Understanding Risk Management through an Environmental Health and Safety Template

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Out of this nettle, danger, we pluck this flower, safety.

—William Shakespeare (1564–1616), English Poet and Playwright
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Abstract: This article discusses how The City University of New York (CUNY), the third largest university system in the United States, made the transition from an institution whose risk management functions were covered in many different departments and offices to one with an integrated risk management focus. CUNY chose to model its risk management function and methods after its environmental health and safety program. Specific components include measuring, evaluating, and managing risks; bridging bureaucratic boundaries in higher education; recognizing that failure incurs more than financial loss; and creating a culture of continuous improvement.

Introduction: Establishment of a Risk Management Office at CUNY
“Why don’t you join URMIA and see what other universities are doing?” That was one of the first pieces of advice that I received as the newly minted risk manager of The City University of New York (CUNY), the third largest university system in the United States. CUNY has 23 colleges, graduate schools, and professional schools; approximately 460,000 matriculated and non-matriculated students; 35,000 faculty members and other employees; and more than 23 million square feet of space in almost 300 buildings located throughout New York City’s five boroughs. Just by virtue of its size and scope, the university poses a significant risk management challenge. Since July 2007, the newly established Office of Environmental, Health, Safety and Risk Management has been tasked with coordinating the response to this challenge.

To suggest, however, that CUNY had no risk management function prior to July 2007 would be misleading. For years, CUNY has had an internal audit and control department with risk management responsibilities; a public safety department that prepares and disseminates emergency management procedures; a human resource department that addresses job-related injuries and workplace violence, among other employee risks; and many other units that perform risk management activities even if they do not refer to them as such. Beyond that, responsible managers are always actively searching for ways to minimize risk in their functional areas.

What happened in 2007 to convince CUNY and other universities to upgrade their risk management efforts? It is easy to suggest that the proximate cause for many universities to establish or re-invigorate risk management capabilities in 2007 was the tragedy at Virginia Tech, which resulted in 32 campus deaths and overwhelming—albeit understandable—post-mortem scrutiny from the public, the press, and the government. For CUNY, at least, this is only part of the picture.

Let’s begin with a little history. CUNY’s Borough of Manhattan Community College (BMCC) has a dubious distinction as the only college in America to have been the victim of a major international act of terrorism. While the destruction of the World Trade Center’s twin towers on September 11, 2001, is seared in our collective memory, few realize how many nearby buildings were damaged severely or destroyed. Fiterman Hall, an integral part of the BMCC campus located just a block north of ground zero, was damaged beyond repair and is still undergoing deconstruction.

Add to that the worldwide apprehension of the potentially devastating impact of an avian influenza pandemic, the threat of coastal storm flooding exacerbated by the feared effects of climate change, an occasional infrastructure malfunction, lab explosion, or security breach, and pretty soon you realize that risk management deserves a bit more direct attention.

Deciding what to do and how to do it, however, are two entirely different things. Once an institution has
and most EH&S activities are performed or at least monitored by trained professionals—and often seem shrouded in mystery to the uninitiated.

In spite of the imperfect analogy, the success of the EPA audit program coupled with an overarching congruency suggested that EH&S could serve as a good model to follow. The following sections of this article will analyze the application of these constructs borrowed from the CUNY EH&S program over the first year of consolidated risk management at CUNY.

The CUNY EH&S Risk Management Model

The logic behind using the CUNY EH&S program as a model for university-wide risk management is based on several constructs:

1. It has identifiable risks that can be measured, evaluated, and managed;
2. It cuts across the traditional bureaucratic boundaries—or silos, as they are often referred to in higher education;
3. The consequences of failure typically go well beyond financial loss; and
4. Successful implementation can have a transformational impact on the organization.

Nevertheless, the logic is not flawless. EH&S is but a small subset of the risks encountered at a university, especially one as large as CUNY with campuses at multiple urban locations; EH&S has a well defined regulatory regime with which everyone is legally bound to comply;
we might be penalizing larger campuses or campuses with more extensive scientific research. If we considered the dollar value of waived fines and penalties, we might be penalizing a campus for calculations that were difficult to reconcile throughout the audit process.5

The problems with measurement are equally complicated in risk management. One of the first risk issues that we tried to quantify was workers’ compensation. We had historical data broken down by campus providing the number of claims and the various costs associated with them. Needless to say, the numbers lent themselves to quantitative analysis, but explaining what they meant, campus by campus, was no easier—or potentially meaningful—than evaluating environmental compliance based on the number of findings of a given audit.

