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May 28, 2024

BURR.COM

**VIA ELECTRONIC PORTAL UPLOAD ONLY**

Bob Ferguson  
Attorney General  
Washington State

**Re: Notification of Privacy Incident  
HealthFirst Urgent Care, PLLC**

Dear Mr. Ferguson:

This firm represents HealthFirst Urgent Care, PLLC (“HealthFirst”). I am writing to inform you about a privacy incident involving certain patient information retained by HealthFirst and concerning Washington state residents.

**What Happened?** On or around April 10, 2024, it was discovered that certain patient information had been disclosed by HealthFirst to certain contractors without having the appropriate safeguards in place. Between October 1, 2023 and April 1, 2024, HealthFirst utilized an individual to run certain reports and perform certain billing and audit services. Unbeknownst to HealthFirst, that workforce member utilized certain contractors to assist with the performance of such services for HealthFirst and failed to enter into the appropriate confidentiality agreement with the contractors. Despite this technical oversight, at this time, there is no evidence that the contractors have mis-used or further disclosed the information received.

**What Information was Involved?** The information disclosed to the contractors included patient name and internal account number, CPT code and description, name of billing provider, and billing, collection, and payment amount information. **Importantly, the information did not contain social security number, detailed clinical information, credit card or banking information, or demographic or contact information (beyond name).** Approximately 4111 Washington state residents had information involved in the privacy incident.

**What We Are Doing?** HealthFirst has investigated the incident, and, taken steps to mitigate the harm. HealthFirst is in the process of reporting this incident to applicable regulators, as required by law. HealthFirst mailed via U.S. Mail breach notification letters to all individuals whose information was involved in the incident on May 24, 2023. A sample copy of the individual breach notification letter is attached as Attachment A.

HealthFirst has also taken steps in an effort to prevent this type of incident from happening in the future. Specifically, in light of this incident, HealthFirst is reviewing its privacy and security policies and procedures, and updating them as necessary. Among other things, HealthFirst is reminding its employees

Bob Ferguson  
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of their duty to protect patient information and to adhere to patient confidentiality policies and procedures. Finally, the workforce member and the contractors involved are no longer providing services on behalf of HealthFirst.

**For More Information.** If you have any questions regarding this notification or would like to discuss this matter further, please feel free to contact me at any time. I may be reached by e-mail at [kfleming@burr.com](mailto:kfleming@burr.com) or by telephone at (205) 458-5429.

Sincerely,



Kelli Fleming  
Partner

KCF/jlr

Attachment : Sample Individual Breach Notification Letter

**ATTACHMENT A:  
SAMPLE INDIVIDUAL BREACH  
NOTIFICATION LETTER**



37 Columbia Point Dr Richland Wa 99352  
4605 N Road 68 Pasco Wa 99301  
509-300-1500  
www.healthfirstuc.com

May 22, 2024

**PERSONAL AND CONFIDENTIAL**

**VIA FIRST CLASS U.S. MAIL**

*[Insert Recipient Name and Address]*

**Re: Notification of Privacy Breach**

Dear Valued Patient:

At HealthFirst Urgent Care, PLLC (“HealthFirst”), we take patient privacy very seriously, and it is important to us that any privacy issues are adequately addressed. We are writing to inform you about a privacy incident involving certain patient information retained by HealthFirst. You are receiving this letter because we believe the information concerns your treatment at HealthFirst. While we are unaware of any actual or attempted misuse of your information, we are providing you with information about the incident, our response, and steps you may take in response to the incident. As an initial matter, please be aware that this incident will not disrupt or interfere with the care you received or will receive at HealthFirst.

**What Happened?** On or around April 10, 2024, it was discovered that certain patient information had been disclosed by HealthFirst to certain contractors without having the appropriate safeguards in place. Between October 1, 2023 and April 1, 2024, HealthFirst utilized an individual to run certain reports and perform certain billing and audit services. Unbeknownst to HealthFirst, that workforce member utilized certain contractors to assist with the performance of such services for HealthFirst and failed to enter into the appropriate confidentiality agreement with the contractors. Despite this technical oversight, at this time, there is no evidence that the contractors have mis-used or further disclosed the information received.

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**What We Are Doing?** HealthFirst has investigated the incident, and, taken steps to mitigate the harm. We are in the process of reporting this incident to applicable regulators, as required by law. At this point in time, we have no reason to believe that the information has been further used and/or distributed (or will be further used and/or distributed).

We have also taken steps in an effort to prevent this type of incident from happening in the future. Specifically, in light of this incident, we are reviewing our privacy and security policies and procedures, and updating them as necessary. Among other things, we are reminding our employees of their duty to protect patient information and to adhere to patient

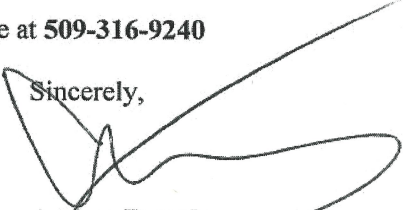
confidentiality policies and procedures. Finally, the workforce member and the contractors involved are no longer providing services on behalf of HealthFirst.

**What You Can Do.** Due to the nature of the breach and the type of information involved, at this time, we do not believe that there is anything you need to do to further protect yourself.

**For More Information.** At HealthFirst, we are dedicated to protecting and safeguarding the privacy and security of patient information. We sincerely regret that this incident occurred and apologize for any inconvenience or worry this situation may cause. If you have any questions or concerns regarding this letter or would like to discuss this matter further, please feel free to contact us at any time. You may contact me by e-mail at [privacyofficer@healthfirstuc.com](mailto:privacyofficer@healthfirstuc.com)

Alternatively, you may contact me by telephone at 509-316-9240

Sincerely,



**Arthur Broady**  
**Privacy Officer**  
HealthFirst Urgent Care, PLLC



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4605 N Road 68 Pasco Wa 99301  
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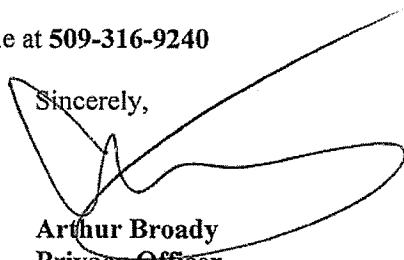
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**Arthur Broady**  
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