



MULLEN
COUGHLIN^{LLC}
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October 20, 2020

VIA E-MAIL

Office of the Attorney General of Iowa
Consumer Protection Division
Security Breach Notification
1305 E. Walnut Street
Des Moines, Iowa 50319-0106
E-mail: consumer@ag.iowa.gov

Re: Notice of Data Event

Dear Sir or Madam:

We represent Timberline Billing Service, LLC (“Timberline”) located at 1801 Fuller Road West Des Moines, IA 50265, and are writing to notify your office of an incident that may affect the security of some personal information relating to five hundred eighty-seven (587) Iowa residents. This notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Timberline does not waive any rights or defenses regarding the applicability of Iowa law, the applicability of the Iowa data event notification statute, or personal jurisdiction.

This notice is being provided to your office by Timberline on behalf of the below named entity, as Timberline experienced a data event impacting personal information received from and relating to this entity, which is understood to be the data owner of the personal information. The information that may have been impacted by this incident varies by individual and is broken down in relation to each of Timberline’s customer school districts on behalf of whom this notification is being submitted:

- Council Bluffs Community School District, located at 300 W. Broadway, Suite 1600, Council Bluffs, IA 51503, has 587 impacted Iowa residents. The data involved was name and Social Security number.

Nature of the Data Event

On March 5, 2020, Timberline noticed suspicious activity on its systems. Timberline launched an investigation to determine the nature and scope of this activity. On March 16, 2020, Timberline notified its data owner clients that it had experienced a security incident and would provide additional information once more was known, including whether any personal information had been subject to unauthorized access or acquisition. Working with outside computer forensics specialists, Timberline determined that an unknown actor accessed the Timberline network between February 12, 2020 and March 4, 2020, encrypted certain files, and also claimed to have removed certain information from the Timberline network. However, the investigation was unable to determine which specific information on Timberline's systems was actually accessed or acquired by the unauthorized actor, and the unauthorized actor did not provide proof of the data which they purportedly removed. Therefore, out of an abundance of caution, Timberline undertook a comprehensive and time-intensive review of all files that could have been impacted to identify any sensitive information present relating to its customer school districts and their students or other related individuals.

This review was completed on or about June 10, 2020, and determined that protected health information ("PHI"), as defined by HIPAA, and/or personally identifiable information ("PII") belonging to Timberline's customer school districts was present in files that may have been subject to unauthorized access or acquisition. However, for a significant number of impacted individuals, the review was unable to match the individuals' information with the related customer school district to whom the data belonged. To address this issue, Timberline undertook a detailed review of both the source documents in which PHI and/or PII identified and its own internal records to identify which school district clients the individuals' information belonged to.

On September 2, 2020, Timberline provided notice to its impacted customer school districts with which the impacted individuals' information is associated that this information was impacted by the incident. Timberline offered to provide notice of the incident and identity protection services to individuals, as well as notice to applicable privacy regulators, on behalf of the school districts. Since that time, Timberline continues to work diligently to assist all school districts who wish to accept its offer to coordinate the notifications.

Notice to Iowa Residents

On October 20, 2020, Timberline mailed written notice of this incident to affected individuals on behalf of its abovenamed customer school district. The number of affected individuals includes five hundred eighty-seven (587) Iowa residents. Written notice is being provided in substantially the same form as the letter attached here as *Exhibit A*.

Other Steps Taken and To Be Taken

Upon learning of this incident, Timberline moved quickly to investigate and respond to the incident, assess the security of relevant Timberline systems, and identify potentially affected individuals. Timberline reported this incident to law enforcement. Timberline is taking steps to

enhance the security of the Timberline systems in addition to the robust security measures already in place, including upgrading all servers and firewalls, resetting all user passwords and requiring frequent password rotations, and migrating school and student data to a cloud location. Although there is no indication of misuse of personal information, and Timberline was unable to confirm with certainty that data was accessed or acquired by an unauthorized actor, Timberline is offering 12 months of complimentary identity monitoring services to impacted individuals through Experian.

