

## MODIFICATION REQUEST COVER SHEET

<b>Name of Filer</b>	<b>CHARLES QUENTIN POWERS</b>
<b>Reporting Period</b>	<input checked="" type="checkbox"/> Annual report – calendar year 2013 <input type="checkbox"/> Candidate/Appointee report
<b>Type of Request</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Renewal with No Change – <u>original granted on June 26, 2008</u> <input type="checkbox"/> Renewal with Change
<b>Office Held/Sought &amp; Term</b>	Trustee, Edmonds Community College Appointment expires September, 2014
<b>PDC Protocol</b>	<input type="checkbox"/> Attorney: Interpretation #02-03 <input type="checkbox"/> Judge / Judicial Candidate: Interpretation #02-04 <input type="checkbox"/> Automobile Dealership: Interpretation #02-05 <input type="checkbox"/> Spousal: Interpretation #02-06 <input checked="" type="checkbox"/> WAC 390-28-100(1)(b) – Income and ownership interest
<b>Supporting Documents (attached)</b>	<input checked="" type="checkbox"/> Current F-1 <input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Prior order (if renewal) – <u>Order # 3111</u>
<b>Reason(s) for Modification (as stated by filer)</b>	<ul style="list-style-type: none"> <li>• Mr. Powers is requesting a renewal of a reporting modification that would exempt him from disclosing the business and other governmental customers that paid \$10,000 or more during 2013 to Premera Blue Cross.</li> <li>• Mr. Powers is Vice-President of Internal Audit, Compliance &amp; Ethics for Premera. He indicated that his duties include oversight for the planning, performing, and reporting of audits of the internal controls, facilitating enterprise risk management processes, corporate policy oversight, compliance monitoring, and ethics training and investigations.</li> <li>• Mr. Powers stated that Premera Blue Cross is a nonprofit, regional health plan. He stated that in 2013, Premera Blue Cross provided health-care coverage to 1.8 million members, had annual revenue of \$3.3 billion, and employed 3,600 employees.</li> <li>• Mr. Powers estimated that Premera Blue Cross has thousands of reportable customers. He also stated that disclosure of the customer information would likely adversely affect the competitive position of the company.</li> <li>• Mr. Powers stated that he is not involved with the day-to-day operations of Premera Blue Cross other than his duties stated</li> </ul>

	<p>above. He said his access to customer information is limited to that which is necessary for him to carry out his internal audits, compliance, and ethics work.</p> <ul style="list-style-type: none"><li>• Mr. Powers stated that he believes that the purposes of the Public Disclosure Act would not be frustrated because of the highly regulated nature of the insurance industry. He stated the company regularly files financial statements with the Office of the Insurance Commissioner and is subject to financial and market conduct examinations by the state agency.</li><li>• Mr. Powers stated that his duties as a member of the Board of Trustee for Edmonds Community College include oversight of the college president and her cabinet, policy setting, review/determination of faculty tenure applications, review/determination of staff contracts, and other issues such as potential litigation or personnel matters.</li></ul>
<b>Other Issues</b>	Mr. Powers reported that Edmonds Community College made no payments to Premera Blue Cross during 2013.
<b>Staff Recommendations</b>	Approve renewal of the reporting modification with no change.