

February 18, 2021

VIA ELECTRONIC MAIL

Office of the Attorney General
1125 Washington St SE
P.O. Box 40100
Olympia, WA 98504
SecurityBreach@atg.wa.gov

Re: Notice of HIPAA Breach to the Secretary of the U.S. Department of Health & Human Services

To Whom It May Concern:

This notification is being provided by Lucid Lane, Inc. ("**Lucid Lane**") to the Washington State Office of the Attorney General ("**WA AG**") pursuant to Rev. Code Wash. § 19.255.010, which requires covered entities as defined under the Health Insurance Portability and Accountability of 1996, as amended by the Health Information Technology for Economic and Clinical Health Act of 2009 (collectively, "**HIPAA**") to notify the WA OAG regarding a breach of protected health information as defined under HIPAA (see 45 CFR §§ 164.400-414). Lucid Lane provides administrative services to certain behavioral health therapy providers, and is therefore required to comply with the HIPAA breach notification requirements pursuant to its function as a business associate.

On December 18, 2020, the billing department ("**Billing Department**") of Lucid Lane sent an e-mail requesting patients to update their insurance information. Due to a clerical error on the part of Lucid Lane, the list of e-mail addresses for patients was inserted in the "To:" field instead of the "Blind carbon copy:" field, which otherwise hides e-mail addresses from being viewed by other intended e-mail recipients. As a result, patient e-mail addresses were exposed to all e-mail recipients. The breach affected four (4) Washington State residents.

Lucid Lane discovered that the security breach had occurred immediately after the Billing Department e-mail was sent on December 18, 2020, and promptly took steps to investigate the breach. In response to the incident, Lucid Lane sent an e-mail on December 18, 2020 requesting that all e-mail recipients delete the Billing Department e-mail from their system, and notify Lucid Lane that the Billing Department e-mail had been deleted. The e-mail sent by Lucid Lane requesting deletion of the Billing Department e-mail is attached as Exhibit A. Subsequent to the incident, and out of an abundance of caution, Lucid Lane has also updated its client communication system, and has implemented an internal process whereby the list of intended e-mail recipients and e-mail content is verified and approved before distribution.

Lucid Lane, on behalf of its behavioral health therapy provider customers, provided e-mail and written notification of the foregoing breach to the affected Washington State residents on December 18, 2021, and to the Secretary of the U.S. Department of Health & Human Services on February 16, 2021 pursuant to the breach notification requirements under HIPAA. The breach notification letter provided to the affected Washington State residents is attached as Exhibit B.

Lucid Lane believes that the security breach poses only a minimal risk of harm to the affected Washington State residents as the breach involved only the disclosure of the patient e-mail address. Nonetheless, Lucid Lane remains committed to protecting the privacy and security of patient information. In the event that the WA AG has any questions regarding this letter, please do not hesitate to contact Mubeena Siddiqui, 630.589.2730 and Mubeena.Siddiqui@gmail.com



Thank you.

Sincerely,

A handwritten signature in black ink, appearing to be 'MS' with a flourish underneath.

Mubeena Siddiqui,
Director of RCM and Compliance



Exhibit A

Sent on 12/18/2020: 4:11pm

Hello,

Earlier today you may have inadvertently received an email from our billing department due to a technical error. Sorry for our error and any inconvenience this has caused.

We have already taken steps to ensure this will never happen again.

Please delete the email and please send us a confirmation email that it has been deleted. We do take your privacy very seriously and again apologize for the inconvenience. If you have any questions, please feel free to call us at any time at 1-800-604-2461.

Sincerely,

David Etheridge
COO, Lucid Lane

Exhibit B

Jennifer Kljalic

February 16, 2021

VIA EMAIL AND FEDERAL EXPRESS

Re: Notice of Security Breach

Dear [PATIENT NAME],

We are writing to inform you about a recent security breach of your personal information by our billing vendor, Lucid Lane, Inc. ("Lucid Lane"). On December 18, 2020, Lucid Lane sent an email requesting patients to update their insurance information. Due to a clerical error on the part of Lucid Lane, the list of email addresses for patients was inserted in the "To:" field instead of the "Blind carbon copy:" field, which hides email addresses from being seen by other intended email recipients. As such, patient email addresses, including yours, were exposed to all email recipients.

We were notified of the security breach promptly after the email was sent, and have worked cooperatively with Lucid Lane to investigate the matter. In response to the incident, Lucid Lane sent an email on December 18, 2020 requesting that all email recipients delete the original email from their system and notify Lucid Lane that the original email had been deleted. Since then, Lucid Lane has also updated its client communication system, and has implemented an internal process whereby the list of intended email recipients and email content is verified and approved before distribution.

We believe that the security breach poses only a minimal risk of harm to you. Nonetheless, we take this incident very seriously. Protecting the privacy and security of your information is extremely important to us. If you have questions regarding this matter, please contact Lucid Lane at 800.604.2461 or info@lucidlane.com. We sincerely apologize for any inconvenience that this incident may cause.

Sincerely,

Jennifer Kljalic