

[REDACTED]

Anthem Blue Cross and Blue Shield
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Manchester, NH 03101-1505
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February 18, 2015

Attorney General Joseph A. Foster
33 Capitol Street
Concord, NH 03301

RE: Anthem Blue Cross and Blue Shield Data Breach

Dear General Foster:

On January 29, 2015, Anthem Blue Cross and Blue Shield (Anthem) learned that it had been the victim of a sophisticated cybersecurity attack. Anthem acted quickly to investigate the attack as soon as it was detected and promptly notified law enforcement, regulators, customers, members and the public. Anthem continues to cooperate with federal law enforcement in their ongoing investigation.

A number of state Attorneys General have inquired into the Anthem cybersecurity attack, including the Connecticut Attorney General. In response to those inquiries, Jill Rubin Hummel, President of Anthem Blue Cross Blue Shield in Connecticut, responded by affirming Anthem's commitment to protecting its members, outlining the steps taken by Anthem and the remedies it intends to provide to those affected. This letter, along with President Hummel's February 11, 2015 letter (attached) will serve as notice pursuant to RSA 359-C:20. In addition to this letter, Anthem Blue Cross and Blue Shield in New Hampshire has provided notice to the New Hampshire Department of Insurance concerning this matter. Most importantly, within the next few weeks, Anthem will begin sending letters to the affected members, past and present, notifying them of the cybersecurity attack and informing them of the services Anthem intends to provide to them at no cost.

Should you have any questions regarding this matter, please feel free to contact me.

Sincerely,

[REDACTED]

MB/pcs
Encl

Anthem Blue Cross and Blue Shield is the trade name of Anthem Health Plans of New Hampshire, Inc. HMO plans are administered by Anthem Health Plans of New Hampshire, Inc. and underwritten by Matthew Thornton Health Plan, Inc. Independent licensees of the Blue Cross and Blue Shield Association. ANTHEM is a registered trademark of Anthem Insurance Companies, Inc. The Blue Cross and Blue Shield names and symbols are registered marks of the Blue Cross and Blue Shield Association.



February 11, 2015

Matthew Fitzsimmons
Assistant Attorney General
Office of the Connecticut Attorney General
110 Sherman Street
Hartford, CT 06105

Kurt Swan
Insurance Program Manager
Director, Market Conduct Division
Connecticut Insurance Department
153 Market Street
Hartford, CT 06103

Re: Anthem Data Security Investigation

Dear Mr. Fitzsimmons and Mr. Swan:

I write to provide a response to Attorney General Jepsen's February 5 and February 9 letters regarding the recent cybersecurity attack on Anthem, and to provide further information to the questions that have been discussed with the Department of Insurance. Attorney General Jepsen's February 9 letter indicates that it was sent on behalf of the Attorneys General of nine other states; we therefore are sending a copy of this response with your colleagues in those states.

Anthem shares your offices' concerns about this attack, and we are committed to protecting our members' personal information from misuse. To that end, Anthem acted quickly in investigating this attack as soon as our team detected a potential issue, and promptly notified law enforcement, regulators, our customers and members, and the public about the attack and our investigation. We also have been cooperating with federal law enforcement in their ongoing investigation of this attack.

Anthem acted quickly in sharing information about its notification plan, and the protections it is providing for members. Anthem put a notice of the cybersecurity attack on our home page, at www.anthem.com. We also established a dedicated page, www.anthemfacts.com, which explains Anthem's remediation of the attack and describes the types of information that Anthem's investigation to date indicates were subject to the attack. On our website and in our news releases, Anthem has been clear that we plan to individually notify consumers whose information may have been accessed in this attack.

Anthem has also stated, from the time of our initial announcement, that regardless of whether it is required by law, we will provide credit monitoring and identity protection services free of charge to impacted members. Most companies that provide such identity protection services in the wake of a cybersecurity event do so for one year. Anthem has decided to exceed this standard by offering identity protection along with credit monitoring and repair services to all impacted members for two years.

