STRATEGIC ROLE OF CMAs IN RISK MANAGEMENT, COST MANAGEMENT AND INNOVATION IN THE BANKING SECTOR

Abstract

Risk management has become the epitome of assurance and governance in Indian banking, particularly with the Reserve Bank of India's (RBI) shift toward Risk-Based Supervision (RBS) and the mandated adoption of Risk-Based Internal Audit (RBIA). In this evolving environment, Cost and Management Accountants (CMAs) have emerged as strategic partners, contributing far beyond traditional accounting roles. Their expertise in analytics, financial modelling, costing, project evaluation and process optimisation aligns closely with the ever-evolving risk and compliance requirements of the sector. CMAs enhance robustness of RBIA, strengthen credit appraisal process and recovery management, support cybersecurity and IT risk governance and provide analytical insight into digital banking, treasury management, ESG integration and financial inclusion. Their structured methodologies not only add significant value in specialised monitoring of large exposures, due diligence during mergers, acquisitions and restructuring but also in carrying out settlements. This article outlines the multi-dimensional and future-facing contributions of CMAs to risk management, cost discipline, and innovation in the Indian banking system.

CMA Suman Datta
Former Head - Credit Administration
Indusind Bank, Mumbai
s_datta1968@rediffmail.com

Introduction

In today's financial ecosystem, risk management forms the backbone of assurance mechanisms in Indian banks. RBI's Risk-Based Supervision (RBS) framework places emphasis on evaluating governance, risk culture and systemic and process vulnerabilities. Complementing this, RBI's mandates on Risk-Based Internal Audit (RBIA) require banks to transition from a checklist-driven audit to a dynamic, risk-prioritised assurance model.

In this context, Cost and Management Accountants (CMAs) have evolved from conventional accounting practitioners to strategic contributors in banking. Equipped with strong foundations in cost management, financial analytics, performance measurement and risk evaluation, CMAs bring deep process insight and financial discipline to banking's operational and strategic decision-making. Their contributions span risk management, prudential controls, digital transformation, sustainability and oversight of large credit exposures.

This article synthesises the strategic role of CMAs across some critical domains shaping the banking sector's future.

1. Strengthening Risk-Based Internal Audits (RBIA)

RBI's RBIA framework requires banks to design audit plans based on dynamic risk assessments across credit, treasury, operational, and IT functions. CMAs provide significant value to this mandate through:

- **Risk Assessment:** CMAs evaluate products,

processes, systems and control designs using cost-effective measures and sensitivity analyses to gauge the strength of the prevailing risk and control framework.

- **Strengthened Monitoring:** They analyse portfolio trends, compliance to credit conditions, deviations in disbursements and control breakdowns. Their use of dashboards, KRIs, and scoring models improves audit prioritisation.
- **Control Evaluation:** CMAs enhance the depth of audits covering credit, operations, treasury, IT and data quality, particularly referring to high-value loan segments and optimise audit schedules to cover high-risk units first.
- **Decision Support:** Their structured reporting enhances quality of insights provided to the Audit Committee and Risk Management Committee.

CMAs elevate RBIA from a procedural inspection into a strategic tool that strengthens governance and risk preparedness.

2. Credit Risk Assessment and Recovery Management

CMAs contribute meaningfully to all stages of credit risk management—from origination to stress resolution:

- **Borrower Creditworthiness:** CMAs rigorously analyse financial statements, business cycles, working capital needs, and sector risks using advanced financial ratios and performance metrics.
- **Cost Analysis and Pricing:** By analysing cost structures, credit administration costs, capital costs, and potential loan losses, CMAs help refine risk-based pricing models which help to carry-out cost audits and take effective management decisions on product profitability, services and the efficacy of monitoring and controls.
- **Risk Quantification:** Techniques such as PD (Probability of Default) and LGD (Loss Given Default) estimation help banks improve provisioning and stress testing accuracy.
- **Early Warning Signals:** CMAs review EWS frameworks and trigger-based monitoring dashboards to track compliance of covenants, operational performance deviations, fund flows, margins, and inventories, red flag indicators as per RBI guidelines,
- **Recovery and Resolution:** CMAs use a combination of analytical, forensic, financial and process-based tools to evaluate restructuring proposals, conduct reviews, assess OTS feasibility vis-à-vis valuation of primary and secondary collateral security and examine revival packages with operational and financial realism.

Their blend of financial analytics and operational understanding enables CMAs to assess credit risk more accurately and manage recovery more effectively.

