

#### **Ohio Public Employees Retirement System**

January 15, 2025

Ms. Bethany Rhodes Executive Director Ohio Retirement Study Council 30 East Broad Street, 2<sup>nd</sup> Floor Columbus, OH 43215

#### Dear Director Rhodes:

Pursuant to R.C. 145.095, please find enclosed the 2024 Annual Audit Committee Report of the OPERS Retirement Board. This report was reviewed with the OPERS Audit Committee during its meeting on November 19, 2024 and approved by the OPERS Retirement Board on November 20, 2024. The report documents the activities of the OPERS Internal Audit Department for 2024 including:

- Current Year Completed Audits with Recommendations
- Prior Year Completed Audits with Updates to Recommendations
- Current Year Completed Audits with No Recommendations
- Active Audits
- Other Audit Related Activity

Also, the OPERS Audit Committee held two (2) meetings during 2024. Following is a summary of the meetings and actions taken:

Meeting Date	Meeting Summary & Action Taken
May 14, 2024	<ul> <li>Action: The Audit Committee reviewed, discussed, and approved the 2024 Six Month Internal Audit Plan (July-December).</li> </ul>
	<ul> <li>An executive summary of internal audit initiatives and activities occurring since November 2023 along with the status of outstanding audit recommendations was presented.</li> </ul>
	<ul> <li>Staff from Plante Moran, OPERS' external auditor, discussed the results of the 2023 financial statement audit.</li> <li>Staff from OPERS presented highlights from the Annual Financial Report for 2023.</li> </ul>

Meeting Date	Meeting Summary & Action Taken
Meeting Date November 19, 2024	<ul> <li>Meeting Summary &amp; Action Taken</li> <li>Action: The Audit Committee reviewed and approved the 2024 Annual Audit Committee Report to be provided to the ORSC.</li> <li>An executive summary of internal audit initiatives and activities occurring since May 2024 along with the status of outstanding audit recommendations was presented.</li> <li>Action: The Audit Committee reviewed, discussed, and approved the 2025 Six Month Internal Audit Plan (January-June).</li> <li>Action: The Committee discussed and reviewed recent updates to the Institute of Internal Auditor</li> </ul>
	<ul> <li>(IIA) Global Standards that are followed by the OPERS Internal Audit function. As a result of these updates, changes were approved to the Audit Committee and Internal Audit charters to align with the updates and reorganization of the standards. The basis for these changes was a model template provided by the IIA which will serve to further enhance the Internal Audit function's compliance with the global standards</li> <li>Staff from Plante Moran, OPERS' external auditor, discussed the audit plan for the 2024 financial statement audit.</li> </ul>

Please let us know if you need additional information.

Harm & Canchie

Sincerely,

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# Ohio Public Employees Retirement System 2024 Annual Audit Report

(Submitted to ORSC 01/15/2025)

### **Current Year Completed Audits with Recommendations and Management Response**

Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
Reemployed	Assess the design	1. Research identified workflows to ensure they are fixed	1. Management agreed	1. Closed	1. Completed
Retirees	and effectiveness	and working as intended to accurately report re-	and implemented.		
	of controls in	employment status. An analysis of missed workflows			
	place for	should be performed, and a corrective action plan should			
		be developed to help prevent the same issues from			
		happening again. (Mod.)			
	processing.	2. Ensure identified accounts related to overpayment	2. Management has	2. Open	2. November 2024
		cleanup project were corrected in the systems. An	agreed and will		
		analysis of the cleanup project should be documented	implement.		
		identifying the issues and root cause. A corrective action			
		plan should be developed to include the status of the			
		project along with achievable deadlines to ensure			
		completeness of the cleanup project and to ensure			
		calculations are accurate and reliable. (Mod.)			
		3. Service Retirement should work with IT to fix the issue		3. Closed	3. Completed
		of certain letters not being generated to ensure	and implemented.		
		communication with the other retirement system is			
		documented. (Low)			
		4. Develop a control to remove the Money Purchase (MP)	4. Management agreed	4. Closed	4. Completed
		flag on Savings when an account is not an MP to help	and implemented.		
		ensure accounts are accurately flagged to ensure accurate			
		reporting on status. (Low)			

