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March 15, 2022

**VIA E-MAIL**

Office of Washington Attorney General  
Consumer Protection Division  
800 5<sup>th</sup> Ave., Suite 2000  
Seattle, WA 98104-3188

**Re: Chelan Douglas Health District – Incident Notification**

Dear Sir or Madam:

McDonald Hopkins PLC represents Chelan Douglas Health District. I am writing to provide notification of an incident at Chelan Douglas Health District that may affect the security of personal information of approximately 108,906 residents. Chelan Douglas Health District's investigation is ongoing, and this notification will be supplemented with any new or significant facts or findings subsequent to this submission, if any.

Chelan Douglas Health District recently discovered unauthorized access to its network occurred between July 2, 2021 and July 4, 2021. Chelan Douglas Health District immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate and analyze these types of situations to analyze the extent of any compromise of the information on its network. Based on its comprehensive investigation and document review, we discovered on February 12, 2022, Chelan Douglas Health District discovered that certain identifiable personal information was removed from its network in connection with this incident, including the affected residents' full names and one or more of the following: Social Security numbers, dates of birth/death, driver's license numbers, financial account information, medical information, and/or health insurance policy information.

To date, Chelan Douglas Health District is not aware of any reports of identity fraud or improper use of any information as a direct result of this incident. Nevertheless, out of an abundance of caution, Chelan Douglas Health District wanted to inform you (and the affected residents) of the incident and to explain the steps that it is taking to help safeguard the affected residents against identity fraud. Chelan Douglas Health District is providing the affected residents with written notification of this incident commencing on or about March 15, 2022 in substantially the same form as the letter attached hereto. Chelan Douglas Health District is offering the affected residents whose Social Security numbers were impacted complimentary one-year memberships with a credit monitoring service. Chelan Douglas Health District is advising the affected residents

about the process for placing fraud alerts and/or security freezes on their credit files and obtaining free credit reports. The affected residents whose bank account information was impacted are being advised to contact their financial institutions to inquire about steps to take to protect their accounts. The affected residents are also being provided with the contact information for the consumer reporting agencies and the Federal Trade Commission. The affected residents whose medical information was impacted are also being provided steps to take to safeguard themselves against medical identity theft.

At Chelan Douglas Health District, protecting the privacy of personal information is a top priority. Chelan Douglas Health District is committed to maintaining the privacy of personal information in its possession and has taken many precautions to safeguard it. Chelan Douglas Health District continually evaluates and modifies its practices and internal controls to enhance the security and privacy of personal information.

Notice is being provided pursuant to the HIPAA Breach Notification Rule, 45 CFR §§ 164.400, *et seq.*

Should you have any questions regarding this notification, please contact me at (248) 220-1356 or [dpaluzzi@mcdonaldhopkins.com](mailto:dpaluzzi@mcdonaldhopkins.com). Thank you for your cooperation.

Sincerely,



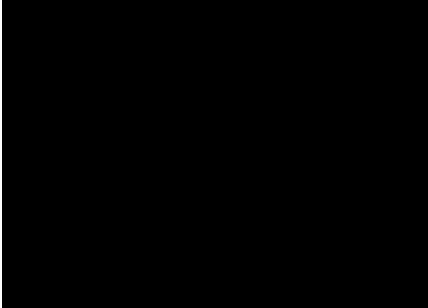
Dominic A. Paluzzi

Encl.



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

***IMPORTANT INFORMATION  
PLEASE REVIEW CAREFULLY***



Dear [REDACTED]:

We are writing with important information regarding a recent security incident. The privacy and security of the personal and protected health information we maintain is of the utmost importance to Chelan Douglas Health District. We wanted to provide you with information about the incident, explain the services we are making available to you, and let you know that we continue to take significant measures to protect your information.

*What Happened?*

We discovered unauthorized access to our network occurred between July 2, 2021 and July 4, 2021.

*What We Are Doing.*

We immediately launched an investigation in consultation with outside cybersecurity professionals who regularly investigate these types of situations to analyze the extent of any compromise of the information on our network.

*What Information Was Involved?*

Based on our comprehensive investigation and document review, we discovered on February 12, 2022 that certain identifiable personal and protected health information, including your full name and one or more of the following may have been removed from our network in connection with this incident: [REDACTED]

*What You Can Do.*

To date, we are not aware of any reports of identity fraud or improper use of your information as a direct result of this incident. Out of an abundance of caution, we wanted to make you aware of the incident, explain the services we are making available to help safeguard you against identity fraud, and suggest steps that you should take as well. To protect you from potential misuse of your information, 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 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.

This letter also provides other precautionary measures you can take to protect your personal information, including placing a Fraud Alert and/or Security Freeze on your credit files, and/or obtaining a free credit report. Additionally, you should always remain vigilant in reviewing your financial account statements and credit reports for fraudulent or irregular activity on a regular basis. To the extent it is helpful, we have also provided information on protecting your medical information on the following pages.

For More Information.

Please accept our apologies that this incident occurred. We are committed to maintaining the privacy of personal and protected health information in our possession and have taken many precautions to safeguard it. We continually evaluate and modify our practices and internal controls to enhance the security and privacy of your personal and protected health information.