Fighting through these complexities may be frustrating at times, but in the long-run it is an invaluable exercise. As we found with our EH&S audit program, arriving at an answer is the ultimate goal, but there is also intrinsic value in simply asking the question. We might not be able to explain definitively why one campus had more violations than another, but we are excited that people are paying attention to the audit results because that, in and of itself, will help improve compliance. Similarly, the fact that campuses realize that we are collecting and analyzing their workers’ compensation costs is enough to get them thinking about how to reduce workplace incidents.

Over time, we hope to develop a risk management system that can obtain and track clear and compelling data. We plan to accomplish this by learning and borrowing from our colleagues at other universities and organizations, such as URMIA, and testing those tools internally to make sure that they work at CUNY. In the meantime, we will draw on the sometimes inexact measurement techniques that we used for our EH&S program, and we hope that they will garner enough attention that they can move the process forward.

**Construct #2: Bridging Silos through the Risk Management Council**

Because there was no CUNY-wide EH&S function prior to 2003, each campus was responsible for its own compliance efforts. Without suggesting that some campus programs were more extensive than others, it was clear under the EPA agreement that all campuses would be held to the same standard. To foster collaboration and consistency, CUNY established a formal Environmental Health and Safety Council that meets monthly to share information, discuss any new regulatory requirements, and hear from one another, as well as from guest presenters, about developments in the field.6

Some campuses benefit from the monthly Council meetings more than others, and those who participate in the standing and ad hoc committees of the Council benefit even more. However, an important outcome of the Council is that the campus EH&S officers are able to look beyond campus-specific concerns and see themselves as key contributors toward an integrated, university-wide program. The perspective of local campus interests will not—and should not—disappear, but it is tempered by a broader CUNY perspective. As a result, the campus EH&S programs, as well as the university-wide programs, are enhanced.

The same template was applied to create a CUNY Risk Management Council, but with several changes that have proven to be helpful. First, each college president was asked to select an appropriate risk management designee to represent the campus on the Council, which led to a very diverse group of participants. In addition, the functional overhead departments at CUNY are well-represented and participate actively.

As with the EH&S Council, this structure encourages members to look beyond individual campus considerations and consider risk management from a CUNY-wide perspective. Additionally, the spectrum of representatives from functional departments ensures that a wide variety of issues are brought before the Council and that solutions are addressed across organizational boundaries. Again, fostering broad-based communication does not take the
place of focused risk analysis, but it certainly creates a more conducive environment. This same silo-bridging process that has energized the Council has been applied to its working subcommittees on critical cross-cutting issues, such as emergency preparedness, business continuity, student affairs, and insurance.

Construct #3: Failure Is Not an Option
One of the mantras of the EPA Audit and Disclosure Agreement was that the campus that incurs the fine pays the fine. Although CUNY is an integrated university, each campus is encouraged to take advantage of its unique characteristics, because those unique characteristics benefit each college and the University as a whole.

Risk management at CUNY may have recently taken a more integrated, university-wide approach, but it is not new to CUNY, and it is certainly not new to the college administrators who always have been responsible for risk management on their campuses. Although many decisions are made consultatively, such as closing the campus because of a snowstorm, the college president is ultimately accountable for decisions affecting the campus. This is most clearly the case when it relates to an emergency decision that requires immediate and often unilateral action.

As a result, the college presidents are asked to play a pivotal role in CUNY’s risk management effort. As noted, they were asked to select their designee to the Risk Management Council, and they gave the selection due consideration. Additionally, they have been tasked with establishing local campus risk management committees to focus on campus-specific concerns and serve as the liaison to the CUNY Risk Management Council. Finally, just as EH&S indicators were incorporated into each president’s annual performance evaluation, risk management indicators are now being added to upcoming evaluations.

College presidents are quite capable of worrying about campus-based risks without constant reminders. They would not likely have been given chief executive responsibility without demonstrating fairly well-developed risk management skills. They know that failure is not an option, because they also know that they will be the ones under the klieg lights at the inevitable press conference. It is in everyone’s interest to maximize CUNY’s risk management efficacy, especially for those on the front lines.

