

ATG MI ADM Security Breach

From: JeanD@klinegalland.org
Sent: Friday, August 05, 2016 4:36 PM
To: ATG MI ADM Security Breach
Subject: Breach Notification per RCW 19.255.010
Attachments: Breach Notification -- Tracking Number 8 5 2016.docx; De-identified Notification Letter.docx; Insert re credit reporting for Breach Notification Letters -- 6 13 2016.docx

Dear Sir or Madam:

Attached as required pursuant to RCW 19.255.010 (10) and (15) are electronic copies of the following:

1. Report of Breach made 8/5/2016 by covered entity The Caroline Kline Galland Home dba Kline Galland Hospice Services to the US Department of Health and Human Services under Breach Tracking Number L6D6QQSPHX, concerning the breach of protected health information in paper record form, concerning 12 individuals, occurring by theft from an employee's home on 6/13/2016.
2. Copy of the de-identified written notice given on behalf of the covered entity by the undersigned to the 12 individuals affected and their families, and credit reporting informational sheet enclosed.

Please do not hesitate to contact me if you require further information regarding this matter.

Very truly yours,

Jean M. DeFond

Jean M. DeFond, JD, CIPP/US

Chief Compliance Officer and Counsel

E jeand@klinegalland.org
D (206) 456-9881 x193
C (206) 450-7385



www.klinegalland.org

7500 Seward Park Ave. S. • Seattle, WA 98118-4256

This message is private or privileged. If you are not the individual for whom it is intended, please delete this message and notify me immediately, and please do not copy or send it to anyone else.

Disclaimer - The information contained in this e-mail communication is privileged and/or confidential information intended only for the use of the individual or entity named above. If the reader of this e-mail is not the intended recipient, please do not disseminate, distribute, or copy this e-mail communication or the information contained. If you received this communication in error, please notify us by reply e-mail and please delete the e-mails from your computer.

Breach Tracking Number: **L6D6QQSPHX**

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: **The Caroline Kline Galland Home dba Kline Galland Hospice Services**

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

* Street Address Line 1: **5950 Sixth Ave S.**

Street Address Line 2: **Suite 100**

* City: **Seattle**

* State: **Washington**

* ZIP: **98108**

Covered Entity Point of Contact Information

* First Name: **Jean** * Last Name: **DeFond**

* Email: **jeand@klinegalland.org**

* Phone Number: **Phone Number Usage**
(Include area code): **(206) 456-9881 x193 Work**

* Breach Start Date: **06/13/2016** * Breach End Date: **06/13/2016**

* Discovery Start Date: **06/13/2016** * Discovery End Date: **06/13/2016**

* Approximate Number of Individuals Affected by the Breach: **12**

* Type of Breach: **Theft**

* Location of Breach: • Paper/Films

* Type of Protected Health Information Involved in Breach: • Clinical

* Clinical

- Other Treatment Information

* Brief Description of the Breach: 2 Paper records containing PHI for 12 hospice patients were stolen from a hospice worker's home in a break in. Also taken was the hospice worker's work laptop, but we have determined that the laptop was fully encrypted and DID NOT contain the encryption key. The Seattle Police have recently recovered the laptop, however, its encrypted hard drive was missing at the time recovered. PHI taken: 1. the names (first and last) of 11 hospice patients were contained on the first paper record stolen. This paper record was an email to the hospice worker listing 11 patient files that needed sign offs. 2. the second paper record stolen was a care conference report regarding a single hospice patient. It contained the patient's first and last name, and details from the care conference reflecting on patient's condition and care.

* 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: 06/20/2016 Individual Notice Provided 06/22/2016
Projected/Expected End Date:

Was Substitute Notice Required? No

Was Media Notice Required? No

* Actions Taken in Response to Breach: • Other

* Describe Other Employee was interviewed and counseled generally

Actions Taken: regarding security for work materials transported in her car, and stored overnight in her home. The employee's actions were fully consistent with our Electronic Devices Agreement which employee had signed at the time first employed by us.

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: **Jean M. DeFond** Date: *08/05/2016*



Honor Thy Father & Mother

June __, 2016

[Addressee]

[Address]

Re: Breach of Protected Health Information

Dear [Addressee]:

Kline Galland Hospice Services has discovered a potential breach of [Patient's] protected health information. We became aware of this breach on June 13, 2016, when one of our employee's home was broken into and work papers stolen. That incident has been reported to the Seattle Police Department, South Seattle Precinct.

We believe that a document listing [Patient's] first and last name was among the papers stolen from our employee's home. Thankfully, the document taken did NOT include the date of birth, social security number, address, or financial information.

We will continue to work with the Seattle Police to investigate this theft, detect the culprit, and regain the protected health information. To protect against such breaches in the future, we have alerted all of our employees, and are reviewing our policies regarding the transportation and storage of documents containing protected health information.

We sincerely apologize for any concern this situation may cause you. We are committed to keeping health information safe, and assure you that we are doing everything possible to regain your trust in our practices. Please do not hesitate to contact me at 206-456-9881 or jeand@klinegalland.org with any questions you may have about this incident.

Very truly yours,

Jean M. DeFond

Chief Compliance Officer and Counsel

7500 Seward Park Ave S.
Seattle, WA 98118-4256

P (206) 725-8800
F (206) 722-5210
www.klinegalland.org

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Senior Care Resource*

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Kline Galland Foundation

1. Contacting the 3 Major Credit Bureaus to Place a Fraud Alert on Your Credit Report:

You may wish to contact the three major credit bureaus listed below to place a fraud alert on your credit report. This can help prevent an identity thief from opening accounts in your name. As soon as the credit bureau confirms your fraud alert, the other two credit bureaus will automatically be notified to place alerts on your credit report, and all three bureaus will provide you a copy of your credit report free of charge.

Equifax: (888)766-0008; www.fraudalerts.equifax.com. General: (800) 685-1111, www.equifax.com, P.O. Box 740241, Atlanta, GA 30374-0241.

Experian: (888) 397-3742; <https://www.experian.com/fraud/center.html>. General: (888) EXPERIAN (397-3742); www.experian.com; 475 Anton Blvd., Costa Mesa, CA 92626.

TransUnion: (800) 680-7289 (888-909-8872 for freeze); <http://www.transunion.com/personal-credit/credit-disputes/fraud-alerts.page>; TransUnion Fraud Victim Assistance Department, P.O. Box 2000, Chester, PA 19022-2000. General: (800) 680-7289; www.transunion.com; P.O. Box 2000, Chester, PA 19022-2000

2. Order Your Credit Reports:

You may also want to order copies of your credit report. By establishing a fraud alert, you will receive a follow-up letter that will explain how you can receive a free copy of your credit report. When you receive your credit report, examine it closely and look for signs of fraud, such as credit accounts that are not yours.

3. Continue to Monitor Your Credit Reports:

You may continue to monitor your credit reports by periodically contacting the three major credit bureaus listed above.