



HAMILTON COUNTY, TENNESSEE
OFFICE OF THE COUNTY MAYOR
WESTON WAMP

MEMORANDUM

TO: HAMILTON COUNTY BOARD OF COMMISSIONERS

FROM: MAYOR WESTON WAMP

DATE: APRIL 1, 2025

SUBJECT: NRS DATA BREACH AND HIPAA COMPLIANCE

Commissioners,

I am writing to provide clarity on the recent data breach involving NRS and to address confusion and concerns that have emerged in recent days. I was first made aware of the situation through a Memo from Dana Beltramo received March 11th, more than two weeks after the County Attorney's office and several County Commissioners were made aware of the incident. We have since learned the Memo of March 11th included several inaccuracies.

This memo is intended to set the record straight, outline the facts as I understand them, and ensure we move forward with transparency and urgency.

1. July 2024 Email from NRS

On July 14, 2024, NRS sent an email to EMS Billing—a department distinct from EMS. Despite what was stated in Ms. Beltramo's Memo, this correspondence was not a breach notification. Rather, it was a notice of suspicious activity that NRS was continuing to investigate. The email stated that if it was determined that Hamilton County data had been impacted, we would be further notified.

2. February 2025 Letter from NRS

On February 17, 2025, a letter was mailed to "Hamilton County EMS" at the McDaniel Building (Finance Department). This letter is a follow up from the July 2024 email and serves as the formal notification of a confirmed breach.

NRS states in this letter that it only recently determined Hamilton County patient/customer information was affected. Accordingly, this correspondence is the triggering document that initiates any obligation the County may have to notify impacted individuals, not the July 2024 email as stated in the Memo the Times Free Press obtained.

3. Timing and Internal Awareness

On March 11, 2025, I received an interoffice memorandum from Dana Beltramo regarding a HIPAA breach involving Hamilton County data. This was the first time any member of the County Mayor's Office received official communication regarding the NRS breach and that it impacted Hamilton County EMS patients.



It is deeply concerning that knowledge of this issue existed prior to the March 5 Baker Donelson meeting regarding HIPAA compliance, but was not disclosed to me or anyone with oversight of the day-to-day operations of county government.

- In an email, Rheubin Taylor stated, “my office was informed of the breach incident a couple of days before last Wednesday’s (March 5) meeting,” yet I, as chief executive of the county, was not informed until more than two weeks later. According to Dana Beltramo’s Memorandum, she states the County Attorney’s Office received the February 17, 2025 letter on February 24, 2025, nine days prior to the meeting at Baker Donelson.
- Additionally, when a question arose as to why elected officials were not informed of the breach prior to the Baker Donelson meeting, Commissioner Sharpe noted in an email that “all the appropriate individuals on the County Commission were timely informed and consulted as to when the rest of the CC would be brought up to speed,” further underscoring the withholding of information.
- Prior to this incident, COS McVay and COO Roddy had repeatedly requested through County Attorney Taylor that information pertaining to HIPAA compliance be shared with each of them, so they are aware of issues impacting county general government.

This raises serious and troubling questions about the withholding of information from officials. Why was I, along with senior members of my administration, kept out of the loop about such a critical matter for more than two weeks, especially in light of the fact that corrective action will most likely be required?

5. Next Steps

As of today, we are just 16 days away from the 60-day deadline to notify patients impacted by this breach.

In my conversations with Commissioners, I have learned of an effort to move Risk Management and/or HIPAA compliance as a stand alone department reporting to the Commission. I reached out to CTAS to find out whether a department of county government can report to the Commission and was told: “it is not within the law for the county commission to manage the day-to-day operations of a county department.” Attached is CTAS’s email clarifying its position on this matter.

As the Chief Executive Officer of Hamilton County government, I am responsible for ensuring our government remains in compliance with all applicable laws and regulations. However, that responsibility depends on timely communication with my office. When critical information is withheld or delayed, it undermines our ability to act swiftly and puts the county at legal and reputational risk.

To meet the 60-day notification requirement and prevent similar breakdowns in the future, I believe Risk Management should be formally placed under the purview of the Human Resources Department, as proposed in Resolution 425-5.

Sincerely,

A handwritten signature in black ink, appearing to read "West Wamp", written in a cursive style.

Weston Wamp
Mayor, Hamilton County