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April 9, 2026

Executive Office
Tribal Council
The Eastern Band of Cherokee Indians
Cherokee, NC

We conducted an audit of Safety and Security – Tribalwide in accordance with the FY26 annual audit plan.

This review is designed to assess operations, key processes, and the effectiveness of controls to determine if improvement is needed.

REDW identified 4 observations. The details can be found in the attached report. Management's action plan is included as an attachment.

The assistance of the Risk Management staff is appreciated. Please do not hesitate to contact our office with questions.

Sincerely,

A handwritten signature in blue ink that reads "SBlankenship".

Sharon Blankenship, CIA, CGAP, IAP, CFE, LPEC
Chief Audit and Ethics Executive

cc: Monique Taylor, Audit and Ethics Committee Chair
Paxton Myers, Chief of Staff
Pam Straughn, Deputy Chief of Staff
Divisional Secretaries
Joe Bernhisel, Risk Management Manager



Eastern Band of Cherokee Indians

Tribal Safety and Security
Internal Audit

March 23, 2026

redw
Advisors & CPAs

Eastern Band of Cherokee Indians Tribal Safety and Security Internal Audit

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Eastern Band of Cherokee Indians Tribal Safety and Security Internal Audit

Report

Introduction

We performed the internal audit services described below solely to assist the Eastern Band of Cherokee Indians (EBCI) in assessing the processes and internal controls over key Tribal safety and security functions through the EBCI Risk Management Program.

Our services were conducted in accordance with the Consulting Standards issued by the American Institute of Certified Public Accountants and the terms of our Professional Services Contract agreement for internal audit services.

Purpose and Objectives

The EBCI Risk Management function plays a central role in supporting Tribal-wide safety and security by coordinating employee safety activities and administering the Tribe's insurance programs. Primary responsibilities include management of Tribal-wide insurance coverage and related claims, overall risk assessment, incident monitoring, and delivery of Tribal-wide safety training for Tribal employees. The Risk Management team is comprised of the Risk Management Manager, Workplace Safety & Training Officer, and the Risk Analyst/Claims Administrator.

Our internal audit focused on assessing whether Risk Management's safety and security processes are designed and operating in a manner that supports hazard identification, timely corrective action, and effective communication across departments. In addition, we tested to determine if employees are receiving safety training to reduce the likelihood of workplace injuries, property damage, and liability exposure. Finally, we tested the incident reporting process to ensure below deductible incidents were reported and resolved timely.

Observations and Recommendations

As a result of our test work, we identified the following observations:

1) *Facility Safety and Inspections*

EBCI's 1900 – Risk Management Policy (Section 6: Loss Control) and the EBCI Tribal Safety Manual & Risk Management Policies and Procedures (Section 2: Risk Management Authority Policy) require regular on-site facility/worksite inspections, documentation of results, and follow-up on identified deficiencies to support timely correction. Our testing determined there was no inspection roster/schedule maintained by the department to ensure all EBCI buildings were inspected on a regular basis in accordance with policy. In addition, we determined:

- **Limited Inspection Documentation:** According to discussions with Risk Management staff, the department will shadow the insurance company during their facility inspections process, but the department did not retain sufficient internal records showing the inspection occurred and what was reviewed.
- **Unable to Evidence Inspections for Tested Sites:** For a sample of 20 facilities, documentation supporting that an inspection had been performed by EBCI within the past 36 months (or that inspections had occurred at all) was not provided.
- **Inspection Reports Not Shared Timely:** Risk Management did not receive the insurance carrier inspection reports in a timely manner to distribute to affected departments. Insurance inspections were performed in June 2024, but the final report with corrective action recommendations was not received until December 8, 2025, delaying department communication and follow-up.

Potential Risk – High: Without a comprehensive inspection program and documented communication and follow-up, age-related facility hazards and other safety deficiencies may not be identified, communicated, and corrected timely. As a result, hazardous conditions may persist or worsen, increasing the risk of injury and/or increased cost exposure; therefore, we have assessed the risk as high.