3. Credit Appraisal, Project Financing and Cost-Benefit Analysis

CMAs bring depth and rigour to project financing and appraisal processes. Their contributions include:

- **Feasibility Assessment:** CMAs examine project cost structures, revenue assumptions, utilisation forecasts, and product mix to assess financial viability.
- **Structuring of Funding:** They help determine the optimal mix of debt and equity, evaluating repayment capacities and stress scenarios.
- **Advanced Financial Modelling:** Tools like DSCR, IRR, break-even analysis, and scenario modelling allow for comprehensive project evaluation.
- **Credit Support:** CMAs produce structured appraisal notes highlighting financial strengths, risks, and mitigants, directly supporting credit committee decisions.

Their cost-benefit analyses enable selection of the most financially sound lending proposals, reducing sanctioning errors and improving asset quality.

4. Cybersecurity, IT Risk and Financial Controls

As cyber threats escalate, cybersecurity is now viewed as a financial and operational risk. CMAs contribute by:

- **Risk Identification:** Evaluating internal controls in digital transactions, IT general controls, and access rights to identify vulnerabilities.
- **Quantifying Cyber Exposure:** CMAs assess the financial impact of cyber incidents and support decisions on cyber insurance, control investments, and escalation frameworks.
- **Fraud Detection and Compliance:** Their data analytics skills support fraud-risk monitoring and compliance with RBI's IT and cyber governance guidelines.
- **Strengthening Governance:** CMAs help integrate cybersecurity into overall risk management frameworks by linking financial consequences with technology controls.

CMAs help bridge the gap between IT security, operations and financial oversight, improving resilience.

5. Digital Banking and FinTech Integration

Digital transformation requires banks to redesign financial controls, costing frameworks, and risk models. CMAs play an important role in ensuring digital initiatives are both financially viable and well-governed:

- **Strategic Cost Management:** Using activity-based costing and variance analysis, CMAs optimise costs related to digital channels, fintech partnerships, and customer acquisition.
- **Profitability Analysis:** They assess the performance of digital products such as BNPL, digital lending, wallets, and API-driven services.
- **Risk and Performance Evaluation:** CMAs design KPIs and KRIs for digital KYC, algorithmic lending, outsourcing risks, and data governance.
- **Business Case Development:** They support digital innovation teams by modelling business cases and explaining financial implications of new technologies as well as major internal projects for Banks viz. Core Banking System (CBS) migration, adoption of new risk models and systems, new product development, etc.

CMAs ensure digital expansion remains sustainable, profitable, and risk-aligned.

6. Treasury Operations and Foreign Exchange Risk Management

CMAs strengthen treasury governance and support ALM, market risk, and forex risk management through:

- **Performance Measurement:** Independent evaluation of investment classification, valuation processes, and trading strategies.
- **Liquidity and ALM Management:** Assessing interest rate sensitivities, liquidity mismatches, and hedging strategies to improve ALM monitoring.
- **Compliance:** Ensuring adherence to RBI and FEMA limits on forex exposures, derivatives, and investment operations.
- **Risk Assessment:** Enhancing pricing models, market risk controls, and stress-test frameworks.

CMAs expertise in financial modelling enhances treasury transparency and strategic risk governance.

7. Sustainability, ESG and Long-Term Value Management

Banks are increasingly incorporating ESG considerations into strategy and risk assessment. CMAs contribute through:

- **Strategic Planning:** Aligning ESG metrics with business strategy, designing KPIs to measure sustainability performance.
- **ESG Risk Assessment:** Evaluating ESG-related risks in lending decisions and corporate operations.
- **Cost Management:** Using tools like Material Flow Cost Accounting (MFCA) to analyse resource efficiency, waste reduction, and cost-benefit of green projects.
- **Governance and Reporting:** Supporting sustainability disclosures, climate-risk reporting, and green-bond frameworks.
- **Regulatory Compliance:** Integrating ESG into enterprise risk management and ensuring compliance with evolving reporting standards.

CMAs help banks translate ESG objectives into

measurable financial outcomes, supporting long-term value creation.

8. Agency for Specialised Monitoring (ASM) of Large Borrower Accounts

For large exposures, CMAs are frequently empanelled as ASMs due to their analytical capabilities:

- **Risk Identification:** Detecting diversion of funds, stock discrepancies, cost overruns, covenant breaches, and operational inefficiencies.
- **Monitoring and Reporting:** Preparing structured, periodic reports for consortium banks to ensure ongoing visibility and risk mitigation.
- **Data Integrity:** Providing accurate cost-related data for assessing exposure values, including off-balance sheet exposures.

