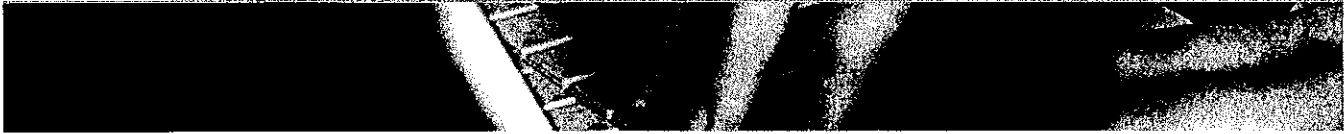


**U.S. Department of Health and Human Services  
Office for Civil Rights**

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



**Please Note: The Breach Notification Portal will be offline for maintenance from Thu Oct 25 09:00 PM EDT to Fri Oct 26 06:00 AM EDT. Any information being entered when the Portal is taken off-line will be lost.**

**Breach Form Confirmation**

Breach Tracking Number: **HNSWR56DR9**

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](#)



\* 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

\* Type of Covered Entity: Healthcare Provider

\* Street Address Line 1: 5950 6th Avenue S., Suite 100

Street Address Line 2:

\* City: Seattle

\* State: Washington

\* ZIP: 98108

### Covered Entity Point of Contact Information

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

\* Email: jeand@klinegalland.org

\* Phone Contact Phones

Number: **Phone Number Usage**

(Include area code): (206) 456-9881 x193 Work

\* Breach Start Date: 01/01/2015 \* Breach End Date: 09/20/2018

\* Discovery Start Date: 09/20/2018 \* Discovery End Date: 09/20/2018

\* Approximate Number of Individuals Affected by the Breach: 203

\* Type of Breach: Unauthorized Access/Disclosure

\* Location of Breach: • Paper/Films

\* Type of Protected Health Information Involved in Breach: • **Demographic**  
• **Financial**

\* Demographic

• Address/ZIP

\* Financial

• Other Financial Information

\* Brief Description of the Breach:

Client lists and other records containing patient PHI and a small number of employment applicant records were improperly removed from Kline Galland Home Care offices during sometime in 2015 or thereafter by its Home Care Manager, and apparently stored by her at her home in SE, Renton, WA, in a plastic bag, in violation of Kline Galland policies. During the week of September 17, 2018, a relative of the Manager's performed certain housekeeping tasks at this address and discarded the plastic bag containing these Kline Galland records. The bag was disposed of by her in or near a trash dumpster at a local day care facility located approximately 2 blocks from the Manager's home. The day care facility found the plastic bag, examining it generally, and notified Kline Galland of its discovery. Kline Galland immediately retrieved all of the materials, and confirmed that no employee of the day care facility had viewed the items in detail, nor made any copies or utilized any of the information which the records contained. Kline Galland interviewed the Home Care Manager to determine that the materials had been in her home undisturbed from the time they were originally removed from Kline Galland's offices at 5950 6th Ave. S., Seattle, WA 98108, until disposed of at the day care facility in Renton, WA. Kline Galland also interviewed the relative who removed/discarded the materials, to verify the details of their removal. On October 2, 2018, Kline Galland accepted the resignation of this Home Care Manager in connection with the incident.

\* 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:

10/25/2018

Individual Notice

Provided

Projected/Expected End Date: 11/19/2018

Date:

Was Substitute Notice Required?

No

Was Media Notice Required?

No

- Provided individuals with free credit monitoring

- \* Actions Taken in Response to Breach:
- 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(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, JD; CIPP/US; CHC Date: 10/25/2018

Breach Tracking Number: **HNSWR56DR9**

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

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- Address/ZIP

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- Security Rule Technical Safeguards (Access Controls, Transmission Security, etc.)

* Individual Notice Provided Start Date:	10/25/2018	Individual Notice Provided Projected/Expected End Date:	11/19/2018
Was Substitute Notice Required?	No		
Was Media Notice Required?	No		

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* Actions Taken in Response to Breach:	<ul style="list-style-type: none"> <li>• Provided individuals with free credit monitoring</li> <li>• Sanctioned workforce members involved (including termination)</li> <li>• Took steps to mitigate harm</li> <li>• Trained or retrained workforce members</li> </ul>
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I attest, to the best of my knowledge, that the above information is accurate.

\* Name: Jean M. DeFond, JD; CIPP/US; CHC Date: 10/25/2018



[Addressee Name]

[Address]

*Re: Notice Regarding Breach of RCW 19.255.010 Disclosure of Personal Information*

Dear [Name]:

Kline Galland Community Based Services has recently discovered a breach of personal information pursuant to RCW 19.255.010. A copy of an employment application disclosing your name and social security number was improperly removed from our offices and disposed of. We are required to notify you of this breach.

Fortunately, we have recovered all of the paper records lost during this incident, and do not believe that any of them were accessed or used by anyone while they were missing from our office.

Although we do not believe the records were accessed or used improperly, Kline Galland would nevertheless like to offer you at no cost a one year Premier AAA membership, featuring AAA's "Identity Theft Restoration Program." The benefits of this AAA Premier Membership's Identity Theft Restoration Program are outlined in the enclosed brochure. If you would like to take advantage of this offer, please call me (206-456-9881 ext 193), or email me at [jeand@klinegalland.org](mailto:jeand@klinegalland.org) and I will take care of the enrollment at no cost to you.

Very truly yours,

Jean M. DeFond, JD, CIPP/US

Chief Compliance Officer and Counsel

# AAA Identity Theft Restoration Program

**Introducing what is perhaps the most valuable piece of protection you need today – complimentary with your AAA Premier membership.**

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