

STATE OF NH
DEPT OF JUS

2018 MAY 18 AM 9:44

BakerHostetler

Baker & Hostetler LLP

811 Main Street
Suite 1100
Houston, TX 77002-6111

T 713.751.1600
F 713.751.1717
www.bakerlaw.com

May 16, 2018

Lynn Sessions
direct dial: 713.646.1352
lsessions@bakerlaw.com

VIA OVERNIGHT MAIL

Attorney General Joseph Foster
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: *Incident Notification*

Dear Sir or Madam:

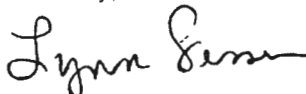
We are writing on behalf of our client, USACS Management Group, Ltd. (USACS), to notify you of a security incident involving eighty-nine New Hampshire residents.

On March 9, 2018, USACS learned that an unauthorized third party may have accessed a USACS employee's email account that same day. USACS immediately began an investigation, including hiring a leading outside computer forensic firm to assist it. The investigation determined that the unauthorized third party illegally gained access to one USACS email account containing patient information, including names, addresses, dates of service, USACS account numbers, medical and health insurance information, diagnostic and treatment information, and Social Security numbers.

USACS mailed notification letters to the New Hampshire residents on May 8, 2018. A copy of the notification letter is attached. USACS is offering credit monitoring and identity protection services to the New Hampshire residents whose Social Security numbers were affected. To help prevent something like this from happening in the future, USACS continues to enhance its security measures relating to protection of patient information and conducts regular security trainings with its workforce.

As a business associate to covered entities under the Health Insurance Portability and Accountability Act of 1996, USACS is required to maintain procedures for responding to a breach of security and notification to the New Hampshire residents is being provided in compliance with these procedures. Notification to the New Hampshire Attorney General is being made pursuant to NH Rev. State §359-C:20 (2015). Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,



Lynn Sessions
Enclosure

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC



4535 Dresslet Rd NW
Canton, OH 44718

May 8, 2018



##D7358-L06-0123456 **** *GENERIC-OEL-LINE
SAMPLE A SAMPLE - Adult SSN
APT ABC
123 ANY ST
ANYTOWN, US 12345-6789

Dear Sample A Sample,

USACS Management Group, Ltd. (USACS) is a management company for physician practices providing emergency room, observation care and inpatient hospitalist services at hospitals and other facilities across the United States. USACS is separate and distinct from the facilities where we provide services, and USACS clinicians are not employed by the facility where you received medical services.

USACS is committed to maintaining the privacy and security of patient information. Regrettably, we are writing to inform you of an incident involving some of that information.

On March 9, 2018, we learned that an unauthorized third party may have accessed a USACS employee's email account that same day. We immediately began an investigation, including hiring a leading outside computer forensic firm to assist us. The investigation determined that the unauthorized third party illegally gained access to one USACS email account containing patient information. The email account may have included some of your information, including your name, address, date of service, USACS account number, medical and health insurance information, diagnostic and treatment information, and Social Security number. Your credit card information was not affected.

Importantly, USACS has no indication that any of the information has been used inappropriately. However, we wanted to advise you of this incident and assure you that we take it very seriously. As a precaution, we are offering you a complimentary one-year membership of Experian's® IdentityWorksSM. This product provides you with superior identity detection and resolution of identity theft.

If you believe there was fraudulent use of your information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (888) 270-0056. 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 (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).

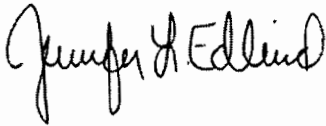
0123456



Please note that this Identity Restoration support is available to you for one 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 <http://www.ExperianIDWorks.com/restoration>. You will also find self-help tips and information about identity protection at this site.

We regret any inconvenience or concern this may cause you. To help prevent something like this from happening in the future, we continue to enhance our security measures relating to protection of patient information and conduct regular security training with our workforce. Should you have any questions or concerns, please do not hesitate to contact us at (888) 270-0056, Monday through Friday, 9 a.m. to 9 p.m. Eastern Standard Time, and Saturday through Sunday, 11 a.m. to 8 p.m. Eastern Standard Time.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Edlind". The signature is written in a cursive style with a large initial "J" and "E".

Jennifer Edlind
Chief Compliance Officer

To Activate Experience IdentityWorksSM:

- Ensure that you enroll by: 8/31/2018 (Your code will not work after this date.)
- Visit the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/3bcredit>
- Provide your activation code: ABCDEFGHI

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 (888) 270-0056 by 8/31/2018. Be prepared to provide engagement number DB06652 as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS MEMBERSHIP:

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.
- Up to \$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.

MORE INFORMATION ON WAYS TO PROTECT YOURSELF

We remind you to remain vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742

TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. 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. Contact information for the Federal Trade Commission is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

0123456



If you are a resident of Connecticut, Maryland, Massachusetts, North Carolina, or Rhode Island, you may contact and obtain information from your state attorney general at:

Connecticut Attorney General's Office, 55 Elm Street, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

Maryland Attorney General's Office, 200 St. Paul Place, Baltimore, MD 21202, www.oag.state.md.us,
1-888-743-0023 (toll free when calling within Maryland)
(410) 576-6300 (for calls originating outside Maryland)

Office of the Attorney General, One Ashburton Place, Boston, MA 02108, 1-617-727-8400,
www.mass.gov/ago/contact-us.html

North Carolina Attorney General's Office, 9001 Mail Service Center, Raleigh, NC 27699, www.ncdoj.gov,
1-877-566-7226

Rhode Island Attorney General's Office, 150 South Main Street, Providence, RI 02903, www.riag.ri.gov,
401-274-4400

If you are a resident of Massachusetts or Rhode Island, note that pursuant to Massachusetts or Rhode Island law, you have the right to file and obtain a copy of any police report.

Fraud Alerts: There are two types of fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for at least 90 days. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years. You can place a fraud alert on your credit report by contacting any of the three national credit reporting agencies.

Credit Freezes: You may have the right to put 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 a 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. Fee amount for Massachusetts residents to place, lift, or remove a security freeze cannot exceed \$5 per action. 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.

To place a security freeze on your credit report, you must send a written request to each of the three major reporting agencies by regular, certified, or overnight mail at the addresses below:

Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com
Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com
TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com

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 the police report, investigative report, or complaint to a law enforcement agency concerning identity theft

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period.

To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.

Fair Credit Reporting Act: You also have rights under the federal Fair Credit Reporting Act, which promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. The FTC has published a list of the primary rights created by the FCRA (<https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>), and that article refers individuals seeking more information to visit www.ftc.gov/credit. The FTC's list of FCRA rights includes:

- You have the right to receive a copy of your credit report. The copy of your report must contain all the information in your file at the time of your request.
- Each of the nationwide credit reporting companies – Equifax, Experian, and TransUnion – is required to provide you with a free copy of your credit report, at your request, once every 12 months.
- You are also entitled to a free report if a company takes adverse action against you, like denying your application for credit, insurance, or employment, and you ask for your report within 60 days of receiving notice of the action. The notice will give you the name, address, and phone number of the credit reporting company. You're also entitled to one free report a year if you're unemployed and plan to look for a job within 60 days; if you're on welfare; or if your report is inaccurate because of fraud, including identity theft.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited. And you must give your consent for reports to be provided to employers.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.

