



## IMPORTANT PRIVACY NOTICE

Please be advised, if you had health insurance coverage through FirstCare Health Plans during June 2014 to August 2018, this notice may apply to you. To determine if you were impacted, please contact FirstCare at 1-800-884-4901 and reference Case # Aug\_Case 01\_2018.

FirstCare takes member privacy very seriously and it is important to us that you are made fully aware of a potential privacy issue. We have learned that your personal information, including your name, member identification number, description of treatment, procedure codes, authorization number, and treating provider name, may have been compromised. FirstCare has various security controls in place to monitor access, acquisition, use, or disclosure of any electronic protected health information (e-PHI), including Data Loss Prevention rules which function as an added level of security. On August 15, 2018, FirstCare's IT Security Team received an alert that e-PHI was emailed to an external account without a form of encryption. Beginning on March 22, 2017 through August 16, 2018, it was discovered that an automated daily report containing medical requests that did not require prior authorization had been emailed to an unintended recipient in error. However, we have not received any indication that the information has been accessed or used by an unauthorized individual.

To protect against such breaches in the future, we have taken the following immediate corrective action steps:

- We updated the automated daily report to remove the unintended recipient from the distribution list; this occurred as soon as the incident was discovered.
- Following the update to the distribution list, FirstCare conducted a review of all automated reports to assure no further unauthorized external accounts existed.
- We outreached to the unintended recipient in order to promptly mitigate any information that may have been compromised; however, there was no response to the outreach attempts.
- To ensure the confidentiality, integrity, and availability of any e-PHI that may have been accessed, we engaged the U.S. Federal Government to conduct an investigation for the express purpose of confirming the unintended recipient's identity and to minimize FirstCare asset vulnerability.
- We developed new protocol to regularly monitor the recipients of all active reports. The newly implemented safeguards not only allow FirstCare to monitor changes in a timely manner, but also lead to the development of new auditing parameters specific to change controls.

We are keenly aware of how important your personal information is to you and are committed to lessen the harm this may cause you. If you choose, as a measure of added security, **FirstCare will reimburse one year of credit monitoring and reporting services at the Standard Membership level at no cost to you.** The service is performed through LifeLock, an organization that watches for and reports to you unusual credit activity, such as creating new accounts in your name. LifeLock will also request that the three credit bureaus place a "Fraud Alert" on your credit report.

To take advantage of the free credit monitoring service, please submit a copy of the LifeLock receipt, along with a copy of this notice, by **December 1, 2018**, to:



FirstCare Health Plans  
ATTN: Corporate Compliance  
12940 N Hwy 183  
Austin, TX 78750

We understand that this may be an inconvenience to you. We sincerely apologize and regret that this situation occurred. FirstCare remains committed to providing quality care, including protecting your personal information. Should you have any questions about the incident, please contact FirstCare at [Compliance@FirstCare.com](mailto:Compliance@FirstCare.com).