

# Board of Accountancy

WASHINGTON STATE



## REGULAR BOARD MEETING AGENDA

**Date, Time:** Friday, January 29, 2016 – Regular Board Meeting – 9:00 a.m.

**Location:** University of Washington – Bothell  
Collaboratory in the Beardslee Building  
18807 Beardslee Blvd., UWBB205, Bothell, WA 98011  
(425) 352-3556

**Notices:** None

Chair Introductions

## REGULAR MEETING AGENDA

Attachments at tab:

1. Minutes – October 30, 2015, Annual Board Meeting.....A
2. Delegations of Authority – Annual Review
  - a. Charges, Subpoenas, Negotiate Settlement - Amendment Proposed.....B
  - b. Administrative Notices of Non-Compliance/Administrative Sanctions.....C
  - c. CPE Waiver Extension Requests/Firm Names, Professional/Education Organizations  
Recognition Requests; Late Fee Waiver Requests; Domestic or Foreign Education  
Credential Evaluation Services/Appeal of Denials of Requests for Lists of Individuals .....D
  - d. Authority to Conduct Investigations.....E
  - e. Quality Assurance Review (QAR) Program Remedial Actions/Review of Publicly  
Available Professional Work.....F
3. Rules Review
  - a. WAC 4-30-060 What are the education requirements to qualify to apply for the  
CPA examination? .....G
  - b. WAC 4-30-062 How do I apply to take the CPA examination? .....H
  - c. WAC 4-30-010 Definitions .....I
4. Board Member Participation Summary .....J
5. NASBA Update

The Board of Accountancy schedules all public meetings at barrier free sites. Persons who need special assistance, such as enlarged type materials, please contact the Board's Americans with Disabilities Act contact person:

Kirsten Donovan, Washington State Board of Accountancy  
PO Box 9131, Olympia, WA 98507-9131  
Phone: 360-664-9191 E-mail: kirstend@cpaboard.wa.gov

7-1-1 or 1-800-833-6388 (TTY) - 1-800-833-6385 (Telebraille)  
(TTY and Telebraille service nationwide by Washington Relay  
[www.washingtonrelay.com](http://www.washingtonrelay.com))

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6. Chair's Report
  - a. SSARS 21 .....K
  - b. SSARS 21 / Peer Review
  - c. WSCPA Education Fund
  - d. Firm Merger or Sale – WAC 4-30-050
  - e. CPA Retired Designation – WAC 4-30-058
7. Committee/Task Force Reports
  - a. Executive – Thomas Neill, CPA, Chair - *Verbal Report*
  - b. Compliance Assurance Oversight – Edwin Jolicoeur, CPA, Chair – *No Report*
  - c. Legislative Review – Donald Aubrey, CPA, Chair – *Verbal report*
  - d. Quality Assurance – Thomas Neill, CPA, Chair - *No Report*
  - e. Request Review – Karen Saunders, CPA, Chair – *Verbal Report* .....L
  - f. State Ethics Compliance – Lauren Jassny, Ethics Advisor – *No Report*
  - g. Qualifications – Thomas Neill, CPA, Chair – *No Report*
  - h. Performance Review and Succession – Emily Rollins, Chair – *No Report*
  - i. Social Media Task Force – Favian Valencia, Chair – *Verbal Report*.....M
8. Executive Director's Report
9. Director of Investigation's Report .....N
10. Legal Counsel's Report
11. Executive and/or Closed Sessions with Legal Counsel
12. Public Input - To ensure the public has an opportunity to address its concerns and the Board has an opportunity to ask questions of the public. Individual speakers will be provided 10 minutes each.

# WASHINGTON STATE BOARD OF ACCOUNTANCY

## Unapproved Draft - Minutes of an Annual Meeting of the Board – Unapproved Draft

<b>Time and Place of Meeting</b>	9:00 am – 1:15 pm Friday, October 30, 2015 Crowne Plaza Seattle Airport Queen Anne Room 17338 International Boulevard SeaTac, Washington
<b>Attendance</b>	Donald F. Aubrey, CPA, Chair, Board Member Karen R. Saunders, CPA, Secretary, Board Member Elizabeth D. Masnari, CPA, Board Member Emily R. Rollins, CPA, Board Member Thomas G. Neill, CPA, Board Member Favian Valencia, Public Member James R. Ladd, Public Member Bruce L. Turcott, Assistant Attorney General, Board Advisor (arrived at 11:10 am) Jennifer Sciba, Deputy Director Charles E. Satterlund, CPA, Director of Investigations Kirsten Donovan, Board Clerk
<b>Call to Order</b>	Board Chair, Don Aubrey, called the annual meeting of the Board to order at 9:00 am.  The Board Chair excused the absences of Lauren C. Jassny, Public Member, Edwin G. Jolicoeur, CPA, Member, and Richard C. Sweeney, CPA, Executive Director.
<b>AICPA State Regulation and Legislation Team</b>	Guest speaker, Steve McConnel, consultant with the AICPA, reported on major profession initiatives currently being worked on by the State Regulation and Legislation Team. The team's purpose is to support state boards in ways that add value to the services received from NASBA and the AICPA. Topics included: <ul style="list-style-type: none"><li>• Definition of attest</li><li>• Firm mobility</li><li>• CPE reciprocity</li><li>• 2017 CPA Exam changes</li><li>• DOL referrals</li></ul>
<b>Minutes – July 31, 2015 Regular Board Meeting</b>	The Board approved the minutes of the July 31, 2015, regular Board meeting with one correction for a typographical error.

**Chair's Report**

Election of 2016 Officers – The Chair presented the following slate of officers to serve during 2016:

- Chair – Thomas G. Neill, CPA
- Vice Chair – Elizabeth D. Masnari, CPA
- Secretary – James R. Ladd

No other nominations were made. The Board cast a unanimous vote for the slate of officers presented.

2016 Board Meeting Schedule – The Board established the following schedule for the 2016 Board meetings:

- January 29, 2016 – University of Washington - Bothell
- April 19, 2016 – Evergreen Plaza Building - Olympia
- July 29, 2016 – North Seattle College - Seattle
- October 28, 2016 – Washington State University - Pullman

Committee Appointments for 2016 – The Board made the following committee appointments for 2016:

- Compliance Assurance Oversight Committee  
Chair:  
Karen R. Saunders, CPA  
Members:  
Edwin G. Jolicoeur, CPA
- Legislative Review Committee  
Chair:  
Favian Valencia  
Member:  
Donald F. Aubrey, CPA
- Quality Assurance Committee  
Chair:  
Thomas G. Neill, CPA  
Member:
- Request Review Committee  
Chair:  
Elizabeth D. Masnari, CPA  
Member:  
Karen R. Saunders, CPA

## Minutes, October 30, 2015, Annual Board Meeting

- State Ethics Compliance Committee  
Ethics Advisor:  
James R. Ladd
- Qualifications Committee:  
Chair:  
Emily R. Rollins, CPA  
Members:  
Elizabeth D. Masnari, CPA
- Performance Review and Succession Committee  
Chair:  
Emily R. Rollins, CPA  
Members:  
Lauren C. Jassny  
Donald F. Aubrey, CPA
- Client Record Task Force  
The Board voted unanimously to dissolve the task force.
- Social Media Task Force  
Chair:  
Favian Valencia  
Members:  
Donald F. Aubrey, CPA  
Jennifer Sciba

### **NASBA Update**

Don Aubrey reported on the 2015 annual NASBA meeting held in Dana Point, CA from October 25-28. Topics included:

- CGMA designation
- Competency based education

Don also discussed the Board coordinating with NASBA for the production of a video, which will be an introduction to the Board. The video will be used for licensees and outreach. A script for the video will be presented at the January Board meeting for approval.

### **Rules Revisions Discussions**

WAC 4-30-050 What are the requirements concerning records and clients confidential information?

The Chair removed this discussion item from the agenda.

WAC 4-30-060 What are the education requirements to qualify to apply for the CPA examination?

Tom Neil presented the Qualifications Committee proposed changes to the rule and led the discussion.

The Board directed staff to file the CR-101 with the Office of the Code Reviser for review at the Board's January meeting.

WAC 4-30-062 How do I apply for the CPA examination?

Don Aubrey presented the Executive Director's proposed change due to an apparent error in the sentence structure in the Rule.

The Board directed staff to file the CR-101 with the Office of the Code Reviser for review at the Board's January meeting.

WAC 4-30-010 Definitions

Don Aubrey led the discussion on the Executive Director's proposed changes to the rule. Action on the Executive Director's proposed changes was deferred until the January meeting. Legal counsel will review the changes and advise the Board.

**Policy Updates and Discussions**

2004-1 Sanction and Penalty Guidelines

Jennifer Sciba presented the Executive Director's proposed changes to the policy and led the discussion.

The Board voted unanimously to amend the policy as revised.

2011-2 Interim Policy Guidelines Pending Rule Changes

Jennifer Sciba presented the Executive Director's proposed changes to the policy and led the discussion.

The Board voted unanimously to amend the policy as revised.

#### 2012-1 Social Media

Favian Valencia reported on the Social Media task force's meeting held October 23, 2015. Favian reported that they are moving forward carefully with the potential policy change due to public records concerns. The task force defined the target audience as current licensees and potential CPAs. Favian said that the Board website already meets requirements for reporting information, however social media would go above and beyond. The goal would be to engage with the younger population.

