



Office of the Washington State Auditor
Pat McCarthy

Accountability Audit Report

North Sound Behavioral Health Administrative Services Organization

For the period January 1, 2020 through December 31, 2021

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Office of the Washington State Auditor Pat McCarthy

January 19, 2023

Board of Directors
North Sound Behavioral Health Administrative Services Organization
Mount Vernon, Washington

Report on Accountability

Thank you for the opportunity to work with you to promote accountability, integrity and openness in government. The Office of the Washington State Auditor takes seriously our role of providing state and local governments with assurance and accountability as the independent auditor of public accounts. In this way, we strive to help government work better, cost less, deliver higher value and earn greater public trust.

Independent audits provide essential accountability and transparency for Organization operations. This information is valuable to management, the governing body and public stakeholders when assessing the government's stewardship of public resources.

Attached is our independent audit report on the Organization's compliance with applicable requirements and safeguarding of public resources for the areas we examined. We appreciate the opportunity to work with your staff and value your cooperation during the audit.

Sincerely,

Pat McCarthy, State Auditor
Olympia, WA

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AUDIT RESULTS

Results in brief

This report describes the overall results and conclusions for the areas we examined. In those selected areas, Organization operations complied, in all material respects, with applicable state laws, regulations, and its own policies, and provided adequate controls over the safeguarding of public resources.

In keeping with general auditing practices, we do not examine every transaction, activity, policy, internal control, or area. As a result, no information is provided on the areas that were not examined.

About the audit

This report contains the results of our independent accountability audit of North Sound Behavioral Health Administrative Services Organization from January 1, 2020 through December 31, 2021.

Management is responsible for ensuring compliance and adequate safeguarding of public resources from fraud, loss or abuse. This includes the design, implementation and maintenance of internal controls relevant to these objectives.

This audit was conducted under the authority of RCW 43.09.260, which requires the Office of the Washington State Auditor to examine the financial affairs of all local governments. Our audit involved obtaining evidence about the Organization's use of public resources, compliance with state laws and regulations and its own policies and procedures, and internal controls over such matters. The procedures performed were based on our assessment of risks in the areas we examined.

Based on our risk assessment for the years ended December 31, 2021 and 2020, the areas examined were those representing the highest risk of fraud, loss, abuse, or noncompliance. We examined the following areas during this audit period:

- Accounts payable – general disbursements
- Final closeout payments – reviewing to ensure compliance with guidance from the Health Care Authority
- Open public meetings – compliance with minutes, meetings and executive session requirements
- Financial condition – reviewing for indications of financial distress



North Sound BH-ASO
 2021 E. College Way, Suite 101, Mt. Vernon, WA 98273 Phone: (360) 416-7013 Fax:
 (360) 899-4754
www.nsbhaso.org

SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

North Sound Behavioral Health Administrative Services Organization January 1, 2020 through December 31, 2021

This schedule presents the status of findings reported in prior audit periods.

Audit Period: January 1, 2018 through December 31, 2019	Report Ref. No.: 1027817	Finding Ref. No.: 2019-001
Finding Caption: North Sound made additional compensation and facility cost payments that did not align with the state Constitution and guidance from the Health Care Authority.		
Background: North Sound Behavioral Health Organization transitioned to North Sound Behavioral Health Administrative Services Organization (North Sound) on July 1, 2019. <ul style="list-style-type: none"> • Our audit reviewed disbursements of North Sound, including those related to the spend-down plan, and noted the following concerns: North Sound contracted with all employees to provide retention incentive payments with the expectation that staff stayed through the transition to a BH-ASO. This additional compensation was paid both to employees who had accepted positions with the BH-ASO and those who had not. Employment terms did not substantially change for those who had accepted positions after the transition, and therefore the additional compensation was not allowable. • North Sound prepaid the second half of 2019 and the entire period of 2020 rent for its administrative office building. However, under the spend-down guidance from HCA, BHO reserves must be directly related to support closeout activities and may not be used to pay for services provided beyond the end of the contract period, especially start-up or operational costs of the BH-ASO. 		
Status of Corrective Action: (check one) <input checked="checked" type="checkbox"/> Fully Corrected <input type="checkbox"/> Partially Corrected <input type="checkbox"/> Not Corrected <input type="checkbox"/> Finding is considered no longer valid		

Corrective Action Taken:

North Sound BHO and HCA resolved the outstanding issues noted above. A letter dated July 16, 2021 from HCA indicated the following: “HCA met internally and has carefully reviewed all the information received. In addition to reviewing the documentation, HCA has also considered North Sound’s good faith efforts in collaboratively working to resolve the outstanding closeout issues. Therefore, based on careful consideration, HCA will not request North Sound to pay back this amount as part of their closeout process. HCA will expect that the BHO financial statements accurately reflect with information.” It is understood by HCA and the BHO the matter is resolved and closed.

