

Office of the Washington State Auditor Pat McCarthy

March 27, 2025

Board of Directors Yakima Regional Clean Air Agency Yakima, Washington

Report on Agreed-Upon Procedures

Please find attached our report on the results of performing certain agreed-upon procedures as specified in our report.

Sincerely,

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Pat McCarthy, State Auditor Olympia, WA

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INDEPENDENT ACCOUNTANT'S REPORT

Marc Thornsbury, Executive Director Yakima Regional Clean Air Agency 186 Iron Horse Ct Yakima, WA 98901

To the Board of Directors and Management of the Yakima Regional Clean Air Agency:

We have performed the procedures enumerated below related to the Agency's Air Operating Permit (AOP) program and the Agency's compliance with program's fiscal requirements established by Chapter 70A.15.2260-2270 of the Revised Code of Washington and Chapter 173-401 of the Washington Administrative Code (the specified requirements), during the period July 1, 2022 through June 30, 2024. The Agency's management is responsible for managing its AOP program, compliance with those requirements, and for the accuracy of its financial records.

The Agency's management and the Washington State Department of Ecology (Ecology) have agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assisting the Agency and Ecology in determining whether the Agency complied with the specified requirements. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

Procedure Results

The agreed-upon procedures and associated results are as follows:

Procedures related to collection of fees

1. Inspect the Agency's written procedure for developing, assessing and collecting fees from its sources and determine whether it is more than three years old.

- 2. Compare totals from the AOP permit ledgers or systems to the general ledger for each fiscal year. (Applicable only if permits were issued out of a separate system than the general ledger and may only be feasible if permit amounts are included in the permit ledger or system.)
 - **Results:** The Agency uses spreadsheets to calculate the AOP permits. We compared the 2023 and 2024 AOP spreadsheets to the general ledger and the totals agreed.

Results: The Agency's written procedures were approved by the Board on May 14, 2009. This is more than three years old.

- 3. Judgmentally select AOP permits issued during the engagement period and trace amounts to receipts and to the general ledger.
 - **Results:** We selected all four AOP permits issued during the period ended June 30, 2023 and all three AOP permits issued during the period ended June 30, 2024. The Agency billed \$71,093 and \$101,376, respectively. We traced the billings to receipts and the general ledger. No exceptions were found as a result of applying this procedure.
- 4. Inspect a judgmental selection of AOP permit accounts receivables for each fiscal year and determine whether late fees were assessed and collection measures initiated in accordance with Authority policies and procedures.
 - **Results:** The Agency did not have an accounts receivable balance at fiscal year ended June 30, 2023. The Agency had one accounts receivable with a balance of \$2,915 at fiscal year ended June 30, 2024. The Agency did not follow its policy by assessing late fees and initiating collection measures.

Procedures related to computation of fees

- 5. Inspect invoices for a judgmental selection of AOP permits issued during the engagement period to ensure fees agreed with the Agency's approved fee schedule and fee calculation worksheets.
 - **Results:** The Agency's policy requires the Agency to bill for permits based on the Agency's budget, reconciling the budget to actual each year. The Agency must provide rebates or additional charges as necessary based on the annual reconciliation. We inspected and recalculated all four permits issued for fiscal year ended June 30, 2023 and all three permits issued for fiscal year ended June 30, 2024. No exceptions were found.

Procedures related to revenue and expenditure accounting

- 6. Identify which fund or accounts are used to account for AOP revenue and expenses.
 - **Results:** The Agency uses Fund 002 in its accounting system to account for AOP revenues and expenses. The Agency also tracked expenditures in an Excel spreadsheet used to determine actual AOP expenses.
- 7. Inspect all Agency general ledger accounts used to account for AOP revenue and expenses and determine whether AOP revenue and expenses are commingled with other revenue sources or expense uses.
 - **Results:** AOP revenues were not commingled with other revenue sources. In 2023, AOP expenses were not commingled with other expense uses. However, the Agency coded general payroll expenses to Fund 002 from January 2024 to May 2024. As a result, the Agency comingled approximately \$32,453 in general payroll expenses with AOP expenses in the general ledger.

- 8. Judgmentally select expenses accounted for in non-AOP accounts during the engagement period and inspect supporting documentation to determine whether they were for AOP activities.
 - **Results:** We inspected the non-AOP general ledger expense reports and did not identify any payments for Ecology oversight fees and audit costs. We determined that the expenses were only for non-AOP activities.

Procedures related to authorized activities

- 9. Judgmentally select AOP program expenses (including payroll) for the engagement period and inspect supporting documentation to determine whether they were for allowable program activities.
 - **Results:** The Agency's AOP expenses include Ecology oversite fees, audit costs and payroll. We selected the Ecology oversight fees and audit costs and inspected supporting documents. We verified that the expenses were allowable for the program. We also judgmentally selected direct payroll expenses for three months in 2023 and five months in 2024 and tied the timesheets to the general ledger and the Excel spreadsheet. Although the Agency coded general payroll to Fund 002 in the general ledger as noted in procedure 7, it properly coded the payroll in the Excel spreadsheet used to calculate the billings and annual reconciliation. We determined that the payroll expenses were for allowable program activities.
- 10. Inspect supporting documentation for a judgmental selection of tasks the sources were billed for during the engagement period and determine whether they were completed.
 - **Results:** The Agency bills its sources annually for payroll costs, Ecology oversight fees and auditing costs. We inspected three months of payroll costs for 2023 and five months of payroll costs for 2024, as well as the Ecology oversight fees and auditing fees. No exceptions were found as a result of applying this procedure.
- 11. Inspect the Agency's indirect cost allocations and determine whether indirect costs were also charged to the program as direct costs.

Results: Indirect costs were not charged to the program as direct costs.

Procedures related to available funds

- 12. Inspect Agency interim and year-end balance sheets for each fiscal year to determine if the AOP program had a negative fund balance at any time during the engagement period.
 - **Results:** We compared the revenue and expenses in the general ledger and confirmed that the AOP program did not have a negative fund balance at any time.

- 13. Inspect uses of AOP program revenues collected in excess of actual program costs for each fiscal year and determine whether the Agency complied with its policy for handling excess program revenue.
 - **Results:** The Agency's policy requires an annual reconciliation of budget to actual and the Agency must provide rebates the following year for revenues collected in excess of actual program costs. No exceptions were found as a result of applying this procedure.
- 14. To ensure all Title V facilities were billed for permit fees during the engagement period, perform a query of all Title V sources and synthetic minors on an annual basis.
 - **Results:** The Agency had four Title V sources for 2023 and three Title V sources for 2024. We determined that Title V sources were billed for permit fees.

About the Engagement

We were engaged by the Agency's management to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the Agency's AOP program or on compliance with the specified requirements. Additionally, the agreed-upon procedures do not constitute an audit or review of the financial statements or any part thereof, the objective of which is the expression of an opinion or conclusion, respectively, on the financial statements or a part thereof. Accordingly, we do not express such opinions or conclusions. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Agency and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

Sincerely,

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Pat McCarthy, State Auditor Olympia, WA March 20, 2025