

January 31, 2025

Attorney General Nick Brown
Office of the Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100

RE: Notification of Breach of Washington Residents' Information.

Dear Attorney General Brown,

I am reporting a data breach impacting 714 Washington residents who have policies with either Regence BlueShield or Regence BlueCross BlueShield of Oregon (collectively, Regence).

On December 19, 2024, two separate policy holders reported receiving messages through their digital member portal accounts about new claims for their dependents that they were not used to seeing. We determined these two instances reported did not result in unauthorized disclosures; however, we immediately began an investigation.

Through our investigation we determined that on December 5, 2024, Regence technical teams implemented a change that transitioned the API used to retrieve data necessary to run the nightly process of sending claim notification messages to members through their digital member portal accounts and app. During the transition, an error occurred that resulted in the member ID suffix defaulting to the policy holder suffix (instead of the suffix for the member to whom the claim belonged). This resulted in all claim notification messages being sent to policy holders between December 5, 2024, and December 19, 2024, even in instances where the policy holder should not have received the dependent's information.

The error resulted from a misunderstanding between the teams responsible for implementing the API transition regarding the scope of testing and quality assurance sign-off required. The teams tested to ensure claim notification messages reached member portal accounts but failed to test whether the messages were sent to the intended recipients (sent to the dependents instead of the policy holders).

The claim notification messages included the dependent's first and last name, birth year, claim number, date of service, claim processed date, provider name, and claim amounts related to sensitive condition claims that policy holders should not have received.

Immediately upon discovering the error, claim notification messages were disabled. Read and un-read claim notification messages sent to policy holders in error were deleted from policy holders' member portal accounts beginning December 20, 2024. The process for retrieving claim notification messages reverted to the previous method on December 23, 2024. Since then, accurate claim notifications have been sent. Involved teams are updating written processes to require additional testing and approval before implementing changes that affect the how data surfaces in any digital member portal account or app.

On January 13, 2025, our data teams determined and validated a list of impacted dependents, and we determined 714 Washington residents were affected. On January 31, 2025, written notification is being mailed to members and we are reporting this to the United States Department of Health and Human Services Office for Civil Rights.

If you have any questions, please contact me at (503) 225-4962.

Sincerely,

Valerie Berg
Privacy Officer, Director

Jan. 31, 2025

Member Name
Address Line 1
Address Line 2

Subject: Disclosure of your information

Dear [First name],

I am writing about an incident that was reported to our Privacy Office on Dec. 19, 2024.

After an immediate investigation, we learned that on Dec.5, 2024, a technical change was made related to how member data is retrieved to trigger claim notification messages in the Regence member portal or app message center. The teams unfortunately failed to conduct testing to ensure that notifications were sent to the correct recipients. Between Dec. 5 and Dec. 19, 2024, Regence sent claim notification messages intended for dependents to policy subscribers via the subscribers' member portal account or app message center.

We confirmed that because of this error, the subscriber of your policy accessed a claim notification message that included information about your claim. The claim was related to a sensitive condition and should not have been disclosed to the subscriber on your policy without your authorization. The information in the claim notification message included no specific treatment information or any financial information. However, the message did include your name, birth year, claim number, date of service, claim processed date, claim amounts and provider name.

When we discovered the error, we immediately disabled claim notification messages and began deleting dependents' claim notification messages from subscribers' member portal account message center. All messages have been deleted. The issue was fixed Dec. 23, 2024, and claim notifications have been sent to correct recipients since.

Because your information related to a sensitive condition was disclosed to your subscriber, we will notify the Secretary of the United



1111 Lake Washington Blvd N, Suite 900
Renton, WA 98056

States Department of Health and Human Services Office for Civil Rights about this incident. To avoid a similar incident in the future, individual teams are updating written processes to require added testing and approval before making changes that affect information that is disclosed in the digital member portal accounts and app.

We take the security and confidentiality of our members' information seriously and we apologize for any concerns this incident may cause. If you have questions or would like to discuss this further, please feel free to call Customer Service at 1-800-365-3155 or at the number on the back of your member ID card.

Sincerely,

Your Regence Team