

## Compliance Today – January 2020

### The risk of getting nothing done

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By Gerry Zack

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Not to be confused with the risk of doing nothing, the risk of getting nothing done comes from what I sometimes call “over mitigation.” I can recall several times during my years as an outside advisor when a CEO, CFO, or other senior management team member told me to design internal controls that would eliminate the risk of a particular fraud or compliance risk. My standard response was always something along the lines of “No problem, now let’s start planning to close down your organization.” I would then explain how assurance that a risk is eliminated is very rarely feasible without exiting the activity that creates the risk in the first place. The perfect control(s) that eliminate a risk rarely exist without major disruption to operations.

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