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July 19, 2018

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**VIA E-MAIL (ATTORNEYGENERAL@DOJ.NH.GOV)**  
**AND FEDERAL EXPRESS**

The Honorable Gordon MacDonald  
Attorney General of the State of New Hampshire  
Office of the Attorney General  
33 Capitol Street  
Concord, NH 03301

**Re: Notification of Potential Data Security Incident**

Dear Attorney General MacDonald:

We represent the Fairbanks North Star Borough (the “Borough”) in connection with a recent incident that may have impacted the personal information of four (4) New Hampshire residents. The Borough is reporting a potential unauthorized access of unencrypted computerized data containing personal information of the four (4) New Hampshire residents pursuant to N.H. REV. STAT. ANN. § 359-C:20. This notice will be supplemented, if necessary, with any new significant facts discovered subsequent to its submission. While the Borough is notifying you of this incident, the Borough does not waive any rights or defenses relating to the incident or this notice, or the applicability of New Hampshire law on personal jurisdiction.

**BACKGROUND OF THE INCIDENT**

The Borough is located in the State of Alaska. The Borough includes two cities within its boundaries, Fairbanks and North Pole, and encompasses 7,361 square miles, making it the fourth largest borough in the State of Alaska. The Borough recently learned that its former billing vendor for ambulance Emergency Medical Services (“EMS”), Golden Heart Administrative Professionals, Inc. (“GHAP”), experienced a cybersecurity incident and that certain information within GHAP’s computer system was compromised. GHAP was the Borough’s EMS ambulance billing agency from 2012 through 2017. The Borough switched billing service providers in 2017.

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Based on the information provided to the Borough by GHAP, the Borough understands that GHAP was subject to a ransomware attack that resulted in the encryption of certain information maintained in its computer system. Upon discovery of the incident, GHAP retained a third-party IT and forensics firm to investigate the incident. According to GHAP, the forensic investigation determined that all information in the GHAP system was potentially compromised and subject to the unauthorized access and acquisition by an unknown third-party, including affected individuals' names, addresses, Social Security numbers, dates of birth, medical treatment and diagnosis codes and, in certain instances where payment was made by credit card, credit card information and other potentially sensitive information.

GHAP reported that the ransomware attack occurred on April 14, 2018, and that the attack was discovered by GHAP on that same day. GHAP provided an initial notification of the incident to the Borough in a letter, dated May 25, 2018. However, GHAP did not provide detailed information concerning the incident or who was affected until June 18, 2018.

#### **NOTICE TO NEW HAMPSHIRE RESIDENTS**

On July 19, 2018, the Borough will be notifying the four (4) affected New Hampshire residents of the incident. Attached is a sample of the notification letter that is being sent to the affected New Hampshire residents via first-class United States mail. In addition, the Borough has arranged to offer one (1) year of complimentary credit monitoring and identity theft protection services through Experian to the affected New Hampshire residents. The Borough has also established a confidential telephone inquiry line to assist the affected New Hampshire residents with any questions they may have regarding the incident. The confidential inquiry line is available between 9 a.m. and 9 p.m., Eastern Time, Monday through Friday at 1-888-668-9006.

#### **STEPS TAKEN RELATED TO THE INCIDENT**

The Borough has been advised by GHAP that it is working with its technology service provider to mitigate any further damage as a result of this incident and to increase the security of its system to provide protection against future cyber-attacks. GHAP has also advised the Borough that it has notified law enforcement of the incident as well as the three major credit agencies (Equifax, Experian, and TransUnion). Additionally, the Borough has been advised by GHAP that it has replaced the affected computer hardware and installed updated computer software on its systems, is re-evaluating the security of its computer system and will provide updated training to its personnel. The Borough will continue to monitor GHAP's investigation and will work with the Borough's current ambulance billing provider to ensure that it has adequate administrative, technical and physical safeguards to protect personal information against similar future threats.



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**CONTACT INFORMATION**

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Bruce A. Radke".

Bruce A. Radke

cc: Wendy Tisland, Risk Manager, Fairbanks North Star Borough  
Jill Dolan, General Counsel, Fairbanks North Star Borough

BAR:mck  
Enclosure



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

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Dear <<Name 1>>:

We are sending this letter to you as part of Fairbanks North Star Borough's commitment to patient privacy to inform you of a data security incident that may have affected your personal information. The Borough's former billing vendor for ambulance Emergency Medical Services ("EMS"), Golden Heart Administrative Professionals, Inc. ("GHAP"), reported to the Borough that GHAP experienced a cybersecurity incident and that certain information within GHAP's computer system was compromised.