#### Current Year Completed Audits with Recommendations and Management Response Anticipated Recommendation Recommendation, Risk Rating, and Summarized Finding Management's Response Implementation Audit Area Status Date 5. Document Employer Services procedures for 5. Management agreed 5. Closed 5. Completed workflows related to re-employment (Low) and implemented. Comments: None Test a sample of 1. Establish a control to reconcile the ILPA templates to 1. Management agreed 1. Completed Real Estate -1. Closed actual fees paid. Work with the managers to ensure they and implemented. Separate Real Estate Account Fees | Separate Account | are properly recording fees and holdbacks in the ILPA templates. Ensuring a complete reconciliation of fees to validate available fee information with the managers serves as a calculations and further check around the accuracy of fees paid and effectiveness of manager oversight. (Mod.) key controls. 2. Enhancements should be made to documentation to 2. Management agreed 2. Closed 2. Completed support timely oversight and management of the fee and implemented. process to ensure contractual obligations are met related to Separate Real Estate Account incentive fees. (Mod.) 3. Document the process for holdbacks and reconciliation 3. Management agreed 3. Closed 3. Completed for managers/tranches that have shortfalls to ensure and implemented. consistency, continuity, and completeness. (Low) Comments: None Private Assess the design 1. Enhance security and password procedures associated 1. Management agreed 1. Completed 1. Closed and effectiveness with interactions with fund managers. (Mod.) and implemented. Equity of key controls

#### Current Year Completed Audits with Recommendations and Management Response Anticipated Recommendation Recommendation, Risk Rating, and Summarized Finding Management's Response Implementation Audit Area Status Date 2. Ensure evidence is documented that Committee 2. Management agreed 2. Closed 2. Completed associated with members are required to disclose any conflicts of interest and implemented. managing **Private Equity** prior to a formal vote. Consider documenting this for previously approved fund managers. Failure to request investments. and document conflicts of interest could potentially increase reputational risk to OPERS. (Mod.) 3. Management agreed 3. Closed 3. Completed 3. Include a procedural step to review funds in liquidation and ensure the correct NAV is being reported and implemented. (Low) Comments: None Assess the design 1. Identified accounts with remaining service credit 1. Management agreed 1. Completed Death 1. Closed and effectiveness and/or contributions remaining should be cleaned up to and implemented. Benefits of controls in ensure all accounts are marked as refunded and no contributions are remaining. A report should be place for death

provided to the death benefits team on a regular basis that shows any accounts that received a death refund and still has service credit and/or contributions remaining and is in inactive status instead of refunded. (Low)

benefits.

#### Current Year Completed Audits with Recommendations and Management Response Anticipated Recommendation Implementation Recommendation, Risk Rating, and Summarized Finding Management's Response Audit Area Status Date 2. Internal Audit recommends IT should create an 2. Management agreed 2. Closed 2. Completed and implemented. artifact within Cherwell to determine the strategy and prioritization of data/code clean up related to audit trail logic correction for the Death Processing UI. Based on the minimal usage of these specific tables in reporting by the business, it may not be a high priority but creating the artifact will at a minimum log this issue for future consideration. This would be important to track should there be a future need to pull this data into reporting by other groups to ensure the data is accurate. (Low) Comments: None Perform internal 1. Update the Internal Audit manual to account for the 1. Management agreed 1. Open 1. December 2024 Internal quality review implementation of recently implemented audit. (Low) and implemented. Quality Assessment procedures to Review evaluate conformance with the Institute 2. The Internal Audit Strategic Plan should be formally 2. Management agreed 2. Open 2. November 2024 and implemented. documented. (Low) Auditors (IIA) Standards. Comments: None