The primary concern is ensuring that the conversation can be restricted to one-way, which will allow the Board to put out information without response from the public.

Tests will be performed by Board staff on Facebook and LinkedIn to verify that only one-way conversation is viable. The outcome of the test will be reported at the January meeting.

#### Policy to Consider Fee Reductions

Don Aubrey led the discussion on a potential policy to consider fee reductions.

The Board directed staff to draft a policy for review at the January meeting. The policy should include a cash management schedule and explain the reason a policy is necessary.

#### Board of Accountancy Outreach

Don Aubrey led the discussion on a potential policy for Board of Accountancy outreach.

Board Members agreed that outreach through attending and/or participation in WSCPA committee and chapter meetings is a good starting point. Board

Minutes, October 30, 2015, Annual Board Meeting

staff will monitor the WSCPA website for activities and email the Board Members.

Board members will report all outreach participation at the next Board meeting and to the Board Clerk for recording.

**Consent Agreement Discussion**

Don Aubrey led the discussion on the Consent Agreement process.

The current process of voting by email will continue. However, when Board Members report substantive questions on a case to the Board Clerk, the Board Clerk will inform the Board Members that the vote will be tabled until the next Board meeting. The case will be discussed in a closed session at the meeting and a vote will be taken at that time.

**Client Confidentiality and the Cloud**

Don Aubrey led a discussion on Cloud data storage and the potential violation of the RCW. Cloud data storage should be disclosed in the engagement letter to prevent the violation.

The Board is waiting for guidance from the AICPA on the issue.

Don Aubrey and Tom Neill will draft a reminder of the importance of engagement letters for the WSCPA to disseminate to their members.

**Executive Committee**

Don Aubrey reported that he met with the Deputy Director, and the Secretary on October 22, 2015 by teleconference. Their discussion included:

- The Board Meeting Agenda

**Compliance Assurance Oversight Committee**

Don Aubrey advised that Ed Jolicoeur had nothing to report.

**Legislative Review Committee**

Don Aubrey reported that he, Tom Neill, Rick Sweeney, and Jennifer Sciba will be meeting with WSCPA officials on November 11<sup>th</sup> to identify what issues will be brought up for legislation this coming year.



**Quality Assurance  
Committee**

Tom Neill reported on the 2015 QAR results.

**Request Review  
Committee**

Karen Saunders reported on the 3rd quarter 2015 approval and denials from the committee:

Firm Names: *Approved:*

- UPSIID, LLC
- BAS PARTNERS LLC
- RSM US LLP
- THREE OAKS FINANCIAL, LLC
- ASSURE PROFESSIONAL, LLC
- KREISCHER MILLER
- BECKER ACCOUNTING SOLUTIONS, LLC
- USTAXCENTRAL PLLC
- COLUMBIA BASIN CPAS LLC
- FUTCHER GROUP
- BFBA, LLP
- HONEST CPAS
- THE AMERICAN AUDITORS GROUP, LLC
- PITCH CPA, LLC
- ARTESIAN CPA, LLC
- LIGHTHOUSE ASSOCIATES, PLLC

Professional/Educational Organization - Recognition

Requests: During the 3<sup>rd</sup> quarter 2015, the Board did not receive any requests for recognition of an educational organization for purposes of obtaining list requests.

Domestic or Foreign Education Credential Evaluation

Services – Applications: During the 3<sup>rd</sup> quarter 2015, the Board did not receive any requests for recognition of domestic or international education credential evaluation services.

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<b>State Ethics Compliance Committee</b>	Don Aubrey reported for Lauren Jassny on the state ethics compliance checklists which were completed by Board staff.
<b>Qualifications Committee</b>	Tom Neill had nothing to report.
<b>Performance Review and Succession Committee</b>	Emily Rollins had nothing to report.
<b>Client Record Task Force</b>	Tom Neill had nothing to report.
<b>Social Media Task Force</b>	Favian Valencia had nothing to report.
<b>Director of Investigations Report</b>	<p><u>Investigation Statistics/Investigations &amp; Administrative Sanctions:</u> Charles Satterlund, CPA, Director of Investigations provided the following report to the Board:</p> <ul style="list-style-type: none"><li>• Enforcement Report: July 1, 2015 through September 30, 2015</li></ul> <p>Charles Satterlund reported on:</p> <ul style="list-style-type: none"><li>• Tri-Cities Business Connection outreach</li><li>• Case load under control</li></ul>
<b>Amendment to Delegation of Authority D-201 – Authority to Conduct Investigations</b>	<p>The Chair reported on the proposed changes to Delegation of Authority D-201 - Authority to Conduct Investigations.</p> <p>The Board voted unanimously to amend the delegation as proposed.</p>
<b>Executive Director's Report</b>	<p>Jennifer Sciba and Don Aubrey reported on a Board Member evaluation proposal. Objective data only will be collected and reported to the Governor.</p> <p>The Performance Review and Succession committee will draft the proposal and present it at the January Board meeting.</p>

**Legal Counsel's Report**

Bruce Turcott, the Board's legal counsel reported on:

- The Supreme Court ruling in favor of the FTC against the North Carolina Dental Board for violation of anti-trust laws. Our Board must be cautious of anti-competitive behavior when taking action against non-CPAs.
- Open government manual was just reviewed and revised. It is available on the Attorney General's website.
- State Supreme Court in a case against the Pierce County Prosecutor ruled that state business conducted on private cell phones is subject to the Public Records Act.

**Executive and/or Closed Sessions with Legal Counsel**

No executive or closed sessions with legal counsel held.

**Public Input**

The Board received input from representatives of the WSCPA throughout the meeting.

**Adjournment**

The meeting adjourned at 1:15 pm.

Minutes, October 30, 2015, Annual Board Meeting

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Secretary

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Chair

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Vice-Chair

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Member

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Member

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Member

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# DELEGATION OF AUTHORITY

## BY THE

### WASHINGTON STATE BOARD OF ACCOUNTANCY

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I, ~~DONALD F. AUBREY~~THOMAS G. NEILL, Chair of the Washington State Board of Accountancy (“Board”), acting under authorization by a vote of the Board, delegate to ~~Richard C. Sweeney, the~~ Executive Director for the Board, the specific authority to:

- (a) **sign, issue, and withdraw Statements of Charges and/or Statements of Intent to Deny that seek to suspend, revoke, reprimand, refuse to issue, reinstate, or renew a certificate or license, or otherwise discipline or impose a fine upon a certified public accountant, a certificate holder, a licensee, a licensed firm, an applicant, or a nonlicensee holding an ownership interest in a licensed firm; and**
- (b) **make application to the appropriate court for an order enjoining any acts or practices which constitute, or will constitute, a violation of Chapter 18.04 RCW pursuant to RCW 18.04.360; to temporarily stay the practice rights or use of the restricted title by an order signed by the Executive Director initiating an emergency adjudicative proceeding pursuant to RCW 34.05.479 in situations requiring immediate agency action due to an immediate danger to the public health, safety, or welfare; and**
- (c) in making investigations concerning alleged violations of RCW 18.04 and in all proceedings under RCW 18.04.295, 18.04.305, or chapter 34.05 RCW, to issue subpoenas to compel the attendance of witnesses and require the production of documents, administer oaths or affirmations to witnesses appearing before the Board, take testimony, and require that documentary evidence be submitted; and
- (d) negotiate settlement proposals during investigations of alleged violations of RCW 18.04 or Board rules Title 4 WAC and in all proceedings under RCW 18.04.295, 18.04.305, or Chapter 34.05 RCW. Such proposals are subject to concurrence by a consulting Board member prior to submission to the Board for consideration.

~~This delegation shall remain in effect for so long as Richard C. Sweeney is the Executive Director for the Washington State Board of Accountancy.~~

This delegation is made pursuant to the authority of RCW 18.04.045, 18.04.295, and 18.04.305.

DATED this \_\_\_\_ day of \_\_\_\_\_ 2016~~5~~.

Donald F. AubreyThomas G. Neill, CPA  
Chair, Washington State Board of Accountancy

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# DELEGATION OF AUTHORITY

## BY THE

# WASHINGTON STATE BOARD OF ACCOUNTANCY

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I, ~~DONALD F. AUBREY~~ THOMAS G. NEILL, Chair of the State of Washington Board of Accountancy (“Board”), acting under authorization by a vote of the Board, delegate to the Executive Director the specific authority to:

Issue Administrative Notices of Noncompliance and execute Respondent Agreements Consenting to Administrative Sanctions including monetary sanctions in accordance with the guidelines in Appendix A attached hereto.

This delegation is made pursuant to the authority of RCW 18.04.045, RCW 18.04.305, and RCW 18.04.295.

DATED this ~~29~~<sup>30</sup>th day of January 201~~6~~<sup>5</sup>.

~~Donald F. Aubrey~~ Thomas G. Neill, CPA  
Chair, Washington State Board of Accountancy

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# WASHINGTON STATE BOARD OF ACCOUNTANCY

## Appendix A

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These guidelines will be used when (a) it is the first time an individual or firm has been notified of an alleged specific type of violation of the Public Accountancy Act or Board rule, (b) the alleged violation occurred during any period the individual or firm is or was subject to Board jurisdiction, and (c) sufficient evidence is obtained by investigation to merit Board action.

