



Elizabeth Rice
Compliance Officer & Director, Health
Information Management
P.O. Box 6128
Kennewick, WA 99336

Tel: 509-221-5720 (option 2)
Fax: 509-221-5707
Email: privacy@trioshealth.org

May 26, 2017

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

Re: Notice of Breach—Impermissible use of Protected Health Information

To Whom It May Concern:

Enclosed is a copy of an electronic breach notification and an amendment breach notification submitted with the U.S. Office for Civil Rights at the Department of Health and Human Services regarding an impermissible use of protected health information, which occurred in the State of Washington. The original breach notification submitted on May 18, 2017 to the U.S. Office for Civil Rights reported 373 affected individuals; however our amendment submitted on May 26, 2017 reflects 569 affected individuals. The investigation of this event is ongoing, and this notice will be supplemented with any new significant facts subsequent to this submission or additional identified affected residents.

Also enclosed is a copy of the de-identified letter which will be sent out to the 569 affected individuals during the week of May 29, 2017.

Nature of the Incident
Steps Taken and to be Taken

On March 14, 2017 Kennewick Public Hospital District, dba Trios Health discovered electronic health record (EHR) access activity outside the normal job functions for one particular employee. An investigation was immediately started. The employee who impermissibly accessed patient records had access to our EHR applications to perform job responsibilities; however the employee utilized the EHR application to lookup additional patients, where there was no obvious direct correlation to job responsibilities. Upon learning of this incident, Trios Health immediately took steps to limit EHR access by the individual and began conducting an extensive investigation. Further EHR access permissions were restricted to all staff within the employee's department as the investigation progressed. In response to our findings, and in accordance with policies, we took disciplinary action against the employee including involuntary administrative leave, followed by termination upon confirming the nature and extent of the breach. In addition to providing notice of this incident to the Washington State Attorney General, Trios Health is notifying the media, posting the incident on its website and providing notification to appropriate regulatory agencies.

We sincerely apologize for this unauthorized access by our former employee. From our investigation we do not believe that personal information is at risk for further use or disclosure; however, as a precaution, we are offering free identity theft protection and advanced fraud monitoring services for one year at no cost to the affected individuals, paid for by Trios Health.

The safety and privacy of protected health information is very important to Trios Health. In addition to the disciplinary action described above, we continue to deploy additional privacy training to employees, security risk assessment, audit privacy policies, and implement standard auditing processes to further protect patient information.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Rice". The signature is written in a cursive, flowing style.

Elizabeth Rice, CCS

Compliance Officer and Director, Health Information Management

Breach Tracking Number: **4J3CMJ4MG8**

Thank you for filing a breach notification via the website of the Office for Civil Rights (OCR) at the Department of Health and Human Services. This is an automated response to acknowledge receipt of your breach notification. Your breach notification will be assigned to an OCR staff member for review and appropriate action. If OCR has any questions about the breach notification you submitted, we will contact you directly. Otherwise, you will receive a written response indicating whether or not OCR has accepted your breach notification for investigation.

Please do not fax, email, or mail a copy of this breach notification to us as that may delay the processing of your breach notification.

If you have any additional information to add to your breach notification, you may call 1-800-368-1019. Please reference the number given by OCR when submitting your breach notification.

* Breach Affecting: **Fewer Than 500 Individuals**

* Report Type: **Initial Breach Report**

* Are you a Covered Entity filing on behalf of your organization? **Yes**

Covered Entity

* Name of Covered Entity: **Kennewick General Hospital dba Trios Health**

* Type of Covered Entity: **Healthcare Provider**

* Street Address Line 1: **900 South Auburn Street**

Street Address Line 2:

* City: **Kennewick**

* State: **Washington**

* ZIP: **99336**

Covered Entity Point of Contact Information

* First Name: **Elizabeth**

* Last Name: **Rice**

* Email: **elizabeth.rice@trioshealth.org**

* Phone Number: (Include area code):

Phone Number	Usage
(509) 221-5883	Work

* Breach Start Date: **10/23/2013** * Breach End Date: **03/31/2017**

* Discovery Start Date: **03/14/2017** * Discovery End Date: **05/18/2017**

* Approximate Number of Individuals Affected by the Breach: **373**

* Type of Breach: **Unauthorized Access/Disclosure**

* Location of Breach: **• Electronic Medical Record**

* Type of Protected Health Information Involved in Breach:

