enterprise-wide communications, and fully aligned objectives that help build and protect enterprise value. To achieve alignment and ensure effective communications, we created a standard risk universe of inherent risk types we assess across our portfolio of businesses (see Figure 3). This standard universe allows for a common language among the businesses, leadership, and the Audit Committee of our Board of Directors and also enables us to aggregate risk themes across our entire enterprise for ERM reporting and analysis.

As these drivers fueled our execution of BRM and ERM at UnitedHealth Group, we gained a number of insights and learned quite a few lessons along the way, some of which are highlighted next for your consideration.

BUILDING BLOCKS AND SUCCESS FACTORS

To create, communicate, execute, and measure BRM and ERM, you need a framework with key cornerstones. Here are some of the cornerstones and factors of success that we use in our ongoing implementation of BRM and ERM at UnitedHealth Group.

1. Strong Executive Backing and Sponsorship: This is critical to the success of most significant projects and ini-

tiatives, so solicit and maintain strong executive sponsorship, or plan to fail. At UnitedHealth Group, our Business Risk Management has buy-in at the right levels of leadership. We have risk champions ranging from the executive leadership level to individual contributors (people who are on the front line day after day). BRM's primary executive sponsor is the chief financial officer. "Our Audit Committee relies on BRM to give them a view into our businesses, proactively identify and communicate key risks, and monitor the mitigation of those risks across our entire portfolio of businesses," Pat Erlandson, CFO of UnitedHealth Group and executive sponsor of BRM/ERM, states.

Lesson Learned: ERM value must be apparent to the executive sponsors, and the information provided must be timely. We all know that "rear-view mirror" information is limited in value and can only aid in predicting some future results. Be proactive, and provide a forward look through the windshield. Current business projects/issues are the quickest way to engage people and provide value to the business. Be facilitative, consultative, and help your stakeholders address their current needs to create quick wins and build a foundation of trust.

2. A Staged Methodology: What does BRM/ERM look

like? See Figure 4 for the model we've adapted and adopted at UnitedHealth Group. ERM isn't rocket science nor is it a sprint, and it takes a commitment from executive leadership to allow it time to unfold. In our experience, it has taken businesses around three years to get through all nine stages of the continuum, but you receive value and payback every step of the way. Establish a planned, thoughtful evolution to gain engagement, deliver value, and make a meaningful difference.

Lesson Learned: *Don't boil the ocean. Do you want comprehensive coverage? Absolutely. Do you want to look at all large risks? You bet. But do it in a smart fashion. Don't name 100 potential risks and ask the business to assess everything under the sun. As a means of establishing a common viewpoint that would facilitate the articulation and plotting of various business risks, we created a standard risk universe of 40 risk types that cover all basic business risks (originally larger before we simplified it).*

3. Accountability Established: Each quarter our vice president of Business Risk Management and general auditor presents the findings of the segments' self-assessments of risk along with our assessment and monitoring of enterprise risks to executive management and the Audit Committee. He also presents the results and validations of internal audits conducted along with any supplemental analysis. Although this is reported and presented by the corporate Business Risk Management area, accountability goes back to the businesses' executive sponsorship and leadership to effectively manage and report on their risks. One or more of the executive leaders in each of our business segments has reviewed and attested to the accuracy of the business risk information. Therefore, this reporting reflects their assessment of how their businesses are performing and provides insight into any current or expected risks.

