

Enterprise Compliance Services 18-Month Maturity Plan Update as of March 31st, 2024

18-Month Maturity plan covers the period of January 1, 2024, through June 30, 2025

#	Activity	Status	Accomplishments
Phase 1			
1	Update framework and charter	On target	<ul style="list-style-type: none"> ERM Framework education provided to the ARM committee in March 2024. ERM Framework scheduled for presentation at the May Audits and Risk Management Committee for first reading. Enterprise Compliance Services (ECS) charter scheduled for presentation at the May Audits and Risk Management Committee for first reading.
2	Hire staffing resource	On target	<ul style="list-style-type: none"> One staffing resource has been identified and offer has been made to candidate.
3	Develop compliance procedure manual	Complete	<ul style="list-style-type: none"> Procedures have been completed and approved by ECS Director for compliance and ethics hotline administration, policy management, annual compliance risk assessment, system and organization controls (SOC) reports review and reporting.
4	Support third-party risk management and procurement compliance (ongoing through phase 3)	On target	<ul style="list-style-type: none"> Supporting the third party risk management working group through risk assessment testing, review and feedback on due diligence checklist and staffing needs assessment.
5	Identify ECS team training needs to support maturity plan	Complete	<ul style="list-style-type: none"> Partnered with consultant, Gartner to complete a gap analysis on training needed for effective compliance programs. In Phase 1, the ECS team completed 75 hours of continuing professional education in compliance and ethics related topics.
6	Develop an annual risk-based compliance education plan	Completed	<ul style="list-style-type: none"> An annual communication plan was developed with and approved by the Communications team. The plan covers the period of January 2024-December 2024.
7	Secure funding and acquire software to support maturity	On target	<ul style="list-style-type: none"> Funding for software included in the FY24/25 budget. Working through internal procurement process to acquire software.

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Phase 2			
8	Inventory organization-wide assurance activities	Not started	
9	Support implementation of new regulatory compliance requirements (ongoing through phase 3)	Not started	
10	Administer annual enterprise-wide policy attestation	Complete	<ul style="list-style-type: none"> Human Resources has transferred the annual attestation process to ECS. ECS successfully executed the 2024 annual enterprise-wide policy attestation March 1, 2024- April 1, 2024.
11	Develop plan to align ECS and ERM risk assessments	On target	<ul style="list-style-type: none"> The ERM assessments have been adjusted to provide more compliance related topics such as aligning CalSTRS policies to enterprise risks. However, more planning is required to fully align the risk assessments.
12	Develop and document monitoring program framework and processes	Not started	
13	Develop ECS team continuous education program	On target	<ul style="list-style-type: none"> ECS acquired memberships with OCEG¹ to access industry-leading standards, education, and certifications. Evaluation of certificates that fit compliance's future needs are being assessed.
14	Implement risk-based compliance education plan	Complete	<ul style="list-style-type: none"> An annual communication plan was developed with and approved by the Communications team. The plan covers the period of January 2024- December 2024.
15	Implement software	Not started	

¹ OCEG is a global nonprofit organization. They provide authoritative models and an all-in-one certification suite to help governance, risk, and compliance professionals develop versatile skills, empowering them to improve performance. [About OCEG](#)

#	Activity	Status	Accomplishments
Phase 3			
16	Request staffing resources	Not started	
17	Fully align ERM and ECS risk assessments	Not started	
18	Select policies to begin testing and monitoring	Not started	