




Enterprise Compliance 2019-20 Mid-Year Plan Update

Strategic Initiative: Risk Management


Strategic Measure: Compliance Program Maturity Assessment

Target an increase of one point by FY 2021-22, from the baseline set in FY 2017-18 of 2+ score

STATUS	INITIATIVES	Q2 UPDATES
	Build Risk-Specific Mitigation Plans	
50% 	Continue to strengthen and enhance oversight of the conflict of interest rules	Initiated the review and revision process for the Conflict of Interest Code to reflect changes in filer classifications.
	Embed Policies and Procedures into Operations	
50% 	Strengthen existing delegation of authority and policy governance practices	Initiated development of an automated policy management tool, in preparation for pilot testing and rollout.
	Monitor Compliance Risk Exposure	
50% 	Monitor business changes to make sure CalPERS complies with applicable laws and regulations	Introduced a tool to be used by program areas to track newly implemented state legislation.

Strategic Measure: Compliance Employee Awareness Survey

Target maintaining a 90 percent or greater positive response rate to the compliance survey question through June 2022, from the baseline set in FY 2017-18 at 87 percent

STATUS	INITIATIVE	Q2 UPDATES
	Develop Communication Content	
75% 	Reinforce communications around laws and policies that inform team member ethical behavior	Conducted 6 sessions of Annual Compliance Training for all team members, and 12 sessions of Personal Trading Training for Covered Persons who were affected by the revised Personal Trading Regulation.

Status Legend



On-Target



At-Risk



Off-Target