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March 22, 2023

**VIA EMAIL: DOJ-CPB@doj.nh.gov**

Attorney General John Formella  
Office of the Attorney General  
Consumer Protection Bureau  
33 Capitol Street  
Concord, NH 03301

**Re: Notification of Data Security Incident**

Dear Attorney General MacDonald:

Constangy, Brooks, Smith & Prophete, LLP represents Integrated Supports for Living, Inc. (“ISL”), a nonprofit organization headquartered in Salem, Oregon, in connection with a recent data security incident described in greater detail below. The purpose of this letter is to notify you of the incident in accordance with New Hampshire’s data breach notification statute, N.H. Rev. Stat. §§ 359-C:19 - C:21.

**1. Nature of the Security Incident**

On January 22, 2023, ISL learned that certain information of its current and former employees, clients, and patients may have been impacted by a data security incident. On October 7, 2022, ISL detected unusual activity in its systems. In response, ISL immediately took steps to terminate the activity and to secure its network, systems, and data. It also retained independent cybersecurity experts to conduct a forensic investigation into the incident and determine what happened.

The forensic investigation determined that there may have been unauthorized access to files stored within ISL systems from July 26, 2022 through October 7, 2022, including those that store personal information and certain protected health information. ISL then worked diligently to identify individuals whose information may have been impacted, as well as their current address information to notify all potentially impacted individuals about the incident. That review was completed on January 22, 2023. ISL then worked to identify current mailing addresses so that it could notify potentially impacted individuals about the incident.

To date, ISL has no reason to believe that personal information of potentially impacted individuals has been misused as a result of this incident. Out of an abundance of caution, ISL is notifying all potentially impacted individuals of the incident, providing them with steps they can take to protect their personal information, and offering them free credit and identity monitoring services.

**2. Number of Affected New Hampshire Residents & Information Involved**

The incident involved personal information for approximately 3 New Hampshire residents. The information involved in the incident may differ depending on the individual but may include the following for affected New Hampshire residents: . Again, ISL has no reason to believe that the information involved has been or will be published, shared, or otherwise misused.

**3. Notification to Affected Individuals**

On March 21, 2023, notification letters will be sent to affected New Hampshire residents by USPS First Class Mail. The notification letter provides resources and steps individuals can take to help protect their information. The notification letter also offers complimentary identity protection services to each individual whose Social Security numbers was affected by this event, including credit monitoring, dark web monitoring, \$1 million identity fraud loss reimbursement policy, and fully managed identity theft recovery services. A sample notification letter is enclosed.

**4. Measures Taken to Address the Incident**

In response to the incident, ISL retained cybersecurity experts and launched a forensics investigation to determine the source and scope of the compromise. ISL has implemented additional security measures to further harden its digital environment in an effort to prevent a similar event from occurring in the future.

Finally, ISL is notifying the potentially affected individuals and providing them with steps they can take to protect their personal information as discussed above and reporting the incident to nationwide consumer reporting agencies (i.e., Equifax, Experian, and Transunion).

**5. Contact Information**

If you have any questions or need additional information regarding this incident, please do not hesitate to contact me at .

Sincerely,

Lauren D. Godfrey of  
Constangy, Brooks, Smith & Prophete LLP

LDG:mff

Encl.: Sample Notification Letter

cc: Michael F. Ferragamo, Constangy



P.O. Box 1907  
Suwanee, GA 30024

To Enroll, Please Call:  
1-833-753-4820  
Or Visit:  
<https://app.idx.us/account-creation/protect>  
Enrollment Code:

<<First Name>> <<Last Name>>  
<<Address1>> <<Address2>>  
<<City>>, <<State>> <<Zip>>

March 21, 2023

### Notice of Data Security <<Variable 2>>

Dear <<First Name>> <<Last Name>>,

Integrated Supports for Living, Inc. (“ISL”) takes the privacy and security of your information very seriously. That is why we are informing you of a data security incident that may have involved your personal information. This notice explains the incident, provides you with steps you can take to protect your information, and offers you complimentary credit monitoring and identity protection services.

