



OFFICE OF THE AUDITOR GENERAL

The Navajo Nation

A Follow-up Review of the Four Corners Monument Tribal Park Corrective Action Plan Implementation

**Report No. 23-06
December 2022**

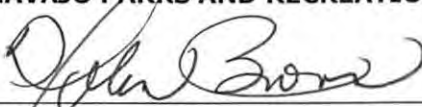
**Performed by:
HEINFELD, MEECH & CO., P.C.**



M-E-M-O-R-A-N-D-U-M

TO : Karen Yazzie, Park Manager
FOUR CORNERS MONUMENT TRIBAL PARK

: Martin L. Begaye, Department Manager III
NAVAJO PARKS AND RECREATION DEPARTMENT

FROM : 
Helen Brown, CFE, Principal Auditor
Delegated Auditor General
OFFICE OF THE AUDITOR GENERAL

DATE : December 30, 2022

SUBJECT : Audit Report No. 23-06, A Follow-up Review of the Four Corners Monument Tribal Park Corrective Action Plan Implementation

BACKGROUND

In 2018, the Office of the Auditor General finalized an internal audit over the Four Corners Monument Tribal Park. The internal audit was performed to address concerns over emergency preparedness and the accountability of safeguarding cash revenues. Internal audit report number 18-11 was issued February 9, 2018, and the Four Corners Monument Tribal Park developed a corrective action plan (CAP) to address the audit findings and to continue to improve the safety of the park for the visitors and to continue to improve the safety of the park for the visitors and to continue to improve the cash handling procedures within the park. The internal audit report and CAP were approved on September 18, 2018 with resolution BFS-38-18 by the Budget and Finance Committee of the Navajo Nation Council.

OBJECTIVE AND SCOPE

The objective of the follow-up review is to determine the status of the corrective action plan implementation based on a nine-month review period of October 1, 2021 through June 30, 2022. The review consisted primarily of inquiries of Four Corners Monument Tribal Park and Navajo Parks and Recreation Department personnel and also the examination of documents and records provided by Four Corners Monument Tribal Park. Heinfeld, Meech & Co., was engaged to perform the follow-up review of the Four Corners Monument Tribal Park corrective action plan implementation.

SUMMARY

Of 37 total corrective measures, Four Corners Monument Tribal Park implemented 25 (68%) corrective measures, with the remaining 12 (32%) not implemented. See attached Exhibit A for the detailed explanation of the follow-up results.

CONCLUSION

The Four Corners Monument Tribal Park did not fully implement its corrective action plan, and therefore, findings from the 2018 audit remain unresolved. The Four Corners Monument Tribal Park had opportunities to address the audit issues, however, due to staffing vacancies, the lack of power and powerlines within the park, and the COVID-19 pandemic presented challenges. Therefore, Heinfeld Meech and the Delegated Auditor General agree to:

- Grant the Four Corners Monument Tribal Park a six-month extension from the date of this report to continue implementing its corrective action plan.
- Conduct a 2nd follow-up review six-months after the date of this report and based on those results, provide an appropriate recommendation in accordance with 12 N.N.C. Section 9(b) and (c).

We thank the Four Corners Monument Tribal Park for assisting in this follow-up review.

xc: Mike Halona, Division Director
DIVISION OF NATURAL RESOURCES
Sara Kirk, Partner
HEINFELD, MEECH & CO.
Chrono

December 30, 2022

Office of the Auditor General of the Navajo Nation
P.O. Box 708
Window Rock, AZ 86515

We have completed our engagement to perform a follow-up review of the Four Corners Monument Tribal Park corrective action plan implementation and have provided the results in this report for your consideration. Our review consisted primarily of inquiries of Four Corners Monument Tribal Park and Navajo Parks and Recreation Department personnel and also the examination of documents provided by Four Corners Monument Tribal Park personnel. The accompanying report includes the following:

- A table summarizing the number of audit issues that are resolved or not resolved
- Narrative explanations on the status of the corrective measures
- An overall conclusion on whether Four Corners Monument Tribal Park resolved issues and made improvements through the implementation of its corrective action plan

To the extent we have performed our review using data and information obtained from the Four Corners Monument Tribal Park, we have relied upon such information to be accurate, and no assurances are intended, and no representation or warranties are made with respect thereto or the use made therein.

We would like to thank everyone at the Office of the Auditor General and the Four Corners Monument Tribal Park for their assistance and cooperation.