#### Current Year Completed Audits with Recommendations and Management Response Anticipated Recommendation Recommendation, Risk Rating, and Summarized Finding Management's Response Implementation Audit Area Status Date Verify the 1. To prevent any appearance of non-participation in the 1. Management agreed 1. Closed 1. Completed Annual accuracy of the qualitative component of the incentive compensation and implemented. Incentive Compensatio 2023 Incentive plan, documentation enhancements should be made to n Audit Compensation include all roles and responsibilities included as part of the process. The expectations and review process should payments. be documented. (Low) Comments: None Assess the design 1. To ensure that trading functionality remains available 1. Management agreed 1. Completed Equity 1. Closed Trading during a loss of connection to OPERS systems, the Equity and implemented. and effectiveness Trading teams should test trading manually on a more Audit of controls in frequent basis. place for equity trading. To ensure there are adequate resources given a loss of workforce, the Business Continuity Plan Critical Processes document should be updated to include how various scenarios would be handled during the loss (rebalancing, trade prioritization, etc.). (Mod.) Comments: None Assess the design 1. Enhance controls and documentation to identify 1. Management agreed Cash and 1. In Process 1. June 2024 securities that extend their WAL 3-year Policy limit and and will implement. Cash and effectiveness Equivalents of key controls ensure Policy language and understanding is clear as to what "addressed in 90 days" means. (Mod.) Audit related to

# **Current Year Completed Audits with Recommendations and Management Response**

Audit Area	Scope investments held in cash and cash equivalents as well as liquidity management.	Recommendation, Risk Rating, and Summarized Finding  2. Ensure securities that fall outside of guidelines are clearly identified and process/procedures are in place to ensure holdings that fall outside of guidelines are documented on a watchlist, escalated, and evaluated. For consistency, this process should be included in documented procedures. (Mod.)		Recommendation Status  2. In Process	Anticipated Implementation Date  2. June 2024
		3. While it appears some data issues are being addressed with our risk system vendor, it seems in some cases to be an ongoing issue where the root cause is not being fixed. We recommend working with appropriate vendors to ensure the data is reliable without manual manipulation or correction. Any known issues or workarounds should be appropriately documented for the context and general understanding of all potential users of the data. (Mod.)		3. Open	3. December 2024
		4. Perform a review of the internal data staging and understand what data is currently incomplete/incorrect. Determine if there are opportunities to obtain more reliable data or if management accepts the risk associated with the current data obtained. Any inconsistencies or omissions should be cataloged and documented for reference to assist in further understanding the availability and reliability of data available for reporting. (Mod.)	and implemented.	4. Closed	4. Completed

#### Current Year Completed Audits with Recommendations and Management Response Anticipated Recommendation Recommendation, Risk Rating, and Summarized Finding Management's Response Implementation Audit Area Status Date 5. Establish a threshold and escalation process for the 5. Management agreed 5. In Process 5. June 2024 daily reconciliations. Update procedures for current and will implement. practice and establish a process to perform the daily reconciliation when the main processor does not perform the daily review. Save screen shots of the bank and GL balance for the weekly reconciliation to indicate the control was performed accurately. (Low) Comments: None 1. System enhancements should be considered within the 1. Management agreed 1. September 2024 Continuous Assess benefit 1. In Process Auditing eligibility pension system to flag an account with a warning/alert and will implement. Benefits Survivor Benefits when a processor pays a beneficiary for the first time for a 2S benefit when they are 22 or older at time of payment or creates a workflow for account review what an account trips the overpayment scenario described (>22 year old beneficiary with a person status of "living" in the system and receiving benefit payments). (High) Comments: None Assess the design 1. Update the Procurement Policy for recent leadership 1. Management agreed Accounts 1. Open 1. March 2025 structure changes to ensure threshold approvals are Payable and will implement. and effectiveness of key controls Audit current. Financial Services should maintain documentation of approval limits for individuals whose implemented within OPERS limits deviate from the standard expense approval limits accounts payable documented in the Procurement Policy and these department. exceptions should be reviewed periodically. (Low)

