



Group Health Cooperative
Privacy Office

320 Westlake Avenue N, Suite 100
Seattle, WA 98109

www.ghc.org

VIA ELECTRONIC MAIL (SecurityBreach@atg.wa.gov)

September 23, 2016

Office of the Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
SecurityBreach@atg.wa.gov

RE: Notification of a security breach of personal health information in compliance with RCW 19.255.010.

Dear Sir or Madam:

On September 6, 2016, Group Health Cooperative discovered a potential privacy breach related to a letter notifying the member of their coverage termination. Letters mailed on August 31, 2016, September 1, 2016 and September 2, 2016 was sent to the wrong subscriber. This incident affected 651 Washington residents. The member information on the letter included: patient name, address, and medical record number. No financial data, Social Security number, or medical information was included.

Upon discovery, Group Health immediately stopped the mailing process and worked to identify the root cause. We concluded the error was isolated to the coverage termination letter. The letter template had been updated, reducing the total pages from four (4) to two (2) pages. The change in page count was not programmed into the equipment. We are reviewing our processes, including standard work procedures, and taking steps to make sure this type of error does not happen again.

Group Health will be notifying the members as well as the Department of Health and Human Services' Office for Civil Rights as required by Group Health policy and applicable law. Although there was no financial information involved, we will be offering the affected member with access to credit monitoring and identity theft consultation and restoration, if needed, at no cost. A copy of the letter is attached.

We are providing this notice to you in accordance with RCW 19.255.010. If you have any questions about this matter, please contact me at 206-448-5816.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen Gilles".

Kathleen Gilles
Group Health Privacy Officer
Group Health Cooperative Privacy Office
320 Westlake Ave N, Suite 100
Seattle, WA 98109



<<MemberFirstName>> <<MemberLastName>>

<<Date>> (Format: Month Day, Year)

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip Code>>

Notice of Data Breach

Dear <<MemberFirstName>> <<MemberLastName>>,

We are writing to tell you about a data security incident that may have exposed some of your personal information. We take the protection and proper use of your information very seriously. For this reason, we are contacting you directly to explain the circumstances of the incident.

What happened?

On August 31, 2016, September 1, 2016 and September 2, 2016, we sent letters to members notifying them of a coverage termination. On September 12, 2016, we discovered that your termination letter was mailed to the wrong member. This happened because a change in the length of the letter from four pages to two pages was not programmed into the equipment which places letters into envelopes. Therefore, two letters were erroneously enclosed in one envelope. The letters included member numbers, names, addresses and group names for the subscribers and their dependents. No financial data, Social Security numbers, or information about your health was included. Because of this error, we are reviewing our processes and taking steps to make sure something like this does not happen again.

Protecting the confidentiality and privacy of our members is very important to us. While we have no reason to believe your information will be misused, we are taking a proactive approach and offering services to you, at no cost, to protect you against possible identity theft.

What information was involved?

The letters included member numbers, names, addresses and group names for the subscribers and their dependents. No financial data, Social Security numbers, or information about your health was included.

What we are doing.

Although we have no reason to believe your information has been misused, to help relieve concerns and restore confidence following this incident, Group Health has secured the services of Kroll to provide identity monitoring **at no cost to you for one year**. Kroll is a global leader in risk mitigation and response, and their team has extensive experience helping people who have sustained an unintentional exposure of confidential data. Your identity monitoring services include Credit Monitoring, Web Watcher, Identity Consultation, and Identity Restoration.

Visit krollbreach.idmonitoringservice.com to enroll and take advantage of your identity monitoring services.

Membership Number: <<Member ID>>

To receive credit services by mail instead of online, please call 1-844-263-8605. Additional information describing your services is included with this letter.

What you can do.

Please review the enclosed "Additional Resources" section included with this letter. This section describes additional steps you can take to help protect yourself, including recommendations by the Federal Trade Commission regarding identity theft protection and details on how to place a fraud alert or a security freeze on your credit file.

For more information.

If you have questions, please call 1-866-775-4209, Monday through Friday from 8:00 a.m. to 5:00 p.m. Central Time. Please have your membership number ready.