- **Clinical**
- **Demographic**
- **Financial**
- * Clinical**
 - **Diagnosis/Conditions**
 - **Lab Results**
 - **Medications**
 - **Other Treatment Information**
- * Demographic**
 - **Address/ZIP**
 - **Date of Birth**
 - **Drivers License**
 - **Name**
 - **SSN**
- * Financial**
 - **Claims Information**

* Brief Description of the Breach: **An employee impermissibly accessed multiple patients medical records.**

* Safeguards in Place Prior to Breach:

- **Privacy Rule Safeguards (Training, Policies and Procedures, etc.)**
- **Security Rule Administrative Safeguards (Risk Analysis, Risk Management, etc.)**
- **Security Rule Physical Safeguards (Facility Access Controls, Workstation Security, etc.)**
- **Security Rule Technical Safeguards (Access Controls, Transmission Security, etc.)**

* Individual Notice Provided Start Date:	05/22/2017	Individual Notice Provided Projected/Expected End Date:	05/22/2017
Was Substitute Notice Required?	No		
Was Media Notice Required?	No		

* Actions Taken in Response to Breach: • Sanctioned workforce members involved (including termination)

Under the Freedom of Information Act (5 U.S.C. §552) and HHS regulations at 45 C.F.R. Part 5, OCR may be required to release information provided in your breach notification. For breaches affecting more than 500 individuals, some of the information provided on this form will be made publicly available by posting on the HHS web site pursuant to § 13402(e)(4) of the Health Information Technology for Economic and Clinical Health (HITECH) Act (Pub. L. 111-5). Additionally, OCR will use this information, pursuant to § 13402(i) of the HITECH Act, to provide an annual report to Congress regarding the number and nature of breaches that are reported each year and the actions taken to respond to such breaches. OCR will make every effort, as permitted by law, to protect information that identifies individuals or that, if released, could constitute a clearly unwarranted invasion of personal privacy.

I attest, to the best of my knowledge, that the above information is accurate.

* Name: Elizabeth Rice Date: 05/18/2017

Breach Tracking Number: **4J3CMJ4MG8**

Thank you for filing a breach notification via the website of the Office for Civil Rights (OCR) at the Department of Health and Human Services. This is an automated response to acknowledge receipt of your breach notification. Your breach notification will be assigned to an OCR staff member for review and appropriate action. If OCR has any questions about the breach notification you submitted, we will contact you directly. Otherwise, you will receive a written response indicating whether or not OCR has accepted your breach notification for investigation.

Please do not fax, email, or mail a copy of this breach notification to us as that may delay the processing of your breach notification.

If you have any additional information to add to your breach notification, you may call 1-800-368-1019. Please reference the number given by OCR when submitting your breach notification.

* Breach Affecting: 500 or More Individuals
 * Report Type: Addendum to Previous Report
 * Breach Tracking Number: 4J3CMJ4MG8
 * Are you a Covered Entity filing on behalf of your organization? Yes

Covered Entity

* Name of Covered Entity: Kennewick General Hospital dba Trios Health
 * Type of Covered Entity: Healthcare Provider
 * Street Address Line 1: 900 South Auburn Street
 Street Address Line 2:
 * City: Kennewick
 * State: Washington
 * ZIP: 99336

Covered Entity Point of Contact Information

* First Name: Elizabeth * Last Name: Rice
 * Email: elizabeth.rice@trioshealth.org
 * Phone Number: (Include area code):

Phone Number	Usage
(509) 221-5883	Work

* Breach Start Date: 10/23/2013 * Breach End Date: 03/31/2017
 * Discovery Start Date: 03/14/2017 * Discovery End Date: 05/26/2017
 * Approximate Number of Individuals Affected by the Breach: 569

* Type of Breach: Unauthorized Access/Disclosure

* Location of Breach: • Electronic Medical Record

* Type of Protected Health Information Involved in Breach:

- Clinical
 - * Clinical
 - Diagnosis/Conditions
 - Lab Results
 - Medications
 - Other Treatment Information
 - * Demographic
 - Address/ZIP
 - Date of Birth
 - Drivers License
 - Name
 - SSN
 - * Financial
 - Claims Information
- Demographic
- Financial

