

To Whom It May Concern:

This notice from Brockton Neighborhood Health Center, Inc. ("BNHC") is posted here related to a recent incident which may have resulted in a breach of your protected health information ("PHI"). We want you to know that BNHC takes this incident seriously and is committed to ensuring the privacy of all of our patients.

What happened?

Throughout the public health pandemic, BNHC has been providing COVID-19 testing to its patients and the community-at-large. To expedite registration and scheduling for the testing, BNHC launched an online scheduling platform on its website using Google Forms. On April 7, 2021, a patient reported to BNHC that after submitting an appointment request, the patient was able to access a link on the Google Form that indicated "see previous responses." Upon accessing this link, the individual accessed a report that included the PHI of some individuals who had scheduled COVID-19 testing appointments at BNHC.

What type of information was involved?

The report included the following categories of PHI: addresses, phone numbers, first names, last names, dates of birth and other aggregate demographic information. Importantly, these categories of PHI were contained in separate fields in the report which did not correspond or match up with each other. For example, first names did not match up with last names, no names matched up with addresses, etc. The information was also limited to a very small number of individuals, not everyone who received a COVID test at BNHC. The page did not contain any social security numbers, credit card numbers, other health-related information about your care or financial account information.

What steps were taken in response?

Upon being notified by the patient, BNHC immediately took down the Google Forms scheduling page from its website. BNHC's technical support team removed the "see previous responses" link and re-activated the scheduler after testing and ensuring that users could not access any other user's PHI. Additionally, we have worked with our staff involved with the BNHC website to ensure the Google Form for scheduling, which is live again, is configured to comply with the Health Insurance Portability and Accountability Act (HIPAA) and ensure patient confidentiality.

At this time, we do not believe that there are any continuing steps for you to take related to securing your PHI. Again, we regret this incident occurred and are committed to ensuring that the appropriate steps are taken. If you have any questions, please contact Chyree Heirs-Alexandre at 1 855 654-1293.

Yours truly,  
Samantha Halloran  
Compliance Officer  
Brockton Neighborhood Health Center