# **Current Year Completed Audits with Recommendations and Management Response**

Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
		2. Internal Audit recommends Financial Reporting	2. Management agreed	2. Open	2. November 2024
		should consider certain credit card policy enhancements	and will implement.		
		related to the areas of processing, reconciliation and			
		temporary limit increases. (Low)			
		3. Given the sensitivity and susceptibility to fraud	3. Management agreed	3. Open	3. November 2024
		associated with vendor bank account updates, Financial	and will implement.		
		Reporting should review the bank update changes			
		process in line with those across the industry for			
		potential efficiencies and enhancements to the process to			
		include documented processes and documented			
		confirmation of information from vendor contacts. (Low)			
		4. Internal Audit recommends that the Procurement	4. Management agreed	4. Open	4. June 2025
		function work with Financial Reporting to document the	and will implement.		
		procedures and any process enhancements associated			
		with purchasing via certain large online vendors. (Low)			
		Comments: None			

# **Current Year Completed Audits with Recommendations and Management Response**

		-			
Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
Member	Assess the design	1. Review the current Member Directed vendor contract	1. Management agreed	1. Open	1. December 2024
Directed	and effectiveness	and begin reporting on performance standards as	and will implement.		
Processing	of controls in	outlined. Any deviations from what has been agreed to			
Audit	place related to	in the contract should be documented.			
	the processing of				
	Member Directed	Enhance the review and communication process of the			
	Benefits as well	quarterly performance standards provided by the vendor			
	as processes	to include sharing with a wider OPERS group that has			
	outsourced to	more direct insight into certain reported metrics. A			
	supporting	periodic status meeting between OPERS and the vendor			
	vendor.	should be considered in order to discuss any			
		questions/concerns, open items, or further performance			
		metric review. (Mod.)			
		2. OPERS should enhance the process of removing access	2. Management agreed	2. In Process	2. June 2024
		from Member Directed Plan vendor's system for	and will implement.		
		terminated employees as well as the process of			
		considering the level of access current employees have.			
		Consideration should be given to whether access to the			
		Voya system can be managed through an identity and			
		access tool to allow for timely removal of system access.			
		(Mod.)			

	Current Yo	ear Completed Audits with Recommenda	tions and Manage	_	<b>Se</b> Anticipated
Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Implementation Date
		3. While it would take a larger error in the member count	3. Management agreed	3. Open	3. December 2024
		to have any material impact on the monthly invoicing	and will implement.		
		amounts, OPERS should consider if there is a need to be			
		able to reconcile member information managed by the			
		vendor with what is being recorded and maintained			
		within our internal system. This might be valuable in the			
		ongoing management and oversight of the vendor			
		relationship as well as ensuring that plan participation			
		member counts are being accurately reported. (Low)			
		Comments: None			<u> </u>
				1	
Risk Rating					
0		ttention and remediation.			
Moderate (M	l <b>od.)</b> : Requires i	near-term attention.			
Low: Improv	ements possible	e but does not require attention in immediate or near-	term.		
D 1	1' Ct t				
Recommend					
	0	plemented the audit recommendation and it has been	<b>,</b>		
	-	simplemented the audit recommendation and it is in t	-		Audit
Open: Manaş	gement has not	yet implemented the audit recommendation (see anti-	cipated implementation	n date)	
Accepted: Ma	anagement has	chosen to accept the risk of not implementing this auc	lit recommendation (ac	lditional discussio	n to be added in
"Comments"	section)				

Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
Health Care	Assess the design	1. Implement the missed performance	1. Management agreed	1. Closed	1. Completed
Connector		guarantee and establish a control to ensure	and implemented.		
Audit (2023)	-	all performance guarantees are measured			
	0 ,	and reported. (Low)			
	monitoring of health				
	care.				
		Comments: None			
2022	Verify the accuracy	1. The Incentive Compensation Plan should	1. Management agreed	1. Closed	1. Completed
Incentive		include detail on how to calculate the	and implemented.		
Comp	=	quantitative component for both total fund			
Calculation	payments.	and individual portfolios to ensure			
Audit (2023)		consistency and understanding of the			
		mechanics in differing scenarios. (Mod.)			
		Comments: None			
Annual Ethics		1. The new Board member onboarding	1. Management agreed	1. Closed	1. Completed
Policy	the annual conflict of	checklist should be enhanced to ensure	and implemented.		
Procedures	interest process.	compliance requirements associated with			
(2023)		the distribution of Ohio Ethics Laws and			
		related statues. (Low)			
		Comments: None			

