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February 26, 2021

**VIA ONLINE SUBMISSION**

Attorney General Aaron Frey  
Maine Attorney General's Office  
Consumer Protection Division  
6 State House Station  
Augusta, ME 04333

Re: **Notice of Data Security Incident**

Dear Attorney General Frey:

We represent Summit Behavioral Healthcare, LLC ("SBHC"), located in Franklin, Tennessee. This letter is being sent pursuant to Me. Rev. Stat. Tit. 10 § 1348(5) because SBHC determined that personal information of Maine residents may have been affected by a data security incident. The incident may have involved unauthorized access to protected health information and other personal information, including Social Security numbers.

Beginning in late May of 2020, suspicious activity associated with the personal information of SBHC employees prompted SBHC to conduct a forensic investigation of certain email accounts. SBHC engaged a third-party digital forensics firm to handle the investigation, which determined that there may have been unauthorized access to two (2) employee email accounts. On August 10, 2020, an investigation commenced to determine whether personal information was accessed or acquired without authorization in the two accounts. On January 21, 2021, the investigation identified one (1) Maine resident whose information may have been affected.

The single resident is in the process of being notified with the attached letter via first class U.S. Mail, and SBHC is offering 12 months of complimentary identity protection services. SBHC has taken steps in response to this incident to prevent similar incidents from occurring in the future. Those steps include employee training to increase awareness of phishing and other cybersecurity risks, implementing mandatory password changes, and SBHC is also in the process of revising its policies governing where PHI is stored on its network.

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If you have any questions or need any additional information, please contact me at 971.712.2795 or [Sean.Hoar@LewisBrisbois.com](mailto:Sean.Hoar@LewisBrisbois.com). Our associate, Tom Moran, is also available at 216.298.1267 or [Thomas.Moran@LewisBrisbois.com](mailto:Thomas.Moran@LewisBrisbois.com).

Sincerely,



Sean B. Hoar of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

SBH

enclosure: Consumer Notification Letter



C/O IDX  
P.O. Box 1907  
Suwanee, GA 30024

To Enroll, Please Call:  
833-726-0935  
Or Visit:  
<https://response.idx.us/summit>  
Enrollment Code: [XXXXXXXXXX]

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

February 26, 2021

Re: Notice of Data Security Incident

Dear <<First Name>>,

We are writing to provide information regarding a data security incident that may have affected your personal information. At Summit Behavioral Healthcare (“SBHC”), we take the privacy and security of the data entrusted to us very seriously. This notice will provide you with information about the incident, offer credit and identity monitoring services, and inform you about steps you can take to protect your information.

**What Happened.** Beginning in late May of 2020, suspicious activity associated with personal information of SBHC employees prompted SBHC to conduct a forensic investigation of certain email accounts. SBHC engaged a third-party digital forensics firm to handle the investigation, which determined that there may have been unauthorized access to two (2) employee email accounts. On January 21, 2021, the investigation discovered that your protected health information (“PHI”) may have been affected.

**What Information Was Involved.** The information may have included your: <<Variable Text>>.

**What We Are Doing.** As soon as we discovered the incident, we took the steps described above. We also enhanced the security of our system in an attempt to prevent any similar incident from occurring in the future. In addition, we are providing you with the information below outlining steps you can take to protect your personal information. We are also offering you free credit and identity monitoring and recovery services for <<12/24 months>> through IDX as described below.

**What You Can Do.** We suggest that you read and follow the recommendations included at the end of this letter. We also encourage you to enroll in the credit and identity monitoring services we are offering through IDX to protect your personal information. To enroll, please visit <https://response.idx.us/summit> or call 833-726-0935 and provide the enrollment code provided above.

To receive credit services, you must be over the age of 18, and have established credit in the U.S., have a Social Security number in your name, and have a U.S. residential address associated with your credit file. Additional information describing these services is included with this letter.

Please note you must enroll by May 26, 2021. If you have questions or need assistance, please call IDX at 833-726-0935.

**For More Information.** If you have any questions about this letter, please call 833-726-0935, Monday through Friday from 9:00 a.m. to 9:00 p.m. Eastern Time.

Please accept our sincerest apologies. We deeply regret any worry or inconvenience that this may cause you, and we hope the information and resources offered here might be of assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Schwieger". The signature is fluid and cursive, with a prominent initial "S".

Scott Schwieger  
Summit Behavioral Healthcare

## STEPS YOU CAN TAKE TO 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 (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 <http://www.annualcreditreport.com/>, calling toll-free 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:

**TransUnion**

P.O. Box 1000  
Chester, PA 19016  
1-800-916-8800  
[www.transunion.com](http://www.transunion.com)

**Experian**

P.O. Box 2002  
Allen, TX 75013  
1-888-397-3742  
[www.experian.com](http://www.experian.com)

**Equifax**

P.O. Box 740241  
Atlanta, GA 30374  
1-866-349-5191  
[www.equifax.com](http://www.equifax.com)

**Free Annual Report**

P.O. Box 105281  
Atlanta, GA 30348  
1-877-322-8228  
[annualcreditreport.com](http://annualcreditreport.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 90 days. 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 <http://www.annualcreditreport.com>.

**Security Freeze:** Under U.S. law, 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, and  
[www.ftc.gov/idtheft](http://www.ftc.gov/idtheft)  
1-877-438-4338

**Maryland Attorney  
General**

200 St. Paul Place  
Baltimore, MD 21202  
[oag.state.md.us](http://oag.state.md.us)  
1-888-743-0023

**North Carolina Attorney  
General**

9001 Mail Service Center  
Raleigh, NC 27699  
[ncdoj.gov](http://ncdoj.gov)  
1-877-566-7226

**Rhode Island  
Attorney General**

150 South Main Street  
Providence, RI 02903  
<http://www.riag.ri.gov>  
401-274-4400

**New York Attorney General**

120 Broadway – 3<sup>rd</sup> Fl.  
New York, NY 10271  
<https://ag.ny.gov/internet/data-breach>  
1-800-771-7755

**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 [http://files.consumerfinance.gov/f/201504\\_cfpb\\_summary\\_your-rights-under-fcra.pdf](http://files.consumerfinance.gov/f/201504_cfpb_summary_your-rights-under-fcra.pdf).