**If you have any further questions regarding this incident, please call our dedicated and confidential toll-free response line that we have set up to respond to questions at [REDACTED].** This response line is staffed with professionals familiar with this incident and knowledgeable on what you can do to protect against misuse of your information. The response line is available Monday through Friday, 9 am to 9 pm Eastern Time.

Sincerely,

Chelan Douglas Health District

– OTHER IMPORTANT INFORMATION –

**1. Enrolling in Complimentary 12-Month Credit Monitoring.**

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

1. ENROLL by: [REDACTED] (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: [REDACTED]

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 [REDACTED] 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 IdentityWorks, 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™:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance\*\*:** 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 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.

\* Offline members will be eligible to call for additional reports quarterly after enrolling.

\*\* The Identity Theft Insurance is underwritten and administered by American Bankers Insurance Company of Florida, an Assurant company. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

**2. Placing a Fraud Alert on Your Credit File.**

Whether or not you choose to use the complimentary 12 month credit monitoring services, we recommend that you place an initial one-year "Fraud Alert" on your credit files, at no charge. A fraud alert tells creditors to contact you personally before they open any new accounts. To place a fraud alert, call any one of the three major credit bureaus at the numbers listed below. As soon as one credit bureau confirms your fraud alert, they will notify the others.

**Equifax**  
P. O. Box 105788  
Atlanta, GA 30348  
<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>  
(800) 525-6285

**Experian**  
P. O. Box 9554  
Allen, TX 75013  
<https://www.experian.com/fraud/center.html>  
(888) 397-3742

**TransUnion**  
P. O. Box 6790  
Fullerton, CA 92834-6790  
<https://www.transunion.com/fraud-alerts>  
(800) 680-7289

**3. Consider Placing a Security Freeze on Your Credit File.**

If you are very concerned about becoming a victim of fraud or identity theft, you may request a "Security Freeze" be placed on your credit file, at no charge. A security freeze prohibits, with certain specific exceptions, the consumer reporting agencies from releasing your credit report or any information from it without your express authorization. You may place a security freeze on your credit report by contacting all three nationwide credit reporting companies at the numbers below and following the stated directions or by sending a request in writing, by mail, to all three credit reporting companies:

**Equifax Security Freeze**

P.O. Box 105788  
Atlanta, GA 30348  
<https://www.equifax.com/personal/credit-report-services/credit-freeze/>  
1-800-349-9960

**Experian Security Freeze**

P.O. Box 9554  
Allen, TX 75013  
<http://experian.com/freeze>  
1-888-397-3742

**TransUnion Security Freeze**

P.O. Box 2000  
Chester, PA 19016  
<https://www.transunion.com/credit-freeze>  
1-888-909-8872

In order to place the security freeze, you'll need to supply your name, address, date of birth, Social Security number and other personal information. After receiving your freeze request, each credit reporting company will send you a confirmation letter containing a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

If your personal information has been used to file a false tax return, to open an account or to attempt to open an account in your name or to commit fraud or other crimes against you, you may file a police report in the city in which you currently reside.

If you do place a security freeze *prior* to enrolling in the credit monitoring service as described above, you will need to remove the freeze in order to sign up for the credit monitoring service. After you sign up for the credit monitoring service, you may refreeze your credit file.

#### **4. Obtaining a Free Credit Report.**

Under federal law, you are entitled to one free credit report every 12 months from each of the above three major nationwide credit reporting companies. Call **1-877-322-8228** or request your free credit reports online at **[www.annualcreditreport.com](http://www.annualcreditreport.com)**. Once you receive your credit reports, review them for discrepancies. Identify any accounts you did not open or inquiries from creditors that you did not authorize. Verify all information is correct. If you have questions or notice incorrect information, contact the credit reporting company.

#### **5. Additional Helpful Resources.**

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Checking your credit report periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Be sure to obtain a copy of the police report, as many creditors will want the information it contains to absolve you of the fraudulent debts. You may also file a complaint with the FTC by contacting them on the web at [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft), by phone at 1-877-IDTHEFT (1-877-438-4338), or by mail at Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcement for their investigations. In addition, you may obtain information from the FTC about fraud alerts and security freezes.

If this notice letter states that your bank account information was impacted, we recommend that you contact your financial institution to inquire about steps to take to protect the account, including whether you should close the account or obtain a new account number.

**North Carolina Residents:** You may obtain information about preventing identity theft from the North Carolina Attorney General's Office: Office of the Attorney General of North Carolina, Department of Justice, 9001 Mail Service Center, Raleigh, NC 27699-9001, [www.ncdoj.gov/](http://www.ncdoj.gov/), Telephone: 877-566-7226.

#### **6. Protecting Your Medical Information.**

We have no information to date indicating that your medical information involved in this incident was or will be used for any unintended purposes. As a general matter, however, the following practices can help to protect you from medical identity theft.

- Only share your health insurance cards with your health care providers and other family members who are covered under your insurance plan or who help you with your medical care.
- Review your "explanation of benefits statement" which you receive from your health insurance company. Follow up with your insurance company or care provider for any items you do not recognize. If necessary, contact the care provider on the explanation of benefits statement and ask for copies of medical records from the date of the potential access (noted above) to current date.
- Ask your insurance company for a current year-to-date report of all services paid for you as a beneficiary. Follow up with your insurance company or the care provider for any items you do not recognize.