Recommendation: Risk Management should establish and implement a Tribal-wide facility inspection program, in collaboration with other applicable EBCI departments (i.e., Facilities, Housing, etc.), that is managed internally and supported by clear standards and documentation. Specifically, Risk Management should:

- Develop and maintain a comprehensive inspection roster/schedule that includes all EBCI buildings requiring inspection. At a minimum, the roster should identify the required inspection frequency for each facility, the next scheduled inspection date, and inspection completion dates.
- Define minimum inspection expectations and documentation standards to evidence inspection performance and follow-up. Documentation requirements should include, as applicable: inspection scope/checklist, date performed, inspector(s), identified deficiencies, and required corrective actions.
- Implement a corrective action tracking process to ensure deficiencies are addressed timely, including assignment of responsible parties, target completion dates, and closure/verification of completed actions.
- Document missed or deferred inspections, including the reason an inspection did not occur as scheduled and the planned timeframe for completing the inspection.

- Coordinate with the insurance carrier to establish timelines and accountability for report delivery, including expectations for the timely receipt of risk survey reports and recommendations so results can be communicated promptly to departments and corrective actions can be initiated without delay.
- Memorialize key process requirements into the Risk Management Policy to ensure processes are performed consistently.

2) Inter-Departmental Communication and Collaboration

EBCI's Tribal Safety Manual & Risk Management Policies and Procedures and EBCI 1900 – Risk Management Policy emphasizes communication and collaboration around safety matters, including sharing safety information and following-up of issues identified. In addition, recognized safety program best practices (e.g., Occupational Safety and Health Administration [OSHA] and Center for Disease Control and Prevention [CDC]/National Institute for Occupational Safety and Health [NIOSH] guidance) recommend various program activities to ensure organizations are properly communicating, responding to, and mitigating safety related incidents. We conducted an analysis of these best practices compared to EBCI Risk Management's current communication processes and determined:

- **Safety Committee:** A Tribal-wide Safety Committee was not active; therefore, a consistent forum for cross-department safety issue escalation, decision-making, and follow-up was not in place. According to discussions with management, a prior Safety Committee dissolved due to lack of sustained department-level participation and buy-in.
- **Safety Meeting Scheduling and Documentation:** Safety meetings were not consistently scheduled at the Tribal-wide level, and agendas, attendance, minutes, and action logs were not maintained in a centralized format.
- **Safety Communication Methods:** Safety communications were largely reactive (post-incident) and disseminated through emails or memos. A recurring, Tribal-wide communication method and a searchable archive of communications were not maintained.
- **Safety Issue Tracking and Follow-Up:** A centralized, cross-department log of safety issues, open action items, owners, deadlines, and closure status was not consistently maintained; therefore, tracking and trend reporting across departments was limited.

Potential Risk – Moderate: Without a structured and documented approach to collaboration and communication, safety information may not be shared consistently across departments, and cross-department safety issues may not be escalated or resolved timely. Since departments do coordinate on safety for specific events and some programs present recurring safety meetings (hospital and emergency management), we assessed the risk as moderate.

Recommendation: Risk Management, in collaboration with EBCI management, should evaluate safety program best practices versus current practice to determine where enhancements may be made. Further information regarding short-term vs. long-term recommendations, based on priority, have been provided to Risk Management (Appendix A) for consideration.

3) Employee Training and Education

EBCI's Tribal Safety Manual & Risk Management Policies and Procedures and EBCI 1900 – Risk Management Policy establish expectations for employee safety training and the communication of safety practices. In addition, recognized safety and training best practices

(e.g., Occupational Safety and Health Administration [OSHA] guidance and International Standard for Occupational Health and Safety [ISO] 45001 concepts) recommend evaluating training effectiveness, centrally tracking training completion, and providing periodic refresher training for current employees. We conducted an analysis of these best practices compared to EBCI Risk Management's current training processes and determined:

- **Evaluation of Training Effectiveness:** There was no formal process to evaluate training effectiveness (e.g., knowledge checks, feedback, or periodic review using incident trends); therefore, training impact and opportunities for improvement were not consistently documented.
- **Central Tracking/Documentation of Training Completion:** New hire training completion was tracked; however, recurring/refresher training documentation was inconsistent, and a central, comprehensive electronic record of ongoing training completion was not maintained. As a result, records were not consistently available to confirm completion of training across employees and departments.
- **Recurring/Refresher Training for Current Employees:** Outside of certain role-based requirements, recurring/refresher safety training for current employees was not consistently provided across all departments and was primarily provided on an as-needed basis (either by request or following incidents).
- **Coverage of Safety Topics in Training:** New hire safety training coverage was supported by a detailed checklist regarding topics covered; however, periodic review and update of training topics (e.g., annual review for regulatory and workplace relevance) was not documented to ensure topics remained relevant.

Potential Risk – Moderate: If employee safety training is not performed in alignment with best practices, employees may be unaware of safety protocols when performing their job duties which may result in job related injuries. Since new-hire training is comprehensive and certain role-based training is completed, we assessed the risk as moderate.

Recommendation: EBCI Risk Management, in collaboration with EBCI management, should evaluate the employee training program best practices versus current practice to determine where enhancements may be made. Further information regarding short-term vs. long-term recommendations, based on priority, have been provided to management (Appendix B).

4) Minor Incident Reporting and Resolution

EBCI Tribal Safety Manual & Risk Management Policies and Procedures (Section 6: Process for Reporting Accidents/Incidents) requires incidents to be reported and documented in a manner that supports appropriate review, investigation, follow-up, and resolution. According to policy, incidents are expected to be reported within 24 hours and are tracked via an internal tracking log. Our testing determined that incidents considered minor (i.e., those that do not result in an insurance claim) were not consistently tracked via the log. Further testing over 4 minor incidents determined the incident support documentation provided was incomplete as incident reports were either not signed/dated, documentation supporting the incident was investigated was missing, and corrective action plans, if applicable, were not provided.

Potential Risk – Low: If minor incidents are not tracked and investigated properly, recurring hazards or trends may not be identified timely. Since minor incidents did appear to be verbally communicated to EBCI Risk Management, just not documented and tracked for resolution, we have assessed the risk at low.

Recommendation: EBCI Risk Management should ensure all incidents, regardless of minor or major status, are tracked via the internal tracking log to support follow-up and trend reporting. In addition, Risk Management should ensure incident support documentation, including investigation dates and corrective actions plans, is complete and includes all investigation performed.

Scope and Procedures Performed

In order to gain an understanding of the process, we interviewed the following personnel:

- Joe Bernhisel, Risk Management Manager
- Bill Paul, Workplace Safety & Training Officer
- Melody Little, Risk Analyst/Claims Administrator

In order to gain an understanding of the processes and controls in place we read relevant portions of:

- EBCI Tribal Safety Manual & Risk Management Policies and Procedures (No. 12EO-02, issued July 2012)
- EBCI Tribal Safety Manual & Risk Managements Policies and Procedures - Completing a Workers' Compensation Report, and Completing a Motor Vehicle Accident Report (November 2025 update - not finalized)
- EBCI 1900 - Risk Management Policy
- Safety Training Checklist for New Hires (November 6, 2025, version)

We performed the following test work:

Facility Safety and Inspections – We obtained a listing of all EBCI facilities as of December 4, 2025, and the most recent insurer assessed Risk Survey Report from June 17, 2024. From a total population of 548 facilities, we sampled 20 and tested to determine:

- A complete, formal safety inspection was conducted by EBCI on the facility in the past 36 months.
- A completed inspection report was on file.
- If deficiencies were identified, a corrective action plan was developed by the Facility Manager/Supervisor.
- Risk Management documented completion and follow-up of the corrective action plan.
- If the facility was not inspected, the reason for omission was documented

For the 4 insurers assessed risk recommendations reported, we tested to determine:

- Risk Management communicated the insurer recommendations to the affected departments timely.
- A corrective action plan was developed by the affected Facility Manager/Supervisor to respond to the assessed risk.
- Risk Management documented completion and follow-up of the corrective action plan.

- A complete, formal safety inspection was conducted by EBCI on the affected facility in the past 12 months.