	<b><u>Administrative Violation:</u></b>	<b><u>Board Approved Sanction:</u></b>
1.	First noncommercial use of a restricted title on <i>Business Cards, Resumes</i> or other <i>Applications for Employment</i> in Washington state after establishing residency in this state but prior to obtaining credentialed status in Washington State, <i>Provided:</i> the individual did not use the title while a resident in conjunction with offering or rendering professional services.	Administrative Notice to Cease and Desist
2.	First-time use of a restricted title by an individual within the 18-month period following successful completion of the Uniform CPA Examination but who has not yet been credentialed by the Board	\$500 fine + cost recovery + submission of proof of completion of Board approved course in ethics and regulation in Washington State regulation applicable to the practice of public accounting <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction.</i>
3.	First-time use of a restricted title with a lapsed individual license or CPA-Inactive status. <i>Provided:</i> The individual did not use the CPA or CPA-Inactive title for more than 90 days after the date of transmittal by Board staff of a <i>Notice of Noncompliance.</i>	<b>\$750</b> fine+ late fee + cost recovery <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction.</i>
4.	First time representation on a reinstatement application that the CPA title had not been used when in fact the title had been used.	<b>\$750</b> fine+ late fee + cost recovery <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction.</i>
5.	First time failure to obtain a firm license by a Washington resident firm owned by one individual for more than 90 days after <i>the date of transmittal</i> by Board staff of a <i>notice of noncompliance.</i>	<b>\$750</b> fine + cost recovery + submission of proof of completion of Board approved course in ethics and regulation in Washington State <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction..</i>

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# WASHINGTON STATE BOARD OF ACCOUNTANCY

## Appendix A

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6.	First-time failure to timely change either or both individual and/or firm addresses.	\$0-\$200 fine + cost recovery (unless <i>the failure to timely change the address results in a more severe first-time administrative violation and sanction</i> ) to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction.
7.	First-time failure by a firm to timely notify the Board of changes in the firm name, ownership, or managing licensee of the firm's main office after <i>the date of transmittal</i> by Board staff of a <i>Notice of noncompliance</i> ..	\$500 fine + cost recovery to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction.
8.	First-time CPE deficiency by a licensee, CPA-Inactive certificateholder, or nonCPA firm owner <i>not exceeding 16 hours</i> .	<p><b><u>Licensee:</u></b> <b>Exclusive of the required 4 hour course addressing ethics and regulation in Washington State a <u>sliding scale</u>:</b></p> <p>\$250 fine for a deficiency up to and including 8 hours;</p> <p>\$500 fine for deficiency up to and including 16 hours;</p> <p><b>Additional (separate) \$500 fine</b> if the deficiency includes or is limited to failure to complete the required 4-hour course addressing ethics and regulation in Washington State.</p> <p><b><u>CPA-Inactive Certificateholder or NonCPA firm owner:</u></b></p> <p>\$500 fine + cost recovery for failure to complete the required 4-hour course addressing ethics and regulation in Washington State</p> <p>All amounts assessed are <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction</i>.</p>
9.	First-time misunderstanding of courses qualifying for the CPE in regulatory ethics specific to Washington State.	\$100 fine + cost recovery + submission of proof of completion of Board approved course in ethics and regulation in the state of Washington <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction</i> .



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# WASHINGTON STATE BOARD OF ACCOUNTANCY

## Appendix A

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10.	First-time failure to meet CPE documentation requirements <u>determined by CPE audit</u> provided the documentation deficiency results from a cause or circumstance beyond the control of the credentialed person.	\$250 fine + cost recovery + submission of proof of completion of Board approved course in ethics and regulation in the state of Washington <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction.</i>
11.	First-time use of titles likely to be confused with <b>CPA, Certified Public Accountant, or CPA-Inactive</b> by person never credentialed by this Board or not qualified for practice privileges pursuant to RCW 18.04.350(2).	\$1,500 fine + cost recovery + <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction.</i>
12.	First-time failure to timely deliver records requested by a client as required by WAC 4-30-051, UNLESS the lack of "timely delivery" results in financial harm to the client by a state or federal regulatory agency or governmental unit.	\$1,500 fine + cost recovery + restitution for proven client costs incurred to reconstruct essential records incurred as a result of the lack of availability of such records + submission of proof of completion of Board approved course in ethics and regulation in the state of Washington <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction..</i>
13.	First-time failure to timely respond to a request for administrative information or documents directly related to information and/or documents specified in Board rules (Title 4 WAC).	\$1,500 fine + cost recovery + submission of proof of completion of Board approved course in Ethics and Regulation in the state of Washington <i>to be received by the Board's office within 90 days of signing an agreement consenting to an Administrative Sanction.</i>

If an individual or firm's conduct includes multiple first-time administration violations, the Executive Director is to impose the more severe first-time administrative sanction.

In cases of Administrative Sanction, the Board will not publish the individual's or firm's name; however, the Board will:

- Post statistics related to these sanctions on the Board's web site
- Comply with the Public Records Act

Effective: April 28, 2006

Revised: Delegation and Appendix A Revised: January 26, 2012, by Board vote

Appendix A Revised: July 14, 2011, by Board vote

Delegation and Appendix A Revised: April 23, 2013, by Board vote

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# DELEGATION OF AUTHORITY BY THE WASHINGTON STATE BOARD OF ACCOUNTANCY

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I, ~~DONALD F. AUBREY~~THOMAS G. NEILL, Chair of the State of Washington Board of Accountancy (“Board”), acting under authorization by a vote of the Board, delegate the following specific authority:

1. CPE Waiver Extension Requests – To the Executive Director the specific authority to review, approve or deny Continuing Professional Education (CPE) waiver extension requests where individual hardship including, but not limited to, financial hardship, critical illness, or active military deployment, results in a CPE deficiency of not more than 16 CPE credit hours pursuant to applicable section(s) of Title 4 WAC.
2. Request Review Committee - To the Executive Director with concurrence of one member of the Request Review Committee, the specific authority to review and approve or deny:
  - a) **Continuing Professional Education (CPE) Waiver Extension Requests** where individual hardship including, but not limited to, financial hardship, critical illness, or active military deployment, results in a licensee CPE deficiency of more than 16 CPE credit hours pursuant to applicable section(s) of Title 4 WAC.
  - b) **Firm Names** that do not comply with the requirements of RCW 18.04.345 and applicable section(s) of Title 4 WAC to ensure the Board that the firm name is not deceptive or misleading.
  - c) **Professional/Education Organizations Recognition Requests** for purposes of obtaining lists of individual applicants for a license of “Certified Public Accountant” (CPA), individual CPA licensees, individual CPA-Inactive certificateholders, or CPA firms pursuant to RCW 42.56.070(9) and applicable section(s) of Title 4 WAC.
  - d) **Late Fee Waiver Requests** where individual hardship including, but not limited to, financial hardship, critical illness, or active military deployment is a factor pursuant to applicable section(s) of Title 4 WAC.
  - e) **Domestic or foreign education credential evaluation services** applications for approval pursuant to applicable section(s) of Title 4 WAC.
3. Appeal of Denials of Requests for Lists of Individuals – To one member of the Request Review Committee not involved in the review of the original request under delegation 2(c) of this delegation, the specific authority to review and uphold or overturn denials of requests for list of individuals pursuant to RCW 42.56.520. This Request Review Committee member shall complete the review by the end of the second business day following the denial. The Committee member’s decision is the final action the Board will take on the matter for purposes of judicial review.

This delegation shall remain in effect until rescinded or modified by a majority vote of the Washington State Board of Accountancy.

The Executive Director will report all actions taken pursuant to this delegation of authority at each regular quarterly Board meeting to assist the Board in evaluating whether this delegation should be rescinded or modified.

This delegation is made pursuant to the authority of RCW 18.04.045 and 42.56.070(9).

DATED this \_\_\_\_\_ day of \_\_\_\_\_ 20165.

~~Donald F. Aubrey~~ Thomas G. Neill, CPA  
Chair, Washington State Board of Accountancy

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# DELEGATION OF AUTHORITY BY THE WASHINGTON STATE BOARD OF ACCOUNTANCY

Delegation Number: D-201

Dated: ~~October 30~~January 29, 20165

Delegation For: Authority to Conduct Investigations\*

Delegation To: Director of Investigations

Approved:

~~Donald F. Aubrey~~Thomas G. Neill, CPA  
Chair

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I, ~~DONALD F. AUBREY~~THOMAS G. NEILL, Chair of the Washington State Board of Accountancy ("Board"), acting under authorization of a vote of the Board, delegate to the Director of Investigations, the specific authority to:

Conduct investigations concerning alleged violations of the provisions of chapter 18.04 RCW and Title 4 WAC as directed by the Executive Director of the Washington State Board of Accountancy. This also includes specific authority to administer oaths or affirmations to witnesses, subpoena witnesses and compel their attendance, take testimony, and to require that documentary evidence be submitted in the course of the investigation of alleged violations of chapter 18.04 RCW and Title 4 WAC.

This delegation does not include the authority to extend confidentiality to any testimony or evidence.

This delegation shall remain in effect for so long as the Executive Director has designated a Director of Investigations for the Washington State Board of Accountancy to exercise this authority, and through any necessary testimony at administrative hearings, should same be held.

