Archived: Thursday, August 17, 2023 10:51:31 AM

Subject: FW: Notice of security breech notification of more than 500 Iowa residents

From: Compliance < Compliance@healthcare.uiowa.edu>

Sent: Monday, August 14, 2023 3:21 PM

To: AG CONSUMER [AG] <consumer@ag.iowa.gov>

Subject: Notice of security breech notification of more than 500 lowa residents

To: Director of the Consumer Protection Division of the Iowa Attorney General

Subject: Notice of security breech notification of more than 500 lowa residents

On March 23, 2023, UI Community HomeCare discovered encrypted files on certain computer systems. UI Community Home Care immediately launched an investigation to determine the nature and scope of the activity. The investigation determined that there was unauthorized access to our servers beginning on or about March 23, 2023 and our systems allowed us to identify the event in a timely manner. UI Community HomeCare has determined that the impacted files contained certain information related to patients. At this time, UI Community HomeCare has seen no evidence of misuse of any information related to this incident. UI Community HomeCare is performing a comprehensive security review of our systems and taking steps to minimize the likelihood of a similar event occurring in the future.

The breach impacted 67,897 total patients. The initial investigation revealed that scope of information potentially involved included name, date of birth, address, phone number, medical record number, referring physician, dates of service, health insurance information, billing and claims information, medical history information, and diagnosis/treatment information. At this time, UI Community Home Care did not believe that patient social security number (SSN) was compromised.

Impacted patients were notified of the breach on May 23, 2023 via letter. UI Community Home care also posted a public notice on their website on May 23, 2023, as well as notices in local and regional newspapers. UI Community Home Care reported the HIPAA breach to the Office of Civil Rights on May 24, 2023. UI Community Home Care did not report the breach to the Iowa Attorney General's Office, as the data points outlined in Iowa Code, Chapter 715C, Personal Information Security Breach Reporting, were not impacted.

The breach also impacted 214 employee's data including name, date of birth, Social Security Number, bank routing information, along with employment record which includes offer letters, salary increases, and if applicable, disciplinary reports and FMLA paperwork.

Impacted employees were notified of the breach on May 23, 2023 via letter. UI Community Home care did not report the breach to the Iowa Attorney General's Office, as the number of impacted individuals was below the threshold required in Iowa Code, Chapter 715C, Personal Information Security Breach Reporting.

UI Community Home Care later discovered that 9,828 of the patient record also contained an SSN. The SSN was retained as a part of the patient's electronic medical record for billing and claims purposes. In the original notification letter sent to patients on May 23, 2023, patients were notified that billing and claims information was impacted by the breach. As SSN is a part of billing and claims notification, UI Community Home Care did not renotify impacted patients that SSN was specifically compromised.

As the impacted data points and number of patients now meet the thresholds detailed in Iowa Code, Chapter 715C, Personal Information Security Breach Reporting, UI Community Home Care is notifying the Iowa Attorney General of the breach. If you have additional questions, please contact Kiley Bybee, Associate Director, Joint Office for Compliance, or Sarah Younker, Compliance Specialist, Joint Office for Compliance, at 319-384-8282 or compliance@healthcare.uiowa.edu.

Thank you,

## Sarah Younker, MOL, CHPC

Compliance Specialist | Joint Office for Compliance | <u>University of Iowa Health Care</u> Tel: 319-384-8282 | compliance@healthcare.uiowa.edu