Sincerely,

Heinfeld Meech & Co. PC

Heinfeld, Meech & Co., P.C.
Phoenix, Arizona

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Executive Summary

Background

The Four Corners Monument Tribal Park was established in 1983 and attracts visitors to view the only place within the United States that four states (Arizona, Colorado, Utah, and New Mexico) intersect at one point. Visitors can also hike and shop at an Indian market wherein artists from all four states sell arts and crafts.



The Four Corners Monument Tribal Park operates under the Navajo Parks and Recreation Department (NPRD) along with six (6) other tribal parks on the Navajo Nation. Each park operates under the Park Manager who in turn reports directly to the Department Manager of the Parks and Recreation Department. The Parks and Recreation Department operates within the Division of Natural Resources.

In 2018, the Office of the Auditor General of the Navajo Nation finalized an internal audit over the Four Corners Monument Tribal Park. The internal audit was performed to address concerns over emergency preparedness and the accountability of safeguarding cash revenues. The internal audit report number 18-11 resulted in five (5) findings with two (2) of the findings related to safety and three (3) of the findings related to cash collection. As a result of the audit, the Four Corners Monument Tribal Park developed a corrective action plan (CAP) to address the audit findings and to continue to improve the safety of the park for the visitors and to continue to improve the cash handling procedures within the park. The Four Corners Monument Tribal Park internal audit report and CAP were approved on September 18, 2018 with resolution BFS-38-18 by the Budget and Finance Committee of the Navajo Nation Council.

HeinfeldMeech was awarded a proposal issued by the Office of the Auditor General of the Navajo Nation to conduct the follow-up review and issue a written follow-up review report. The Office of the Auditor General commenced with this follow-up review based on the tribal park's claim that it had implemented its corrective action plan.

Objective and Scope

The objective of the follow-up review is to determine the status of the corrective action plan implementation based on a 9-month review period of October 1, 2021 through June 30, 2022. The review consisted primarily of inquiries of Four Corners Monument Tribal Park and Navajo Parks and Recreation Department personnel and also the examination of documents and records provided by Four Corners Monument Tribal Park.

HeinfeldMeech would like to express appreciation to Four Corners Monument Tribal Park and the Navajo Parks and Recreation Department personnel for their cooperation and assistance through the performance of this review.

Summary

Four Corners Monument Tribal Park did not fully implement the corrective action plan. As outlined in *Exhibit A – Review Results* of this report, of the 37 corrective measures identified in the corrective action plan, Four Corners Monument Tribal Park implemented 25 (68%), with the remaining 12 (32%) not implemented.

Conclusion

The Four Corners Monument Tribal Park did not fully implement its corrective action plan, and therefore, findings from the 2018 audit remain unresolved.

The Four Corners Monument Tribal Park had opportunities to address the audit issues, however, staffing vacancies, the lack of power and powerlines within the park, and the COVID-19 pandemic presented challenges. Therefore, HeinfeldMeech and the Delegated Auditor General agree to do the following:

- Grant the Four Corners Monument Tribal Park a six-month extension from the date of this report to continue implementing its corrective action plan.
- Conduct a 2nd follow-up review six-months after the date of this report and based on those results, provide an appropriate recommendation in accordance with 12 N.N.C Section 9 (b) and (c).

Exhibit A - Review Results

Four Corners Monument Tribal Park Corrective Action Plan Implementation Review Period: October 1, 2021 to June 30, 2022

Audit Issues	Total of Corrective Measures	# of Corrective Measures Resolved	# of Corrective Measures Not Resolved	Audit Issue Resolved?	Review Details	
1	Four Corners Monument Tribal Park needs to do more to alert park visitors about potential hazards on park premises and the need for safety precautions	7	6	1	Yes	Attachment A
2	Four Corners Monument Tribal Park needs to strengthen its cash controls	4	3	1	Yes	
3	Four Corners Monument Tribal Park deposits of cash revenues need to be timely to minimize risk exposure to theft	9	8	1	Yes	
4	Four Corners Monument Tribal Park emergency action plan needs improvement to ensure the park is adequately prepared to respond to any potential emergency	6	3	3	No	Attachment B
5	Four Corners Monument Tribal Park needs to strengthen security controls to properly safeguard cash revenues	11	5	6	No	
Total		37	25	12	3 - Yes 2 - No	

Corrective Measure Evaluation Criteria

Implemented: Four Corners Monument Tribal Park provided sufficient and appropriate evidence to support all elements of the implementation of the corrective measure.

Not Implemented: Four Corners Monument Tribal Park did not provide evidence to support meaningful movement towards implementation, and/or where no evidence was provided.