Additionally, Timberline is providing impacted individuals with guidance on how to better protect against identity theft and fraud, including advising individuals to report any suspected incidents of identity theft or fraud to their credit card company and/or bank. Timberline is providing individuals with information on how to place a fraud alert and security freeze on one's credit file, information on protecting against tax fraud, the contact details for the national consumer reporting agencies, information on how to obtain a free credit report, a reminder to remain vigilant for incidents of fraud and identity theft by reviewing account statements and monitoring free credit reports, and encouragement to contact the Federal Trade Commission, their state Attorney General, and law enforcement to report attempted or actual identity theft and fraud.

Contact Information

Should you have any questions regarding this notification or other aspects of the data security event, please contact us at (267) 930-4801.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Walker".

Alexander T. Walker of
MULLEN COUGHLIN LLC

ATW/zlg
Enclosure

EXHIBIT A



Return Mail Processing
PO Box 589
Claysburg, PA 16625-0589

October 20, 2020

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PARENT OR GUARDIAN OF
SAMPLE A SAMPLE - L01 GENERAL - MINOR
APT 123
123 ANY ST
ANYTOWN, US 12345-6789



Re: Notice of Data Event

Dear Sample A Sample,

Timberline Billing Service, LLC is writing on behalf of [Extra1 - School District Name] to notify you of a data privacy incident that may impact the privacy of some of your minor dependent’s personal information. While we are unaware of any actual misuse of your minor dependent’s information, we are providing you with information about the incident, our response, and the steps you may take to better protect against possible misuse of your minor dependent’s information, should you feel it necessary to do so.

Who is Timberline and Why Did They Have My Minor Dependent’s Information? Timberline contracts with over 190 of the more than 320 school districts in Iowa. We support our clients claiming of Medicaid reimbursement for covered IEP services. As part of this process, the school district sends Timberline a listing of IEP students from the state IEP system.

What Happened? On March 5, 2020, Timberline noticed suspicious activity on its network impacting certain servers and systems. We launched an investigation to determine the nature and scope of this activity. Working with outside computer forensic specialists, we determined that an unknown actor accessed our network between February 12, 2020 and March 4, 2020, encrypted certain files, and also removed certain information from our network; however, the investigation was unable to determine which specific information was actually removed. Therefore, out of an abundance of caution, we undertook a comprehensive and time-intensive review of all files that could have been impacted. This review was recently completed and determined that protected health information and/or personal information relating to your minor dependent was present in files that may have been compromised. On September 2, 2020, we provided confirmation to school district with which your minor dependent’s information is or was associated that your information was impacted by this incident.

What Information Was Involved? The investigation determined the following types of your minor dependent’s information were involved: name and [Extra2 - Data Elements]. To date, Timberline is unaware of any actual or attempted misuse of personal information as a result of this incident.



What We Are Doing. The security, privacy, and confidentiality of your minor dependent's personal information are among our highest priorities. Upon learning of this incident, Timberline moved quickly to investigate and respond to the incident, assess the security of relevant Timberline systems, and identify potentially affected individuals. Timberline reported this incident to law enforcement and is also reporting this incident to certain regulatory authorities, as required. We are taking steps to enhance the security of our systems in addition to the robust security measures already in place including upgrading all servers and firewalls, resetting all user passwords and requiring frequent password rotations, and migrating school and student data to a cloud location. While we are unaware of any misuse of your minor dependent's information as a result of this incident, we are offering your minor dependent access to 12 months of minor identity monitoring through Experian at no cost to you.

What You Can Do. Please review the instructions contained in the attached "Steps You Can Take to Protect Your Personal Information," to enroll in these services.

For More Information. We recognize that you may have questions that are not addressed in this notice. If you have additional questions or concerns, please call our toll-free dedicated assistance line at (844) 439-7669. This toll-free line is available Monday – Friday from 8:00 am to 10:00 pm CT and Saturday – Sunday from 10:00 am to 7:00 pm CT.

We sincerely regret the inconvenience this event may cause you. We remain committed to safeguarding the information in our care and will continue to take steps to ensure the security of our systems.

Sincerely,

A handwritten signature in black ink, appearing to read "Dann Stevens", with a stylized flourish at the end.

