



## Notice of Data Security Incident

**Garden City, Kansas – February 28, 2023** Compass Behavioral Health (“Compass”) recently experienced a data security incident that may have resulted in an unauthorized access to a limited amount of sensitive health information. While we have not received any reports of related misuse of health information since the date of the Incident, this notice is intended to provide notice of the Incident, steps we are taking in response to the Incident, and resources available to help you protect against the potential misuse of information.

**What Happened?** On or around December 13, 2022, Compass was made aware that a limited number of files on its employee OneDrive accounts and an e-mail account had been accessed by an unauthorized user, which may have resulted in the inadvertent exposure of sensitive health information of current and former Compass patients (the “Incident”). Upon discovery of the Incident, Compass engaged a specialized third-party vendor to conduct a cyber forensic investigation. The purpose of the investigation was to determine the root cause of the Incident, the extent of the unauthorized access, and identify the individuals whose information was potentially impacted by the Incident in order to provide the affected individuals with notice of the Incident.

On February 14, 2023, the forensic investigation found evidence indicating that an excel spreadsheet containing a list of incident reports maintained by Compass for purposes of recording any breach of established procedure, injury, accident, or unusual occurrence may have been accessed during the Incident by an unauthorized user.

On February 28, 2023, Compass notified the affected individuals via postal mail and provided them with steps that they can take to protect their information.

**What Information Was Involved?** Based on the investigation, it appears that some individuals’ information may have been impacted, including: names, addresses, dates of birth, dates of death, location of treatment, medical record numbers, information related to a medical incidents, limited medical information, medication information.

Please note these incident reports **did not contain any patients’ Social Security number or other types of financial information.** In addition, there is no evidence at this time that any of your personal information has been misused as a result of this incident.

**What We Are Doing?** Data privacy and security are among Compass’s highest priorities, and there are extensive measures in place to protect information in Compass’s care. Since the discovery of the Incident, Compass moved quickly to investigate, respond, and confirm the security of our systems. Specifically, Compass engaged a specialized third-party cybersecurity firm, changed administrative credentials, implemented multi-factor authentication, and took steps and will continue to take steps to mitigate the risk of future harm.

**What You Can Do:** We encourage you to remain vigilant, monitor your accounts, and immediately report any suspicious activity or suspected misuse of your personal information. Please review the enclosed Additional Important Information, to learn more about how to protect against the possibility of information misuse.

Again, at this time, we have not received any reports of related misuse of personal health information since the date of the Incident.

**Other Important Information:** We recognize that you may have questions not addressed in this notice. If you have additional questions, please call 1-800-405-6108, Monday through Friday, 9:00 A.M. to 5:00 P.M. Eastern Standard Time, except holidays.

Compass sincerely regrets any inconvenience or concern that this matter may cause, and remains dedicated to ensuring the privacy and security of all information in our control.

Sincerely,

Compass Behavioral Health

## Steps You Can Take to Help Protect Your Information

**Credit Reports:** You may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the three nationwide credit reporting agencies. To order your free credit report, please visit [www.annualcreditreport.com](http://www.annualcreditreport.com), or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at <https://www.consumer.ftc.gov/articles/0155-free-credit-reports>) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

**Fraud Alerts:** You can place fraud alerts with the three credit bureaus by phone or online. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. As of September 21, 2018, initial fraud alerts last for one year. Victims of identity theft can also get an extended fraud alert for seven years.

### Experian

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/fraud/center.html](http://www.experian.com/fraud/center.html)

### TransUnion

P.O. Box 2000  
Chester, PA 19016  
1-800-680-7289

[www.transunion.com/fraud-alerts](http://www.transunion.com/fraud-alerts)

### Equifax

P.O. Box 105069  
Atlanta, GA 30348  
1-800-525-6285

<https://www.equifax.com/personal/credit-report-services/credit-fraud-alerts/>

**Monitoring:** You should always remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and by monitoring your credit report for suspicious or unusual activity.