The following details of the incident have been provided by GHAP:

**GHAP's Description of the Incident:** GHAP was the Borough's emergency medical services ("EMS") ambulance billing agency from 2012 through 2017. The Borough switched billing service providers in 2017. Based on the information provided to us by GHAP, we understand that GHAP was subject to a ransomware attack that resulted in the encryption of certain information maintained in its computer system. Upon discovery of the incident, GHAP retained a third-party IT and forensics firm to investigate the incident. According to GHAP, the forensic investigation determined that all information in the GHAP system was potentially compromised and subject to the unauthorized access and acquisition by an unknown third-party, including affected individuals' names, addresses, Social Security numbers, dates of birth, medical treatment and diagnosis codes and, in certain instances where payment was made by credit card, credit card information and other potentially sensitive information.

**Date of Incident and GHAP's Notification to the Borough:** GHAP reported that the ransomware attack occurred on April 14, 2018, and that the attack was discovered by GHAP on that same day. As described further, below, GHAP has taken steps to minimize the impact of the incident. GHAP provided an initial notification of the incident to the Borough in a letter, dated May 25, 2018. However, GHAP did not provide detailed information concerning the incident or who was affected until June 18, 2018.

**What you can do to protect yourself:** Out of an abundance of caution, we are offering a complimentary one-year membership in Experian IdentityWorks<sup>SM</sup> Credit 3B. This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.

**Steps taken by GHAP and the Borough:** We have been advised by GHAP that it is working with its technology service provider to mitigate any further damage as a result of this incident and to increase the security of its system to provide protection against future cyber-attacks. GHAP has advised us that it has notified law enforcement of the incident as well as the three major credit agencies (Equifax, Experian, and TransUnion). Additionally, we have been advised by GHAP that it has replaced the affected computer hardware and installed updated computer software on its systems, is re-evaluating the security of its computer system and will provide updated training to its personnel. We will continue to monitor GHAP's investigation and will work with our current ambulance billing provider to ensure that it has adequate administrative, technical and physical safeguards to protect personal information against similar future threats.

We value the trust you place in us to protect the privacy and security of your personal information, and we apologize for any inconvenience or concern that this incident might cause you. The Borough is committed to keeping your information safe and recognizes the importance of securing your healthcare and financial information.

If you have any additional questions, you may call our confidential inquiry line at 1-888-668-9006, between 5 a.m. and 5 p.m., Alaska Time, Monday through Friday.

Sincerely,



Wendy Tisland  
Risk Manager  
Fairbanks North Star Borough

## Activating Your Complimentary Credit Monitoring

To help protect your identity, we are offering a complimentary one-year membership of Experian IdentityWorks<sup>SM</sup> Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

### Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. **ENROLL** by: <<Enrollment Deadline>> (Your code will not work after this date.)
2. **VISIT** the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. **PROVIDE** the **Activation Code**: <<Activation Code>>

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-288-8057. Be prepared to provide engagement number <<Engagement #>> as proof of eligibility for the identity restoration services by Experian.

### ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian Identity Works, you will have access to the following additional features:

- **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.
- **Experian IdentityWorks ExtendCARE<sup>TM</sup>:** You receive the same high level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance<sup>\*\*</sup>:** Provides coverage for certain costs and unauthorized electronic fund transfers.

**Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 877-288-8057 to register with the Activation Code listed above.**

**What you can do to protect your information:** There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to [www.ExperianIDWorks.com/restoration](http://www.ExperianIDWorks.com/restoration) for this information. If you have any questions about IdentityWorks, 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.

### **Additional Important Information**

As a precautionary measure, we recommend that you remain vigilant to protect against potential fraud and/or identity theft by, among other things, reviewing your credit card account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You should also promptly report any fraudulent activity or any suspected incidents of identity theft to proper law enforcement authorities, including the police and your state's attorney general, as well as the Federal Trade Commission ("FTC").