**What happened?** On October 7, 2022, we detected unusual activity in our systems. In response, we immediately shut down some systems and began an investigation with the help of third-party cybersecurity experts and incident response professionals. After a thorough investigation, it was determined that an outside party gained access to our computer systems from July 26, 2022 through October 7, 2022 and some personal information contained on those systems. We conducted a thorough review of the information involved in the incident so that we could identify individuals whose personal information may have been involved. This process was completed on January 22, 2023. We then worked to identify current mailing addresses so that we could notify potentially impacted individuals about the incident. Please note that to date we have no reason to believe that your information has been misused as a result of this incident. Regardless, out of an abundance of caution, we are notifying you to provide you with steps you can take to protect your information.

**What Information Was Involved?** The data involved may have included your name in combination with a <<Variable 1>>.

**What We Are Doing:** In addition to the steps described above, we have worked with cybersecurity experts to enhance the security of our digital environment and prevent a similar incident from occurring in the future. We reported this matter to law enforcement and will work with them to investigate the people responsible for this incident. We are also offering you complimentary identity theft protection services through IDX. These services include: <<12 / 24>> months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

**What You Can Do:** We encourage you to contact IDX with any questions and to enroll in the free identity protection services by calling 1-833-753-4820 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX representatives are available Monday through Friday from 6 am - 6 pm Pacific Time. Please note the deadline to enroll is June 21, 2023. Again, at this time, there is no evidence that your information has been misused. However, we encourage you to take advantage of this offering. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

**For More Information:** You will find detailed instructions for enrollment on the enclosed Recommended Steps document. Also, you will need to reference the enrollment code at the top of this letter when calling or enrolling online, so please do not discard this letter.

Please call 1-833-753-4820 or go to <https://app.idx.us/account-creation/protect> for help or for any questions you may have.

The privacy and security of your information is a top priority for Integrated Supports for Living, Inc. We take this incident very seriously and we regret any worry or inconvenience this may cause you.

Sincerely,

Henry Mukhuna  
CEO  
Integrated Supports for Living, Inc.

## Steps You Can Take to Protect Your Personal Information

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant by reviewing your 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 also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, 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 also can contact one of the following three national credit reporting agencies:

**Equifax**

P.O. Box 105788  
Atlanta, GA 30348  
1-888-378-4329  
[www.equifax.com](http://www.equifax.com)

**Experian**

P.O. Box 9532  
Allen, TX 75013  
1-800-831-5614  
[www.experian.com](http://www.experian.com)

**TransUnion**

P.O. Box 1000  
Chester, PA 19016  
1-800-916-8800  
[www.transunion.com](http://www.transunion.com)

**Fraud Alert:** 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 one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

**Security Freeze:** You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

**Federal Trade Commission**

600 Pennsylvania Ave, NW  
Washington, DC 20580  
[consumer.ftc.gov](http://consumer.ftc.gov)  
1-877-438-4338

**Maryland Attorney General**

St. Paul Plaza  
200 St. Paul Place  
Baltimore, MD 21202  
[marylandattorneygeneral.gov](http://marylandattorneygeneral.gov)  
1-888-743-0023

**New York Attorney General**

Bureau of Internet and Technology  
Resources  
28 Liberty Street  
New York, NY 10005  
[ag.ny.gov](http://ag.ny.gov)  
1-212-416-8433 / 1-800-771-7755

**North Carolina Attorney General**

9001 Mail Service Center  
Raleigh, NC 27699  
[ncdoj.gov](http://ncdoj.gov)  
1-877-566-7226

**Rhode Island Attorney General**

150 South Main Street  
Providence, RI 02903  
<http://www.riag.ri.gov>  
[riag.ri.gov](http://riag.ri.gov)  
1-401-274-4400

**Washington D.C. Attorney General**

400 S 6th Street, NW  
Washington, DC 20001  
[oag.dc.gov](http://oag.dc.gov)  
1-202-727-3400

**You also have certain rights under the Fair Credit Reporting Act (FCRA):** These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit [https://files.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](https://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf).