

## 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 2016 <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, 2019
<b>Application Rule(s)</b>	<input checked="" type="checkbox"/> Income & Ownership Interest: <a href="#">WAC 390-28-100(b)</a> <input type="checkbox"/> Personal Residence: WAC 390-28-100(d) <input type="checkbox"/> Attorney: WAC 390-28-100(1)(e)(i) <input type="checkbox"/> Judge / Judicial Candidate: WAC 390-28-100(1)(e)(ii) <input type="checkbox"/> Spousal: WAC 390-28-100(1)(e)(iv) <input type="checkbox"/> Other: WAC 390-28-100(1)(a)(c)
<b>Explanation of Rule</b>	<p><b>Income and ownership interests.</b> An applicant may be exempted from reporting the information otherwise required by RCW <a href="#">42.17A.710</a> (1)(f) and (g), if:</p> <p>(i) Public disclosure would violate any legally recognized confidential relationship;</p> <p>(ii) The information does not relate to a business entity which would be subject to the regulatory authority of the office sought or held by the applicant in whole or in part;</p> <p>(iii) Such reporting would present a manifestly unreasonable hardship to the applicant including but not limited to adversely affecting the competitive position of an entity in which the applicant had an interest of ten percent or more as described in RCW <a href="#">42.17A.120</a>; and</p> <p>(iv) The interest in question would present no actual or potential conflict with the performance of the duties of the office sought or held.</p>
<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) – April 21, 2016
<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 \$12,000 or more during 2016 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</li> </ul>

	<p>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.</p> <ul style="list-style-type: none"> <li>• Mr. Powers stated that Premera Blue Cross is a nonprofit, regional health plan. He stated that in 2016, Premera Blue Cross provided health-care coverage to 2.2 million members, had annual revenues of \$10.5 billion, and employed 3,200 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 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.</li> <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>
<p><b>Other Issues</b></p>	<p>Mr. Powers reported that Edmonds Community College made no payments to Premera Blue Cross during 2016.</p>
<p><b>Staff Recommendations</b></p>	<p>Approve renewal of the reporting modification with no change.</p>