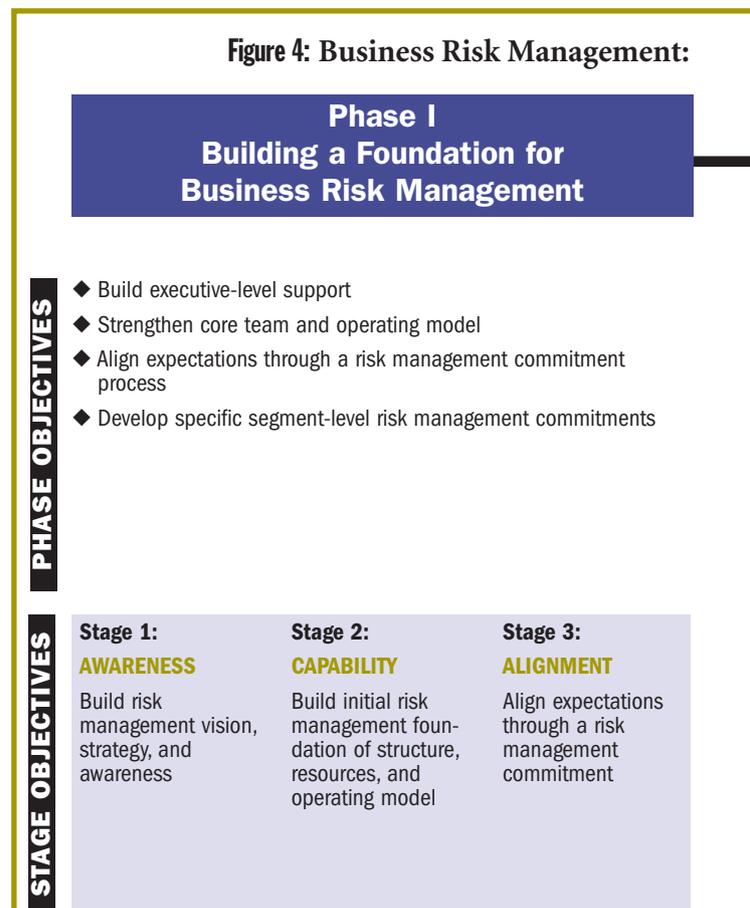
Lesson Learned: *Get the right level of sponsorship and executive engagement. Also, ensure that you don't take ownership of any risk. As a leader of Business Risk Management, you are a facilitator and advisor. The business must own the risk and be accountable for managing it effectively.*

4. A Good Balance Between Segment Value and Enterprise Governance: Each quarter our business segments look at their respective business profile, current operations and objectives, and major change events and then assess their business risks and variability in achieving their established targets. To accomplish this, BRM must be ingrained in each business and must leverage existing resources where ownership for risk management resides. The businesses achieve this through the creation of "risk

expert networks." At the corporate level, the Business Risk Management group focuses on aggregating risk information and creating global portfolio views of risk while providing best-practice development and consultative support. Collectively, as risks are identified, commitments to mitigate those risks must be articulated, reported on, and monitored. BRM also engages other functional groups in mitigating risks, such as Six Sigma experts to reengineer processes, technology professionals to apply or enhance technology solutions, and business planning leaders if the risk is something that could be turned into a competitive advantage. One of the biggest challenges—and largest value points—in the enterprise aggregation of risk information is a reconciliation process. We facilitate a top-down/bottom-up reconciliation of views among the businesses, enterprise monitoring groups, and leadership. Facilitating and administrating this reconciliation of views in a \$40 billion company can be challenging, but achieving consensus and agreement on discrete action plans, which are then driven to the individual level, is quite powerful. This is what starts setting the stage for true ERM.

Lesson Learned: *Create standardization where possible to*

Figure 4: Business Risk Management:



gain efficiencies, and set minimum thresholds of execution while being as flexible as possible within operating segments to account for differing business models and maturity. Having standard deliverables and definitions, combined with flexible processes and reporting, will support ERM while also allowing BRM to be valuable to the individual businesses.

5. A Diverse Team of People: Obviously, the success of any initiative starts with the people. As Jim Collins asks in his book *Good to Great*, “Do you have the right people in the right seats on the bus?” One of the approaches we have taken with our team is to include people with diverse backgrounds from different industries and functions: Big 4 consulting, banking, manufacturing, auditing, regulatory, finance, technology, process engineering, strategic planning, and quality. We each look at business risks a little differently because of our experiences and education, but we all use the same methods and tools for evaluation and remediation of the risks we agree are the top priorities. Diversity builds strength.