In the event that the Executive Director is recused or otherwise unable to exercise responsibility for investigations, enforcement, and settlement, the Board delegates authority to the Director of Investigations to assume those responsibilities including the authority to:

- (a) Sign, issue, and withdraw Statements of Charges and/or Statements of Intent to Deny that seek to suspend, revoke, reprimand, refuse to issue, reinstate, or renew a certificate or license, or otherwise discipline or impose a fine upon a certified public accountant, a certificate holder, a licensee, a licensed firm, an applicant, or a nonlicensee holding an ownership interest in a licensed firm; and

- (b) Negotiate settlement proposals during investigations of alleged violations of RCW 18.04 or Board rules Title 4 WAC and in all proceedings under RCW 18.04.295, 18.04.305, or chapter 34.05 RCW. Such proposals are subject to concurrence by a consulting Board member prior to submission to the Board for consideration. Settlement proposals negotiated under this authority are not binding on the Board or respondent until the settlement is accepted by a quorum vote of the Board.
- (c) Issue Administrative Notices of Noncompliance and execute Respondent Agreements Consenting to Administrative Sanctions including monetary sanctions in accordance with the Board's delegation to the Executive Director.

This delegation and its subparts are made pursuant to the authority of RCW 18.04.045, 18.04.295 and 18.04.305.

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# DELEGATION OF AUTHORITY

## BY THE

# WASHINGTON STATE BOARD OF ACCOUNTANCY

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I, DONALD F. AUBREY THOMAS G. NEILL, Chair of the State of Washington Board of Accountancy (“Board”), acting under authorization by a vote of the Board, delegate the following specific authority:

1. **Quality Assurance Oversight** - To the Executive Director, with concurrence of one member of the Board’s Quality Assurance Committee, the specific authority to take those actions deemed appropriate pursuant to the applicable section(s) of Title 4 WAC for any CPA firm:
  - That has unresolved matters relating to the peer review process or that has not complied with, or acted in disregard of the peer review requirements; and
  - When issues with a peer review may warrant further action.

To implement this delegation, the Executive Director may execute Respondent Agreements including one or any combination of the actions deemed appropriate after concurrence of the member of the Board’s Quality Assurance Committee. These actions may include requiring the firm/practitioner to:

- Develop and implement quality control procedures to provide reasonable assurance that similar occurrences will not occur in the future;
- Engage a Board-approved licensee to conduct a Board-prescribed on-site field review of the firm’s work product and practices to provide a more in-depth review of the practitioner’s work, previously taken continuing professional education, library and other practice support tools, knowledge, abilities, and system of quality control;
- Submit all or specified categories of its compilation, audit, review, or other attest working papers and reports to a preapproved independent practitioner review prior to issuance; and/or
- Obtain continuing education courses in specific areas.

Uncooperative CPA firms or CPA firms requiring more than one oversight will be subject to investigation and appropriate Board action.

*This delegation does not include matters that require Board action such as acceptance of voluntary practice restriction.*

2. **Review of Publicly Available Professional Work** – To the Executive Director the specific authority to review publicly available professional work of licensees pursuant to RCW 18.04.045(8) and the applicable section of Title 4 WAC.

This delegation shall remain in effect until rescinded or modified by a majority vote of the Washington State Board of Accountancy.

*The Executive Director will report all actions taken pursuant to this delegation of authority at each regular quarterly Board meeting to assist the Board in evaluating whether this delegation should be rescinded or modified.*

This delegation is made pursuant to the authority of RCW 18.04.045.

DATED this \_\_\_\_\_ day of \_\_\_\_\_ 20165.

\_\_\_\_\_  
**Donald F. AubreyThomas G. Neill, CPA**  
Chair, Washington State Board of Accountancy



# PREPROPOSAL STATEMENT OF INQUIRY

**CR-101 (June 2004)**

(Implements RCW 34.05.310)  
Do NOT use for expedited rule making

**Agency:** Board of Accountancy

**Subject of possible rule making:**

WAC 4-30-060 What are the education requirements to qualify to apply for the CPA examination?

**Statutes authorizing the agency to adopt rules on this subject:**

RCW 18.04.055(5); RCW 18.04.105(1).

**Reasons why rules on this subject may be needed and what they might accomplish:**

Rule-making is needed to align the qualifications on a national level to ensure Washington State is substantially equivalent to the other state boards by eliminating the following sentence in WAC 4-30-060(1)(c): "For purposes of meeting this subsection, individuals will be given 1.5 credits for each 1.0 graduate level credit of accounting courses taken."

**Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies:**

None.

**Process for developing new rule (check all that apply):**

- ☐ Negotiated rule making
- ☐ Pilot rule making
- ☒ Agency study
- ☐ Other (describe)

**How interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication:**

(List names, addresses, telephone, fax numbers, and e-mail of persons to contact; describe meetings, other exchanges of information, etc.)

Richard C. Sweeney, Executive Director  
Washington State Board of Accountancy  
PO Box 9131  
Olympia, WA 98507-9131  
Phone: (360) 586-0163; Fax: (360) 664-9190  
Email: ricks@cpaboard.wa.gov

**DATE**

December 23, 2015

**NAME (TYPE OR PRINT)**

Richard C. Sweeney, CPA

**SIGNATURE**

**TITLE**

Executive Director

**CODE REVISER USE ONLY**

OFFICE OF THE CODE REVISER  
STATE OF WASHINGTON  
FILED

**DATE:** January 05, 2016

**TIME:** 3:41 PM

**WSR 16-02-107**



WAC 4-30-060 What are the education requirements to qualify to apply for the CPA examination?

(1) **Education requirements:** Effective July 1, 2000, to apply for the CPA examination you must have completed:

(a) At least one hundred fifty semester hours (two hundred twenty-five quarter hours) of college education, including;

(b) A baccalaureate or higher degree; and

(c) An accounting major or concentration as defined as at least:

(i) Twenty-four semester hours (thirty-six quarter hours) or the equivalent in accounting subjects of which at least fifteen semester hours must be at the upper level or graduate level (an upper level course is defined as a course that frequently carries completion of a lower level course(s) as a prerequisite). ~~For the purposes of meeting this subsection, individuals will be given 1.5 credits for each 1.0 graduate level credit of accounting courses taken;~~ and

(ii) Twenty-four semester hours (thirty-six quarter hours) or the equivalent in business administration subjects at the undergraduate or graduate level.

~~\_(d) The board will not recognize accounting concentration credits awarded for "life experience" or similar activities retroactively evaluated and recognized by colleges or universities. This restriction is not intended to apply to internships prospectively approved by colleges or universities.~~

(2) **One hundred eighty-day provision:** If you expect to meet the education requirements of this section within one hundred eighty days following the examination, you will be eligible to take the CPA examination provided you submit a signed Certificate of Enrollment from the educational institution in which you are enrolled stating that you will meet the board's education requirements within one hundred eighty days following the day you first sit for any one section of the examination. If you apply for the exam using the one hundred eighty-day provision, then within two hundred ten days of first sitting for any section of the exam, you must provide the examination administrator complete documentation demonstrating that you met the board's education requirements within one hundred eighty days of first sitting for any one section of the exam. If you do not provide such documentation within the required two hundred ten-day time period, your exam score(s) will not be released and you will not be given credit for any

section(s) of the examination. Applicants failing to provide such documentation must reapply as a first-time applicant.

(3) **Education obtained outside the United States:** If you obtained all or a portion of your education outside the United States you must have your education evaluated by a board approved foreign education credential evaluation service. The board will establish the criteria for board approval of foreign education credential evaluation services. The board ~~will~~ does not provide education credential evaluation services.

(4) **Semester versus quarter hours:** As used in these rules, a "semester hour" means the conventional college semester hour. Your quarter hours will be converted to semester hours by multiplying them by two-thirds.

(5) **Accreditation standards:** For purposes of this rule, the board will recognize colleges and universities which are accredited in accordance with (a) through (c) of this subsection.

(a) The accredited college or university must be accredited at the time your education was earned by virtue ~~of membership in one of the following accrediting agencies:~~ being listed on the U.S Department of Education's Database of Accredited Postsecondary Institutions and Programs as a regionally or nationally accrediting agency.

~~(i) Middle States Association of College and Secondary Schools;~~  
~~(ii) New England Association of Schools and Colleges;~~  
~~(iii) North Central Association of Colleges and Schools, Higher Learning Commission;~~  
~~(iv) Northwest Commission on Colleges and Universities (formerly the Northwest Association of Schools and Colleges);~~  
~~(v) Southern Association of Colleges and Schools;~~  
~~(vi) Western Association of Schools and Colleges; and~~  
~~(vii) Accrediting Commission for Independent Colleges and Schools, or its predecessor, the Accrediting Commission of the Association of Independent Colleges and Schools.~~

(b) If an institution was not accredited at the time your education was earned but is so accredited at the time your application is filed with the board, the institution will be deemed to be accredited for the purpose of (a) of this subsection provided that it:

(i) Certifies that your total educational program would qualify the applicant for graduation with a baccalaureate degree during the time the institution has been accredited; and

(ii) Furnishes the board satisfactory proof, including college catalogue course numbers and descriptions, that the preaccrediting



courses used to qualify you for a concentration in accounting are substantially equivalent to postaccrediting courses.

(c) If your degree was received at an accredited college or university as defined by (a) or (b) of this subsection, but the educational program which was used to qualify you for a concentration in accounting included courses taken at nonaccredited institutions, either before or after graduation, such courses will be deemed to have been taken at the accredited institution from which your degree was received, provided the accredited institution either:

(i) Has accepted such courses by including them in its official transcript; or

(ii) Certifies to the board that it will or would accept such courses for credit toward graduation.