Collaboration and Communication – We obtained EBCI’s Safety Manual, Risk Management Policies, and available documentation of interdepartmental safety meetings or communication practices from October 1, 2024 through November 30, 2025. We compared EBCI’s current procedures and documented practices to best practices for governmental safety communication and collaboration and performed the following analyses:

- Identified and summarized stated key communication and collaboration requirements.
- Documented specific gaps between current EBCI Risk Management practices and best practices.
- For all gaps identified, we provided targeted recommendations for improvement.

Incident Reporting and Resolution – We obtained a listing of minor/below-deductible security incidents, safety issues, and other property incidents from October 1, 2025 through December 9, 2025. For the 4 incidents reported, we tested to determine:

- The incident was reported to Risk Management within 24 hours.
- An investigation of the incident was completed timely.
- A corrective action plan was developed by the Facility Manager/Supervisor.
- Risk Management documented follow-up of the corrective action plan.
- Incident support documentation was maintained.
- The incident was tracked in a centralized tracking log or spreadsheet.

Training and Education – We obtained the Safety Training Checklist for New Hires as of November 6, 2025, and available documentation of any additional safety training that occurred throughout EBCI. We compared EBCI’s current procedures and documented practices to best practices for governmental safety training and education and performed the following analyses:

- Assessed all EBCI required safety topics to tribal and governmental benchmarks.
- Identified any gaps where recurring or refresher safety training for current employees was not provided or documented.
- Developed and prioritized recommendations to help EBCI improve ongoing safety training and tracking.

* * * * *

We discussed and resolved minor observations with management and received cooperation and assistance from the EBCI Tribal Safety and Security during the course of our interviews and testing. We sincerely appreciate the courtesy extended to our personnel.

REDW LLC

Albuquerque, New Mexico
March 23, 2026

APPENDIX A: This appendix provides a simplified summary of the gap analysis performed by comparing EBCI's current collaboration and safety communication practices to recognized safety program best practices. It outlines benchmark expectations, EBCI's current standards/practices, and an action roadmap to address identified gaps over time.

Key Control Area	Control Area Best Practices		Current Practice	Benchmark Compliance Scale
	Benchmark Standard	Benchmark Reference		
Safety Committee Structure	Organization maintains an active, management-sponsored safety/risk committee with cross-departmental representation (line staff and management). Committee meets at least quarterly, maintains minutes/action logs, and is assigned clear authority for safety recommendations, escalation, and follow-up.	- OSHA 29 CFR 1910.38 - CDC/NIOSH Safety Committee Guidance - NCAI Tribal Best Practices Toolkit	<ul style="list-style-type: none"> Committee structure and protocols exist on paper, but the committee is inactive. Meetings are not held as prescribed or lack formal cross-department buy-in/documentation. Collaboration is primarily event-driven or departmental, not systematized at the tribal level. 	Does Not Meet Benchmark
Safety Meeting Scheduling and Documentation	Cross-departmental safety meetings are scheduled (at least quarterly), with required agendas, attendance, and action/follow-up tracked in centralized, audit-ready documentation. Digital access provided for recordkeeping and continuous improvement.	- OSHA Safety Committee/Mgmt. Systems Guidelines - CDC/NIOSH Safety Records Guidance	<ul style="list-style-type: none"> Safety meetings are not consistently scheduled or documented across departments. Some ad hoc and emergency-driven meetings occur, with variable records. No central digital archive is maintained. 	Does Not Meet Benchmark
Safety Communication Methods	Routine, proactive safety communication: bulletins/newsletters, trends, alerts, and lessons learned disseminated at regular intervals to all staff. Content archived in a secure, searchable repository. Trend and risk communication is two-way (feedback solicited).	- OSHA Recommended Practices for Communication - CDC/NIOSH Tribal Outreach Guidance - NCAI Best Practices Toolkit	<ul style="list-style-type: none"> Most official safety communication is post-incident, via emails or memos. Some bulletins produced by HR/hospital departments, but there is no tribe-wide scheduling, format, or searchable archive. No systematic feedback loop to all staff. 	Does Not Meet Benchmark
Safety Issue Tracking and Follow-Up	A centralized, cross-departmental log is maintained of all safety issues/incidents, trends, open action items, assigned owners, deadlines, and completion status. Safety Committee and leadership review trends/results and integrate lessons learned into policy and practice.	- OSHA 29 CFR 1910.120 (Incident Investigation) - CDC/NIOSH Key Elements of Effective Safety Committees - NCAI Guidelines	<ul style="list-style-type: none"> Individual incident response and some department-level tracking happen, but there is no unified log, shared accountability, or routine trend reporting/closure across EBCI. 	Partially Meets Benchmark