CMAs enhance transparency and accountability in monitoring large, interconnected borrower groups, safeguarding systemic stability.

9. Due Diligence, Valuation, Mergers, Acquisitions and Restructuring

CMAs are valuable contributors to consolidation and restructuring efforts in the banking sector:

- **Financial and Operational Due Diligence:** Identifying non-compliance, inefficiencies, asset quality issues, and hidden liabilities.
- **Valuation:** Assessing loan books, subsidiaries, intangible assets, and NPA provisioning adequacy.
- **Strategic Evaluation:** Analysing synergy potential, cost savings, integration risks, and financial feasibility of restructuring.

CMAs analytical rigour complements investment bankers and consultants, improving decision quality in transformative transactions.

10. Evaluating Cost Efficiency of Financial Inclusion Schemes

Financial inclusion initiatives must balance outreach with financial sustainability. CMAs support this through:

- **Cost-to-Serve Analysis:** Evaluating costs of serving rural and underserved regions to ensure long-term viability.
- **Operational Efficiency:** Reviewing BC/BF models, micro-branches, and digital inclusion channels for leakage and inefficiency.
- **Decision Support:** Analysing subsidy utilisation, DBT mechanisms, and proposing optimisation measures.

CMAs help banks achieve inclusion goals while maintaining cost efficiency and performance discipline.

11. Usage of Operations Research Tools

CMAs use Operations Research (OR) tools viz. PERT, CPM and crashing to improve banking systems and processes. These tools allow CMAs to:

- **Build efficient workflows:** Process crashing helps to reduce operational and settlement risk and assists in deal settlements, nostro reconciliations and processing of treasury deals.
- **Reduce operational bottlenecks:** CPM identifies delays in 'Aadhaar' authentication, sponsor bank credit or BC reconciliation; PERT helps model the end-to-end flow of benefit transfer; Crashing helps reduce TAT during mass campaigns (KYC updation, account opening drives)
- **Enhance customer experience:** Speeding up onboarding during peak demand and accelerate the credit appraisal process during time-bound corporate lending
- **Improve compliance and regulatory timelines:** Human errors, process gaps, system delays and downtimes are a common theme nowadays. CMAs use OR tools to estimate the probability of process delays contributing to operational loss and use the same for process re-engineering to reduce non-critical steps and also implement business continuity and resilience planning.

In an industry increasingly driven by process optimisation, automation and risk-focused supervision, OR tools provide CMAs with a strong analytical advantage to drive measurable improvements in the banking sector.

12. Legal and resolution pathway assessment

CMAs are often seen in the company with legal teams to help determine the most financially optimal legal route which would be a win-win situation and help resolve an issue amicably viz.

- **SARFAESI feasibility and time analysis:** The SARFAESI Act empowers Banks to proceed (in DRT) with the recovery without court intervention provided certain criteria are fulfilled. CMAs help to ensure its feasibility in co-ordination with legal and compliance team of the Bank.
- **IBC process and readiness checklist:** The intent of Corporate Insolvency Resolution Process (CIRP) is to resolve financial distress through a restructuring plan instead of liquidation. CMAs in conjunction with Business, Legal and Credit teams to formulate a viable strategy with Borrower to discuss feasibility of moratorium and other options / additional collaterals, structuring / escrowing future cash flows to resolve the issue.
- **Wilful defaulter evaluation framework:** CMAs often need to validate Borrower's default with RBI's circulars on wilful default category to comply with RBI classification. The core principle to abide is whether the default was intentional, deliberate and calculated and not the result of genuine business failure.

Conclusion

Today's risk management focuses on proactive, integrated Enterprise Risk Management (ERM) approach to confront the complexity, speed and interconnectedness of risk e.g. cyber, geo-political, supply-chain, etc. This requires a transformation from static, siloed risk register approach to a dynamic and continuous monitoring approach leveraging real-time data analytics along-with co-ordination from other stakeholders.

As RBI continues to escalate expectations around risk management, governance, and sustainability, the role of CMAs will become even more pivotal in shaping the next phase of India's banking evolution. They are expected to play a transformative role in the Indian banking sector by strengthening risk management frameworks, enhancing cost governance, supporting digital innovation, and contributing to strategic decision-making. Their unique blend of financial analytics, operational insight, costing expertise, and risk assessment makes them essential partners in building a resilient, competitive, and future-ready banking system. MA

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