

484 Main St. Suite 345, Denholm Building, Worcester, MA 01608 Voice (508) 755-0350 Toll Free (800) 570-4020 , ext 2359 TTY (508) 755-1003 VP (508) 762-1164 Facsimile (508) 797-4015 Website: www.centerlw.org

> Independent Living Services Personal Care Management Services Deaf & Hard of Hearing Independent Living Services

September 30, 2021

Dear Center for Living & Working PCM Consumer,

I'm writing to inform you of a privacy incident that took place when a former nurse at Center for Living & Working, Inc. (CLW) provided unauthorized access to other individuals to your personal information. This letter provides information about the outcome of our investigation into this incident and steps you can take if you are concerned about the potential misuse of your personal information.

Our Investigation and Response

On January 28, 2021, CLW was made aware of the incident through an U.S. Department of Health and Human Services, Office for Civil Rights complaint. The complaint alleged the nurse, who was no longer employed at CLW, shared her log-in credentials with other individuals for the purpose of completing clinical evaluations beginning in July 2020. The sharing of credentials was not authorized. Said nurse resigned from CLW on January 14, 2021, prior to the allegation being made.

Our investigation found that there is sufficient evidence to indicate that she shared her credentials and your name, date of birth, MassHealth identification number or other insurance number(s), address, Social Security Number, medications and clinical care need could have been accessed by an unauthorized individual. On January 14, 2021, CLW revoked the nurse's credentials. CLW conducted an investigation which included:

- CLW notified authorities and sought legal assistance whom determined there was a breach of privacy law our Written Information Security Program (WISP).
- CLW reviewed the employee's employment file and ensured she was trained on all of CLW's policies including Confidentiality, Consumer Protection and WISP upon hire.
- CLW reviewed all individuals who had a clinical evaluation completed by this nurse.
- CLW ensured the former employee's access to all databases was terminated.

In response to this incident:

- CLW contacted our information technology vender to discuss safety mechanisms.
- CLW has re-trained all staff on privacy law, WISP and confidentiality policies.

Please note that CLW was required by law to delay sending this notice as a result of a law enforcement referral. Under Massachusetts law, you have the right to obtain any police report that may have been filed in regard to this incident. If you believe that you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.



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What You Can Do

Our investigation has given us <u>no reason</u> to believe that your information has been further used in an impermissible manner. Nevertheless, there are some steps you can take if you are concerned about the potential misuse of your personal information.

You may contact one or more of the three major consumer reporting agencies to take the following actions:

- Notify them of the loss of your personal information and request an initial fraud alert to be placed
 on your credit reports for 1 year. There is no charge to request a fraud alert.
- Order a credit report and review it for any signs of fraud on any accounts. For example, look for
 inquiries listed on the credit report from businesses that accessed your credit without your
 request.
- Request a security freeze which will restrict the opening of new accounts using your information. There is no charge to request a security freeze. Please note that requesting a security freeze on your credit may delay, interfere with or prevent timely approval of any requests made by you for new loans, credits, employment, housing or other services.

Equifax P.O. Box 105788 Atlanta, GA 30348 1-800-349-9960

Security Freeze and Fraud Alter: https://www.equifax.com/personal/credit-report-services/

Experian P.O. Box 9554 Allen, TX 75013 1-888-397-3742

Security Freeze: https://www.experian.com/freeze/center.html

Fraud Alert: www.experian.com/fraud

TransUnion P.O. Box 160 Woodlyn, PA 19094 1-888-909-8872

Security Freeze: https://www.transunion.com/credit-freeze

Fraud Alert: www.transunion.com/fraud



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In order to request a security freeze, you will need to provide some or all of the following information to the credit-reporting agency, depending on whether you do so online, by phone, or by mail:

- 1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.);
- 2. Social Security Number;
- 4. If you have moved in the past five (5) years, the addresses where you have lived over the prior
- 5. Proof of current address, such as a current utility bill, telephone bill, rental agreement, or deed;
- 6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.);
- 7. Social Security Card, pay stub, or W2;
- 8. 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.

