



Enterprise Compliance 2018-19 Mid-Year Plan Update

Strategic Initiative: Risk Management

STATUS	INITIATIVES	Q2 UPDATES
50%	Manage Third Party Risks Enhance vendor conflict of interest monitoring	
100%	Maintain Reporting Channels Promote awareness of existing non-retaliation protections	Completed December 2018
50%	Establish Incentives and Disciplinary Measures Explore adding risk and compliance components into performance plans and evaluations	
60%	Code of Conduct Formalize ethics values, policies, and expectations in a single document <ul style="list-style-type: none"> • Include easy-to-understand guidance on high-risk policies • Incorporate learning aids to increase comprehension 	
100%	Assess Compliance Risks Partner with the Risk Management Office to establish a compliance risk assessment process	Completed December 2018
100%	Assess compliance risks at the operational and enterprise level	
75%	Build Mitigation Plans for Key Compliance Risks Use compliance risk assessment to identify key compliance risks	
0%	Document risk-specific mitigation plans	Dependent upon completing risk assessment
30%	Measure Organizational Culture Regularly assess employee perceptions of organizational culture	Spring survey prepared
75%	Promote a Culture of Integrity Reinforce the importance of ethics in compliance communications	
50%	Measure and Report Program Effectiveness Benchmark program maturity against peers	
0%	Provide context for metrics by analyzing trends over time	Dependent upon benchmark results

Status Legend

On-Target

At-Risk

Off-Target