



November 30, 2006

Teresa A. Santiago, Chairperson and Executive Director  
New York State Consumer Protection Board  
5 Empire State Plaza, Suite 2101  
Albany, New York 12223

Dear Chairperson and Executive Director Santiago:

The purpose of this letter is to notify your office of a recent security incident that may impact residents of your state. First, let me state that Concentra Preferred Systems, Inc. (CPS) takes all privacy concerns seriously and is taking appropriate steps to prevent a similar incident in the future.

In the early morning hours on Thursday, October 26, 2006, one of CPS' satellite business offices — and five other businesses within the same building — were broken into and burglarized. Property stolen from the various businesses includes a variety of easily transportable items, including cash and a lock-box from the CPS office's data room that looked like a "cash-box." This lock-box contained a number of back-up data tapes, as well as blank data tapes.

CPS has confirmed that the data tapes stolen included information from various client engagements. Concentra has confirmed that the data tape cassettes stolen included a subset of information from Humana Inc.'s members.

To date, the analysis performed by CPS' Information Technology team indicates that some of the missing data included personally identifiable information (PII). Based on the nature of the crime and the items taken from the six businesses burglarized, law enforcement authorities believe this to be the act of common thieves looking for cash or pawnable items of value, and not the act of sophisticated criminals targeting PII.

CPS is a business associate of Humana and provides insurance administration services. In consultation with Humana, CPS will send notification letters to a total of 15,243 Humana members across multiple states that may be impacted by this situation.

Notification letters were sent to 523 Humana members in the state of Louisiana who were impacted by this situation. Attached you will find a copy of the letter that includes the steps an individual may take to enroll with a credit monitoring service. In addition, we have also notified the consumer reporting agencies. If you need any additional information, please let me know.

We deeply regret this incident, but want to assure you that CPS has various safeguards to protect individual information including policies, procedures, and technical safeguards. CPS engaged a team of private investigators who have been working in close coordination with local law enforcement. In addition, we have launched our own internal investigation, including a thorough review of additional security measures and actionable steps to prevent future occurrences. CPS will promptly report to your office and appropriate law enforcement officials any information that is shared with us that indicates this information has been inappropriately used.

Again, we understand the gravity of this situation. Please do not hesitate to contact me if you have any additional questions regarding this situation at the telephone number or email address below.

Sincerely,



Dona-Marie Geoffrion  
Vice President/Privacy and Security Officer  
Concentra Preferred Systems, Inc.  
615-778-4066  
dona-marie.geoffrion@concentra.com

cc: James Theiss  
Chief Privacy Officer, Humana Inc.

Enclosure



Date

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Patient Name  
Address  
City, ST Zip

Dear Patient Name,

We are writing to notify you of a recent incident involving your personal information. Concentra Preferred Systems (CPS), a Business Associate for Humana, has recently had some computer data files stolen from one of its office locations. Unfortunately, the data contained personal information of yours. Although we believe the risk of exposure to be minimal, it is possible that your information may have been compromised. We deeply apologize for this unfortunate situation and have taken actions to address this case.

The following is some additional information regarding the incident and may answer some of the questions you may have:

**1.) Why does Concentra have my information?**

To help control costs, health plans (such as Humana) routinely audit claims to make sure that the amounts billed are appropriate for the services provided. Often times health plans use trusted third party vendors such as Concentra to perform specialized claim audits.

**2.) How did my information get taken?**

In the early morning hours on Thursday, October 26, 2006, a CPS satellite business office, and five other businesses within the same building, were broken into and burglarized. Stolen property included a variety of easily transportable items such as cash and a lock-box from the office's secure data room that looked like a "cash-box." This lock-box contained a number of computer data files.

**3.) What type of data was stolen?**

The information on the data files was in many different types of formats and in some cases, not all, may have included the patient name, date of birth, your health plan identification number, date of service, CPT (numeric insurance billing code), numeric diagnosis code, provider name, and provider address. In addition, there may be instances where certain files may have contained a Social Security number.