6. A Practical Approach that Fits the Culture: Understand the concepts of risk management, and learn from what others have done, but don’t forget to customize

your approach, tools, and processes to what will work in your culture. We adopted a “Nine-Box Rating Map” to create a method of mapping and categorizing risks that works within UnitedHealth Group (see Figure 5). From a theoretical standpoint, a risk manager scores inherent risk and probability, considers controls around those risks, and then scores residual risk and probability based on his/her company’s risk tolerance. In application, however, this process can be confusing to work through with business owners who understand risk, probability, and tolerance but not in the same terms or order. So we created a hybrid map at the business level, which is a residual risk map of dollar impact and variability around our business targets. To create this map, you must still think about the impact and probability of inherent and residual risk, as well as your risk tolerance. But the blending of these thoughts becomes more intuitive as business leaders understand what they should and shouldn’t worry about.

Lesson Learned: *Keep it simple, please! You can’t be too academic in the implementation of BRM/ERM or you’ll lose the buy-in of the business leaders and risk experts right away. Create an approach they can grasp and that will be*

Evolutionary Continuum

Phase II Segment-Level Business Risk Management

- ◆ Execution of a consistent risk management approach across all segments
- ◆ Engagement in specific areas to help the businesses remediate significant risk issues and fulfill their segment risk management commitment
- ◆ Segment-level personnel at appropriate levels engaged in the risk management process
- ◆ Demonstrating the tangible value of a disciplined risk management process within each segment

Phase III Enterprise-Level Business Risk Management

- ◆ Evolve to an Enterprise Risk Commitment and accountability model by “connecting” the segment risk commitments to consider cross-segment risk issues and interdependencies
- ◆ Enhance coordination and integration among Segment Business Risk Services (BRS) teams to help the enterprise remediate significant risk issues and fulfill the Enterprise Risk Commitment
- ◆ Deepen risk management focus on potential risk issues applicable to all business segments
- ◆ Enhance coordination with other components of the UnitedHealth Group Enterprise Risk Management Operating Model that focus on specific areas of risk exposure

Stage 4:

ENGAGEMENT

Engagement in specific risk issues to help fulfill the risk management commitment

Stage 5:

VALUE

Demonstrating tangible value from a disciplined risk management process

Stage 6:

OPERATIONALIZE

Segment-level personnel at all levels fully engaged in and operationalizing the risk management process

Stage 7:

COLLABORATE

Enhance BRM collaboration across other segment teams to consider cross-segment risk issues and interdependencies

Stage 8:

COORDINATE

Enhance BRM coordination with other areas within the segment and UnitedHealth Group that focus on specific areas of risk exposure

Stage 9:

INTEGRATE

BRM is fully integrated with business planning, performance management, quality, and other key management processes

Figure 5: Performance Map Standards

CRITICALITY OF ACHIEVEMENT	UNITEDHEALTH GROUP- LEVEL IMPACT (e.g. > \$xx Million OI)	6 Yellow (Level III)	8 Red (Level IV)	9 Red (Level V)
	SEGMENT-/INTERSEGMENT- LEVEL IMPACT (e.g. > x < \$xx Million OI)	3 Green (Level II)	5 Yellow (Level III)	7 Red (Level IV)
	PROCESS-/BUSINESS- LEVEL IMPACT (e.g. < \$x Million OI)	1 Green (Level I)	2 Green (Level II)	4 Yellow (Level III)
		LOW	MODERATE	HIGH
		CONSISTENTLY within risk tolerance (supported by key metrics/targets)	SOMETIMES within risk tolerance (supported by key metrics/targets)	CONSISTENTLY OUTSIDE OF risk tolerance (supported by key metrics/targets)
ACTUAL/POTENTIAL PERFORMANCE VARIABILITY AROUND TARGETS				
Achievement of Objective/Execution of Process/Implementation of Change/Management of Risk				

helpful to them in assessing and mitigating business risk. Core risk management isn't rocket science, but the basics need to be instilled. (That is, are we looking at inherent risk maps? Residual risk maps? What are our tolerance levels?) Get your concepts and definitions straight, and adapt them to your business and industry to achieve both effectiveness and efficiency. Let your BRM experts deal with the conceptual aspects of the process and engage your business people in a meaningful dialogue around risks and risk management.