Our priority in making our initial announcement was to share timely, accurate information about the attack and to assure our customers that we are putting protections in place. Anthem announced a dedicated toll-free number that members can call with any questions or concerns. We also provided timely and relevant tools to help customers protect themselves; for example, we have cautioned customers to be alert for email “phishing” scams that often follow cybersecurity incidents. Anthem has been communicating information quickly, because we want to be transparent with our customers and members, because we want them to understand the services Anthem will provide, and because we want to help them be on alert for any suspicious activity. And, as we explained from the beginning, Anthem will provide identity repair assistance, credit and identity theft monitoring, and other services to consumers whose data was impacted in this attack.

Today, Anthem will announce further details on the services we are providing, and will announce that consumers may sign up for two years of identity protection and credit monitoring services, beginning this Friday. The company has contracted with an experienced, well-respected vendor to provide a comprehensive package to affected consumers that includes:

1. Identity repair services. An individual who suspects identity theft can call to receive remediation services to help restore the compromised accounts and the individual’s identity. Importantly, this service is retrospective in nature in that individuals are not required to sign up or register in advance to obtain the benefit of these services; an affected individual may access these services when needed.
2. Credit monitoring. Individuals who register for this service will be enrolled to receive credit monitoring alerts from a national credit bureau.
3. Special protection for minors. The protections will include an identity theft product for minors that searches database for accounts tied to a minor’s social security number at the three national credit bureaus, in national public records databases and in national utilities databases. If a minor’s social security number is determined to have a credit record on file, our vendor will work to remove the credit history from the record and the minor’s identity information will be placed in a high risk database with TransUnion. This will place a credit block on the minor’s social security number until they are 17 years of age.
4. Identity theft insurance. For individuals who enroll, the company has arranged for \$1,000,000 in identity theft insurance, where allowed by law.

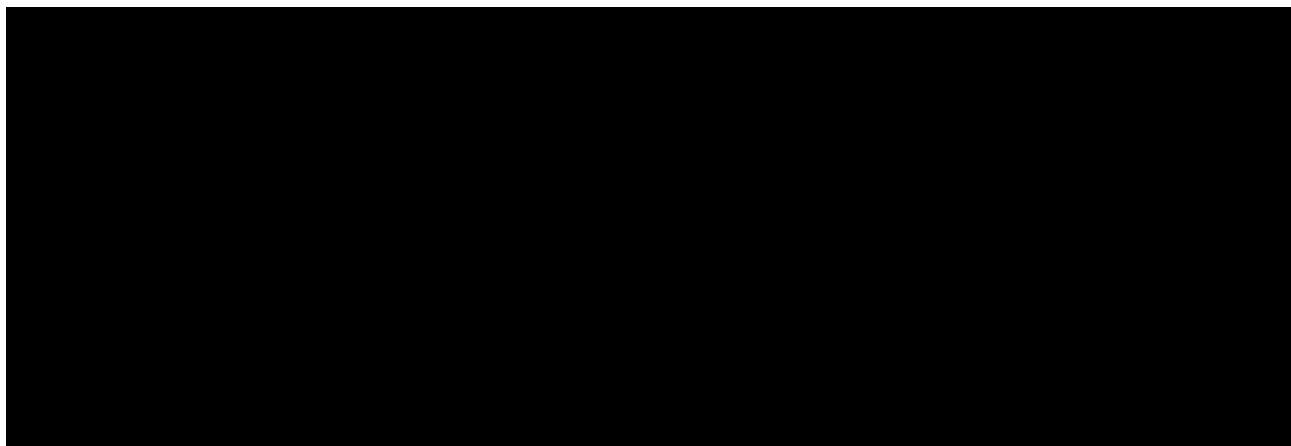
5. Identity theft monitoring/fraud detection. For members who enroll, data such as credit card numbers, social security numbers and emails will be scanned against aggregated data sources maintained by top security researchers that contain stolen and compromised individual data, in order to look for any indication that the members' data has been compromised.

6. Phone Alerts. Individuals who register for this service and provide their contact information will receive an alert when there is a notification from a credit bureau, or when it appears from identity theft monitoring activities that the individual's identity may be compromised.

The identity theft protections provided by these services will apply to protect members from the day of the potential exposure of their information. Information on how to enroll will be posted at www.anthemfacts.com.

