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Cybersecurity & Data Privacy Team
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Direct: 215-770-4234

April 8, 2025

**ELECTRONIC MAIL**
Attorney General Brenna Bird
Office of the Attorney General
Consumer Protection Division
Security Breach Notifications
1305 E Walnut Street
Des Moines, Iowa 50319-0106
Email: consumer@ag.iowa.gov

**RE: NOTICE OF DATA SECURITY INCIDENT**

Attorney General Bird:

Constangy, Brooks, Smith & Prophete, LLP, represents the American Association of Colleges of Osteopathic Medicine ("AACOM") in connection with a recent data security incident described in greater detail below. AACOM takes the protection of all information within its possession very seriously and has taken measures to reduce the likelihood of a similar incident reoccurring. This notice is being sent on behalf of AACOM because personal information for Iowa residents may have been involved in the incident. The purpose of this letter is to notify you of the incident in accordance with Iowa's data breach notification statute, Iowa Code § 715C.2.

## I. NATURE OF THE SECURITY INCIDENT

On September 26, 2024, AACOM discovered unusual activity associated with an employee email account. Upon discovery, AACOM took steps to secure its email environment and engaged independent experts to complete a comprehensive investigation. The investigation determined that certain emails / attachments may have been accessed or acquired without authorization. AACOM then undertook a comprehensive review to determine the nature of the information and the individuals to whom the information pertained, as well as to obtain the addresses for those individuals. That process was completed on March 31, 2025, at which time AACOM worked to arrange for notification.

## II. NUMBER OF IOWA RESIDENTS INVOLVED

On April 8, 2025, AACOM provided notification to 631 potentially affected Iowa residents by first-class U.S. mail via the attached notification letter template or a substantially similar version thereof.

The potentially affected personal information for Iowa residents included names and Social Security numbers.

## III. Steps Taken to Address the Incident

As soon as AACOM became aware of the incident, it took steps to further secure its email environment and conducted a comprehensive investigation. AACOM has also implemented additional measures to further enhance the security of its email environment and reduce the likelihood of a similar incident reoccurring.

Finally, AACOM is notifying the potentially affected individuals and providing them with steps they can take to protect their personal information as discussed above. AACOM has established a toll-free call center through IDX to answer questions about the incident and address related concerns.

AACOM has also arranged to provide the potentially affected Iowa residents whose Social Security numbers may have been involved with twelve (12) months of complimentary credit monitoring and identity protection services through IDX, which will work with individuals to help resolve issues with unrecognized payment card transactions.

AACOM is also reporting the incident to the major nationwide consumer reporting agencies (i.e., Equifax, Experian, and Transunion).

## IV. Contact Information

AACOM remains dedicated to protecting the information in its control. If you have any questions or need additional information, please do not hesitate to contact me at aweaver@constangy.com.

Sincerely,

Aubrey Weaver
Partner
Constangy, Brooks, Smith & Prophete, LLP

Encl. Sample Notification Letter

AACOM
American Association of Colleges of Osteopathic Medicine
P.O. Box 989728
West Sacramento, CA 95798-9728

Enrollment Code: <<ENROLLMENT>>
To Enroll, Scan the QR Code Below:

SCAN ME

Or Visit:
https://app.idx.us/account-creation/protect

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>
<<Country>>

April 8, 2025

Subject: Notice of Data <<Variable Text 2: Header>>

Dear <<First Name>> <<Last Name>>:

We are writing to inform you of a data security incident that may have involved your personal information. American Association of Colleges of Osteopathic Medicine ("AACOM") takes the privacy and security of the data under our care very seriously and we regret any concern or inconvenience this may cause. Please read this letter carefully as it contains information regarding the incident and steps you can take to help protect your personal information.

**What Happened.** On September 26, 2024, we discovered unusual activity associated with an employee email account. Upon discovery, we took steps to secure our email environment and engaged independent experts to complete a comprehensive investigation. The investigation determined that certain emails / attachments may have been accessed or acquired without authorization. We then undertook a comprehensive review to determine the nature of the information and the individuals to whom the information pertained, as well as to obtain the addresses for those individuals. That process was completed on March 31, 2025. Please note that we have no evidence of the misuse, or attempted misuse, of any potentially affected information.