You may wish to review the tips provided by the FTC on fraud alerts, security/credit freezes and steps you can take to avoid identity theft. For more information and to contact the FTC, please visit [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft) or call 1-877-ID-THEFT (1-877-438-4338). You may also contact the FTC at Federal Trade Commission, 600 Pennsylvania Avenue, NW, Washington, DC 20580.

**Credit Reports:** You may obtain a free copy of your credit report once every 12 months from each of the three national credit reporting agencies by visiting [www.annualcreditreport.com](http://www.annualcreditreport.com), by calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You can print a copy of the request form at [www.annualcreditreport.com/cra/requestformfinal.pdf](http://www.annualcreditreport.com/cra/requestformfinal.pdf).

Alternatively, you may elect to purchase a copy of your credit report by contacting one of the three national credit reporting agencies. Contact information for the three national credit reporting agencies for the purpose of requesting a copy of your credit report or for general inquiries, including obtaining information about fraud alerts and placing a security freeze on your credit files, is as follows:

Equifax  
1-800-349-9960  
[www.equifax.com](http://www.equifax.com)  
P.O. Box 105788  
Atlanta, GA 30348

Experian  
1-888-397-3742  
[www.experian.com](http://www.experian.com)  
P.O. Box 9554  
Allen, TX 75013

TransUnion  
1-888-909-8872  
[www.transunion.com](http://www.transunion.com)  
P.O. Box 2000  
Chester, PA 19016

**Fraud Alerts:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least ninety (90) days. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any new accounts in your name. To place a fraud alert on your credit report, contact any of the three national credit reporting agencies using the contact information listed above. Additional information is available at [www.annualcreditreport.com](http://www.annualcreditreport.com).

**Credit and Security Freezes:** You may have the right to place a credit freeze, also known as a security freeze, on your credit file, so that no new credit can be opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A credit freeze is designed to prevent potential credit grantors from accessing your credit report without your consent. If you place a credit freeze, potential creditors and other third parties will not be able to get access to your credit report unless you temporarily lift the freeze. Therefore, using a credit freeze may delay your ability to obtain credit. In addition, you may incur fees to place, lift and/or remove a credit freeze. Credit freeze laws vary from state to state. The cost of placing, temporarily lifting and removing a credit freeze also varies by state, generally \$5 to \$20 per action at each credit reporting company. Unlike a fraud alert, you must separately place a credit freeze on your credit file at each credit reporting company. Since the instructions for how to establish a credit freeze differ from state to state, please contact the three major credit reporting companies as specified below to find out more information:

Equifax Security Freeze  
P.O. Box 105788  
Atlanta, GA 30348

Experian Security Freeze  
P.O. Box 9554  
Allen, TX 75013

TransUnion Security Freeze  
Fraud Victim Assistance Department  
P.O. Box 2000  
Chester, PA 19016

You can obtain more information about fraud alerts and credit freezes by contacting the FTC or one of the national credit reporting agencies listed above.

If you do not have internet access but would like to learn more about how to place a security freeze on your credit report, contact the Vermont Attorney General's Office at 802-656-3183 (800-649-2424 toll free in Vermont only).

**Iowa Residents:** Iowa residents can contact the Office of the Attorney general to obtain information about steps to take to avoid identity theft from the Iowa Attorney General's office at:

Office of the Attorney General of Iowa  
Hoover State Office Building  
1305 E. Walnut Street  
Des Moines IA 50319  
515-281-5164

**Maryland Residents:** Maryland residents can contact the Office of the Attorney General to obtain information about steps you can take to avoid identity theft from the Maryland Attorney General's office at:

Office of the Attorney General  
220 St. Paul Place  
Baltimore, MD 21202  
(888) 743-0023

**New Mexico Residents:** New Mexico residents can obtain information about preventing identity theft the New Mexico Attorney General's Office at

Office of the Attorney General  
408 Galisteo Street  
Villagra Building  
Santa Fe, NM 87501  
(505) 490-4060

**North Carolina Residents:** North Carolina residents can obtain information about preventing identity theft from the North Carolina Attorney General's Office at:

North Carolina Attorney General's Office  
9001 Mail Service Center  
Raleigh, NC 27699-9001  
(877) 566-7226

**Rhode Island Residents:** We believe that this incident affected one (1) Rhode Island resident. Rhode Island residents can contact the Office of the Attorney general at:

Rhode Island Office of the Attorney General  
150 South Main Street  
Providence, RI 02903  
(401) 274-4400