Anthem has been working to arrange these services since the attack on our systems was discovered. Doing so has required enormous efforts and commitment of resources to ensure that our vendor can accommodate what we anticipate will be very high demand for these services. It is essential that we work with the vendor to develop the infrastructure to handle a high volume of calls and web traffic, and to train representatives to accurately answer specific questions from our members. We have been working around the clock so that when we provide members with information on how to obtain the credit and identity repair services, our team can provide a seamless process that allows members to access these services without delay or further frustration. Our goal is to provide both protection and peace of mind to consumers.

We recognize that the Attorney General and the Department of Insurance have sent additional questions, to which Anthem will respond under separate cover. In the meantime, please do not hesitate to contact me with any questions.



Anthem Mailing to Members

February 13, 2015

On January 29, 2015, Anthem, Inc. (Anthem) discovered that cyber attackers executed a sophisticated attack to gain unauthorized access to Anthem's IT system and obtained personal information relating to consumers who were or are currently covered by Anthem or other independent Blue Cross and Blue Shield plans that work with Anthem. Anthem believes that this suspicious activity may have occurred over the course of several weeks beginning in early December 2014.

As soon as we discovered the attack, we immediately began working to close the security vulnerability and contacted the FBI. We have been fully cooperating with the FBI's investigation. Anthem has also retained Mandiant, one of the world's leading cybersecurity firms, to assist us in our investigation and to strengthen the security of our systems.

Consumers Impacted

Current or former members of one of Anthem's affiliated health plans may be impacted. In addition, some members of other independent Blue Cross and Blue Shield plans who received healthcare services in any of the areas that Anthem serves over the last 10 years may be impacted. Anthem is providing identity protection services to all individuals that are impacted. For a listing of potentially impacted Anthem affiliated health plans and other Blue Cross and Blue Shield companies for which Anthem is providing this service, visit anthemfacts.com to view a list. Anthem is a service provider to other group health plans and Blue Cross and Blue Shield plans across the country.

Information Accessed

The information accessed may have included names, dates of birth, Social Security numbers, health care ID numbers, home addresses, email addresses, employment information, including income data. We have no reason to believe credit card or banking information was compromised, nor is there evidence at this time that medical information such as claims, test results, or diagnostic codes, was targeted or obtained.

Identity Protection Services

Anthem has arranged to have AllClear ID protect your identity for two (2) years at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next two (2) years.

- AllClear SECURE: The team at AllClear ID is ready and standing by if you need identity repair assistance. This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-877-263-7995 and a dedicated investigator will do the work to recover financial losses, restore your credit and make sure your identity is returned to its proper condition. AllClear ID maintains an A+ rating at the Better Business Bureau.
- AllClear PRO: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of fraud against children by searching thousands of databases for use of your child's information. To use the PRO service, you will need to provide your personal information to AllClear ID. To learn more about these services, or to enroll, visit our source of truth <http://www.anthemfacts.com/> and click on the AllClear ID link from there. Please note: Additional steps may be required by you in order to activate your phone alerts.

Mailed Notification

Anthem will also individually notify potentially impacted current and former members by U.S. Postal mail with this same specific information on how to enroll in free credit monitoring and identity protection services. These services will be provided to potentially impacted current and former members free of charge. Anthem has also established a dedicated website (www.anthemfacts.com) where members can access additional information, including frequently asked questions and answers.

Toll-Free Hotline

Anthem has established a dedicated toll-free number that you can call if they have questions related to this incident. That number is 877-263-7995. We have included contact information for the three nationwide credit bureaus below.

Fraud Prevention Tips

We want to make you aware of steps you may take to guard against identity theft or fraud.

We recommend that potentially impacted members remain vigilant for incidents of fraud and identity theft, including by reviewing account statements and monitoring free credit reports. In addition, you can report suspected incidents of identity theft to local law enforcement, Federal Trade Commission, or your state attorney general. To learn more, you can go to the FTC's Web site, at www.consumer.gov/idtheft, or call the FTC, at (877) IDTHEFT (438-4338) or write to Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

You should be aware of scam email campaigns targeting current and former Anthem members. These scams, designed to capture personal information (known as "phishing"), are designed to appear as if they are from Anthem and the emails include a "[click here](#)" link for credit monitoring. These emails are **NOT** from Anthem.

- DO NOT reply to the email or reach out to the senders in any way.
- DO NOT supply any information on the website that may open, if you have clicked on a link in email.
- DO NOT open any attachments that arrive with email.

Anthem is not calling members regarding the cyber attack and is not asking for credit card information or Social Security numbers over the phone. For more guidance on recognizing scam email, please visit the FTC Website: <http://www.consumer.ftc.gov/articles/0003-phishing>.

Credit Bureau Information

Equifax PO BOX 740241 ATLANTA GA 30374-0241 1-800-685-1111 equifax.com	Experian, PO BOX 9532 ALLEN TX 75013 1-888-397-3742 experian.com	TransUnion PO BOX 6790 FULLERTON CA 92834-6790 1-800-916-8800 transunion.com
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You can obtain additional information from the FTC and the nationwide credit bureaus about fraud alerts and security freezes. You can add a fraud alert to your credit report file to help protect your credit information. A fraud alert can make it more difficult for someone to get credit in your name because it

tells creditors to follow certain procedures to protect you, but it also may delay your ability to obtain credit. You may place a fraud alert in your file by calling just one of the three nationwide credit bureaus listed above. As soon as that bureau processes your fraud alert, it will notify the other two bureaus, which then must also place fraud alerts in your file. In addition, you can visit the credit bureau links below to determine if and how you may place a security freeze on your credit report to prohibit a credit bureau from releasing information from your credit report without your prior written authorization:

- Equifax security freeze: https://www.freeze.equifax.com/Freeze/jsp/SFF_PersonalIDInfo.jsp
- Experian security freeze: http://www.experian.com/consumer/security_freeze.html
- TransUnion security freeze: <http://www.transunion.com/personal-credit/credit-disputes/credit-freezes.page>
- For Maryland and North Carolina Residents - You can obtain information from these sources about preventing identify theft:
- **Visit** the Federal Trade Commission website at:
www.ftc.gov, or call **1-877-ID-THEFT**, or write to this address:
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580

Maryland:

Visit the Maryland Office of the Attorney General at:
oag.state.md.us/idtheft/index.htm, or call **1-410-528-8662**
or write to this address:
CONSUMER PROTECTION DIVISION
MARYLAND OFFICE OF THE ATTORNEY GENERAL
200 ST PAUL PLACE
BALTIMORE MD 21202

North Carolina:

Visit the North Carolina Office of the Attorney General at:
<http://www.ncdoj.gov/Crime.aspx> or call **1-919-716-6400**
or write to this address:
Attorney General's Office
9001 Mail Service Center
Raleigh, NC 27699-9001

Anthem Credit Protection FAQ

1. When and how did you discover the attack?

On January 27, 2015, an Anthem associate, a database administrator, discovered suspicious activity – a data query running using the associate’s logon information. He alerted Anthem’s Information Security department.

On Jan. 29, 2015, we determined that we were the victim of a sophisticated cyber attack. We notified federal law enforcement officials and shared the indicators of compromise with the HITRUST C3 (Cyber Threat Intelligence and Incident Coordination Center).

2. What information has been compromised?

Initial investigation indicates that the member data accessed included names, member ID numbers, dates of birth, Social Security Numbers or Health Care Identification Numbers, addresses, telephone numbers, email addresses and employment information.

3. Was there any diagnosis or treatment data exposed?

No, we do not believe any diagnosis or treatment data was exposed.

4. Was my information accessed?

Anthem is currently conducting an extensive IT forensic investigation to determine what members are impacted. However, all members whose information was in the impacted data warehouse will receive free credit protection services for two years.

5. Is Anthem providing credit protection services?

Yes, Anthem is providing credit protection services, free of charge, for two years.

6. How can I enroll in credit protection services?

Identity theft repair services are available to Anthem members who feel they have experienced fraud. For members who have been impacted by the cyber attack, these services are automatically available and do not require enrollment. Please visit AnthemFacts.com to learn how to access these services. Members may access identity repair services by calling 877-263-7995.