Dann Stevens
Chief Executive Officer
Timberline Billing Service, LLC

Steps You Can Take to Protect Your Minor Dependent's Information

Enroll in Complimentary One-Year of Identity Monitoring Service

To help protect your minor's identity, we are offering a complimentary one-year membership of Experian's® IdentityWorksSM. This product provides superior identity detection and resolution of identity theft. To activate this membership and start monitoring your minor's personal information please follow the steps below:

- Ensure that you **enroll by: January 31, 2021** (Your code will not work after this date.)
- **Visit** the Experian IdentityWorks website to enroll: <https://www.experianidworks.com/minorplus>
- Provide your **activation code: ABCDEFGHI**
- Provide your minor's information when prompted

If you have questions about the product, need assistance with identity restoration for your minor or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at (844) 439-7669 by **January 31, 2021**. Be prepared to provide engagement number **DB23244** as proof of eligibility for the identity restoration services by Experian.

Additional details regarding the 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 for your minor:

- **Social Security Number Trace:** Monitoring to determine whether enrolled minors in your household have an Experian credit report. Alerts of all names, aliases and addresses that become associated with your minor's Social Security Number (SSN) on the Experian credit report.
- **Internet Surveillance:** Technology searches the web, chat rooms & bulletin boards 24/7 to identify trading or selling of your personal information on the Dark Web.
- **Identity Restoration:** Identity Restoration specialists are immediately available to help you address credit and non-credit related fraud.
- **Experian IdentityWorks ExtendCARETM:** Receive the same high-level of Identity Restoration support even after the Experian IdentityWorks membership has expired.
- **Up to \$1 Million Identity Theft Insurance*:** Provides coverage for certain costs and unauthorized electronic fund transfers.

If you believe there was fraudulent use of your minor's information and would like to discuss how you may be able to resolve those issues, please reach out to an Experian agent at (844) 439-7669. 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).

** 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.*

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Please note that this Identity Restoration support is available to your minor 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 www.ExperianIDWorks.com/restoration. You will also find self-help tips and information about identity protection at this site.

Monitor Your Accounts

To protect against the possibility of identity theft or other financial loss, we encourage you to remain vigilant, to review your account statements, and to monitor your credit reports for suspicious activity. While minors under the age of 18 typically do not have credit files, the following information relates to protecting one's credit once established.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. You should report any suspicious activity to local law enforcement or the attorney general. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

You have the right to place a "security freeze" on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit. Pursuant to federal law, you cannot be charged to place or lift a security freeze on your credit report. Should you wish to place a security freeze, please contact the major consumer reporting agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion

P.O. Box 160
Woodlyn, PA 19094
1-888-909-8872
www.transunion.com/credit-freeze

Equifax

P.O. Box 105788
Atlanta, GA 30348-5788
1-800-685-1111
www.equifax.com/personal/credit-report-services

In order 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 either the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

As an alternative to a security freeze, you have the right to place an initial or extended “fraud alert” on your file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer’s credit file. Upon seeing a fraud alert display on a consumer’s credit file, a business is required to take steps to verify the consumer’s identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting seven years. Should you wish to place a fraud alert, please contact any one of the agencies listed below:

Experian

P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/fraud/center.html

TransUnion

P.O. Box 2000
Chester, PA 19016
1-800-680-7289
www.transunion.com/fraud-victim-resource/place-fraud-alert

Equifax

P.O. Box 105069
Atlanta, GA 30348
1-888-766-0008
www.equifax.com/personal/credit-report-services

Additional Information

You can further educate yourself regarding identity theft, fraud alerts, security freezes, and the steps you can take to protect yourself by contacting the consumer reporting agencies, the Federal Trade Commission, or your state Attorney General or the Federal Trade Commission. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. You can obtain further information on how to file such a complaint by way of the contact information listed above. You have the right to file a police report if you ever experience identity theft or fraud. Please note that in order to file a report with law enforcement for identity theft, you will likely need to provide some proof that you have been a victim. Instances of known or suspected identity theft should also be reported to law enforcement and your state Attorney General. This notice has not been delayed by law enforcement.