RELATED REPORTS

Financial

Our opinion on the Organization's financial statements and compliance with federal grant program requirements is provided in a separate report, which includes the Organization's financial statements. That report is available on our website, <http://portal.sao.wa.gov/ReportSearch>.

That report includes a finding for a material weakness in internal controls over financial reporting regarding preparation and review of financial statements.

Federal grant programs

We evaluated internal controls and tested compliance with the federal program requirements, as applicable, for the Organization's major federal programs, which are listed in the Schedule of Findings and Questioned Costs section of the separate financial statement and single audit report. That report is available on our website, <http://portal.sao.wa.gov/ReportSearch>.

INFORMATION ABOUT THE ORGANIZATION

The North Sound Regional Support Network was formed in 1989 through an interlocal agreement created with five neighboring counties: Island, San Juan, Whatcom, Skagit, and Snohomish. The Network does business as the North Sound Mental Health Administration and contracts with vendors and other agencies to coordinate and provide mental health services to individuals within the area.

In February 2016, the North Sound Regional Support Network became North Sound Behavioral Health Organization LLC. On April 1, 2016, the North Sound Behavioral Health Organization took over the responsibility of operating the Substances Use Disorder service system previously run by the state and counties. On June 30, 2019, the Medicaid portion of its contract ended, and on July 1, 2019, it became the North Sound Behavioral Health Administrative Services Organization (North Sound BH-ASO).

The North Sound BH-ASO is governed by a Board of Directors consisting of nine elected members, three tribal representatives and two advisory Board members from entities included in the interlocal agreement. The Board hires an Executive Director to oversee its daily operations, as well as its 23 employees. During fiscal years 2020 and 2021, the North Sound BH-ASO reported operating expenditures of \$25.8 million and \$29.8 million, respectively.

Contact information related to this report	
Address:	North Sound Behavioral Health Administrative Services Organization 2021 E. College Way, Suite 101 Mount Vernon, WA 98273
Contact:	Darrell Heiner, Senior Accountant
Telephone:	(360) 419-5652
Website:	www.nsbhaso.org

Information current as of report publish date.

Audit history

You can find current and past audit reports for the North Sound Behavioral Health Administrative Services Organization at <http://portal.sao.wa.gov/ReportSearch>.

ABOUT THE STATE AUDITOR'S OFFICE

The State Auditor's Office is established in the Washington State Constitution and is part of the executive branch of state government. The State Auditor is elected by the people of Washington and serves four-year terms.

We work with state agencies, local governments and the public to achieve our vision of increasing trust in government by helping governments work better and deliver higher value.

In fulfilling our mission to provide citizens with independent and transparent examinations of how state and local governments use public funds, we hold ourselves to those same standards by continually improving our audit quality and operational efficiency, and by developing highly engaged and committed employees.

As an agency, the State Auditor's Office has the independence necessary to objectively perform audits, attestation engagements and investigations. Our work is designed to comply with professional standards as well as to satisfy the requirements of federal, state and local laws. The Office also has an extensive quality control program and undergoes regular external peer review to ensure our work meets the highest possible standards of accuracy, objectivity and clarity.

Our audits look at financial information and compliance with federal, state and local laws for all local governments, including schools, and all state agencies, including institutions of higher education. In addition, we conduct performance audits and cybersecurity audits of state agencies and local governments, as well as state whistleblower, fraud and citizen hotline investigations.

The results of our work are available to everyone through the more than 2,000 reports we publish each year on our website, www.sao.wa.gov. Additionally, we share regular news and other information via an email subscription service and social media channels.

We take our role as partners in accountability seriously. The Office provides training and technical assistance to governments both directly and through partnerships with other governmental support organizations.

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