

January 05, 2026

Wade Crowfoot, Secretary  
California Natural Resources Agency  
715 P Street, 20th Floor  
Sacramento, CA 95814

Dear Secretary Wade Crowfoot,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the Native American Heritage Commission submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2025.

Should you have any questions please contact Conner Mulligan, Staff Services Manager 1, at (916) 297-3779, Conner.Mulligan@NAHC.ca.gov.

## **GOVERNANCE**

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### **Mission and Strategic Plan**

The mission of the Native American Heritage Commission is to protect Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines on public property, and to ensure the respectful treatment and disposition of ancient Native American Human remains and associated grave goods, all to the fullest extent of the law.

### **Control Environment**

The NAHC operates under the governance of a nine-member Commission, which convenes monthly to conduct official business. The Executive Secretary reviews critical matters and provides informed recommendations to the Commission, which remains the final decision-making body.

The NAHC is a constituent entity of the **California Natural Resources Agency (CNRA)**, which provides oversight and support. The Commissioners hold responsibility for upholding the integrity and ethical standards of the organization.

The **Executive Secretary** is responsible for the day-to-day management of the NAHC. Both the Executive Secretary and the **Chief Deputy Executive Secretary** are appointed by the Governor. The Chief Deputy Executive Secretary reports to the Executive Secretary. The Executive Secretary oversees a total of 23 staff positions within the NAHC. Currently out of the 23 staff positions 12 positions are filled.

To maintain ethical integrity and compliance, the commission ensures the implementation of appropriate **Conflict of Interest** regulations. All commission members, staff, and relevant contractors are required to timely file **Statements of Economic Interests (Form 700)** and complete **ethics training**. Additionally, whistleblower information is posted in a publicly accessible location to ensure transparency.

The Executive Secretary is responsible for hiring qualified staff, while the Chief Deputy Executive Secretary ensures adequate control systems are in place and properly documented.

### **Information and Communication**

As a small organization, the NAHC benefits from the ability to respond quickly to operational and programmatic needs. Professional and executive staff engage in regular, informal discussions to address issues as they arise, allowing for timely decision-making and implementation.

Financial decisions that fall within the scope of Commission approval are handled by the executive staff. When necessary, the executive team works with both the administration manager of the NAHC and the Department of General Services accounting team to obtain important budgetary information critical to the NAHC mission. If needed, the executive team prepares budget change proposals to secure the budgetary authority needed.

All Commission meetings are open to the public, allowing opportunities for community input prior to decision-making.

### **MONITORING**

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The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the Native American Heritage Commission monitoring practices are implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Andrew Alejandro, Executive Secretary.

The NAHC maintains an entity-wide, continuous internal control monitoring process to ensure that systems function as intended. The designated **Executive Monitoring Sponsor** is **Executive Secretary Andrew Alejandro**. The Executive Secretary responsibilities include facilitating and verifying the implementation and effectiveness of NAHC's monitoring practices.

Given the organization's small size, executive staff are closely involved in daily operations and are well-positioned to identify and resolve issues in real time. This structure promotes proactive

problem-solving and follow-up to ensure that resolutions are effective and do not generate unintended consequences.

In addition to executive staff, two managers and staff members participate in the review and monitoring of internal control systems, further reinforcing accountability and continuous improvement within the organization.

## **RISK ASSESSMENT PROCESS**

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The following personnel were involved in the Native American Heritage Commission risk assessment process: executive management, middle management, and staff.

The following methods were used to identify risks: ongoing monitoring activities, audit/review results, and other/prior risk assessments.

The following criteria were used to rank risks: likelihood of occurrence, potential impact to mission/goals/objectives, timing of potential event, potential impact of remediation efforts, and tolerance level for the type of risk.

The NAHC is currently monitoring risks from both internal and external sources. When identified appropriate action is taken on a case by case basis.

## **RISKS AND CONTROLS**

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### **Risk: Risk 1**

Turnover in executive staff beginning in 2022 has created challenges for the NAHC. These challenges include loss of historical knowledge, fast transition of workload resulting in incomplete assignments, and shortcuts thru process. This could results in failing to meet demand which could erode trust between commission and tribes

#### **Control: Control 1**

Capturing current projects and notes including historical knowledge in the share drive of departing executive level staff has assisted the NAHC in keeping critical

information. Generalizing classifications of NAHC staff has open up opportunity for staff with historical knowledge to grow and advance within the commission.

### Risk: Risk 2

The NAHC has not had a records retention program since 1988. This has led to documents both electronic and hard files accumulating mainly unorganized. NAHC staff fear that historical records may have been lost or destroyed prior to retention due to the extreme volume.

#### Control: Control 1

The NAHC has hired a new analyst who is spearheading updating and inventorying both electronic and digital files. The NAHC is currently organizing and recording both electronic and hard copy files once completed we will submit a new retention plan to Calrim at the secretary of state.

### Risk: Risk 3

DGS has stopped providing EEO/RA services to the NAHC. Leaving NAHC scrambling to find another department or other entity to assist with NAHC RA/EEO complaints.

#### Control: Control 1

NAHC is rapidly trying to find a solution for this need by reaching out to Agency to see if CALFIRE or another department can assist with EEO/RA services.

## CONCLUSION

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The Native American Heritage Commission strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

### **Andrew Alejandro, Executive Secretary**

CC: California Legislature [Senate, Assembly]  
California State Auditor  
California State Library  
California State Controller  
Director of California Department of Finance  
Secretary of California Government Operations Agency