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Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
Assess compliance	1. Review the board meeting minutes in the	1. Management agreed	1. Closed	1. Completed
with accounting and	OPERS employer case file approving the	and implemented.		
reporting	Pickup Plan. Determine if a new document			
requirements as an	needs to be drafted per the regulatory			
OPERS' employer.	requirements. (Low)			
	Comments: None			
Evaluate the	1. IT should implement the following:	1. Management agreed	1. Closed	1. Completed
		o o		r
• •	_	1		
OPERS Ransomware	offboarded from integration with the			
Response	Ransomware Response Team in a complete			
_	and timely manner.			
	Consider enhancements in training			
	opportunities.			
	(High)			
	Assess compliance with accounting and reporting requirements as an OPERS' employer.  Evaluate the adequacy of implementation of OPERS Ransomware	Assess compliance with accounting and reporting requirements as an OPERS' employer.  Evaluate the adequacy of implementation of OPERS Ransomware Response  Response  Summarized Finding  1. Review the board meeting minutes in the OPERS employer case file approving the Pickup Plan. Determine if a new document needs to be drafted per the regulatory requirements. (Low)  Comments: None  1. IT should implement the following:  • A process should be established to ensure core individuals are onboarded or offboarded from integration with the Ransomware Response Team in a complete and timely manner.  • Consider enhancements in training opportunities.	Assess compliance with accounting and reporting requirements as an OPERS employer.  Evaluate the adequacy of implementation of OPERS Ransomware Response  Summarized Finding  1. Review the board meeting minutes in the OPERS employer case file approving the Pickup Plan. Determine if a new document needs to be drafted per the regulatory requirements. (Low)  Comments: None  1. IT should implement the following:  • A process should be established to ensure core individuals are onboarded or offboarded from integration with the Ransomware Response Team in a complete and timely manner.  • Consider enhancements in training opportunities.	Assess compliance with accounting and reporting requirements as an OPERS' employer.  Evaluate the adequacy of implementation of OPERS Ransomware Response  Evaluate the Ransomware Response  Status  1. Review the board meeting minutes in the OPERS employer case file approving the Pickup Plan. Determine if a new document needs to be drafted per the regulatory requirements. (Low)  Comments: None  1. Management agreed and implemented.  1. I'T should implement the following:  • A process should be established to ensure core individuals are onboarded or offboarded from integration with the Ransomware Response Team in a complete and timely manner.  • Consider enhancements in training opportunities.

Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
		2. IT Security should consider the following:	2. Management agreed	2. Closed	2. Completed
		• partner with Human Resources to assist	and implemented.		
		with the follow-up and escalation of the			
		completion of these trainings.			
		• A process and cadence of reporting out on			
		the statistics associated with the results of			
		training and phishing exercises should be			
		established for interested parties.			
		• IT Security should assess the effectiveness			
		of security awareness and training by			
		performing analysis over results to report on			
		potential patterns and identify additional			
		training needs.			
		Updates to procedures should be			
		documented to ensure consistency of			
		execution.			
		• IT Security should consider a cadence for			
		the requirement of recertification to existing			
		IT Security Policies.			
		(Mod.)			
		Comments: None			

Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
Investment	Assess the design	2. Procedures and requirements for	1. Management agreed	1. Closed	1. Completed
Performance	and effectiveness of	benchmarks should be documented and	and implemented.		
& Benchmark	key controls related	made clear to all parties (Front Office,			
Audit – co-	to the calculation	Middle/Back Office, Board Consultants,			
sourced w	and monitoring of	Board) the specific steps needed to select			
third-party	investment	and/or update a benchmark. Clarification			
firm (2023)	performance as well	and further transparency should be sought			
	as the establishment	in the creation of a specific Board approved			
	and review of	benchmark policy which clearly outlines the			
	investment	Board's responsibilities and approvals, what			
	benchmarks.	responsibilities and approvals are delegated			
		to the Board Consultant, how any updates or			
		actions are communicated back to the Board,			
		and a cadence for the periodic review of			
		benchmarks by the Board and Board			
		Consultant. (Mod.)			

Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
		4. A matrix of portfolios and corresponding benchmarks should be developed to clearly evidence when benchmarks have been reviewed, changed, approved and to be used as a check with BNYM to ensure the correct benchmark is being utilized. A cadence of review should be implemented and documented to confirm benchmarks are a correct fit according to the portfolio. (Mod.)	4. Management agreed and implemented.	4. Closed	4. Completed
		5. Ensure comfort with the current timing for risk parity benchmarks or if the recordkeeper should be waiting until the benchmark is finalized for reporting. (Low)	5. Management agreed and implemented.	5. Closed	5. Completed
		6. Update written Investment Operations procedures to validate they include and align with current processes. (Low)	6. Management agreed and implemented.	6. Closed	6. Completed
		Comments: None	Į.	Į.	

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Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
Internally Managed	O	4. OPERS should review counterparty confirmations to understand any additional	4. Management agreed and will implement.	4. Open	4. December 2025
Derivatives	key controls	language included and risk imposed as a	1		
(2022)	associated with the	result. The confirmation review process			
	use of internally	should be further documented to include			
	managed derivative	any additional procedures that might be			
	instruments	considered necessary to mitigate legal or business risk. (Low)			
		(2011)			
		Comments: Management is actively discussing	I ng and working on remedia	ation options for this	
		recommendation.		•	
2021	Verify the accuracy	1. Internal Audit recommends that the	1. Management agreed	1. Closed	1. Completed
Incentive		calculation mechanics and impact of changes	and implemented.		
Comp	Compensation	to the Annual Incentive Compensation			
Calculation	payments.	calculation during the year be included as			
Audit (2022)		part of the change forms discussed by the			
		Incentive Compensation Committee (ICC).  This will allow for those on the ICC to			
		review the calculation mechanics and			
		discuss any additional considerations or			
		updates prior to execution of the end of year			
		calculation. (Low)			
		Comments: None			

Audit Area	Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
IT Change	Assess the design	2. PERS should continue with the plan to	2. Management agreed	2. Closed	2. Completed
Management	and effectiveness of	communicate the results of the secure	and implemented.		
(2022)	key controls within	application code assessment reports			
	the change	performed during the system development			
	management process	lifecycle with the Information Security			
	to manage the	department. OPERS should verify all			
	enhancements,	corrective actions are implemented and risk			
	updates, incremental	exceptions are approved before completion			
	fixes, and patches to	of testing and deployment to production.			
	production systems.	(High)			
		6. OPERS should consider the enhancement	6. Management agreed	6. Closed	6. Completed
		of manual and/or the implementation of	and implemented.		
		automated controls. As a result of the			
		implementation of manual or automated,			
		policy requirements and documented			
		procedures should be reviewed and updated			
		accordingly. (Low)			
		7. OPERS should continue the project plan to	7. Management agreed	7. Closed	7. Completed
		enhance the change management workflow	and implemented.		
		to include a root cause analysis. (Low)			
		Comments: None			
					1