(6) **Alternative to accreditation:** If you graduated from a ~~four-year~~ degree-granting institution that was not accredited at the time your degree was received or at the time your application was filed, you will be deemed to be a graduate of an ~~a four-year~~ accredited college or university if a credentials evaluation service approved by the board certifies that your degree is equivalent to a degree from an accredited college or university as defined in subsection (5) of this

section. The board does not provide education credential evaluation services.

[Statutory Authority: RCW 18.04.055(5), 18.04.105(1). WSR 10-24-009, amended and recodified as § 4-30-060, filed 11/18/10, effective 12/19/10; WSR 05-01-137, § 4-25-710, filed 12/16/04, effective 1/31/05; WSR 02-04-064, § 4-25-710, filed 1/31/02, effective 3/15/02. Statutory Authority: RCW 18.04.055(5). WSR 95-20-065, § 4-25-710, filed 10/3/95, effective 11/3/95; WSR 93-12-071, § 4-25-710, filed 5/27/93, effective 7/1/93.]



## PREPROPOSAL STATEMENT OF INQUIRY

**CR-101 (June 2004)**

(Implements RCW 34.05.310)  
Do NOT use for expedited rule making

**Agency:** Board of Accountancy

**Subject of possible rule making:**

WAC 4-30-062 How do I apply to take the CPA examination?

**Statutes authorizing the agency to adopt rules on this subject:**

RCW 18.04.105(2).

**Reasons why rules on this subject may be needed and what they might accomplish:**

Rule-making is needed to correct the error in one of the sentence structure for clarification.

**Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies:**

None.

**Process for developing new rule (check all that apply):**

- ☐ Negotiated rule making
- ☐ Pilot rule making
- ☒ Agency study
- ☐ Other (describe)

**How interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication:**

(List names, addresses, telephone, fax numbers, and e-mail of persons to contact; describe meetings, other exchanges of information, etc.)

Richard C. Sweeney, Executive Director  
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PO Box 9131  
Olympia, WA 98507-9131  
Phone: (360) 586-0163; Fax: (360) 664-9190  
Email: ricks@cpaboard.wa.gov

**DATE**

01/05/2016

**NAME (TYPE OR PRINT)**

Richard C. Sweeney, CPA

**SIGNATURE**

**TITLE**

Executive Director

**CODE REVISER USE ONLY**

OFFICE OF THE CODE REVISER  
STATE OF WASHINGTON  
FILED

**DATE:** January 05, 2016

**TIME:** 3:42 PM

**WSR 16-02-108**

**WAC 4-30-062 How do I apply to take the CPA examination? (1) Ap-**

**plication process and due dates:** Your application to take the CPA examination must be submitted to the board's examination administrator. Applicants must submit all required information, documents, and fees to complete their application within sixty days of the date their application is submitted to the board's examination administrator. Your application is not considered complete until all of the following are provided:

- Complete application information and requested documents;
- Fee(s).

(2) **Fee refund and forfeiture:** Upon submission of your application to the examination administrator, no portion of the board's administrative fee is refundable. Upon the examination administrator's authorization to test, no portion of the total exam fee (both administrative fee and section fee(s)) is refundable. If you fail to meet the board's scheduling or admission requirements, you forfeit all of the exam fee(s) and you must reapply to take the section(s) of the exam.

(3) **Notice of admittance to the examination or denial of your application:** You must contact the approved test provider to schedule the time and location for your examination. The notice of eligibility to



take the examination is called a Notice to Schedule (NTS), the NTS will be valid for one taking of the examination within the six months following the date of the NTS.

Notice of a denial of your application, or notice of your eligibility to take the examination will be sent to you by the examination administrator.

(4) **Examination content and grading:** The CPA examination shall test the knowledge and skills required for performance as an entry-level certified public accountant. The examination shall include the subject areas of accounting and auditing and related knowledge and skills as the board may require. The examination will consist of the following four sections: Auditing and attestation; financial, accounting and reporting; regulation; and business environment and concepts. The board may accept the advisory grading services of the American Institute of Certified Public Accountants.

(5) **Examination process:**

(a) **Conditions for examinations held prior to January 1, 2004:**

Contact a customer service representative at customerservice@cpaboard.wa.gov or by phone at 360-753-2586.

(b) **For examinations taken after December 31, 2003:** The board uses all parts of the uniform CPA examination and the advisory grading services of the American Institute of Certified Public Accountants.

(i) To satisfy the examination requirement for a license you must have achieved a score of seventy-five on all four sections of the examination within a rolling eighteen-month period.

(ii) You may take the required four sections individually and in any order. Credit for any section(s) taken and passed after December 31, 2003, will be valid for eighteen months from the actual date you successfully passed any particular section of the examination.

(iii) You must pass all four sections of the examination within a rolling eighteen-month period, which begins on the date that the first section(s) is passed. A section is considered passed on the date that ~~is used is the date that~~ you took the exam section and not the date that your grade(s) ~~is~~are released.

(iv) You may not retake a failed section(s) in the same examination window. An examination window refers to a three-month period in which candidates have an opportunity to take the examination (comprised of two months in which the examination is available to be taken and one month in which the examination will not be offered while routine maintenance is performed and the examination is refreshed).

(v) In the event you do not pass all four sections of the examination within the rolling eighteen-month period, credit for any section(s) passed prior to the eighteen-month period will expire and you must retake any expired section.

[Statutory Authority: RCW 18.04.105(2). WSR 10-24-009, amended and recodified as § 4-30-062, filed 11/18/10, effective 12/19/10; WSR 05-01-137, § 4-25-720, filed 12/16/04, effective 1/31/05; WSR 03-17-041, § 4-25-720, filed 8/15/03, effective 9/30/03. Statutory Authority: RCW 18.04.055(5) and 18.04.105(2). WSR 02-04-064, § 4-25-720, filed 1/31/02, effective 3/15/02. Statutory Authority: RCW 18.04.055. WSR 93-12-070, § 4-25-720, filed 5/27/93, effective 7/1/93.]

The objective of these proposed definitions is to enhance the clarity of the terms for purposes of the application of WAC 4-30-142, *What are the bases for the Board to impose discipline?*

WAC 4-30-142(5)(h) provides that the Board may discipline for “Discharging a trustee’s duty in a negligent manner or breaching one’s fiduciary duties”;

RCW 11.98 generally obliges fiduciaries of a trust to adhere to the following duties: **the duty to invest prudently; the duty of impartiality; the duty of loyalty; and the duty to carry out the trust’s fiduciary purpose.**

We have determined that certain trustees and other fiduciaries may unknowingly be in violation of RCW 11.98.108, RCW 11.98.145, and/or RCW 11.96A.070, and RCW 11.96A.220. These statutes provide that a trustee/fiduciary must advise beneficiaries of their legal rights when executing transactions and/or making final accountings and distributions. Failure to do so may result in legal liability to beneficiaries for 3 years after a final accounting and distribution.

CPA trustees/fiduciaries may be requesting beneficiaries of trusts and estates to sign “hold harmless” clauses without advising beneficiaries of their legal rights.

It appears that any “hold harmless” language releasing a trustee/fiduciary from liability **would only have legal effect** if the trustee properly notified the beneficiary of his/her rights; and the statute of limitations would only apply if it (and its subject matter) were properly disclosed to the beneficiary.

**“Breach of Fiduciary Responsibilities/Duties”** means when one person agrees or has been designated to act for another in a fiduciary relationship and the fiduciary acts in any manner adverse or contrary to the interests of the client, or for personal benefit in relation to the subject matter. This phrase includes failure to advise beneficiaries of their legal rights under state law as well as other fiduciary responsibilities/duties defined in the trust agreement or state law if the trust agreement is vague or omits the subject matter.

**To be inserted as WAC 4-30-010, subsection (8).**

**“Fiduciary”** means a relationship wherein one person agrees to act for the interests and benefits of another person or persons. The term embraces, but is not limited to, legal relationships such as those between attorney and client, broker and principal, principal and agent, trustee and beneficiary, and executors or administrators and the heirs of a decedent's estate, a partner in an “at will partnership”, a person granted an effective general or durable power of attorney. A person acting in a fiduciary capacity is held to a high standard of honesty and **full disclosure** in regard to the client and must not obtain a personal benefit at the expense of the client.

**To be inserted as WAC 4-30-010, subsection (17).**

**Requires renumbering of intervening current subsections (8-16) and remaining subsections (17-49)**



## WAC 4-30-010

### Definitions.

For purposes of these rules the following terms have the meanings indicated unless a different meaning is otherwise clearly provided in these rules:

(1) **"Act"** means the Public Accountancy Act codified as chapter 18.04 RCW.

(2) **"Active individual participant"** means an individual whose primary occupation is at the firm or affiliated entity's business. An individual whose primary source of income from the business entity is provided as a result of passive investment is not an active individual participant.

(3) **"Affiliated entity"** means any entity, entities or persons that directly or indirectly through one or more relationships influences or controls, is influenced or controlled by, or is under common influence or control with other entities or persons. This definition includes, but is not limited to, parents, subsidiaries, investors or investees, coinvestors, dual employment or management in joint ventures or brother-sister entities.