* Brief Description of the Breach: On March 14, 2017 Kennewick Public Hospital District, dba Trios Health discovered electronic health record (EHR) access activity outside the normal job functions for one particular employee. An investigation was immediately started. The employee who impermissibly accessed patient records had access to our EHR applications to perform job responsibilities; however the employee utilized the EHR application to lookup additional patients, where there was no obvious direct correlation to job responsibilities. Upon learning of this incident, Trios Health immediately took steps

to limit EHR access by the individual and began conducting an extensive investigation. Further EHR access permissions were restricted to all staff within the employee's department as the investigation progressed. In response to our findings, and in accordance with policies, we took disciplinary action against the employee including involuntary administrative leave, followed by termination upon confirming the nature and extent of the breach. In addition to providing notice of this incident to the Washington State Attorney General, Trios Health is notifying the media, posting the incident on its website and providing notification to appropriate regulatory agencies.

* Safeguards in Place Prior to Breach:

- Privacy Rule Safeguards (Training, Policies and Procedures, etc.)
- Security Rule Administrative Safeguards (Risk Analysis, Risk Management, etc.)
- Security Rule Physical Safeguards (Facility Access Controls, Workstation Security, etc.)
- Security Rule Technical Safeguards (Access Controls, Transmission Security, etc.)

* Individual Notice Provided Start Date:

05/27/2017

Individual Notice Provided Projected/Expected End Date:

05/27/2017

Was Substitute Notice Required?

No

Was Media Notice Required?

No

* Actions Taken in Response to Breach:

- Provided individuals with free credit monitoring
- Sanctioned workforce members involved (including termination)

Under the Freedom of Information Act (5 U.S.C. §552) and HHS regulations at 45 C.F.R. Part 5, OCR may be required to release information provided in your breach notification. For breaches affecting more than 500 individuals, some of the information provided on this form will be made publicly available by posting on the HHS web site pursuant to § 13402(e)(4) of the Health Information Technology for Economic and Clinical Health (HITECH) Act (Pub. L. 111-5). Additionally, OCR will use this information, pursuant to § 13402(i) of the HITECH Act, to provide an annual report to Congress regarding the number and nature of breaches that are reported each year and the actions taken to respond to such breaches. OCR will make every effort, as permitted by law, to protect information that identifies individuals or that, if released, could constitute a clearly unwarranted invasion of personal privacy.

I attest, to the best of my knowledge, that the above information is accurate.

* Name: Elizabeth Rice Date: 05/26/2017



Elizabeth Rice
HIM Director and Compliance Officer
P.O. Box 6128
Kennewick, WA 99336

Tel: 509-221-5720 (option 2)
Fax: 509-221-5707
Email: Privacy@trioshealth.org

May 26, 2017

Verification Code: «Validation_Code»

«Address»

Dear «Name»,

This correspondence is to inform you about a breach of your patient information at Kennewick Public Hospital District dba Trios Health (previously doing business as Kennewick General Hospital). On 3/14/17, we discovered that one employee impermissibly accessed medical records. The information accessed may have included information pertaining to your Trios Health visits, diagnoses, and demographic information including address, driver's license number, and Social Security Number. Though our investigation has not yet concluded and we are actively continuing our review, the employee responsible for the breach has been terminated in accordance with our policies and findings thus far.

We sincerely apologize for this unauthorized access by our former employee. From our investigation, we do not believe that your personal information is at risk of further use or disclosure; however, as a precaution, we are offering you **FREE IdentityForce** identity theft protection and advanced fraud monitoring services for one year at **NO COST TO YOU**, paid for by Trios Health. Though we believe this breach is an isolated incident, please let us know if you become aware of any unauthorized use or disclosure of your information.

The safety and privacy of your medical records are very important to Trios Health. In addition to the disciplinary action described above, we continue to provide training to employees regarding the privacy of patient records as well as the prohibition and consequences of unauthorized access.

We apologize for any inconvenience or worry this incident may cause. We also encourage you to sign up **NOW** for your **FREE** benefits. Enroll online using the **IdentityForce** secure website and many of your benefits will be available to you instantly!

To sign up **online** please visit <https://secure.identityforce.com/benefit/kph> and:

Step 1: Enter your *First and Last name*

Step 2: Enter your *Email Address*

Step 3: Enter your *Verification Code* [«Validation_Code»]

Step 4: Click Continue

Step 5: Enter the required information on the Personal Information page

You must complete the enrollment process online at <https://secure.identityforce.com/benefit/kph> to take advantage of the identity theft protection services. By law, we cannot do this on your behalf.

