STATE OF NH
DEPT OF JUSTICE

2017 MAR 27 AM 9: 38

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March 24, 2017

Lynn Sessions
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VIA OVERNIGHT MAIL

Joseph A. Foster
Office of the Attorney General
33 Capitol St
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Foster:

We are writing on behalf of our client, Commonwealth Health Corporation (the parent company of Med Center Health), to notify you of a recent incident involving New Hampshire residents.

On January 4, 2017, during the course of an internal investigation, Med Center Health determined a former Med Center Health employee had inappropriately obtained certain billing information. Med Center Health took immediate action, including reporting the matter to law enforcement on January 10, 2017. Law enforcement asked Med Center Health to delay notification to those affected or make public announcement of the incident so as not to interfere with its investigation. Law enforcement lifted Med Center Health's stay on notification on March 15, 2017 and Med Center Health is now notifying affected individuals.

Med Center Health's investigation determined that the inappropriately obtained billing information included the names, addresses, Social Security numbers, and health insurance information of affected individuals.

On March 24, 2017, Med Center Health started mailing letters to affected individuals including approximately 24 New Hampshire residents in accordance with the Health Insurance Portability and Accountability Act (HIPAA) and applicable state laws in substantially the same form as the letter attached hereto.[1] Notice is being provided as expeditiously as practicable following the law enforcement delay. Med Center Health is offering one year of complementary credit monitoring and identity protection

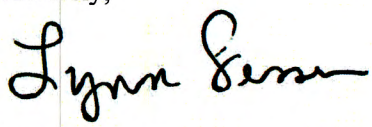
[1] This report is not, and does not constitute, a waiver of Med Center Health's objection that New Hampshire lacks personal jurisdiction over Med Center Health regarding any claims related to the incident.

services through Experian and has established a dedicated call center for affected individuals to call with any questions they may have.

To try to prevent a similar incident from happening in the future, Med Center Health is reinforcing education with its staff regarding its strict policies and procedures in maintaining the confidentiality of patient information.

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

Sincerely,



Lynn Sessions

Enclosure

MED
CENTER
HEALTH
Return Mail Processing Center
P.O. Box 6336
Portland, OR 97228-6336

STATE OF NH
DEPT OF JUSTICE
2017 MAR 27 AM 9: 38

<<Mail ID>>
<<Name1>>
<<Address1>>
<<Address2>>
<<City>><<State>><<Zip>>

<<Date>>

Dear <<Name 1>>:

Med Center Health is committed to protecting the security and confidentiality of our patients' information. Despite our efforts, we have recently uncovered evidence indicating a former employee misused billing information, without authorization for purposes unrelated to work. The evidence we have gathered to date suggests that the former employee intended to use these records to assist in the development of a computer-based tool for an outside business interest which had never been disclosed to Med Center Health officials. The purpose of this letter is to inform you of the incident, as well as to provide you with information regarding the actions we are taking to best protect your interests.

On January 4, 2017, during the course of an internal investigation, we determined that the former Med Center Health employee had, on two past occasions during their employment, obtained certain billing information by creating the appearance that they needed the information to carry out their job duties for Med Center Health. Upon uncovering this information, we took immediate action, including reporting the matter to law enforcement and providing government officials with information we gathered as part of our internal investigation. To date, our investigation indicates that in August 2014 and February 2015 the individual in question obtained patient information on an encrypted CD and encrypted USB drive, without any work-related reason to do so. The billing information included your name, address, Social Security number, health insurance information, diagnosis and procedure codes and charges for your medical services. Your medical records were not included in the information inappropriately obtained. Your clinical medical record was not accessed and remains fully intact. Your medical history and treatment has not and will not be affected by this incident.

You might ask why it has taken this long to contact you. Law enforcement asked that we delay notification to patients or public announcement of the incident until now so as not to interfere with their investigation. Now that law enforcement's request for delay has ended, we are notifying patients as quickly as possible. We are actively working alongside law enforcement throughout their continued investigation into the matter.

While we have no indication that the information was used in any other way than as described in this letter, we are offering you a complimentary one-year membership of Experian's® ProtectMyID® Alert. This product helps detect possible misuse of your personal information and provides you with superior identity protection services focused on immediate identification and resolution of identity theft. 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 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 that you receive from your health insurer. If you see services that you did not receive, please contact your health insurer immediately.

Med Center Health is deeply rooted in its patient-focused, quality-driven and mission-led values. We sincerely apologize for any concern and inconvenience this incident may cause you. We continue to review the incident and to take steps aimed at preventing similar actions in the future. Those actions include reinforcing education with our staff regarding our strict policies and procedures in maintaining the confidentiality of patient information. We value your privacy and work each day to earn your trust. Should you have any questions about this matter, please call our dedicated call center at 844-420-6490, Monday through Friday between 8:00 a.m. and 8:00 p.m. Central Time.

Sincerely,

Connie D. Smith

Connie D. Smith
Chief Executive Officer
Med Center Health

Activate ProtectMyID Now in Three Easy Steps

1. ENSURE **That You Enroll By: <<Enrollment Deadline>>** (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: <<Enrollment Code>>**

If you have questions or need an alternative to enrolling online, please call 877-288-8057 and provide engagement #: <<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 the identity theft protection services we are offering, 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 once every 12 months. To order your credit report, please visit www.annualcreditreport.com or call toll free at 877-322-8228. Contact information for the three nationwide credit reporting agencies is as follows:

Equifax	**Experian**	**TransUnion**
P.O. Box 740241	P.O. Box 2002	P.O. Box 2000
Atlanta, GA 30374	Allen, TX 75013	Chester, PA 19016
www.equifax.com	www.experian.com	www.transunion.com
(800) 685-1111	(888) 397-3742	(800) 680-7289

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should contact the Federal Trade Commission and/or your state attorney general. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
www.ftc.gov/idtheft
(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.