Benchmark Compliance Scale
Meets Benchmark – EBCI practices fully align with external standards and references.
Partially Meets Benchmark – EBCI practices address some but not all elements of the standard.
Does Not Meet Benchmark – EBCI practices lack key requirements of the standard.

APPENDIX A: This appendix provides a simplified summary of the gap analysis performed by comparing EBCI's current collaboration and safety communication practices to recognized safety program best practices. It outlines benchmark expectations, EBCI's current standards/practices, and an action roadmap to address identified gaps over time.

Key Control Area	Recommendation Action Roadmap		
	Opportunities / Recommended Actions	Action Plan / Priority	Recommended Division Collaboration
Safety Committee Structure	<ul style="list-style-type: none"> * Re-establish a Safety Committee, chartered by Tribal leadership and Risk Management, with set terms, duties, and regular reporting. * Membership to include all departments; develop schedule and publish member list. * Require quarterly meetings and assure compliance via regular reporting. 	Short-term: Obtain leadership support to approve an updated Safety Committee charter and publish a cross-department member list.	<i>Governance, Risk Management, Emergency Services, Public Health and Human Services, and others who help manage Tribe-Wide Safety programs</i>
		Intermediate: Schedule and hold quarterly meetings and require agenda, minutes, and an action-item list that can be distributed to department leaders.	<i>Risk Management, Safety Committee and other department leaders</i>
		Long-term: Integrate Committee trends and open items into routine management/Tribal Council reporting.	<i>Governance and Safety Committee</i>
Safety Meeting Scheduling and Documentation	<ul style="list-style-type: none"> * Establish and enforce minimum meeting cadence and documentation standards (agenda/minutes/attendance). * Create a digital, searchable repository for all records. 	Short-term: Assign an administrative/recordkeeper support person to maintain Committee records (i.e. agenda, attendance, minutes, and follow-ups) for each meeting and store all items in a central system.	<i>Risk Management and Safety Committee Secretary</i>
		Intermediate: Standardize meeting record templates and digital file nomenclature for ease of locating and searching for meeting records.	<i>Risk Management and Information Technology</i>
Safety Communication Methods	<ul style="list-style-type: none"> * Develop monthly "Safety Bulletin" or digest for all department heads and staff. * Create an internal webpage or archive for searching safety communications. * Encourage staff input/feedback for continuous improvement. 	Short-term: Begin a regular "Safety Bulletin" memo to all employees on current safety issues or trends.	<i>Risk Management, Emergency Services, Public Health and Human Services, and other departments that manage Tribe-Wide Safety programs</i>
		Intermediate: Create a central bulletin/memo archive center where employees can search for all safety communications and offer feedback on topics.	<i>Risk Management and Information Technology</i>
		Long-term: Track engagement and feedback and adjust communications based on safety trends and employee input.	<i>Risk Management and Information Technology</i>
Safety Issue Tracking and Follow-Up	<ul style="list-style-type: none"> * Leverage the (re)constituted Safety Committee to own a standing safety trend log. * Assign action item owners, track resolution, and review status at each meeting. * Review status quarterly and integrate into management dashboards. 	Short-term: Create a central Safety Issues/Action Log (issue, owner, due date, status) and begin using it.	<i>Risk Management</i>
		Intermediate: Assign action item owners and deadlines and use the log for root cause analysis, trend reporting, and strategic improvements.	<i>Risk Management, Safety Committee and other department leaders</i>
		Long-term: Integrate log review into regular Safety Committee meetings for resolution accountability.	<i>Risk Management, Safety Committee, and Information Technology</i>

Priority Key
Short-term: Can be implemented immediately by Risk Management.
Intermediate: Requires some formalization, coordination with department heads/supervisors.
Long-term: May need technology, broader policy support, and ongoing process ownership.

