

## ATG MI ADM Security Breach

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**From:** JeanD@klinegalland.org  
**Sent:** Monday, May 02, 2016 8:06 PM  
**To:** ATG MI ADM Security Breach  
**Cc:** JeanD@klinegalland.org  
**Subject:** Breach Notification per RCW 19.255.010  
**Attachments:** Scanned image from MX-M623N; Scanned image from MX-M623N

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 5/2/2016 by covered entity The Caroline Kline Galland Home dba Kline Galland Home Care Services to the US Department of Health and Human Services under Breach Tracking Number P3NZ7WDGH6 concerning the breach of protected health information in paper record form, concerning 4 individuals, occurring by theft from a motor vehicle and discovered 4/5/2016.
2. Copy of the de-identified written notice given on behalf of the covered entity by the undersigned to the 4 individuals affected and their families.

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](mailto:jeand@klinegalland.org)

D (206) 456-9881 x193

C (206) 450-7385



[www.klinegalland.org](http://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.

## ATG MI ADM Security Breach

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**From:** fd-sharp@klinegalland.org on behalf of klinegalland.org fd-sharp@klinegalland.org  
**Sent:** Monday, May 02, 2016 7:52 PM  
**To:** JeanD@klinegalland.org  
**Subject:** Scanned image from MX-M623N  
**Attachments:** fd-sharp@klinegalland.org\_20160502\_195254.pdf

Reply to: [fd-sharp@klinegalland.org](mailto:fd-sharp@klinegalland.org) <[fd-sharp@klinegalland.org](mailto:fd-sharp@klinegalland.org)> Device Name: Not Set Device Model: MX-M623N

Location: Not Set

File Format: PDF MMR(G4)  
Resolution: 300dpi x 300dpi

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems Incorporated to view the document.

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**U.S. Department of Health and Human Services  
Office for Civil Rights**

**Breach Portal: Notice to the Secretary of HHS Breach of Unsecured Protected Health Information**



## Breach Form Confirmation

Breach Tracking Number: **P3NZ7WDGH6**

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.

[Show Details or Print](#)



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- \* 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 Home Care Services
- \* Type of Covered Entity: Healthcare Provider
- \* Street Address Line 1: 7500 Seward Park Avenue S.
- Street Address Line 2:
- \* City: Seattle
- \* State: Washington
- \* ZIP: 98118

**Covered Entity Point of Contact Information**

- \* First Name: Jean \* Last Name: DeFond
  - \* Email: jeand@klinegalland.org
  - \* Phone Number: (Include area code):
- | Phone Number        | Usage |
|---------------------|-------|
| (206) 456-9881 x193 | Work  |

- \* Breach Start Date: 04/04/2016 \* Breach End Date: 04/05/2016
- \* Discovery Start Date: 04/05/2016 \* Discovery End Date: 04/05/2016
- \* Approximate Number of Individuals Affected by the Breach: 4

- \* Type of Breach: Theft

- \* Location of Breach: \* Paper/Films

- \* Type of Protected Health Information Involved in Breach: \* Clinical
  - \* Clinical
    - \* Diagnosis/Conditions
    - \* Other Treatment Information

- \* Brief Description of the Breach: Paper records (containing PHI for 4 home care clients) were stolen from a home care worker's vehicle, where the rear driver's side window was broken and items were removed from the vehicle, including the home care worker's work bag, which was located in the trunk. Also taken was a laptop computer containing PHI, but which we have determined was fully encrypted and did NOT contain the encryption key. PHI taken: 5 paper records regarding a total of 4 clients, as follows: Client 1: one 6-month client assessment and one client fall incident report; Client 2: one client assessment; Client 3: one client assessment reflecting changes in the client's home care schedule and rates; and Client 4: one client plan of 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: 04/07/2016 Individual Notice Provided Projected/Expected End Date: 04/14/2016
- 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)
- Took steps to mitigate harm
- Trained or retrained workforce members

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(j) 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: 05/02/2016

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Honor Thy Father & Mother

April 14, 2016

[Addressee]

*Re: Breach of Protected Health Information*

Dear [Addressee]:

As we informed you previously, Kline Galland Community Based Services has discovered a potential breach of [Addressee's] protected health information. We became aware of this breach on April 5, 2016, when one of our employees reported the theft of her briefcase in a "smash and grab" incident from her automobile. That theft has been reported to the Renton, Washington Police Department.

We believe that a copy of the enclosed document ("document") containing [Addressee's] name and certain information about [Addressee] was in our employee's briefcase when it was taken.

Thankfully, the document taken which contained [Addressee's] name did NOT include [Addressee's] date of birth, social security number, address, or financial information. Nevertheless, in order to assist [Addressee], Kline Galland will provide at no cost to your family a one year Premier AAA membership, featuring AAA's "Identity Theft Restoration Program." The benefits of this AAA Premier Membership and its Identity Theft Restoration Program are outlined in the enclosed brochure. To take advantage of this offer, simply call me (206-456-9881 ext 193), or email me at [jeand@klinegalland.org](mailto:jeand@klinegalland.org) and I will see that you are enrolled for one year at no cost to you.