Attachment A

REVIEW RESULTS		
Review Issue	Issue Description	2022 Status
1	Four Corners Monument Tribal Park needs to do more to alert park visitors about potential hazards on park premises and the need for safety precautions	Resolved

The navajonationparks.org website includes information on:

- Tribal Park Rules and Regulations
- Hiking & Camping Rules
- Areas of Trails and Routes
- Emergency Contact Information

Additionally, the park specific webpage was reviewed. The webpage contained current information important to visitors including information about COVID protocols, road construction, and information regarding proximity to amenities and weather.

A new park brochure was developed in conjunction with the Media Specialist that included information on park rules and emergency phone numbers.

Lastly, a monitoring form to track Parks and Recreation Department site visits was not created as noted in the corrective action plan. As an alternative, the park utilized a sheet to track visitors including visitor name, date, time in and time out. Three visits by the Department Manager were noted during the review period. Visits were not made during the audit period specifically related to providing sufficient public information; however, during a site visit, the Department Manager provided the Park Manager the opportunity to address any park related matters including ensuring relevant information is shared with the public.

As a result of the above efforts, this audit issue was deemed reasonably resolved.

New signage was purchased as outlined in the corrective measure; however, it was noted during the site visit that numerous signs have not yet been installed throughout the park as the result of staffing issues.



To achieve full resolution of the finding, signage should be installed immediately. Lack of visible signage could lead to injury among park visitors and vendors.

REVIEW RESULTS		
Review Issue	Issue Description	2022 Status
2	Four Corners Monument Tribal Park needs to strengthen its cash controls	Resolved

The Park Manager updated the *Cash Receipt Policy and Procedures* to address segregation of duties, reconciliation, verification of transactions, and surprise cash counts.

To compensate for the lack of the Fee Collector Supervisor position, the park implemented internal controls to segregate duties with existing personnel. The tribal park currently has four (4) Fee Collectors and one (1) Park Manager involved with cash collection. Duties were segregated among park personnel as follows during the review period:

- Fee Collectors collect park entrance fees in the fee booth
- At the end of one Fee Collector’s shift a second Fee Collector or the Park Manager will review the Z-Tape (cash out tape) from the cash register and the credit card machine and sign off on the *Cash Count* form. If the amounts are different, then the Park Manager must review.
- The Fee Collector encloses the monies into a sealed deposit bag and logs the amount onto the *Deposit Verification Register* and places the sealed deposit bag in the safe
- An employee who did not originally collect the funds will perform a second count and fill out a deposit slip receipt. Both the counter and the depositor sign the *Deposit Verification Register*
- A Park Ranger escorts the depositor to and from the bank

During the nine-month period of review, the park collected \$1,087,644 in revenue. Twenty cash receipts were reviewed totaling \$72,883, 15 (75%) of which included cash totaling \$1,407 and the following was noted:

- For 2 of 20 (10%) cash receipt transactions, the receipt from the cash register and the receipt from the credit card machine did not agree to the *Cash Count* form with no justification by \$30
- For 1 of 20 (5%) cash receipt transactions, the *Cash Count* form did not contain a review signature
- For 2 of 3 (67%) cash receipt transactions where an overage or shortage was documented, a clear justification was not made by the Fee Collector as to why the net overage of \$15 occurred

Based on the sample selection results, review of standard forms, and updates made to the policies and procedures, this audit issue was deemed reasonably resolved.

To ensure full resolution of the finding, a Fee Collector Supervisor position should be hired as indicated in the corrective measure. The remote location of the park and low pay were cited as reasons the position has not yet been filled. The risk that cash could be stolen without detection would be further mitigated by additional oversight.

REVIEW RESULTS		
Review Issue	Issue Description	2022 Status
3	Four Corners Monument Tribal Park deposits of cash revenues need to be timely to minimize risk exposure to theft	Resolved

Four Corners Monument Tribal Park entered into a night depository agreement with Wells Fargo Bank. The Park Manager is the immediate contact for deposit discrepancies and certain Fee Collectors are listed as authorized depositors. The park also maintains a *Deposit Verification Register* to monitor the deposits. The register logs the date, amount, depositor, and deposit verifier for each deposit. Based on our observations of the *Deposit Verification Register* during the period of review, the duties of deposit preparation and depositing were segregated. In addition to the monitoring of deposits internally at the tribal park, the Navajo Nation Cashier's Office required the submission of a *Weekly Recap* of the cash and credit card revenues received. We verified there was a *Weekly Recap* for each of the 20 cash receipt transactions reviewed and that the recap was in agreement with the amount of revenues received for the day.

