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August 31, 2016

**VIA EMAIL (SECURITYBREACH@ATG.WA.GOV)
AND OVERNIGHT MAIL**

Attorney General Bob Ferguson
Office of the Washington Attorney General
Consumer Protection Division
800 5th Ave, Suite 2000
Seattle, WA 98104-318

Re: Incident Notification

Dear Attorney General Ferguson:

On July 22, 2016, R-C Healthcare Management (RCHM), a vendor working on behalf of our client, CHI Franciscan Healthcare Highline Medical Center (“Highline”), advised Highline that files containing patient information had inadvertently been left accessible via the internet by RCHM from April 21, 2016 to June 13, 2016. Upon notification, Highline immediately began an investigation and determined that the files may have contained patients’ names, dates of service, health insurance information and Social Security numbers.

Highline is offering affected patients a free one-year membership in credit monitoring and identity theft protection services through Experian. Highline has also established a dedicated call center for patients to contact with questions. RCHM assured Highline that it has secured the files as of June 13, 2016. Highline has also requested RCHM to destroy the files and RCHM has confirmed it has done so.

On August 31, 2016, Highline is mailing notification to 12,724 residents pursuant to the requirements of the Health Insurance Portability and Accountability Act (“HIPAA”), 45 C.F.R. §§ 164.400-414 in substantially the same form as the documents enclosed herewith.

Please do not hesitate to contact me if you have any questions regarding this matter.

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

Attorney General Bob Ferguson
August 31, 2016
Page 2

Sincerely,

A handwritten signature in black ink that reads "Lynn Sessions". The signature is written in a cursive style with a large initial "L" and a long, sweeping underline.

Lynn Sessions

Enclosures



Our best care. Your best health.™

Return Mail Processing Center
PO Box 6336
Portland, OR 97228-6336

<<mail id>>
<<First Name>> <<Last Name>>
<<Address>>
<<City>><<State>><<Zip>>

<<Date>>

Dear <First Name> <Last Name>>:

CHI Franciscan Health Highline Medical Center (“Highline”) is committed to protecting the privacy and security of our patients’ health information. Regrettably, we are writing to inform you of an incident involving some of that information.

On July 22, 2016, R-C Healthcare Management, a vendor working on behalf of Highline Medical Center advised Highline that files containing patient information had inadvertently been left accessible via the internet by R-C Healthcare, from April 21, 2016 to June 13, 2016. R-C Healthcare performed services for Highline Medical Center prior to CHI’s acquisition of Highline Medical Center in 2014. The data involved was used in cost reporting functions from years 1993-1994 and 2008 – 2013.

Upon notification, we immediately began an investigation and determined that the files may have contained your name, dates of service, health insurance information, and social security number. R-C Healthcare assured us that it has secured the files as of June 13, 2016. Your medical record information was not included and your care will not be affected. Upon validation of the completion of services, we will instruct R-C Healthcare to destroy the files.

We have no knowledge that the information has been accessed, viewed, acquired or otherwise compromised by any unauthorized third party. However, out of an abundance of caution, we are offering you a free one-year credit monitoring membership from Experian’s® ProtectMyID® Alert. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. Experian’s® ProtectMyID® Alert is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and Experian’s® ProtectMyID® Alert, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter. We also recommend that you review the explanation of benefits statements you receive from your health insurer. If you see services that you did not receive, we recommend that you contact your insurer immediately.

We deeply regret any concern this may cause you. Highline takes its responsibility to protect patient privacy very seriously and has taken immediate responsive action. Highline works to continually improve its policies, processes and educational offerings to ensure our patients receive the benefit of proven information security and confidentiality practices.

To answer questions regarding this event, we are establishing a call center. If you have any questions or concerns regarding this matter, please do not hesitate to contact the call center at 1-888-839-9526, Monday through Friday, between the hours of 6:00 a.m. and 6:00 p.m. Pacific time.

Sincerely,

Judi Hofman, BCRT, CHPS, CAP, CHP, CHSS
CHI Franciscan Regional Privacy Officer, Northwest

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE That You Enroll By: <<DATE>> (Your code will not work after this date.)
2. VISIT the ProtectMyID Web Site to enroll: www.protectmyid.com/redeem
3. PROVIDE Your Activation Code: <<code>>

If you have questions or need an alternative to enrolling online, please call 877-288-8057 and provide engagement #: <<number>>

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH PROTECTMYID MEMBERSHIP:

A credit card is not required for enrollment.

Once your ProtectMyID membership is activated, you will receive the following features:

- **Free copy of your Experian credit report**
- **Surveillance Alerts for:**
 - **Daily Bureau Credit Monitoring:** Alerts of key changes & suspicious activity found on your Experian, Equifax® and TransUnion® credit reports.
- **Identity Theft Resolution & ProtectMyID ExtendCARE:** Toll-free access to US-based customer care and a dedicated Identify Theft Resolution agent who will walk you through the process of fraud resolution from start to finish for seamless service. They will investigate each incident; help with contacting credit grantors to dispute charges and close accounts including credit, debit and medical insurance cards; assist with freezing credit files; contact government agencies.
 - It is recognized that identity theft can happen months and even years after a data breach. To offer added protection, you will receive ExtendCARE™, which provides you with the same high-level of Fraud Resolution support even after your ProtectMyID membership has expired.
- **\$1 Million Identity Theft Insurance*:** Immediately covers certain costs including, lost wages, private investigator fees, and unauthorized electronic fund transfers.

Activate your membership today at www.protectmyid.com/redeem or call 877-288-8057 to register with the activation code above.

Once your enrollment in ProtectMyID is complete, you should carefully review your credit report for inaccurate or suspicious items. If you have any questions about ProtectMyID, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-288-8057.

Even if you choose not to take advantage of this free credit monitoring service, we recommend that you remain vigilant to the possibility of fraud and identity theft by reviewing your credit card, bank, and other financial statements for any unauthorized activity. You may also obtain a copy of your credit report, free of charge, directly from each of the three nationwide credit reporting agencies. To order your credit report, free of charge, once every twelve months, please visit www.annualcreditreport.com or call toll-free at 1-877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

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

Experian
PO Box 2002
Allen, TX 75013
www.experian.com
1-888-397-3742

TransUnion
PO Box 2000
Chester, PA 19016
www.transunion.com
1-800-916-8800

If you believe that you are the victim of identity theft or have reason to believe that your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Office of the Attorney General in your home state. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
www.ftc.gov/idtheft
1-877-438-4338

You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records.

*Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of AIG. The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.