



MULLEN
COUGHLIN^{LLC}
ATTORNEYS AT LAW

RECEIVED

MAR 12 2019

CONSUMER PROTECTION

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Wayne, PA 19087

March 8, 2019

VIA U.S. MAIL

Attorney General Gordon J. MacDonald
Office of the New Hampshire Attorney General
Attn: Security Breach Notification
33 Capitol Street
Concord, NH 03301

Re: Notice of Data Event

Dear Attorney General MacDonald:

We represent the American Association of Nurse Anesthetists (“AANA”), 222 South Prospect Avenue, Park Ridge, IL 60068, and are writing to notify your office of an incident that may affect the security of personal information relating to two (2) New Hampshire residents. The investigation into this event is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, AANA does not waive any rights or defenses regarding the applicability of New Hampshire law or personal jurisdiction.

Nature of the Data Event

On January 10, 2019, AANA determined there had been unauthorized access to three AANA employee email accounts. AANA first identified suspicious activity within certain employee email accounts on December 18, 2018, and immediately launched an investigation, with the support of third-party forensic experts, into the nature and scope of the incident, the information that may have been improperly accessed, and the identities of the impacted individuals. AANA also took steps to secure the email accounts. On or around February 6, 2019, AANA confirmed the identities of the individuals who may have had information affected by this incident.

The personal information impacted by this event may include the following: name, address, Social Security number, date of birth, and limited medical information, including: medical record number, diagnosis/treatment information, billing/claim number, health insurance number. A small number of individuals may also have had username and password, PIN, credit card number, CVV, passport and/or driver’s license information and bank account information impacted. To date, AANA has not received any reports of the misuse of this information.

Notice to New Hampshire Residents

On March 8, 2019, AANA began providing written notice of this incident to affected individuals, which includes two (2) New Hampshire residents. Written notice was provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken


Upon discovering the potential unauthorized access to the email accounts, AANA moved quickly to identify those that may be affected, put in place resources to assist them, and provide them with notice of this incident. AANA is also working to implement additional safeguards to protect the security of information in its system.

AANA is providing written notice to those individuals who may be affected by this incident. This notice includes an offer of complimentary access to 1 year of credit and identity monitoring services, including identity restoration services through Experian, and the contact information for a dedicated call center for potentially affected individuals to contact with questions or concerns regarding this incident. Additionally, AANA is providing potentially impacted individuals with guidance on how to better protect against identity theft and fraud, including information on how to place a fraud alert and security freeze on one's credit file, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud. AANA is also providing written notice of this incident to other state regulators, as necessary.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4774.

Very truly yours,

A handwritten signature in black ink, appearing to be 'JC' with a horizontal line extending to the right.

Jennifer Coughlin of
MULLEN COUGHLIN LLC

JAC:plm
Enclosure

EXHIBIT A



[Return address]

<<Name 1>>

<<Name 2>>

<<Address 1>>

<<Address 2>>

<<Address 3>>

<<Address 4>>

<<Address 5>>

<<City>><<State>><<Zip>>

<<Date>>

<<Country>>

Re: Notice of Data Breach

Dear <<Name 1>>:

The American Association of Nurse Anesthetists (“AANA”) is writing to inform you of a recent event that may impact the privacy of some of your personal information. While we are unaware of any attempted or actual misuse of your information, we are providing you with information about the event, our response, and steps you may take to better protect against the possibility of identity theft and fraud, should you feel it is necessary to do so.

What Happened? On January 10, 2019, AANA determined there had been unauthorized access to three AANA employee email accounts. AANA first identified suspicious activity within certain employee email accounts on December 18, 2018, and immediately launched an investigation, with the support of third-party forensic experts, into the nature and scope of the incident, the information that may have been improperly accessed, and the identities of the impacted individuals. AANA also took steps to secure the email accounts. On or around February 6, 2019, AANA confirmed the identities of the individuals who may have had information affected by this incident.

What Information Was Involved? On February 6, 2019, we determined an email message containing the following types of information relating to you was accessible to the unknown actor during this incident: <<insert variable field>>. To date, we have not received any reports of the misuse of your information.

What We Are Doing. Upon learning of this incident, we immediately secured the affected email accounts. As part of our ongoing commitment to the privacy of personal information in our care, we are working to review our existing policies and procedures and to implement additional safeguards to further secure the information in our systems to ensure the high priority we place on maintaining the privacy and security of information in our care is met. We also notified state regulators, as required. While we are unaware of any information misuse as a result of this incident, we are offering you access to complimentary credit monitoring and identity restoration services for 1 year through Experian.

What You Can Do. You can find out more about how to protect against potential identity theft and fraud in the enclosed *Steps You Can Take to Prevent Fraud and Identity Theft*. We encourage you to remain vigilant against incidents of identity theft by reviewing your account statements regularly and keep a close eye on your credit card activity. Under U.S. law, you are entitled to one free credit report annually from each of the three major credit bureaus. To order a free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of their credit report.

