2022 Enterprise Compliance Services Plan Results

Compliance Activity	Status	Notes
1.0 Governance: Structure the program with clearly defined roles & responsibilities		
Facilitate Compliance Advisory Committee Meetings to Address Compliance Initiatives	Completed	CAC was disbanded, but ECS integrated compliance into the Executive Risk Committee and the Risk Champion Network
Publish Compliance and Ethics Accountability Matrix	Not Completed	After discussion with stakeholders, this was converted to defining roles and responsibilities and is on the 2023 six-month compliance plan
Continue Partnership Meetings with Internal Stakeholders	Completed	Continued to build relationships with compliance partners across the organization
Publish Enterprise Training Requirements Matrix	Completed	Published the Required Training Matrix to centralize all mandatory training for CalSTRS employees
Review and Update Enterprise Compliance Services Charter	Not Completed	Drafted an Enterprise Compliance Services Charter; finalization pending maturity implementation plan
2.0 Culture: Ethical & compliant behavior embedded in the foundation & daily operations		
Develop Activity-Based Learning and Communication for CalSTRS Revised Code of Ethics and Business Conduct	Completed	Developed activity-based CalSTRS Code of Ethics & Business Conduct (Code) learning communications
Onboard Compliance Partners to ECS Regulatory Tracking Subscription for Increased Understanding of Compliance Obligations	Completed	Performed RegAlytics onboarding for affected business partners
Develop Ethical Decision Making and Reporting Learning Aids to Promote Culture of Ethics	Completed	Developed ethical decision-making and reporting learning aids for the organization
Develop Communication Guides for Leaders to Address Specific Compliance Obligations as Relates to Business Processes	Not Completed	Deferred until new compliance leadership could be hired; project was added to the 2023 six-month plan
3.0 Risk Assessment: Periodic assessments of risk exposure related to misconduct or non-compliance with laws, regulations, policies, & standards		
Continue to Socialize and Update Compliance Risk Taxonomy	Completed	In partnership with Weaver, updated Compliance Risk Taxonomy
Refine Compliance Risk Scoring Criteria	Completed	In partnership with Weaver, refined the Risk Scoring Criteria
Perform Iterative Compliance Risk Assessments and Update Compliance Initiatives as Needed	Completed	In partnership with Weaver, performed an iterative compliance risk assessment
Participate in the Implementation of the Governance, Risk and Compliance Tool	Not Completed	Participated in the IRM/GRC process; the policy management and compliance component has not started and is still to be determined

Compliance Activity	Status	Notes
4.0 Policies & Standards: Defined guidance to support organizational ethical expectations & compliance with applicable laws and regulations		
Continue Coordination of Annual Policy and Biennial Standard Reviews	Completed	Continued the coordination of annual periodic reviews
Develop and Distribute Policy Management Handbook	Completed	Published and announced a Policy Management Handbook on Central
Update Policy Mapping to Legal Requirements Library	Not Completed	Deferred to the 2023 six-month compliance plan
Identify Policies Related to Highest Compliance Risks	Not Completed	Deferred to the 2023 six-month compliance plan
Implement Knowledge-Based Challenge into CalSTRS Annual Policy Attestation Process	Completed	Completed a policy attestation contest
5.0 Training & Communication: Appropriately tailor subject matter topics to support understanding of compliance & ethics		
Continue to Communicate and Promote through CalSTRS Intranet (Central), Roadshows, Newsletters, and ECS SharePoint	Completed	Communicated all new, revised, and retired policies monthly on Central
Expand Existing Training to Include Compliance and Ethical Topics	Completed	Developed first-ever Annual Compliance Training module
Deliver Communication Aids or Training on Regulatory and Policy Topics	Completed	Promoted the Code weekly on Central
Update Communication Plan as Needed	Not Completed	Deferred to the 2023 six-month compliance plan
Promote Compliance and Ethics Awareness Week	Completed	Promoted C&E Week through "Three Things" on Central
6.0 Confidential Reporting: Efficient & effective mechanism that allows anonymous reporting of compliance & ethical concerns		
In Collaboration with Public Affairs, Communicate/Educate External Stakeholders on Reporting Mechanisms	Completed	Contributed to a Pension Sense blog article educating and informing external stakeholders about the Hotline
Continue to Assess and Promote Importance of Speaking Up	Completed	Continued to promote speaking up through Central News, Three Things, and Townhall
Distribute Compliance and Ethics Hotline Reporting Cards	Completed	Continued to promote speaking up through the distribution of CalSTRS Compliance and Ethics Hotline wallet cards
Identify Trends & Recommend Potential Mitigations	Completed	In partnership with OLEA, worked to identify reporting trends and discuss potential mitigations

Compliance Activity	Status	Notes
7.0 Case Management & Response: System & processes to efficiently and effectively manage, investigate & resolve		
Identify Case Management Process Improvements through Data Analytics	Completed	Developed case manager checklist
Continue to Assess Compliance & Ethics Reporting Trends for Remediation	Completed	In partnership with OLEA, worked to identify reporting trends and discuss potential mitigations
Identify Opportunities for Expanded Use of Case Management System	Completed	Expanded use of the hotline case management system to the Equal Employment and Opportunity Office
8.0 Monitoring: System for routine monitoring of organizational compliance risk, controls & behaviors		
Identify Opportunities to Embed Controls into Procurement and Human Resource Compliance Processes	Completed	Provided recommended controls for Procurement processes and met with Human Resources to discuss opportunities
Partner with Procurement on Contract Management Compliance	Completed	Partnered with procurement compliance on contract management compliance
Collaborate with Facilities Management to Document its Processes, Legal Requirements and Controls	Not Completed	In partnership with Weaver, engaged with Facilities Management and began a safety, security, and resiliency assessment; project was added to the 2023 six-month plan
Update and Validate External Compliance Reporting Matrix	Completed	Updated and validated the External Compliance Reporting Matrix
Coordinate with Compliance Assurance Partners on Risk Mitigation Roles & Reporting	Completed	Coordinated with compliance assurance partners in procurement compliance on risk mitigation roles & reporting
Assist Internal Stakeholders on Resolution of Outstanding Audit Issues	Completed	Worked with business owners on compliance-related audit issues
9.0 Third Party Compliance Management: Risk-based application of due diligence over third-party relationships		
Develop Third-Party/Supplier Code of Conduct	Not Completed	Deferred development of a Supplier Code of Conduct until the Third Party Risk Workgroup project is further along
Assist Procurement in the Development of Contract Manager Monitoring Tools, Communications, and Training	Completed	Assisted procurement in the development of content for contract management training
Collaborate with General Counsel on Third Party Risk Management	Not Completed	Continued our collaboration with the cross-function Third Party Risk Workgroup, deferred into the 2023 six-month plan as collaboration is still ongoing
Coordinate Third-Party System and Organization Controls (SOC) Reporting Review Process	Completed	Performed SOC reporting coordination and review
Continue to Refine SOC Report Review Process	Completed	Improved the SOC review process

Compliance Activity	Status	Notes
10.0 Program Management: Defined structure to manage, measure & evaluate program effectiveness		
Work with Enterprise Strategy Management to Develop Compliance & Ethics Survey	Not Completed	Deferred to the 2023 six-month compliance plan
Publish ECS Compliance and Ethics Accomplishment Report	Completed	Completed Compliance and Ethics accomplishments report
Perform Maturity Assessment of Compliance Program	Not Completed	Completed annual maturity self-assessment with Gartner; Weaver is conducting an independent maturity assessment due to be completed in March 2023