(4) **"Applicant"** means an individual who has applied:

(a) To take the national uniform CPA examination;

(b) For an initial individual license, an initial firm license, or initial registration as a resident nonlicensee owner;

(c) To renew an individual license, a CPA-Inactive certificate, a CPA firm license, or registration as a resident nonlicensee firm owner;

(d) To reinstate an individual license, a CPA-Inactive certificate, registration as a resident nonlicensee firm owner, or practice privileges.

(5) **"Attest"** means providing the following financial statement services:

(a) Any audit or other engagement to be performed in accordance with the statements on auditing standards;

(b) Any review of a financial statement to be provided in accordance with the statements on standards for accounting and review services;

(c) Any examination of prospective financial information to be performed in accordance with the statements on standards for attestation engagements; and

(d) Any engagement to be performed in accordance with the public company accounting oversight board auditing standards.

(6) **"Audit," "review," and "compilation"** are terms reserved for use by licensees, as defined in subsection (28) of this section.

(7) **"Board"** means the board of accountancy created by RCW 18.04.035.

**(8) "Breach of Fiduciary Responsibilities/Duties"** means when one person agrees or has been designated to act for another in a fiduciary relationship and the fiduciary acts in any manner adverse or contrary to the interests of the client, or for personal benefit in relation to the subject matter. This phrase includes failure to advise beneficiaries of their legal rights under state law as well as other fiduciary responsibilities/duties defined in the trust agreement or state law if the trust agreement is vague or omits the subject matter.

**Re-Number to (9-16)**



(9) **"Certificate"** means a certificate as a CPA-Inactive issued in the state of Washington prior to July 1, 2001, as authorized by the act, unless otherwise defined in rule.

(9) **"Certificate holder"** means the holder of a valid CPA-Inactive certificate where the individual is not a licensee and is prohibited from practicing public accounting.

(10) **"Client"** means the person or entity that retains a licensee, as defined in subsection (28) of this section, a CPA-Inactive certificate holder, a nonlicensee firm owner of a licensed firm, or an entity affiliated with a licensed firm to perform professional services through other than an employer/employee relationship.

(11) **"Commissions and referral fees"** are compensation arrangements where the primary contractual relationship for the product or service is not between the client and licensee, as defined in subsection (28) of this section, CPA-Inactive certificate holder, nonlicensee firm owner of a licensed firm, or a person affiliated with a licensed firm; and

(a) Such persons are not primarily responsible to the client for the performance or reliability of the product or service; or

(b) Such persons add no significant value to the product or service; or

(c) A third party instead of the client pays the persons for the products or services.

(12) **"Compilation"** means providing a service to be performed in accordance with statements on standards for accounting and review services that is presenting in the form of financial statements, information that is the representation of management (owners) without undertaking to express any assurance on the statements.

(13) **"Contingent fees"** are fees established for the performance of any service pursuant to an arrangement in which no fee will be charged unless a specified finding or result is attained, or in which the amount of the fee is otherwise dependent upon the finding or result of such service.

(14) **"CPA"** or **"certified public accountant"** means an individual holding a license to practice public accounting under chapter 18.04 RCW or recognized by the board in the state of Washington, including an individual exercising practice privileges pursuant to RCW 18.04.350(2).

(15) **"CPA-Inactive"** means an individual holding a CPA-Inactive certificate recognized in the state of Washington. An individual holding a CPA-Inactive certificate is prohibited from practicing public accounting and may only use the CPA-Inactive title if they are not offering accounting, tax, tax consulting, management advisory, or similar services to the public.

(16) **"CPE"** means continuing professional education.

(17) **"Fiduciary"** means a relationship wherein one person agrees to act for the interests and benefits of another person or persons. The term embraces, but is not limited to, legal relationships such as those between attorney and client, broker and principal, principal and agent, trustee and beneficiary, and executors or administrators and the heirs of a decedent's estate, a partner in an "at will partnership", a person granted an effective general or durable power of attorney. A person acting in a fiduciary capacity is held to a high standard of honesty and full disclosure in regard to the client and must not obtain a personal benefit at the expense of the client.

**Re-Number all remaining**

(18) **"Firm"** means a sole proprietorship, a corporation, or a partnership. "Firm" also means a limited liability company or partnership formed under chapters 25.15 and 18.100 RCW and a professional service corporation formed under chapters 23B.02 and 18.100 RCW.



(18) "**Generally accepted accounting principles**" (GAAP) is an accounting term that encompasses the conventions, rules, and procedures necessary to define accepted accounting practice at a particular time. It includes not only broad guidelines of general application, but also detailed practices and procedures. Those conventions, rules, and procedures provide a standard by which to measure financial presentations.

(19) "**Generally accepted auditing standards**" (GAAS) are guidelines and procedures, promulgated by the AICPA, for conducting individual audits of historical financial statements.

(20) "**Holding out**" means any representation to the public by the use of restricted titles as set forth in RCW 18.04.345 by a person that the person holds a license or practice privileges under the act and that the person offers to perform any professional services to the public. "Holding out" shall not affect or limit a person not required to hold a license under the act from engaging in practices identified in RCW 18.04.350.

(21) "**Home office**" is the location specified by the client as the address to which a service is directed.

(22) "**Inactive**" means the individual held a valid certificate on June 30, 2001, has not met the current requirements of licensure and has been granted CPA-Inactive certificate holder status through the renewal process established by the board. A CPA-Inactive may not practice public accounting nor may the individual use the CPA-Inactive title if they are offering accounting, tax, tax consulting, management advisory, or similar services to the public.

(23) "**Individual**" means a living, human being.

(24) "**Independence**" means an absence of relationships that impair a licensee's impartiality and objectivity in rendering professional services for which a report expressing assurance is prescribed by professional standards.

(25) "**Interactive self-study program**" means a CPE program that provides feedback throughout the course.

(26) "**IRS**" means Internal Revenue Service.

(27) "**License**" means a license to practice public accounting issued to an individual or a firm under the act or the act of another state.

(28) "**Licensee**" means an individual or firm holding a valid license to practice public accounting issued under the act, including out-of-state individuals exercising practice privileges in this state under RCW 18.04.350(2) and out-of-state firms permitted to offer or render certain professional services in this state under the conditions prescribed in RCW 18.04.195 (1)(b).

(29) "**Manager**" means a manager of a limited liability company licensed as a firm under the act.

(30) "**NASBA**" means the National Association of State Boards of Accountancy.

(31) "**Nonlicensee firm owner**" means an individual, not licensed in any state to practice public accounting, who holds an ownership interest in a firm permitted to practice public accounting in this state.

(32) "**PCAOB**" means Public Company Accounting Oversight Board.

(33) "**Peer review**" means a study, appraisal, or review of one or more aspects of the attest or compilation work of a licensee or licensed firm in the practice of public accounting, by a person or persons who hold licenses and who are not affiliated with the person or firm being reviewed, including a peer review, or any internal review or inspection intended to comply with quality control policies and procedures, but not including the "quality assurance review" under subsection (38) of this section.

(34) "**Person**" means any individual, nongovernmental organization, or business entity regardless of legal form, including a sole proprietorship, firm, partnership, corporation, limited liability company, association, or not-for-profit organization, and including the sole proprietor, partners, members, and, as applied to corporations, the officers.

(35) "**Practice privileges**" are the rights granted by chapter 18.04 RCW to a person who:

(a) Has a principal place of business outside of Washington state;

(b) Is licensed to practice public accounting in another substantially equivalent state;



- (c) Meets the statutory criteria for the exercise of privileges as set forth in RCW 18.04.350(2) for individuals or RCW 18.04.195 (1)(b) for firms;
- (d) Exercises the right to practice public accounting in this state individually or on behalf of a firm;
- (e) Is subject to the personal and subject matter jurisdiction and disciplinary authority of the board in this state;
- (f) Must comply with the act and all board rules applicable to Washington state licensees to retain the privilege; and
- (g) Consents to the appointment of the issuing state board of another state as agent for the service of process in any action or proceeding by this state's board against the certificate holder or licensee.

(36) **"Principal place of business"** means the office location designated by the licensee for purposes of substantial equivalency and reciprocity.

(37) **"Public practice"** or the **"practice of public accounting"** means performing or offering to perform by a person or firm holding itself out to the public as a licensee, or as an individual exercising practice privileges, for a client or potential client, one or more kinds of services involving the use of accounting or auditing skills, including the issuance of "audit reports," "review reports," or "compilation reports" on financial statements, or one or more kinds of management advisory, or consulting services, or the preparation of tax returns, or the furnishing of advice on tax matters. The "practice of public accounting" shall not include practices that are permitted under the provisions of RCW 18.04.350(10) by persons or firms not required to be licensed under the act.

(38) **"Quality assurance review or QAR"** is the process, established by and conducted at the direction of the board, to study, appraise, or review one or more aspects of the audit, compilation, review, and other professional services for which a report expressing assurance is prescribed by professional standards of a licensee or licensed firm in the practice of public accounting, by a person or persons who hold licenses and who are not affiliated with the person or firm being reviewed.

(39) **"Reciprocity"** means board recognition of licenses, permits, certificates or other public accounting credentials of another jurisdiction that the board will rely upon in full or partial satisfaction of licensing requirements.

(40) **"Referral fees"** see definition of "commissions and referral fees" in subsection (11) of this section.

