

MODIFICATION REQUEST COVER SHEET

Name of Filer	CARL ZAPORA
Reporting Period	<input checked="" type="checkbox"/> Annual report – calendar year 2019 <input type="checkbox"/> Candidate report
Type of Request	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Full Commission Approval <input type="checkbox"/> Renewal with Change
Office Held/Sought & Term	Regent/Trustee, Edmonds Community College Current term expires in December, 2021
Application Rule(s)	<input checked="" type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(1)(b) <input type="checkbox"/> Personal Residence: WAC 390-28-100(1)(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)(e)
Explanation of Rule(s)	<p>Income and ownership interests. An applicant may be exempted from reporting the information otherwise required by RCW 42.17A.710 (1)(f) and (g), if:</p> <p>(i) Public disclosure would violate any legally recognized confidential relationship that serves a legitimate business interest;</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 42.17A.120; 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>
Supporting Documents (attached)	<input checked="" type="checkbox"/> Modification Request Application (April 28, 2020) <input checked="" type="checkbox"/> Current F-1 (filed April 3, 2020) <input checked="" type="checkbox"/> Amended F-1 (filed June 5, 2020) <input checked="" type="checkbox"/> Emails dated April 3, 2020; May 1, 2020; May 12, 2020; May 13, 2020; and May 26, 2020

Reason(s) for Modification (as stated by filer)	<ul style="list-style-type: none">• Mr. Zapora is requesting a reporting modification that would exempt him from disclosing the business customers that paid \$12,000 or more to Molina Healthcare of Washington during 2019.• Mr. Zapora is one of six Trustees serving at Edmonds Community College. His unpaid duties include setting broad policy, approving the college's annual budget, hiring & firing the President, and granting or denying tenure.• Mr. Zapora is a Board Member of Molina Healthcare of Washington, does not have reportable ownership interest in the company, and is not involved in its day-to-day operations.• Mr. Zapora confirmed that Edmonds Community College made no payments to Molina Healthcare of Washington during 2019.• Mr. Zapora has disclosed on his F-1 report the governmental customers that paid Molina Healthcare of Washington more than \$12,000 in 2019, which included Washington Healthcare Authority and Washington State Department of Health.• Mr. Zapora stated that he does not have access to Molina Healthcare of Washington's customer list and the information is not available from public sources.• Mr. Zapora reported that Molina Healthcare of Washington receives more than \$800,000,000 a year from the State of Washington to provide healthcare insurance and services to hundreds of thousands of Washington citizens. He indicated that Molina Healthcare of Washington also receives payments in excess of \$12,000 a year from thousands of business customers and members (clients). He stated the company lacks the ability to sort its customer list to identify reportable payments. When asked, the company told him that obtaining a breakdown of payments would "take weeks and months to gather..."• Mr. Zapora stated that disclosing the details requested on the F-1 report for Molina Healthcare of Washington would 1) be incredibly onerous, if not impossible; and 2) place the company at a competitive disadvantage by disclosing their customer information to competitors. He added that many of the company's customers and members are protected by HIPAA laws and regulations.
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Other Issues	Mr. Zapora has agreed to recuse himself if a matter comes before him involving a conflict of interest between his public duties and personal interests. He stated his belief that no actual or potential conflict arises from not disclosing the business customers of Molina Healthcare of Washington.
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