The credit reporting agencies have one (1) to three (3) business days after receiving your request to place a security freeze on your credit report, based upon the method of your request. 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. It is important to maintain this PIN/password in a secure place, as you will need it to lift or remove the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must make a request to each of the credit reporting agencies by mail, through their website, or by phone (using the contact information above). You must provide proper identification (including name, address,

and social security number) and the PIN 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. You may also temporarily lift a security freeze for a specified period of time rather than for a specific entity or individual, using the same contact information above. The credit bureaus have between one (1) hour (for requests made online) and three (3) business days (for request made by mail) after receiving your request to lift the security freeze for those identified entities or for the specified period of time.

To remove the security freeze, you must make a request to each of the credit reporting agencies by mail, through their website, or by phone (using the contact information above). You must provide proper identification (name, address, and social security number) and the PIN or password provided to you when you placed the security freeze. The credit bureaus have between one (1) hour (for requests made online) and three (3) business days (for requests made by mail) after receiving your request to remove the security freeze.



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In order to protect yourself against identity theft or other fraud you may want to place a fraud alerts on your credit file; review your credit reports for unexplained activity; and review credit card or other financial accounts for any suspicious and/or unauthorized activity.

Because the unauthorized person accessed your personal information, we would like to offer you 24 months of credit monitoring. This is to lower any risk of identity theft. Additionally, we encourage you to enroll in the complimentary credit monitoring services we are offering. To enroll in this service, go directly to myTrueIdentity website at www.mytrueidentity.com and in the space referenced as "Enter Activation Code", enter the following unique 12-letter Activation Code FFVCVYSBSKXB and follow the three steps to receive your credit monitoring service online within minutes.

Once you are enrolled, you will be able to obtain two years of unlimited access to your TransUnion credit report and VantageScore® credit score by TransUnion. The daily credit monitoring service will notify you if there are any critical changes to your credit file at TransUnion, including fraud alerts, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes the ability to lock and unlock your TransUnion credit report, access to identity restoration services that provides assistance in the event your identity is compromised to help you restore your identity and up to \$1,000,000 in identity theft insurance with no deductible. (Policy limitations and exclusions may apply.*)

You can sign up for the online credit monitoring service anytime between now and **January 31, 2022**. Due to privacy laws, we cannot register you directly. Please note that credit monitoring service might not be available for individuals who do not have a credit file with TransUnion, or an address in the United States (or its territories) and a valid Social Security number, or are under the age of 18. Enrolling in this service will not affect your credit score.

If you have questions about your online credit monitoring benefits, need help accessing your credit report, or passing identity verification, please contact the *my*TrueIdentity Customer Service Team toll-free at: 1-844-787-4607, Monday-Friday: 8am-9pm, Saturday-Sunday: 8am-5pm Eastern time.

We are sorry that this incident has occurred. CLW takes the confidentiality of your personal information very seriously, and we regret any inconvenience or concern this incident has caused you. If you have any questions, please contact Meg Coffin, CEO at 508-755-1101 or mcoffin@centerlw.org.

Meg Coffin

Meg Coffin

CEO

This information is important. It should be translated right away.

Esta información es importante y debe ser traducida inmediatamente.	(Spanish)
	(Brazilian Portuguese)
Esta informação é importante. Deverá ser traduzida imediatamente.	(Chinese)
此處的資訊十分重要,應立即翻譯。	(Haitian Creole)
Enfòmasyon sa enpòtan. Yo fèt pou tradwi li tou swit.	(Vietnamese)
Những tin tức này thật quan trọng. Tin tức này cần phải thông dịch liền.	•
Эта информация очень важна. Ее нужно перевести немедленно.	(Russian)
هذه المعلومات هامة. يجب ترجمتها فوراً.	(Arabic)
- ·	(Cambodian)
នេះគឺជាព័ត៌មានសំខាន់។ វាគួរតែបានបកប្រែភ្លាមៗ។	(French)
Cette information est importante. Prière de la traduire immédiatement.	(Italian)
Questa informazione e importante. Si pregha di tradurla inmediatamente.	(Korean)
이 정보는 중요합니다. 이는 즉시 번역해야 합니다.	(Greek)
Αυτή η πληροφορία είναι σημαντική και πρέπει να μεταφραστεί άμεσα.	•
To jest ważna informacja. Powinna zostać niezwłocznie przetłumaczona.	(Polish)
यह जानकारी महत्वपूर्ण है। इसका अनुवाद भलीभांति किया जाना चाहिए।	(Hindi)
આ માહિતી મહત્વની છે. તેનું તરત જ અનુવાદ થવું જોઇએ.	(Gujarati)
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