Construct #4: Creating a Culture of Continuous Improvement
The first year of the CUNY-wide risk management program has signaled steady progress. CUNY has begun to explore techniques for mapping and assessing—and ultimately mitigating—the University’s risks. It has set up a Risk Management Council and related tools, including a website, newsletter, and an emergency preparedness task force that encourage the disparate parts of the University to collaborate on risk management. Finally, it has enlisted the college presidents as key leaders in the effort.

From the standpoint of the pragmatic risk manager, we still have much work to do. We must continue to develop consistent quantitative criteria that will help us measure and prioritize risks. CUNY’s Risk Management Council has improved communication among functional silos, but organizational obstacles must continue to be addressed. Additionally, while the campus presidents are on board, there are still many key players that must become more involved.

Whether a risk manager is better off thinking that the glass is half full or half empty is unclear, but the initial indications are that we can all agree that there is something in the glass. The next step is to solidify what we have accomplished and build on it.

Several items are on the immediate agenda. Should we bring in more outside expertise, or should we continue to rely on in-house resources? Should we focus on specific high risk areas, or should we continue with a comprehensive effort? How shall we address our ever-changing insurance needs? How will we balance high-impact, low-probability risks with low-impact, high-probability risks? Ultimately, how will we measure the success of our risk management efforts?

Coming to grips with these questions can be quite daunting. Fortunately, we are not grappling with them alone. Risk management colleagues in higher education and in institutions such as URMIA have been down this
road before us, and many of these questions have been resolved successfully following different paths. What has become clear at CUNY is that risk management is a process that requires a commitment to collaboration, diligence, and continuous improvement.

**Conclusion**

When CUNY first established its Office of Environmental Health and Safety in 2003, it sought to build on existing capabilities and to learn from others. Although CUNY is a unique institution in so many ways, it is not the first university faced with EH&S—or risk management—challenges. We knew intuitively and confirmed through experience that we have much to learn from other colleges and universities. In fact, the creation of the New York Campus Environmental Resource (NYCER), a consortium of many of the colleges, universities, and teaching hospitals in and around New York City, was a signature accomplishment. When we meet at a different campus every other month to discuss a range of critical challenges that we all face, it is heartening to see how colleagues from many institutions are willing to share their experiences and help each other avoid repeating unnecessary mistakes.

It is not yet clear whether the NYCER model can be replicated for risk management purposes or whether it even makes sense to try. After all, many national organizations, like URMIA, already have regional or local chapters that can help make the learning curve less steep. We have already taken advantage of a number of these information sharing opportunities, and we hope that in the foreseeable future, CUNY’s risk management program will be able to share its success stories with others.

**About the Author**

Howard N. Apsan, Ph.D., serves as the University Director of Environmental, Health, Safety, and Risk Management (EHSRM) for The City University of New York, the third largest university system in the United States. CUNY has 23 colleges, graduate schools, and professional schools; approximately 460,000 matriculated and non-matriculated students; 35,000 faculty members and other employees; and more than 23 million square feet of space in almost 300 buildings located throughout New York City's five boroughs. The University Director of EHSRM is responsible for environmental health and safety (EH&S) management and compliance throughout the university; serves as the University's chief risk officer, tasked with assessing liabilities and designing systems for minimizing CUNY's operational and reputational risks; and is the chair of the University's Emergency Preparedness Task Force.

Before joining CUNY, Howard worked as an analyst, manager, and consultant for most of his career: he spent several years in New York City government at the Mayor's Office, the Board of Education, and the Sanitation Department and seventeen years in private consulting, including eight years as a Principal and, ultimately, National Director of a nationwide consulting firm. He has also been president of his own firm, Apsan Consulting, Inc., since 2001. He has served clients throughout the United States and has extensive international experience.

In addition to his management and consulting activities, he has been a member of the faculty at Columbia University's School of International and Public Affairs since 1986. He has also served on the United States Technical Advisory Group (US TAG) for ISO 14000, the American Society for Testing and Materials (ASTM) Environmental Committee (E-50), the Springfield (New Jersey) Environmental Commission, and chaired the New York Chamber of Commerce Environment and Energy Committee and the New York Chapter of the Environmental Auditing Roundtable. He is a LEED Accredited Professional, a member of the Editorial Board of Environmental Quality Management, and writes and lectures regularly.

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**Endnotes**


6. Ibid.
Just as energy is the basis of life itself, and ideas the source of innovation, so is innovation the vital spark of all human change, improvement, and progress.