7. Integrating the BRM Discipline with Internal

Audit Validation: We have a team evangelizing our BRM discipline and continuously executing proactive self-evaluations and mitigations of risk. Internal Audit has been positioned as an important independent validation mechanism of both the effectiveness of controls and the accuracy of management's assessment of controls. While Internal Audit continues to spend time reviewing areas

that traditionally have high inherent risks, they now spend more of their time on validation of risk reduction for issues identified through BRM. Although ownership and accountability for risk and mitigated risk reside within the business, Internal Audit validates management's assertions of risk reduction and consults on other best-practice improvements to fully eliminate the risk. This model has allowed UnitedHealth Group to look at many more issues in the whole company, mitigate those risks through attention and resources, and focus Internal Audit on more and higher-value-added activity.

8. Relentless Persistence for Improvement:

While we have come a long way in our BRM/ERM journey, we have much more that we'd like to achieve. We're in the process of a focused evolution to full Enterprise Risk Management as described earlier. We are also working thoughtfully on how to predict more risk and fully incorporate

“risk-sensing” analysis into ERM so we can foresee more risks before they happen. (We have used some risk-sensing models adapted from strategic business planning to identify associated potential risks and outcomes.) Additionally, as we network and share best practices with other companies both inside and outside our industry, we are able to validate our current methods as well as benefit from other companies’ lessons and experience.

A CALL TO ACTION

Now is the time for Certified Management Accountants (CMAs) and other accounting and finance professionals to ensure they drive value in their organizations. Move beyond Sarbanes-Oxley and external compliance activity to promote more value-added activities for internal business constituents and, ultimately, all of your stakeholders. The Institute of Management Accountants (IMA) issued a press release on March 15, 2005, titled “IMA to Rebalance Accountancy Profession.” I’ll paraphrase a portion of that release: *IMA believes it is well positioned to restore credibility to the accountancy profession in the wake of recent massive corporate collapses...by reevaluating their views on the accounting process, auditing and financial reporting, and management accounting. Management accounting is about building value inside organizations. Management accountants serve as trusted partners to executives, offering the expertise and analysis necessary to design, implement, and manage internal accounting systems. CMAs drive business performance from inside the organization by performing the decision-support, planning, and control functions for the value-creating operations that are ethically sound and appropriately qualified, making the right decisions and building quality financial and governance practices inside organizations.*

What are you doing to enable this type of value creation at your company? Are you a trusted partner with those you serve and advise? I believe that CMAs with broad and diverse backgrounds are best able to fill the role of BRM/ERM leaders because we can pull from experience in a variety of areas when we are facilitating, analyzing, aggregating, and administrating business risk management activities. We can bring balance to the accountancy profession by providing value and counsel to our clients in the ultimate achievement of our company’s objectives.

Business/Enterprise Risk Management works at

UnitedHealth Group. We have implemented and continue to evolve BRM and ERM to ensure strong governance and control, to identify and remediate business risks, to achieve alignment and awareness of leadership, to enable a “no surprises” management environment, and to provide value-added consulting to the business. This has allowed UnitedHealth Group to be well ahead of the curve in terms of developing Business Risk Management capabilities required to meet the demands of today’s tumultuous business environment.

Why should you consider implementing ERM? Pick your reasons. But if you are waiting for that “burning platform,” consider this: In the book *Geeks and Geezers* by Warren G. Bennis, one leadership trait that all great leaders, both young and old, have shared throughout time is a defining moment that changed and refined them—a “crucible.” From a biblical context, “*The crucible is for silver, and the furnace is for gold, and the LORD tries hearts,*” Proverbs 17:3. For centuries, crucibles have been a refining time and process. But with the stakes being raised and the rules of the game changed, you simply can’t afford to wait for your own crucible to

learn from. How many headlines about Wall Street companies failing due to “surprises” can you afford to witness? The minimum expectation of leadership has been raised, and today’s effective leaders need to learn from others to survive and thrive. Going through one crucible could be the downfall of your company and your career. Do you want to be the company that lags behind in understanding and taking action on business risks, or do you want to be a survivor in today’s fiercely changing environment?

As to the questions of “Who should execute ERM?” and “Should I personally get engaged?” here’s a final thought about leaders from Bill George in his book, *Authentic Leadership*: “If not me, then who? If not now, then when?” Go ahead—take the challenge! ■

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