(41) **"Reports on financial statements"** means any reports or opinions prepared by licensees, based on services performed in accordance with generally accepted auditing standards, standards for attestation engagements, or standards for accounting and review services, as to whether the presentation of information used for guidance in financial transactions or for accounting for or assessing the status or performance of an entity, whether public, private, or governmental, conforms with generally accepted accounting principles or an "other comprehensive bases of accounting," or the presentation and disclosure requirements of other professional standards. "Reports on financial statements" does not include services referenced in RCW 18.04.350(10) provided by persons not holding a license under the act.

(42) **"Representing oneself"** means having a license, practice privilege, certificate or registration that entitles the holder to use the title "CPA," "CPA-Inactive," or be a nonlicensee firm owner.

(43) **"Rules of professional conduct"** means rules adopted by the board to govern the conduct of licensees, as defined in subsection (28) of this section, while representing themselves to others as licensees. These rules also govern the conduct of CPA-Inactive certificate holders, nonlicensee firm owners, and persons exercising practice privileges pursuant to RCW 18.04.350(2).

(44) **"SEC"** means the Securities and Exchange Commission.

(45) **"Sole proprietorship"** means a legal form of organization owned by one person meeting the requirements of RCW 18.04.195.



(46) **"State"** includes the states and territories of the United States, including the District of Columbia, Puerto Rico, Guam, and the United States Virgin Islands, and the Commonwealth of the Northern Mariana Islands at such time as the board determines that the Commonwealth of the Northern Mariana Islands is issuing licenses under the substantially equivalent standards of RCW 18.04.350 (2)(a).

(47) **"Statements on auditing standards (SAS)"** are interpretations of the generally accepted auditing standards and are issued by the Auditing Standards Board of the AICPA. Licensees are required to adhere to these standards in the performance of audits of financial statements.

(48) **"Statements on standards for accounting and review services (SSARS)"** are standards, promulgated by the AICPA, to give guidance to licensees who are associated with the financial statements of nonpublic companies and issue compilation or review reports.

(49) **"Statements on standards for attestation engagements (SSAE)"** are guidelines, promulgated by the AICPA, for use by licensees in attesting to assertions involving matters other than historical financial statements and for which no other standards exist.

[Statutory Authority: 18.04.055, 18.04.025, 18.04.350. WSR 10-24-009, amended and recodified as § 4-30-010, filed 11/18/10, effective 12/19/10. Statutory Authority: RCW 18.04.055, 18.04.025. WSR 08-18-016, § 4-25-410, filed 8/25/08, effective 9/25/08. Statutory Authority: RCW 18.04.055. WSR 05-01-137, § 4-25-410, filed 12/16/04, effective 1/31/05; WSR 03-24-033, § 4-25-410, filed 11/25/03, effective 12/31/03. Statutory Authority: RCW 18.04.055(16). WSR 02-04-064, § 4-25-410, filed 1/31/02, effective 3/15/02. Statutory Authority: RCW 18.04.055(11). WSR 01-11-124, § 4-25-410, filed 5/22/01, effective 6/30/01; WSR 98-12-020, § 4-25-410, filed 5/27/98, effective 6/27/98; WSR 94-23-071, § 4-25-410, filed 11/15/94, effective 12/16/94.]

Washington State Board of Accountancy  
Board Member Participation Summary  
2016

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Board Member \_\_\_\_\_

Number of Board meetings attended \_\_\_\_\_

Number of consent agreements voted on \_\_\_\_\_

Number of cases upon which served as a CBM \_\_\_\_\_

Board Committees on which served:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Outreach activities for the year:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NASBA participation:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Other Board related activities:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## Statement on Standards for Accounting and Review Services No. 21, *Statements on Standards for Accounting and Review Services: Clarification and Recodification*

A summarization of the SSARSs Clarity Project and SSARS No. 21



Statement on Standards for Accounting and Review Services (SSARS) No. 21, *Statements on Standards for Accounting and Review Services: Clarification and Recodification* was issued in October 2014. SSARS No. 21 represents the AICPA's Accounting and Review Services Committee's (ARSC) efforts to clarify and revise the standards for reviews, compilations, and engagements to prepare financial statements.

### SSARSs Clarity Project

With the release of Statement on Auditing Standards (SAS) Nos. 122–124 in October 2011, the Auditing Standards Board (ASB) reached a major milestone in its project to redraft all of the auditing sections in AICPA *Professional Standards*. The clarified auditing standards are designed to make the standards easier to read, understand, and apply.

The ARSC concluded that undertaking a similar clarity project for the SSARSs would serve the public interest and ensure that all professional literature for audits, reviews, and compilations are drafted using the same conventions. In addition, the resulting clarified compilation and review standards would be easier to read, understand, and apply.

In May 2010, the ARSC approved a project to revise all its existing compilation and review standards in the AR sections of AICPA *Professional Standards*, substantially using the drafting conventions adopted by the ASB in clarifying the auditing literature.

The ARSC determined, however, that there would be certain differences between its clarity drafting conventions and those adopted by the ASB. Specifically, the ARSC determined not to include specific application guidance with respect to governmental entities and smaller, less complex entities. Accordingly, the ARSC's clarity drafting conventions include the following:

- Establish objectives for each clarified AR section.
- Include a definitions section, if relevant, in each clarified AR section.
- Separate requirements from application and other explanatory material.
- Number application and other explanatory material paragraphs with the prefix "A-" and present them in a separate section that follows the requirements section.
- Use formatting techniques, such as bulleted lists, to enhance readability.

### SSARS No. 21

In addition to clarifying the standards, SSARS No. 21 includes significant revisions that affect the standards for accountants in public practice who prepare financial statements for their clients. This standard is effective for reviews, compilations, and engagements to prepare financial statements for financial statements for periods ending on or after December 15, 2015. Early implementation is permitted.

SSARS No. 21 is structured as follows:

Section 60, *General Principles for Engagements Performed in Accordance With Statements on Standards for Accounting and Review Services*— Provides general principles for SSARSs engagements.

Section 70, *Preparation of Financial Statements*— Provides requirements and guidance to an accountant who is engaged to prepare financial statements for an entity but not engaged to perform a compilation, review, or audit with respect to those financial statements.

Section 80, *Compilation Engagements*— Provides requirements and guidance to an accountant when engaged to perform a compilation engagement on financial statements

Section 90, *Review of Financial Statements*—provides requirements and guidance to an accountant when engaged to review financial statements

The sections of SSARS No. 21 will be codified in AICPA *Professional Standards* as AR-C sections using the same section numbers as SSARS No. 21. For example, section 90 of SSARS No. 21 will be codified in the AICPA *Professional Standards* as AR-C section 90, *Review of Financial Statements*. The pre-clarified AR sections will remain in *Professional Standards* until the clarified standards are fully effective.

#### **Section 60—General Principles for Engagements Performed in Accordance With Statements on Standards for Accounting and Review Services**

Section 60 of SSARS No. 21 replaces AR section 60, *Framework for Performing and Reporting on Compilation and Review Engagements* (AICPA, *Professional Standards*), and provides general principles for engagements performed in accordance with SSARSs. Section 60 is intended to help accountants better understand their professional responsibilities when performing engagements in accordance with SSARSs.

An accountant engaged to perform a review, a compilation, or an engagement to prepare financial statements is required to adhere to the requirements in section 60 as well as the requirements in the appropriate engagement section.

Section 60 includes requirements and guidance on the following:

- Ethical requirements
- Professional judgment
- Conduct of the engagement in accordance with SSARSs
- Engagement level quality control
- Acceptance and continuance of client relationships and engagements

#### **Requirement to Obtain a Signed Engagement Letter**

The accountant is required to agree upon the terms of the engagement for all SSARSs engagements with management or those charged with governance, as appropriate. The agreed-upon terms of the engagement should be documented in an engagement letter or other suitable form of written agreement. The engagement letter or other suitable form of written agreement should be signed by the accountant or the accountant's firm and management or those charged with governance. The requirement that management sign the engagement letter is intended to better ensure that management has read the letter and understands the terms of the engagement.

#### **Section 70—Preparation of Financial Statements**

Section 70 of SSARS No. 21 applies when an accountant in public practice is engaged to prepare financial statements but is not engaged to perform an audit, review, or a compilation on those financial statements. The section does not apply in situations in which the accountant is not in public practice. An engagement to prepare financial statements is a nonattest service; therefore, the accountant is not required to make a determination regarding independence from the entity.

A report is not required—even when financial statements are expected to be used by or presented to a third party. To ensure that users can readily identify that the accountant is not providing any assurance on the financial statements, the accountant should include a statement on each page of the financial statements indicating, at a minimum, that “no assurance is provided” on the financial statements. The accountant’s name need not be included in the statement. Software vendors are already working to include the legend in the accounting software.

If the accountant is unable to include a statement on each page of the financial statements, the accountant is required to either

- issue a disclaimer that makes clear that no assurance is provided on the financial statements or
- perform a compilation engagement in accordance with section 80 of SSARS No. 21.

The determination about whether the accountant has been engaged to prepare financial statements or merely assist in preparing financial statements (which is a bookkeeping service not subject to SSARSs) is based on the services the client requests the accountant to perform and requires the accountant to apply professional judgment. The following table provides examples of services that the accountant may be engaged to perform and notes whether section 70 of SSARS No. 21 would apply. The table is not intended to be all inclusive and professional judgment still needs to be applied.