Protecting your information is important to us. We trust that the services we are offering to you demonstrate our continued commitment to your security and satisfaction.

Sincerely,

Kathleen Gilles
Group Health Privacy Officer

ADDITIONAL RESOURCES

Contact information for the three nationwide credit reporting agencies is:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2104, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19022, www.transunion.com, 1-800-888-4213

Free Credit Report. It is recommended that you remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring your credit report for unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting agencies.

To order your annual free credit report please visit **www.annualcreditreport.com** or call toll free at **1-877-322-8228**.

You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available from the U.S. Federal Trade Commission's ("FTC") website at www.consumer.ftc.gov) to:
Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348-5281.

For Colorado, Georgia, Maine, Maryland, Massachusetts, New Jersey, Puerto Rico, and Vermont residents:

You may obtain one or more (depending on the state) additional copies of your credit report, free of charge. You must contact each of the credit reporting agencies directly to obtain such additional report(s).

Fraud Alert. You may place a fraud alert in your file by calling one of the three nationwide credit reporting agencies above. A fraud alert tells creditors to follow certain procedures, including contacting you before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit.

Security Freeze. You have the ability to place a security freeze on your credit report.

A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you may be able to use an online process, an automated telephone line, or a written request to any of the three credit reporting agencies listed above. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. The credit reporting agencies may charge a fee to place a freeze, temporarily lift it or permanently remove it. The fee is waived if you are a victim of identity theft and have submitted a valid investigative or law enforcement report or complaint relating to the identity theft incident to the credit reporting agencies. (You must review your state's requirement(s) and/or credit bureau requirement(s) for the specific document(s) to be submitted.)

For Massachusetts residents: The fee for each placement of a freeze, temporary lift of a freeze, or removal of a freeze is \$5.

Federal Trade Commission and State Attorneys General Offices. If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your home state. You may also contact these agencies for information on how to prevent or avoid identity theft.

You may contact the **Federal Trade Commission**, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580, www.ftc.gov/bcp/edu/microsites/idtheft/, 1-877-IDTHEFT (438-4338).

For Maryland residents: You may contact the Maryland Office of the Attorney General, Consumer Protection Division, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us, 1-888-743-0023.

For North Carolina residents: You may contact the North Carolina Office of the Attorney General, Consumer Protection Division, 9001 Mail Service Center, Raleigh, NC 27699-9001, www.ncdoj.gov, 1-877-566-7226.

Reporting of identity theft and obtaining a police report.

For Iowa residents: You are advised to report any suspected identity theft to law enforcement or to the Iowa Attorney General.

For Massachusetts residents: You have the right to obtain a police report if you are a victim of identity theft.

For Oregon residents: You are advised to report any suspected identity theft to law enforcement, the Federal Trade Commission, and the Oregon Attorney General.



TAKE ADVANTAGE OF YOUR IDENTITY MONITORING SERVICES

You've been provided with access to the following services¹ from Kroll:

Credit Monitoring through TransUnion

You'll receive alerts when there are changes to your credit data—for instance, when a new line of credit is applied for in your name. If you do not recognize the activity, you'll have the option to call a Kroll investigator, who can help you determine if it's an indicator of identity theft.

Web Watcher

Web Watcher monitors internet sites where criminals buy, sell, and trade personal information. You'll be promptly notified if evidence of your identity information being traded or sold is discovered.

Identity Consultation

You have unlimited access to consultation with a dedicated licensed investigator at Kroll. Support includes showing you the most effective ways to protect your identity, explaining your rights and protections under the law, assistance with fraud alerts, and interpreting how personal information is accessed and used, including investigating suspicious activity that could be tied to an identity theft event.

Identity Restoration

If you become a victim of identity theft, an experienced licensed investigator will work on your behalf to resolve related issues. You will have access to a dedicated investigator who understands your issues and will do most of the work for you. Your investigator can dig deep to uncover all aspects of the identity theft, and then work to resolve it.

¹ Kroll's activation website is only compatible with the current version or one version earlier of Internet Explorer, Chrome, Firefox, and Safari.

To receive credit services, you must be over the age of 18 and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file.