We strongly suggest you take advantage of the services offered as a precautionary measure to protect your personal identity and credit.

If you have any additional questions related to this incident or you need assistance with IdentityForce enrollment services, please do not hesitate to contact the toll-free IdentityForce phone line at (877) 288-4664, Monday through Friday 8:30 a.m. to 5:30 p.m. Eastern Time. You may also view a Frequently Asked Questions document about this breach at www.trioshealth.org/Privacy and submit any remaining questions to Privacy@trioshealth.org.

Sincerely,



Elizabeth Rice, CCS

Compliance Officer and Director, Health Information Management



Elizabeth Rice
HIM Director and Compliance Officer
P.O. Box 6128
Kennewick, WA 99336

Tel: 509-221-5720 (option 2)
Fax: 509-221-5707
Email: Privacy@trioshealth.org

Mayo 26, 2017

Código de Verificación: «Validation_Code»

«Address»

Estimado «Name»,

Esta correspondencia es para informarle sobre un incumplimiento de la información de su paciente en Kennewick Public Hospital District dba Trios Health (anteriormente haciendo negocios como Kennewick General Hospital). El 3/14/17, descubrimos que un empleado inadvertidamente accedió a los registros médicos. La información accesada puede incluir información relacionada con sus visitas a Trios Health, diagnósticos e información demográfica incluyendo dirección, número de licencia de conducir y número de Seguro Social. Aunque nuestra investigación aún no ha concluido y seguimos activamente nuestra revisión, el empleado responsable del incumplimiento ha sido terminado de acuerdo con nuestras políticas y hallazgos hasta el momento.

Le pedimos disculpas sinceramente por este acceso no autorizado por nuestro ex empleado. Por nuestra investigación, no creemos que su información personal está en riesgo de uso o divulgación adicional; Sin embargo, como medida de precaución, le estamos ofreciendo **GRATIS** protección contra robo de identidad de IdentityForce y servicios avanzados de monitoreo de fraude por un año **SIN COSTO A USTED**, pagado por Trios Health. Aunque creemos que este incumplimiento es un incidente aislado, comuníquese con nosotros si tiene conocimiento de cualquier uso no autorizado o divulgación de su información.

La seguridad y privacidad de sus expedientes médicos son muy importantes para Trios Health. Además de la acción disciplinaria descrita anteriormente, seguimos proporcionando entrenamiento adecuado a los empleados con respecto a la privacidad de los registros de pacientes y la prohibición y consecuencias de acceso no autorizado.

Lamentamos cualquier inconveniente o preocupación que pueda causar este incidente. También le animamos a registrarse ahora para sus beneficios **GRATIS**. ¡Inscríbese en línea usando el sitio seguro web de IdentityForce y muchos de sus beneficios estarán disponibles al instante!

Para inscribirse en línea, visite <https://secure.identityforce.com/benefit/kph> y:

Paso 1: Escriba su **Nombre y Apellido**

Paso 2: Escriba su **Correo Electrónico**

Paso 3: Escriba su **Código de Verificación** [«Validation_Code»]

Paso 4: Clic Continuar

Paso 5: Escriba la información requerida en la página de información personal

Debe completar el proceso de inscripción en línea en <https://secure.identityforce.com/benefit/kph> para aprovechar los servicios de protección contra robo de identidad. Por ley, no podemos hacer esto en su nombre.

Le recomendamos encarecidamente que aproveche los servicios ofrecidos como medida de precaución para proteger su identidad personal y su crédito.

Si tiene preguntas adicionales relacionadas con este incidente o necesita ayuda con los servicios de inscripción de IdentityForce, no dude en ponerse en contacto con la línea telefónica gratuita de IdentityForce a (877) 288-4664, de Lunes a Viernes de 8:30 am a 5:30 p.m. Hora del este. También puede ver un documento de Preguntas Frecuentes acerca de esta infracción en www.trioshealth.org/Privacy y enviar cualquier otra pregunta a Privacy@trioshealth.org.

Sinceramente,



Elizabeth Rice, CCS
Compliance Officer and Director, Health Information Management