The tribal park indicated on the fee booth that credit card is the preferred method of payment and an additional sign that indicates "credit card transactions only". This is also noted on the website.



As a result of the above efforts, the issue was deemed reasonably resolved.

To fully implement the corrective measure, a deposit schedule should be developed as outlined in the corrective measure and deposits made on a daily basis. Of the 20 cash receipts reviewed, 15 included cash and for 12 transactions (80%), cash was not deposited the same day received as follows:

- 5 cash receipts were deposited one day after the cash was collected
- 3 cash receipts were deposited two days after the cash was collected
- 3 cash receipts were deposited three days after the cash was collected
- 1 cash receipt was deposited four days after the cash was collected

Additionally, for two of 15 transactions (13%), the deposit slip was not provided, therefore we were unable to determine the timeliness of the deposits.

If cash receipts are not deposited timely, the park continues to be exposed to the risk of theft or harm to employees.

Attachment B

REVIEW RESULTS		
Review Issue	Issue Description	2022 Status
4	Four Corners Monument Tribal Park emergency action plan needs improvement to ensure the park is adequately prepared to respond to any potential emergency	Not Resolved

A Senior Safety Technician from the Navajo Nation Risk Management – Safety Loss Control Program completed a safety inspection of the park vendor stalls and grounds at the Four Corner Monument Park on September 29, 2020. A written report was issued to the park with recommendations to implement specific to those areas.

The park utilized a *Vendor Policies and Procedures Manual* to regulate and enforce the vending requirements, rules and procedures. The manual was deemed adequate to properly regulate the vendors within the park.

Park personnel were provided training in several areas involving safety including:

- CPR/AED/First Aid
- FEMA training on Incident Command Center and National Incident Management Systems
- Community Emergency Response Teams (CERT) provided by Coconino County Emergency Management (Sheriff’s Office)

The Emergency Action plan (EAP) was updated by the Park Manager on March 10, 2021. Feedback was solicited from the Park Ranger on the required elements of the plan and incorporated into the EAP.

Lastly, a monitoring form to track Parks and Recreation Department site visits was not created as noted in the corrective action plan. As an alternative, the park utilized a sheet to track visitors including visitor name, date, time in and time out. Three visits by the Department Manager were noted during the review period. Visits were not made during the audit period specifically related to the EAP; however, during a site visit, the Department Manager provided the Park Manager the opportunity to address any park related matters including park safety.

However, the park did not do the following as outlined in the corrective action plan:

- Perform an assessment of pedestrian traffic as recommended in the internal audit.
- Obtain a safety inspection of the hiking trails as recommended in the internal audit. The written report prepared by Navajo Nation Risk Management – Safety Loss Control Program also recommended the hiking trails need inspection.
- Add guidelines for COVID-19 or other infectious diseases to the EAP as recommended by the Navajo Nation Risk Management – Safety Loss Control Program.
- Provide park personnel training from NOSHA and training specific to the park and the EAP semi-annually and annually as noted in the corrective measure.

For the tribal park to effectively manage emergency situations, it is important that the park establishes a comprehensive EAP that all employees are trained on. Without this, the park cannot provide assurance that it can safely and effectively manage emergency situations.

REVIEW RESULTS		
Review Issue	Issue Description	2022 Status
5	Four Corners Monument Tribal Park needs to strengthen security controls to properly safeguard cash revenues	Not Resolved

Park personnel indicated above ground powerlines have been installed from Teec Nos Pos to the Four Corners Monument Tribal Park. The second phase of the infrastructure project to bring power from the above ground powerlines underground and into the park is currently underway. Discussions were held, but no actions were taken regarding alternative energy sources. As the power extension project is not yet complete, the park was unable to move forward with the purchase of a security system. In preparation for the security system, the tribal park did create a *Security Camera Use Policy and Regulations Procedures* document that was developed in February 2019. The document is sufficient for park personnel to implement once the security cameras are installed.

The park utilized a safe and safe access is limited to certain employees. The main safe compartment can be accessed by the Park Manager and one Fee Collector and the second component can be accessed by the Park Manager and two Fee Collectors. The safe combination is changed every three months by the Park Manager.

Lastly, a monitoring form to track Parks and Recreation Department monthly site visits was not created as noted in the corrective action plan. As an alternative, the park utilized a sheet to track visitors including visitor name, date, time in and time out. It was noted during the review of visitor sheets from October 1, 2021 to June 30, 2022, the Department Manager visited the park on three occasions, although no visits related to ensuring security policies and procedures were made by park personnel.

Cash revenues cannot be effectively safeguarded if all recommended security controls are not established.