<b>Examples of Services for Which Section 70 Applies</b>	<b>Examples of Accountant Services for Which Section 70 Does Not Apply</b>
Preparing financial statements prior to audit or review by another accountant	Preparing financial statements when the accountant is engaged to perform an audit, review, or compilation of such financial statements
Preparing financial statements that are not expected to be used by a third party (management-use only financial statements)	
	Preparing financial statements solely for submission to taxing authorities
	Preparing personal financial statements for inclusion in written personal financial plans prepared by the accountant
	Preparing financial statements in conjunction with litigation services that involve pending or potential legal or regulatory proceedings
	Preparing financial statements in conjunction with business valuation services
	Maintaining depreciation schedules
	Preparing or proposing certain adjustments, such as those applicable to deferred income taxes, depreciation, or leases



Preparing a single financial statement, such as a balance sheet or financial statements with substantially all disclosures omitted	Drafting financial statement notes
Using the information in a general ledger to prepare financial statements outside of an accounting software system	Entering general ledger transactions or processing payments (general bookkeeping) in an accounting software system

## Section 80—*Compilation Engagements*

Section 80 of SSARS No. 21 modifies the applicability of the compilation literature. Pre-clarity AR section 80, *Compilation of Financial Statements* (AICPA, *Professional Standards*) applies when an accountant is either

- engaged to report on compiled financial statements or
- *submits* financial statements to the client or to third parties.

Submission is defined as “prepares and presents.” Section 80 of SSARS No. 21 eliminates the need for the accountant to determine who prepared the financial statements by eliminating the submission requirement and making the compilation literature apply when the accountant is *engaged* to perform a compilation service.

The primary changes in the compilation literature include the following:

- A report is now required for all compilation engagements
  - It is no longer necessary to have the non-reporting exception that was previously afforded for financial statements that were prepared and presented by an accountant to management that were not intended for third party use. Such engagements will be covered by section 70.
- The compilation report is now streamlined to differentiate from assurance (review and audit) reports consisting of one paragraph with no headings.
- Additional paragraphs are required when
  - the financial statements are prepared in accordance with a special purpose framework.
  - management elects to omit substantially all disclosures required by the applicable financial reporting framework.
  - when the accountant's independence is impaired.
  - there is a known departure from the applicable financial reporting framework.
  - supplementary information accompanies the financial statements and the accountant's compilation report thereon.

## Section 90—*Review of Financial Statements*

Section 90 of SSARS No. 21 is primarily a clarity redraft of the pre-clarity review literature with very few changes.

SSARS No. 21 does make clear that section 90 may be applied to historical financial information other than historical financial statements, such as specified elements, accounts, or items of a financial statement; supplementary information; required supplementary information; and financial information included in a tax return.

The accountant's review report will look different as SSARS No. 21 requires the use of headings in the report. The accountant is also required to name the city and state of the issuing office. The

requirement will be met if the accountant's review report is presented on the accountant's letterhead and the letterhead contains the city and state of the issuing office.

Although pre-clarity AR section 90, *Review of Financial Statements* (AICPA, *Professional Standards*), states that emphasis paragraphs are never required, section 90 of SSARS No. 21 requires the accountant to include an emphasis-of-matter or other-matter paragraph in the accountant's review report relating to the following matters:

- Financial statements prepared in accordance with a special purpose framework
- A changed reference to a departure from the applicable financial reporting framework when reporting on comparative financial statements
- Reporting on comparative financial statements when the prior period is audited
- Reporting a known departure from the applicable financial reporting framework that is material to the financial statements
- Reporting when management revises financial statements for a subsequently discovered fact that became known to the accountant after the report release date and the accountant's review report on the revised financial statements differs from the accountant's review report on the original financial statements
- Supplementary information that accompanies reviewed financial statements and the accountant's review report thereon
- Required supplementary information

Section 90 of SSARS No. 21 introduces the requirement that the accountant include an other-matter paragraph in the accountant's review report when the accountant considers it necessary to communicate a matter other than those that are presented or disclosed in the financial statements that, in the accountant's professional judgment, is relevant to the users' understanding of the review, the accountant's responsibilities, or the accountant's review report.

In addition, section 90 of SSARS No. 21 requires the accountant to include an emphasis-of-matter paragraph in the accountant's review report when the accountant considers it necessary to draw users' attention to a matter appropriately presented or disclosed in the financial statements that, in the accountant's professional judgment, is of such importance that it is fundamental to the user's understanding of the financial statements, provided that the accountant does not believe that the financial statements may be materially misstated.

If the accountant expects to include an emphasis-of-matter or other-matter paragraph in the accountant's review report, section 90 of SSARS No. 21 requires the accountant to communicate with management regarding this expectation and the proposed wording of this paragraph.

### **Pre-clarity AR Sections**

SSARS No. 21 will supersede all pre-clarity AR sections in AICPA *Professional Standards*, with the exception of AR section 120, *Compilation of Pro Forma Financial Information* (AICPA, *Professional Standards*). AR section 120 will be superseded by an additional clarity SSARS at a future date.

### **Other Helpful Information and Resources**

The AICPA Audit & Attest Standards Team maintains a web page dedicated to the ARSC Clarity Project, which contains valuable implementation resources for SSARS No. 21. The web page is available at <http://www.aicpa.org/SSARSClarity>. The web page will be updated frequently so, please check back often.

Additionally, AICPA Risk Alert *Developments in Review, Compilation, and Financial Statement Preparation Engagements—2014/15* serves as a valuable information resource and is available from the AICPA store at <http://www.cpa2biz.com/ssars21>.

Also, the AICPA Accounting and Auditing Technical Hotline is available for any questions that you may have. You can reach the Hotline at 877.242.7212, via e-mail at [techinquiry@aicpa.org](mailto:techinquiry@aicpa.org), and on the web at <http://www.aicpa.org/Research/TechnicalHotline/Pages/TechnicalHotline.aspx>

## **Request Review Committee Report January 2016**

Karen Saunders, CPA, Chair

During the fourth quarter 2015, the Executive Director and a Consulting Board Member from the Request Review Committee took the following action:

Firm Names: *Approved:*

DAVID LIGHTFOOT CFO, LLC  
HMA CPA, PS  
FLATHERS CONSULTING GROUP  
VERITY ACCOUNTANCY, PC  
ILUVTAX.COM  
SNOHOMISH CPA  
TZ JACKSON CPA PLLC  
COHEN FUND AUDIT SERVICES LTD  
AHN TAX & BUSINESS ADVISORS PLLC  
IJM RYAN PLLC  
SERENITY ACCOUNTING LLC  
CARLTON TAX SERVICE  
SHARP TAX & CONSULTING  
NEW ERA CPAS, LLP  
OLYMPIA CPA PLLC  
THE CPA TAX ADVISOR  
NEXTGEN ACCOUNTING PLLC  
NORTH SPOKANE C.P.A. SERVICES, P.S.

Professional/Educational Organization – Recognition Requests – During the 4<sup>th</sup> quarter in 2015, the Board did not receive any requests for recognition of an educational organization for purposes of obtaining list requests.

Domestic or International Education Credential Evaluation Services – Applications – During the 4<sup>th</sup> quarter in 2015, the Board did not receive any requests for recognition of domestic or international education credential evaluation services.



### CPE Extension Requests

CPE Extension Requests were received between 11/01/2015 and 12/31/2015.

A Total of 30 Requests were Received

- 8 requests were for hours 16 or under-
  - 2 approved
  - 1 denied
  - 5 withdrawn request-finished CPE prior to 12/31/2015
- 22 requests were for hours 17 or over
  - 14 approved
  - 6 denied
  - 2 withdrawn request-finished CPE prior to 12/31/2015

## **Washington State Board of Accountancy Social Media Committee**

### **Proposed Mission Statement**

The Washington State Board of Accountancy (Board), in furtherance of its mission to serve licensees, stakeholders, and the public, hereby proposes the following social media platforms. The Board is governed and will abide by the Revised Code of Washington and all other applicable laws. The Board recognizes that it is tasked with regulating licensees and providing information to the public. In order to continue to develop a strong presence and reputation of transparency within our communities, the Board will remain proactive and progressive in improving and expanding its avenues of communication. To do this the Board will implement specific social media campaigns aimed at engaging people through the ever-expanding use of the internet. The social media campaigns will be executed through platforms that allow the Board to maintain ownership and control.

The Board will aim to engage the following communities:

- Current licensees
- Potential future licensees
- Other stakeholder groups
- The public at large

The information to be provided to these communities would be released quarterly with prior Board approval. These quarterly messages would include information that is already included in the Board's newsletter and website. The main purpose of the campaigns will be to keep our communities better informed and to maintain a strong presence and reputation of transparency.

# Board of Accountancy Washington State

## Enforcement Report

Quarterly Report (Oct 01, 2015 through Dec 31, 2015)

	Complaints	Investigations	Period Total
Ongoing at start of period	12	20	32
Received during period	42		42
Total	54	20	74
Complaints opened as investigations	(32)	32	
Total	22	52	74
Complaints Dismissed (Administrative)	(1)		(1)
Complaints Dismissed (investigated <= 180 days)	(15)		(15)
Complaints Dismissed (investigated > 180 days)	0		0
Total	6	52	58
Cases Dismissed (Administrative)		0	0
Cases Dismissed (investigated <= 180 days)		(4)	(4)
Cases Dismissed (investigated > 180 days)		0	0
Total	6	48	54
Cases Closed (Administrative)		(19)	(19)
Cases Closed (investigated <= 180)		(8)	(8)
Cases Closed (investigated > 180)		0	0
Total	6	21	27