Credit monitoring services require a member to actively enroll because the member must provide their personal information and consent to have their credit monitored. Members can enroll at any time during the 24 month coverage period, and can learn how to sign up at [AnthemFacts.com](https://www.anthemfacts.com). Members who do not have access to the Internet may call 877-263-7995 for assistance.

7. What times can I call to enroll in credit protection services?

Phone lines will be open from 2pm to 9 p.m. ET on Friday, Feb. 13, and will be open 9 a.m. to 9 p.m. ET Monday to Saturday.

Spanish-speaking members may access information at [AnthemInforma.com](https://www.antheminforma.com), or receive assistance in Spanish at 877-263-7995.

8. What credit protection services is Anthem offering?

The free identity protection services provided by Anthem include two years of:

- **Identity Theft Repair Assistance:** Should a member experience fraud, an investigator will do the work to recover financial losses, restore the member's credit, and ensure the member's identity is returned to its proper condition. This assistance will cover any fraud that has occurred since the incident first began.
- **Credit Monitoring:** At no cost, members may also enroll in additional protections, including credit monitoring. Credit monitoring alerts consumers when banks and creditors use their identity to open new credit accounts.
- **Child Identity Protection:** Child-specific identity protection services will also be offered to any members with children insured through their Anthem plan.
- **Identity theft insurance:** For individuals who enroll, the company has arranged for \$1,000,000 in identity theft insurance, where allowed by law.
- **Identity theft monitoring/fraud detection:** For members who enroll, data such as credit card numbers, social security numbers and emails will be scanned against aggregated data sources maintained by top security researchers that contain stolen and compromised individual data, in order to look for any indication that the members' data has been compromised.

- **Phone Alerts:** Individuals who register for this service and provide their contact information will receive an alert when there is a notification from a credit bureau, or when it appears from identity theft monitoring activities that the individual's identity may be compromised.

9. Will I receive a letter in the mail from Anthem?

Yes, Anthem will begin to mail letters to all impacted current and former members in the coming weeks. Those letters will provide information on free identity repair services and credit monitoring. However, members can access these services starting Friday, Feb. 13, prior to receiving a mailed notification from Anthem. A copy of the letter will be posted on AnthemFacts.com

10. Will Anthem send me an email with this information?

Members who have provided e-mails to Anthem and have opted in to receiving communications may receive an e-mail directing them to visit AnthemFacts.com to sign up for credit protection services. This e-mail is scheduled to be distributed the week of Feb. 16. A copy of the email will be posted on AnthemFacts.com

This email is being sent due to state notification requirements. It will not ask for personal information and will not contain a link to any websites other than AnthemFacts.com.

If you receive any emails regarding the Anthem Cyber Attack asking for personal information, or asking you to click on an unfamiliar link:

- ✓ DO NOT click on any links in email.
- ✓ DO NOT reply to the email or reach out to the senders in any way.
- ✓ DO NOT supply any information on the website that may open, if you have clicked on a link in an email.
- ✓ DO NOT open any attachments that arrive with email.

For more guidance on recognizing scam email, please visit the FTC Website:

<http://www.consumer.ftc.gov/articles/0003-phishing>

11. Why do I have to enroll in credit monitoring services?

Credit monitoring services require a member to actively enroll because the member must provide their personal information and consent to have their credit monitored. Members can enroll at any time during the 24 month coverage period, and can learn

how to sign up at AnthemFacts.com. Members who do not have access to the Internet may call 877-263-7995 for assistance.

12. Can I access information about the credit protection services in Spanish?

Spanish-speaking members may access information at AnthemInforma.com, or receive assistance in Spanish at 877-263-7995.

13. Am I at risk for identity theft?

Anthem is currently conducting an extensive IT Forensic Investigation to determine which members are impacted. We are not aware of any fraud that has occurred as a result of this incident against our members, but all impacted members will be eligible to receive identity repair assistance. Identity repair services provide affected customers with a dedicated investigator to assist them with fraud-related issues arising from this incident.

14. Do I need a new member ID card and number?

Your current member ID card and number are valid and will provide you access to care.