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March 21, 2024

Re: Homeless Health Care Center—Breach of Personally Identifiable Information Notice Internal Breach Case Number: 20240103-001-004

HIPAA requires notice to individuals when there has been a breach of their personally identifiable information (PII).

On Wednesday, January 3, 2024, the Chattanooga Police Department (CPD) told the Hamilton County Homeless Health Care Center (HHCC) that a box containing items such as driver's licenses, social security cards, birth certificates, etc. was found during an arrest on January 3, 2024. This was a lost and found box taken from the HHCC sometime between Wednesday, December 27, 2023, and Wednesday, January 3, 2024. Our HIPAA Compliance Officer was given the box containing those documents on Monday, February 5, 2024. To our knowledge none of the information was used or shared by the person who was arrested.

Hamilton County's (HCG) response to this breach:

- 1. We made a list of everything in the box and the person to whom it belongs.
- 2. For each bank card, we called each bank to report that the bank cards had been stolen, so that those accounts could be deactivated. We documented each call and destroyed each bank card.
- 3. We scanned a copy of our patient's document(s) to their electronic medical record. We did not scan bank cards.
- 4. We will keep all patients' document(s) at the HHCC through May 31, 2024. You may pick up your documents there. The HHCC's address is 730 E 11th St, Chattanooga, TN 37403.
- 5. On July 1, 2024, HHCC will send all the documents not picked up to the HIPAA Compliance Officer to be destroyed, and you will need to contact the issuing organization to get a valid replacement.
- 6. The HIPAA Compliance Officer will keep all documents that belong to individuals who are not our patients through June 30, 2024. On July 1, 2024, the valid documents will be destroyed, and you will need to contact the issuing organization to get a valid replacement. Please call 1-833-484-8671 for more information.

- 7. We have changed the way that we keep lost and found items. Going forward:
 - Any items turned in to the front desk of the HHCC that contain personally identifiable information (e.g. ID cards, Driver's License, etc.) will be turned over to the Operational Manager or their designee who will inventory the item(s).
 - The inventory list will contain the person's name, date of birth, whether the person is a patient, the date the item was turned in to HHCC, any expiration date, and the date the item was destroyed.
 - All items turned in to HHCC will be stored in a locked cabinet in the manager's office.
 - If the individual is a patient, the item turned in will be scanned into the patient's electronic medical record with a note that something belonging to the patient has been turned in to our lost and found, so that when the patient checks in for an appointment the document(s) can be given to the patient.
 - HHCC will try to contact the patient within the first 30 days after an item is turned in. HHCC will keep all documents belonging to HHCC patients until picked up or for 60 days, whichever happens first.
 - HHCC may send the documents to the Hamilton County Medical Records Department to be filed in the patient's paper chart, if there is a paper chart.
 - —If the individual is <u>not</u> a patient, the items turned in will be kept for 60 days and then destroyed.

If you have lost your driver's license, social security card, birth certificate or other personally identifiable information, please ask the front desk staff to check to see if your information was found.

We sincerely regret that this has happened, and apologize for any inconvenience it may have caused you. Hamilton County Government is committed to providing quality patient care, including protecting your personal information.

If you have any questions, please contact our HIPAA Compliance Officer, Angela Duncan, by phone at 1-833-484-8671 or by email at <u>HIPAA@HamiltonTN.gov</u>. Please include the words "HIPAA Breach" in the subject line of your email.