APPENDIX B: This appendix provides a simplified summary of the gap analysis performed by comparing EBCI's current safety training and education practices to recognized training best practices and requirements. It outlines benchmark expectations, EBCI's current practices, and an action roadmap to address identified gaps over time.

Key Control Area	Control Area Best Practices		EBCI Risk Management Department Current Standards	
	Benchmark Standard	Benchmark Reference	Current Practice	Benchmark Compliance Scale
Evaluation of Training Effectiveness	Training effectiveness is evaluated through quizzes, feedback, or post-training assessments; review of incident trends guides content updates and retraining.	- OSHA "Safety and Health Programs—Training and Education" (Guidelines) - National Safety Council, CDC/NIOSH recommendations - ISO 45001 §7.2, 9.1	<ul style="list-style-type: none"> Employees acknowledge receipt of training, but there is no formalized system for post-training knowledge checks or feedback collection, nor linkage to incident analytics. 	Does Not Meet Benchmark
Central Tracking/Documentation of Training Completion	All safety training, including new hire and refresher, is centrally tracked for audit and compliance. Sign-in sheets or digital records maintained for every session.	- OSHA General Requirements: Training records for HazCom/BBP (29 CFR 1910.1200(h)(3)(iv), 1910.1030(h)(2)(ii)) - ISO 45001 §7.2, 7.5	<ul style="list-style-type: none"> Signed orientation forms are filed by Risk Management/HR. Inconsistent documentation of ongoing/refresher training. No comprehensive digital tracking system across departments. 	Partially Meets Benchmark
Recurring/Refresher Training for Current Employees	All affected staff must receive annual or periodic training on hazardous communication, PPE, bloodborne pathogens, and safety procedures; refreshers to be delivered at least annually or when conditions/equipment change; training must be documented.	- OSHA 29 CFR 1910.1200 (h)(1)-(2) (annual HazCom training) - OSHA 29 CFR 1910.1030 (g)(2) (annual BBP training)	<ul style="list-style-type: none"> Annual training only required/documented for a few key risk areas/roles (i.e. hazardous communication and bloodborne pathogens for at-risk staff only). Other refresher(s) happen after incidents, by request, or for "high risk" jobs. Most staff and supervisors do not receive regular, recorded update training. 	Partially Meets Benchmark
Coverage of Safety Topics in Training	New hire safety training must cover all OSHA-mandated workplace risks and hazard communication, with department/job-specific elements for higher-risk roles. Tribal best practice includes orientation on internal risk reporting and procedures.	- OSHA Hazard Communication Standard 29 CFR 1910.1200 - OSHA Bloodborne Pathogens Standard 29 CFR 1910.1030 - OSHA General Industry PPE Standard 29 CFR 1910 Subpart I - North Carolina Public Sector Safety	<ul style="list-style-type: none"> Safety checklist for new hires ensures coverage of risk (i.e. injury/incident reporting, accident investigations, PPE, hazard communication, lifting, fire, department-specific safety rules, and more). Orientation documented in multiple files and requires both employee and supervisor sign-off. Training led by Risk Mgmt and/or supervisors. 	Meets Benchmark

Benchmark Compliance Scale
Meets Benchmark – EBCI practices fully align with external standards and references.
Partially Meets Benchmark – EBCI practices address some but not all elements of the standard.
Does Not Meet Benchmark – EBCI practices lack key requirements of the standard.

APPENDIX B: This appendix provides a simplified summary of the gap analysis performed by comparing EBCI's current safety training and education practices to recognized training best practices and requirements. It outlines benchmark expectations, EBCI's current practices, and an action roadmap to address identified gaps over time.

