

2021 Compliance Plan Results

Governance & Culture

- ✓ Developed Compliance & Ethics Accountability Matrix Framework
- ✓ Published External Compliance Reporting Matrix
- ✓ Finalized revision of CalSTRS Code of Ethics and Business Conduct

Risk Assessment

- ✓ Performed Integrated Risk Assessment Process
- ✓ Updated Compliance Risk Profile
- ✓ Reported Compliance Risk Results through Dashboard
- ✓ Participated in Fraud Risk Definition

Policies & Standards

- ✓ Coordinated Annual Policy Reviews
- ✓ Implemented Biennial Review Standards Review Schedule
- ✓ Integrated Policy Review Process
- ✓ Developed Policy Review Checklist
- ✓ Collaborated with Human Resources on Annual Policy Attestation Process

Training & Communication

- ✓ Communicated General Compliance Roles and Responsibilities
- ✓ Published CalSTRS Required Training Matrix through Collaboration with Applicable Stakeholders
- ✓ Promoted New and Updated Policies each Month through CalSTRS Intranet
- ✓ Executed Training on Service Control Organization Report Reviews
- ✓ Integrated Compliance and Ethics Topics into Existing Training
- ✓ Updated Communication Plan and Prepared 2022 Compliance & Ethics Awareness Week Strategy
- ✓ Enhanced Enterprise Compliance SharePoint to Include Compliance Resources
- ✓ Concluded Hotline Presentations to Investments

Confidential Reporting

- ✓ Developed Learning Aids Related to Confidential Reporting Categories
- ✓ Provided Additional Case Management Training as a Result of Hotline Report Analysis

Case Management & Response

- ✓ Expanded Use of Case Management System to Ombuds and Equal Employment Officer
- ✓ Collaborated with Office of Legal Ethics and Accountability to Develop Standard Close-Out Message to Reporters
- ✓ Upgraded Case Management System to Allow Tier Access for Ombuds and Equal Employment Office

Monitoring

- ✓ Begun development of Organization Processes, Laws, and Controls Library for Procurement Management Processes

Third Party Compliance Management

- ✓ Collaborated with Applicable Stakeholders to Address Various Third-Party Compliance Management Process
- ✓ Formalized Third-Party System and Organization Controls Report Review Process

Program Management

- ✓ Conducted and Analyzed Results of Two (2) Compliance Surveys
- ✓ Summarized CalSTRS Compliance Program Alignment with Federal Sentencing Guidelines, refer to Attachment 2