**What Information Was Involved**. The information that may have been involved in this incident included your <<Variable Text 1: Data Elements>>.

**What We Are Doing.** As soon as we discovered this incident, we took the steps described above and implemented measures to enhance security and minimize the risk of a similar incident occurring in the future.

Although we have no evidence of the misuse of any information as a result of this incident, we are also offering you complimentary identity protection services through IDX, a data breach and recovery services expert. IDX identity protection services include: <<12 months/24 months>> of credit and CyberScan monitoring, a $1,000,000 insurance reimbursement policy, and fully managed ID theft recovery services. With this protection, IDX will help you resolve issues if your information is compromised.

You can enroll in the IDX services by calling 1-877-798-4138 or by going to https://app.idx.us/account-creation/protect and using the enrollment code provided above. Please note the deadline to enroll is July 8, 2025.

**What You Can Do.** Please review this letter carefully, along with the guidance included with this letter about additional steps you can take to protect your information. You can also enroll in the IDX services, which are offered to you at no cost, using the instructions above. Please note the deadline to enroll in these complimentary services is July 8, 2025. Please do not discard this letter, as you will need the unique code provided above to access services.

**For More Information.** If you have questions about this letter or need assistance, please call IDX at 1-877-798-4138. IDX representatives are available Monday through Friday from 9 am – 9 pm Eastern Time. IDX representatives have been fully versed on the incident and can answer questions or concerns you may have regarding protection of your personal information.

Sincerely,

***AACOM***
7700 Old Georgetown Road, Suite 250
Bethesda, Maryland 20814

**Steps You Can Take to Help Protect Your Personal Information**

**Review Your Account Statements and Notify Law Enforcement of Suspicious Activity:** As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (the "FTC").

**Copy of Credit Report:** You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting www.annualcreditreport.com/, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

**Equifax**
P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

**Experian**
P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

**TransUnion**
P.O. Box 2000
Chester, PA 19016
1-800-916-8800
www.transunion.com

**Fraud Alert:** You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at www.annualcreditreport.com.

**Security Freeze:** You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

**Additional Free Resources:** You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

**Federal Trade Commission**
600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov
877-438-4338

**Maryland Attorney General**
200 St. Paul Place
Baltimore, MD 21202
www.marylandattorneygeneral.gov/Pages/CPD
888-743-0023

**Oregon Attorney General**
1162 Court St., NE
Salem, OR 97301
www.doj.state.or.us/consumer-protection
877-877-9392

**California Attorney General**
1300 I Street
Sacramento, CA 95814
www.oag.ca.gov/privacy
800-952-5225

**New York Attorney General**
The Capitol
Albany, NY 12224
800-771-7755
ag.ny.gov

**Rhode Island Attorney General**
150 South Main Street
Providence, RI 02903
www.riag.ri.gov
401-274-4400

**Iowa Attorney General**
1305 E. Walnut Street
Des Moines, Iowa 50319
www.iowaattorneygeneral.gov
888-777-4590

**NY Bureau of Internet and Technology**
28 Liberty Street
New York, NY 10005
www.dos.ny.gov/consumerprotection/
212.416.8433

**Washington D.C. Attorney General**
400 S 6th Street, NW
Washington, DC 20001
oag.dc.gov/consumer-protection
202-442-9828

**Kentucky Attorney General**
700 Capitol Avenue, Suite 118
Frankfort, Kentucky 40601
www.ag.ky.gov
502-696-5300

**NC Attorney General**
9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov/protectingconsumers/
877-566-7226

**You also have certain rights under the Fair Credit Reporting Act (FCRA)**: These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit www.consumer.ftc.gov/sites/default/files/articles/pdf/pdf-0096-fair-credit-reporting-act.pdf.