**4.) Is it likely that someone will use the data?**

To retrieve information from the data files, the criminals would need to have very technical computer knowledge and specific computer equipment (including software). Therefore, we believe it is highly unlikely that common criminals would be able to access the information.

**5.) What is CPS doing to prevent this from happening again?**

A police report was immediately filed and law enforcement authorities have launched an investigation and efforts remain focused on the apprehension of the criminals, and the rapid recovery of the stolen data files.

CPS has installed additional security measures at the offices where the break-in and theft occurred. They immediately hired 24/7 off-duty police officers to guard the facility until a new security alarm system could be installed. The company has also undertaken a thorough review of the additional security measures that could have prevented this theft as well as steps they will implement to prevent future occurrences. To date, they have completed implementation of several resulting measures and countermeasures.

**6.) Should I do something to protect against identity theft?**

We consider the risk of identity theft in this situation to be extremely low due to the difficulty in getting the data off of the files. However, we encourage you to enroll with the credit monitoring service being offered at Humana's expense through Equifax Consumer Services. This service can help you protect against misuse of the information. This service includes credit monitoring with Equifax Consumer Services for a year and provides up to \$20,000.00 of identity fraud expense coverage. We strongly encourage you to sign up for this free service to protect yourself from the potential misuse of information. Instructions on how to sign up for the service through mail or fax are enclosed. You may simply sign the enclosed form and mail to:

Equifax Consumer Services  
P.O. Box 105496  
Atlanta, GA 30348

**7.) I have a question that was not addressed here. Who can I contact?**

Please feel free to call CPS' hot line at 866-508-6411, Monday through Friday from 7:00 AM to 5:00 PM and we'll be happy to help. If you have questions regarding your enrollment with Equifax, please call Equifax Customer Service at 1-800-437-4179.

Again, please accept our sincere apology for this incident. Concentra Preferred Systems takes its commitment to maintaining the security of confidential information very seriously, and we very much regret that this situation occurred. Although it has not been determined that the information has been misused or disclosed in any way, as a precaution we have notified and will continue to work with Humana on this incident.

Sincerely,

Dona-Marie Geoffrion  
Vice President/Privacy & Security Officer

cc: James S. Theiss  
Chief Privacy Officer  
Humana Inc.

### For your added protection ...

Humana has arranged with Equifax Personal Solutions to help you protect your identity and your credit information at no cost to you. The steps to follow:

1. Enroll in Equifax Credit Watch™ Gold with 3-in-1 Monitoring identity theft protection service.
2. Additionally, you may choose to adopt an increased level of protection by placing a fraud alert on your credit file at Equifax and the other two credit reporting agencies

#### **Equifax Credit Watch™ Gold with 3-in-1 Monitoring**

Equifax Credit Watch will provide you with an “early warning system” to changes to your credit file and help you to understand the content of your credit file at the three credit reporting agencies. The key features and benefits are listed below.

Equifax Credit Watch Gold with 3-in-1 Monitoring provides you with a one-year membership service:

- Comprehensive credit files monitoring, with daily notification of key changes to your Equifax, Experian and Trans Union credit files.
- Automatic notification of key changes to your credit files from any of the three agencies.
- If you enroll online, you have access to one 3-in-1 Credit Report and unlimited copies of your Equifax Credit Report™. If you enroll by U.S. mail, you receive quarterly updates to your Equifax Credit Report.
- Up to \$20,000 Identity Fraud Expense Coverage with \$0 deductible at no additional cost to you. Certain limitations and exclusions apply.†
- Premium Customer Care 24 hours a day, 7 days a week, to assist you in understanding the content of your credit information.

#### **How to Enroll**

Use the enclosed enrollment form, or go to [www.myservices.equifax.com/tri](http://www.myservices.equifax.com/tri) to enroll online.