Scope	Recommendation, Risk Rating, and Summarized Finding	Management's Response	Recommendation Status	Anticipated Implementation Date
Assess the design	1. OPERS should document and maintain a	1. Management agreed	1. Closed	1. Completed
and effectiveness of	set of hardening standards for the Microsoft	and implemented.		
key controls over the	365 applications and services that are in use.	_		
configuration of the	(Low)			
Microsoft 365				
environment.	Comments: None			
1	Assess the design and effectiveness of key controls over the configuration of the Microsoft 365	Assess the design and effectiveness of key controls over the configuration of the Microsoft 365  Summarized Finding  1. OPERS should document and maintain a set of hardening standards for the Microsoft 365 applications and services that are in use. (Low)	Assess the design and effectiveness of key controls over the configuration of the Microsoft 365  Summarized Finding  1. OPERS should document and maintain a set of hardening standards for the Microsoft and implemented.  365 applications and services that are in use. (Low)  Management's Response  1. Management agreed and implemented.	Assess the design and effectiveness of key controls over the Configuration of the Microsoft 365  Summarized Finding  Management's Response  Status  1. OPERS should document and maintain a set of hardening standards for the Microsoft and implemented.  Status  1. Management's Response  Status  1. Closed  and implemented.

#### **Risk Rating Levels:**

High: Requires Immediate attention and remediation.

Moderate (Mod.): Requires near-term attention.

**Low**: Improvements possible but does not require attention in immediate or near-term.

#### **Recommendation Status:**

Closed: Management has implemented the audit recommendation and it has been validated by Internal Audit

In Process: Management has implemented the audit recommendation and it is in the process of being validated by Internal Audit

**Open**: Management has not yet implemented the audit recommendation (see anticipated implementation date)

Accepted: Management has chosen to accept the risk of not implementing this audit recommendation (additional

discussion to be added in "Comments" section)

# Completed Audits with No Recommendations

Audit Area	Scope
Annual Ethics	Assess the design and effectiveness of controls in place related to potential receipt, reimbursement, and reporting of potential gifts.
Policy	
Procedures	Comments: None
Annual	Assess the organization's compliance with the Personal Trading Policy.
Personal	
Trading Policy	
Procedures	
	Comments: None

### **Active Audits**

Audit Area	Scope	Target Completion
Fiduciary Audit	Perform an internal fiduciary assessment to evaluate OPERS fiduciary controls in place related to investments.	December 2024
Review		
Public External	Assess the design and effectiveness of key controls related to public external manager investments.	December 2024
Managers		
Contracts/	Evaluate the procurement process for expenses \$5,000 and greater. Determine if contracts are current, signed, and	December 2024
Procurement Audit	maintained per policy.	
Overpayments	Assess the design and effectiveness of internal controls associated with the overpayment process.	December 2024
Audit		

### Other Audit Related Activity

Area	Subject/Project	Description
Finance/ Benefits/ Health Care/ Investments	Continuous Auditing (On-going)	Monthly review of various processes/indicators to identify exceptions and trends that may prompt a more detailed review.
Assurance Mapping Project	Assurance Mapping Project	Develop an assurance map that documents the assurance activities shared by the three lines of defense across the organization
Information Technology	IT Security Penetration Testing (outsourced to a third-party firm) - 2023	Conduct testing on externally and internally accessible systems from the perspective of an outside threat to assess the effectiveness of security controls. This work was completed in 2023 and finalized in 2024.
Information Technology	IT Security Penetration Testing (outsourced to a third-party firm) - 2024	Conduct testing on externally and internally accessible systems from the perspective of an outside threat to assess the effectiveness of security controls. The work is anticipated to be completed in 2024 and finalized in 2025.
Internal Audit	Institute of Internal Auditors (IIA) Standards Update	Perform a gap analysis and implement any changes necessary to ensure compliance with the recent update to standards made by the IIA.
Enterprise Risk Management	Enterprise Risk Management	Review and provide feedback related to the organization's ERM process.
Internal Audit	Risk Assessment/Audit Plan	Preparation of the 2025 audit plan.
Internal Audit	Audit Recommendation Follow-up	Follow-up and report on the status of outstanding audit recommendations.
Internal Audit	Audit Committee Meetings/Preparation	Prepare communications and attend Audit Committee and Board Meetings.

#### Composition of Audit Committee at end of reporting year

Stewart Smith (Chair) - Representative for Miscellaneous Employees

Chris Mabe - Representative for State Employees

Kathleen Madden - Director, Department of Administrative Services

Jim Tilling - General Assembly Appointed Investment Expert

Tim Steitz - Representative for Retirees