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

P (206) 725-8800  
F (206) 722-5210  
[www.klinegalland.org](http://www.klinegalland.org)

**Board Chair**  
Allan Steinman

**Chief Executive Officer**  
Jeffrey D. Cohen

**Foundation President**  
Joshua H. Gortler

**Chief Operating Officer/  
Kline Galland Home  
Administrator**  
Min An

**Chief Financial Officer**  
Tracey Groscoast

**Chief of  
Human Resources**  
Shelly Ryan

*Your Single-Source  
Senior Care Resource*

Kline Galland Home  
The Summit at First Hill  
Home Care  
Home Health  
Hospice  
Palliative Care  
Polack Adult Day Center  
Rehab/TCU  
Kosher Meals-on-Wheels  
Kline Galland Foundation

[Addressee]  
April 14, 2016  
Page 2

In the meantime, we will continue to work with the Police Department to investigate this theft, detect the culprit, and regain [Addressee's] protected health information. To protect against such breaches in the future, Kline Galland has and will continue to work with our staff to ensure the safety of all documents in our care containing protected health information.

We sincerely apologize for any concern this situation may cause you. We are committed to keeping our client's protected health information safe, and assure you that we are doing everything possible to regain your and your mother's trust in our practices. Please do not hesitate to contact me with any questions you may have about this incident, or to enroll in the AAA program we are offering.

Very truly yours,

Jean M. DeFond

Chief Compliance Officer and Counsel

enclosures

# Details of AAA Identity Theft Restoration Program

**Kline Galland will enroll you as a Premier AAA Member, with a number of valuable benefits including AAA's Identity Theft Restoration Program, without cost to you.**

**To enroll, please call Jean DeFond at Kline Galland, 206-456-9881, ext 193, or email her at [jeand@klinegalland.org](mailto:jeand@klinegalland.org)**

Any of the nearly nine million Americans a year who have had their personal information stolen can tell you what an expensive and time-consuming process it is to achieve full restoration of "a good name." From dealing with consumer reporting agencies to any number of governmental agencies, it can take anywhere from 100 to 1,200 hours to resolve the issues created by identity theft.

The AAA Identity Theft Restoration Program is a comprehensive restoration service that helps victims of this intrusive crime get their lives back to normal. It uses licensed investigators with thousands of hours of experience to *act on the victim's behalf*, not just as a "counselor," to rectify the issue.

For victims, this program will:

- Confirm fraud and identify its starting point or source
- Investigate known, unknown and potentially complicated trails of fraudulent activity
- Explain the victim's rights
- Make phone calls on the victim's behalf
- Issue fraud alerts, and victim's statements when warranted, with the three consumer credit reporting agencies (Experian, Equifax and TransUnion), Social Security Administration, Federal Trade Commission and U.S. Postal Service
- Prepare appropriate, effective documentation -- from dispute letters to defensible complaints
- Contact, follow up and escalate issues with affected agencies and institutions, such as banks and credit unions; check clearinghouses; credit card companies; landlords, property managers and mortgage companies; billing services and collection agencies; and car dealerships

In addition, it should be noted that identity fraud is not limited to credit-related schemes. This is why investigators also search for outlying activity in non-credit components.

Investigators will extend their search to include:

- Criminal data at federal and state levels
- State Department of Motor Vehicles records
- Public records, where fraud-driven liens or bankruptcies could surface
- Social Security tracking, for fraudulent addresses or status entries
- Online research sites known mainly to the investigative community
- Banking and postal records
- Certain “watch lists” familiar to the security industry
- Other sources of fraud indicators

While the licensed investigators in this program do most of the work for the victims, they can also provide expert consultative advice for those situations that don’t require restoration services. These services may be provided before (or after) an identity theft occurs.

#### Consultation services may include:

- What to do upon receiving a security breach letter indicating personal information has been compromised
- Best practices and assistance regarding e-mail/phishing and pharming
- Best practices regarding common schemes and scams
- Best practices for shopping and communicating online
- Best practices for the use of Social Security/Social Insurance Numbers and Personal Identifying Information
- Best practices for financial transactions
- Best practices for consumer privacy
- Providing the knowledge for best protection from identity theft using the rights under federal and state law
- Tactics on how to best safeguard a minor child’s identity
- Best practices on how to effectively shield a recently deceased family member or friend from identity theft
- Assistance in the event of a lost or stolen wallet
- Consumer rights against collection agency abuse
- Help with interpreting and analyzing credit reports
- Help regarding a public record inquiry or background search
- Fraud alert assistance
- Credit freeze assistance

- Best practices and assistance regarding e-mail/phishing and pharming
- Best practices regarding common schemes and scams
- Education on criminal and medical identity theft

**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](http://www.fraudalerts.equifax.com). General: (800) 685-1111, [www.equifax.com](http://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](http://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](http://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.

**4. Accessing No-Cost Credit Monitoring Services:**

To assist you, Kline Galland has arranged to make credit monitoring services available to you at no cost for a period of one year. To access this no-cost service, please contact: Jean DeFond at 206-456-9881 ext. 193, or at [jeand@klinegalland.org](mailto:jeand@klinegalland.org).