Key Control Area	Recommendation Action Roadmap		
	Opportunities / Recommended Actions	Action Plan / Priority	Recommended Division Collaboration
Evaluation of Training Effectiveness	<ul style="list-style-type: none"> * Annual management review of training data. * Add post-training quizzes and feedback sessions. * Utilize incident trends, reviews, quiz results, and feedback to inform content changes. 	Intermediate: Add a short quiz and/or 2-3 question feedback form to each new hire and refresher training and maintain quiz/feedback results with the training record.	<i>Risk Management, Human Resources, and all departments leaders</i>
		Long-term: Once per year, summarize quiz/feedback results and compare to incident trends to decide what, how, and which training content needs updating.	<i>Risk Management, Human Resources, and Information Technology</i>
Central Tracking/Documentation of Training Completion	<ul style="list-style-type: none"> * Launch a centralized register for all training events. * All departments and participants are required to submit sign-in sheets to Risk Management Department. 	Short-term: Require departments to complete a standard sign-in sheet for every training which is submitted and maintained by Risk Management.	<i>Risk Management and all department leaders</i>
		Intermediate: Maintain a single digital training log (spreadsheet/database) showing employee, course, date, and completion status.	<i>Risk Management, Human Resources, and Information Technology</i>
Recurring/Refresher Training for Current Employees	<ul style="list-style-type: none"> * Require and centrally schedule core refresher annual safety training for all employees and targeted groups. * Ensure supervisors/departments are involved in supporting attendance and topic relevance. 	Short-term: Publish an annual refresher schedule (core + role-based topics) and send it to all department leaders.	<i>Risk Management and all department leaders</i>
		Intermediate: Update policy to require annual/core refresher training and define minimum documentation (topic, date, roster, trainer).	<i>Risk Management, Human Resources, and all departments leaders</i>
		Long-term: Utilize the digital training log to monitor training completion and follow up with departments that are behind.	<i>Risk Management, Human Resources, and Information Technology</i>
Coverage of Safety Topics in Training	<ul style="list-style-type: none"> * Maintain comprehensive checklist as foundation. * Ensure annual review of topics for regulatory and workplace relevance. * Involve department heads for job-specific risks. 	Short-term: Continue using the detailed new hire checklist and collect/sign/file the completed forms consistently.	<i>Risk Management, Human Resources, and all departments leaders</i>
		Intermediate: Review and update the checklist annually with department input to confirm it still matches current job hazards and requirements.	<i>Risk Management, Human Resources, and all departments leaders</i>

Priority Key
Short-term: Can be implemented immediately by Risk Management.
Intermediate: Requires some formalization, coordination with department heads/supervisors.
Long-term: May need technology, broader policy support, and ongoing process ownership.

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MEMORANDUM

TO: Executive
Tribal Council

FROM: Sharon Blankenship, Chief Audit and Ethics Executive 

CC: Monique Taylor, Audit and Ethics Committee Chair
Paxton Myers, Chief of Staff
Pam Straughn, Deputy Chief of Staff
Divisional Secretaries
Joe Bernhisel, Risk Management Manager

DATE: April 9, 2026

RE: Action plan for 26-004 – Safety and Security - Tribalwide

The 4 observations and recommendations identified in the Safety and Security audit report 26-004 were sent to the program for an action plan. The action plan as provided is stated below. The original response forms are on file with this office.

1. Facility and Safety Inspections

Response: Agree, Target implementation 6/26/26

Respondent narrative: “Create a Building Inspection Tracking Sheet for buildings that will need to be inspected per Quater or Annually.”

2. Inter-Departmental Communication and Collaboration

Response: Agree, Target implementation 6/26/26

Respondent narrative: “Put a Safety Committee together to help improve the safety of the employees and to identify any unsafe areas with tribal departments.”

3. Employee Training and Education

Response: Agree, Target implementation 6/26/26

Respondent narrative: “Risk Management will evaluate the employee training program best practices versus current practice to determine where enhancements may be made. Some specific training may be needed. I would like to get with Insurance Carriers along with our Tribal HR Training Department to see if they can help or provide any data information for our employees training needs. I will also be working with our Workplace Safety Training Officer with the proper training needed.”

4. Minor Incident Reporting and Resolution

Response: Agree, Target implementation 6/26/26

Respondent narrative: “Create a tracking sheet for all Non-Minor Incident that could arise.”