**Security Freeze:** You have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans, and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse or a minor under the age of 16, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. As of September 21, 2018, it is free to place, lift, or remove a security freeze. You may also place a security freeze for children under the age of 16. You may obtain a free security freeze by contacting any one or more of the following national consumer reporting agencies:

### Experian

P.O. Box 9554  
Allen, TX 75013  
1-888-397-3742

[www.experian.com/freeze/center.html](http://www.experian.com/freeze/center.html)

### TransUnion

P.O. Box 160  
Woodlyn, PA 19094  
1-888-909-8872

[www.transunion.com/credit-freeze](http://www.transunion.com/credit-freeze)

### Equifax

P.O. Box 105788  
Atlanta, GA 30348-5788  
1-888-298-0045

<https://www.equifax.com/personal/credit-report-services/credit-freeze/>

**File Police Report:** You have the right to file or obtain a police report if you experience identity fraud. Please note that in order to file a crime report or incident report with law enforcement for identity theft, you will likely need to provide proof that you have been a victim. A police report is often required to dispute fraudulent items. You can generally report suspected incidents of identity theft to local law enforcement or to the Attorney General.

**FTC and Attorneys General:** 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. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, [www.identitytheft.gov](http://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. Instances of known or suspected identity theft should also be reported to law enforcement.

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**For residents of Iowa:** State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

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**For residents of Massachusetts:** It is required by state law that you are informed of your right to obtain a police report filed in regard to this incident. If you are the victim of identity theft, you also have the right to file a police report and obtain a copy of it.

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**For residents of New Mexico:** State law advises you to review personal account statements and credit reports, as applicable, to detect errors resulting from the security breach. You have rights pursuant to the Fair Credit Reporting Act, such as the right to be told if information in your credit file has been used against you, the right to know what is in your credit file, the right to ask for your credit score, and the right to dispute incomplete or inaccurate information. Further, pursuant to the Fair Credit Reporting Act, the consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information; consumer reporting agencies may not report outdated negative information; access to your file is limited; you must give your consent for credit reports to be provided to employers; you may limit “prescreened” offers of credit and insurance you get based on information in your credit report; and you may seek damages from violators. You may have additional rights under the Fair Credit Reporting Act not summarized here. Identity theft victims and active duty military personnel have specific additional rights pursuant to the Fair Credit Reporting Act. We encourage you to review your rights pursuant to the Fair Credit Reporting Act at [www.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://www.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf) or by writing Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

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**For residents of Oregon:** State law advises you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

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**For residents of Rhode Island:** It is required by state law that you are informed of your right to file or obtain a police report in regard to this incident.

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**For residents of Arizona, Colorado, District of Columbia, Illinois, Maryland, New York, North Carolina, and Rhode Island:** You can obtain information from the Offices of the Attorney General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

**Federal Trade Commission - Consumer Response Center:** 600 Pennsylvania Ave, NW, Washington, DC 20580; 1-877-IDTHEFT (438-4338); [www.identitytheft.gov](http://www.identitytheft.gov)

**Arizona Office of the Attorney General Consumer Protection & Advocacy Section,** 2005 North Central Avenue, Phoenix, AZ 85004 1-602-542-5025

**Colorado Office of the Attorney General Consumer Protection** 1300 Broadway, 9th Floor, Denver, CO 80203 1-720-508-6000 [www.coag.gov](http://www.coag.gov)

**District of Columbia Office of the Attorney General – Office of Consumer Protection:** 400 6th Street, NW, Washington, DC 20001; 202-727-3400; [www.oag.dc.gov](http://www.oag.dc.gov)

**Illinois office of the Attorney General -** 100 West Randolph Street, Chicago, IL 60601; 1-866-999-5630; [www.illinoisattorneygeneral.gov](http://www.illinoisattorneygeneral.gov)

**Maryland Office of the Attorney General - Consumer Protection Division:** 200 St. Paul Place, 16<sup>th</sup> floor, Baltimore, MD 21202; 1-888-743-0023; [www.oag.state.md.us](http://www.oag.state.md.us)

**New York Office of Attorney General - Consumer Frauds & Protection:** The Capitol, Albany, NY 12224; 1-800-771-7755; <https://ag.ny.gov/consumer-frauds/identity-theft>

**North Carolina Office of the Attorney General - Consumer Protection Division:** 9001 Mail Service Center, Raleigh, NC 27699; 1-877-566-7226; [www.ncdoj.com](http://www.ncdoj.com)

**Rhode Island Office of the Attorney General - Consumer Protection:** 150 South Main St., Providence RI 02903; 1-401-274-4400; [www.riag.ri.gov](http://www.riag.ri.gov)

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