**In the Promotion Code box, insert this code:**

If you choose to enroll online, just follow these steps:

- Step 1 – Registration: Complete the form with your contact information (name, address, telephone #, Social Security Number, date of birth, e-mail address). The information is provided in a secured environment.
- Step 2 – Verify Your Identity: Equifax will verify your identity by asking you up to two security questions
- Step 3 – Order Summary: During the “check out” process, insert your Promotion Code, exactly as noted above, in the box labeled “Enter Promotion Code.” This code eliminates the need to provide a credit card number for payment.
- Step 4 - Go to the Member Center: Under “Product List,” select Credit Watch Gold with 3-in-1 Monitoring to access the product features.

**Fraud Alert**

A fraud alert is a consumer statement added to your credit file that lasts 90 days. Once the fraud alert statement is added to your credit file, it alerts creditors of possible fraudulent activity and requests that they contact you before establishing a credit account in your name. To place a fraud alert on your Equifax credit file, you may contact Equifax's auto fraud line at 1-877-478-7625, and follow the simple prompts. Once the fraud alert has been placed with Equifax, a notification will be sent to the other two credit reporting agencies, Experian and Trans Union, on your behalf.

**ENROLLMENT DEADLINE IS [ \_\_\_\_\_ ]**  
(specify date)

† Insurance underwritten by Travelers Casualty and Surety Company of America and its property casualty affiliates, Hartford, CT 06183. Nothing stated herein affects the terms, conditions and coverages of any insurance policy issued by St. Paul Travelers, nor does it imply that coverage does or does not exist for any particular claim or type of claim under any such policy.





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# Facsimile Cover Sheet

**To: Teresa A. Santiago,  
Chairperson & Executive  
Director**

**Company: New York State Consumer  
Protection Board**

**Phone: 518-474-8583**

**Fax: 518-474-2474**

**From: Dona-Marie Geoffrion**

**Company: Concentra Inc.  
Vice President/Privacy and Security  
Officer**

**Phone: 615-778-4066**

**Fax: 615-778-9114**

**Date: 12/4/06**

**Pages including this 8  
cover page:**

**CONFIDENTIAL**

*This communication is confidential and is intended only for the person named above. No one other than the named recipient is authorized to use the information contained here in any manner. If you have received this communication in error, please call the sender to identify the error.*

**COMMENTS:**

**Please replace the previous letter that you received from Concentra Preferred Systems as the number of residents in your State was incorrect.**

**Please do not hesitate to telephone me with any questions you may have.**



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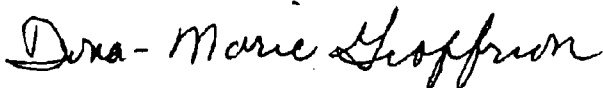
Notification letters were sent to 12 Humana members in the state of New York who were impacted by this situation. Attached you will find a copy of the letter that includes the steps an individual may take to enroll with a credit monitoring service. In accordance with New York law the New York State Office of Attorney General, Department of Law and the New York State Office of Cyber Security & Critical Infrastructure Coordination. We

have also notified the consumer credit reporting agencies. If you need any additional information, please let us know.

We deeply regret this incident, but want to assure you that CPS has various safeguards to protect individual information including policies, procedures, and technical safeguards. CPS engaged a team of private investigators who have been working in close coordination with local law enforcement. In addition, we have launched our own internal investigation, including a thorough review of additional security measures and actionable steps to prevent future occurrences. CPS will promptly report to your office and appropriate law enforcement officials any information that is shared with us that indicates this information has been inappropriately used.

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(specify date)

† Insurance underwritten by Travelers Casualty and Surety Company of America and its property casualty affiliates, Hartford, CT 06183. Nothing stated herein affects the terms, conditions and coverages of any insurance policy issued by St. Paul Travelers, nor does it imply that coverage does or does not exist for any particular claim or type of claim under any such policy.

