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Helping individuals, families and communities improve the quality of lives
for those with behavioral health and developmental challenges.

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February 19, 2019

[REDACTED]

Dear Ms. [REDACTED]

I am writing to notify you that Behavioral Health Network ("BHN") has become aware of an incident involving the inappropriate access of your personal information contained in our electronic medical record for services rendered at BHN. We learned that one member of our staff, with whom you may have had personal contact with in the past, had accessed your medical record. To our knowledge, the information viewed was shared directly with one member of his family, who in turn may have shared it with others.

We learned of this situation from our staff who work with one of our healthcare partners, the Holyoke Health Center. They were informed of this matter from a complaint you had shared with them. Once we learned of the matter, we conducted our own internal investigation which included an audit of our Electronic Medical Record. This audit confirmed that one of our staff had inappropriately accessed your medical record. This employee was later interviewed and admitted to his actions. He further stipulated that he knew his actions were in violation of both BHN policy and HIPAA regulations.

~~BHN takes very seriously our responsibility to safeguard your information. Once we became aware of this incident, we immediately secured your record to prevent further access. As a result of this incident, we are reviewing our policies and procedures and will make updates as needed. Furthermore, we have taken appropriate measures in addressing the employee's failure to adhere to BHN policy.~~

Although we have no reason to believe your social security number or any other information has been used or disclosed in an unauthorized manner, you may wish to consider taking the following steps:

- Call the toll-free numbers of any one of the three major credit bureaus (below) to place a fraud alert on your credit report. This can help prevent an identity thief from opening additional accounts in your name. As soon as the credit bureau confirms your fraud alert, the other two credit bureaus will automatically be notified to place alerts on your credit report, and all three reports will be sent to you free of charge.
 - **Equifax:** 1-800-525-6285; www.equifax.com; P.O. Box 740241, Atlanta, GA 30374-0241.
 - **Experian:** 1-888-EXPERIAN (397-3742); www.experian.com; P.O. Box 9532, Allen, TX 75013.
 - **TransUnion:** 1-800-680-7289; www.transunion.com; Fraud Victim Assistance Division, P.O. Box 6790, Fullerton, CA 92834-6790.
- Order your credit reports. By establishing a fraud alert, you will receive a follow-up letter that will explain how you can receive a free copy of your credit report. When you receive your credit report, examine it closely and look for signs of fraud, such as credit accounts that are not yours.
- Continue to monitor your credit reports. Even though a fraud alert has been placed on your account, you should continue to monitor your credit reports to ensure an imposter has not opened an account with your personal information.
- Under Massachusetts law, you have the right to obtain any police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.
- Massachusetts law also allows consumers to place a security freeze on their credit reports. A security freeze prohibits a credit reporting agency from releasing any information from a consumer's credit report without written authorization. However, please be aware that placing a security freeze on your credit report may delay, interfere with, or



prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing or other services.

- If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift or remove a security freeze. In all other cases, a credit reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze. To place a security freeze on your credit report, you must send a written request to each of the three major consumer reporting agencies listed above by regular, certified or overnight mail.

- In order to request a security freeze, you will need to provide the following information:
 1. 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 either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft;
 8. ~~If you are not a victim of identity theft, include payment by check, money order, or credit card (Visa, MasterCard, American Express or Discover only). Do not send cash through the mail.~~

- ~~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 identities 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 of time.

If you have any questions and/or concerns about this incident, you may call (413) 747-0705 during normal business hours of 8:00 am to 5:00 pm, Monday through Friday. Please ask for the Compliance Officer, or visit our web site at www.bhninc.org.

On behalf of BHN, we sincerely apologize and regret that this incident has occurred. The privacy of your health and personal information and that of all of our patients is extremely important to us.

Sincerely,

Katherine B. Wilson
President and CEO