For More Information. We understand that you may have questions about this incident that are not addressed in this letter. If you have additional questions, please call our dedicated assistance line at (877) 218-2930, Monday through Friday, during the hours of 6:00 a.m. to 4:00 p.m. PST. You may also write to the American Association of Nurse Anesthetists at 222 South Prospect Avenue, Park Ridge, IL 60068.

We sincerely regret any inconvenience or concern this incident has caused.

Sincerely,

A handwritten signature in black ink that reads "Randall D. Moore". The signature is written in a cursive style with a large, stylized initial "R" and "M".

Randall D. Moore, DNP, MBA, CRNA
Chief Executive Officer
American Association of Nurse Anesthetists

STEPS YOU CAN TAKE TO BETTER PROTECT YOUR INFORMATION

DETAILS REGARDING YOUR 1YEAR EXPERIAN IDENTITYWORKS MEMBERSHIP

If you believe there was fraudulent use of your information as a result of this incident and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent. If, after discussing your situation with an agent, it is determined that identity restoration support is needed then an Experian Identity Restoration agent is available to work with you to investigate and resolve each incident of fraud that occurred from the date of the incident (including, as appropriate, helping you with contacting credit grantors to dispute charges and close accounts; assisting you in placing a freeze on your credit file with the three major credit bureaus; and assisting you with contacting government agencies to help restore your identity to its proper condition).

Please note that this offer is available to you for 1 year from the date of this letter and does not require any action on your part at this time.

The Terms and Conditions for this offer are located at www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

While Identity Restoration assistance is immediately available to you, we also encourage you to activate the fraud detection tools available through Experian IdentityWorksSM as a complimentary 1 year membership. This product provides you with superior identity detection and resolution of identity theft. To start monitoring your personal information please follow the steps below:

Ensure that you enroll by: March 31, 2019 (Your code will not work after this date.)

Visit the Experian IdentityWorks website to enroll: www.experianidworks.com/3bcredit

Provide your activation code: Refer to code on the top right-hand corner above

If you have questions about the product, need assistance with identity restoration that arose as a result of this incident or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332 by March 31, 2019. Be prepared to provide engagement number [REDACTED] as proof of eligibility for the identity restoration services by Experian.

A credit card is not required for enrollment in Experian IdentityWorks.

You can contact Experian immediately regarding any fraud issues, and have access to the following features once you enroll in Experian IdentityWorks:

Experian credit report at signup: See what information is associated with your credit file. Daily credit reports are available for online members only.*

Credit Monitoring: Actively monitors Experian, Equifax and Transunion files for indicators of fraud.

Identity Restoration: Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.

Experian IdentityWorks ExtendCARETM: You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.

\$1 Million Identity Theft Insurance^{}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

* Offline members will be eligible to call for additional reports quarterly after enrolling

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (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

ADDITIONAL STEPS YOU CAN TAKE TO BETTER PROTECT YOUR INFORMATION

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian PO Box 9554 Allen, TX 75013 1-888-397-3742 www.experian.com/freeze/center.html	TransUnion P.O. Box 2000 Chester, PA 19016 1-888-909-8872 www.transunion.com/credit-freeze	Equifax PO Box 105788 Atlanta, GA 30348-5788 1-800-685-1111 www.equifax.com/personal/credit-report-services
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In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
2. Social Security number;
3. Date of birth;
4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years;
5. Proof of current address, such as a current utility bill or telephone bill;
6. A legible photocopy of a government-issued identification card (state driver’s license or ID card, military identification, etc.);
7. If you are a victim of identity theft, include a copy of either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian P.O. Box 2002 Allen, TX 75013 1-888-397-3742 www.experian.com/fraud/center.html	TransUnion P.O. Box 2000 Chester, PA 19106 1-800-680-7289 www.transunion.com/fraud-victim-resource/place-fraud-alert	Equifax P.O. Box 105069 Atlanta, GA 30348 1-888-766-0008 www.equifax.com/personal/credit-report-services
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Although we have no reason to believe that your personal information has been used to file fraudulent tax returns, you can contact the IRS at www.irs.gov/Individuals/Identity-Protection for helpful information and guidance on steps you can take

to address a fraudulent tax return filed in your name and what to do if you become the victim of such fraud. You can also visit www.irs.gov/uac/Taxpayer-Guide-to-Identity-Theft for more information.

To monitor for actual or attempted misuse of Social Security benefits, you can create an account at <https://www.socialsecurity.gov/myaccount>. If you see an error or attempted misuse of social security benefits, you can go to your local Social Security Office for assistance. Local offices can be found using the following office locator - <https://secure.ssa.gov/ICON/main.jsp>.

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself, by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General.

The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.

For North Carolina residents, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-877-566-7226 or 1-919-716-6400, www.ncdoj.gov.

For Maryland residents, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us.