

## Notice of Improper Disposal of Records Incident

May 28, 2020

Central Files, Inc. ("Central Files") was entrusted to provide secure record storage and destruction, during the respective time periods below, for the following South Bend-area entities (the "South Bend Entities") which publish this notice:

- Saint Joseph Health System (1999-2013)
- Allied Physicians of Michiana (1995-2007)
- New Avenues (June 2004-December 2015)
- South Bend Medical Foundation (2009-2015)
- Goshen Emergency Physicians, LLC / Elkhart Emergency Physicians, Inc. (2002-2010)
- Michiana Hematology Oncology (2002-2004)
- Cardiology Associates, Inc. ("CAI") (March 1, 2007-November 30, 2013). CAI and its records were acquired by Beacon Health System in December 2013 and CAI was subsequently dissolved

The records entrusted to Central Files included sensitive and legally-protected information about these organizations' patients, clients, and/or employees. Central Files was paid to destroy certain records, and was supposed to securely store the remaining records until transfer to a subsequent records storage company.

Between April 1 and April 9, 2020, the South Bend Entities were alerted that confidential documents which had been entrusted to Central Files for secure storage and destruction were discovered improperly dumped in an unsecure South Bend-area location sometime before April 1, 2020 and several more times until May 15, 2020. The South Bend Entities immediately commenced a thorough investigation to determine the reason for the mishandling of confidential documents entrusted to Central Files. During the investigation, the South Bend Entities worked closely with the South Bend Police Department.

The investigation revealed that the records discovered at the dump site were in poor condition, showing signs of moisture damage, mold and rodent infestation, and damage from being mixed with trash and other debris. Trained safety personnel determined that further inspection of most of these records to identify individuals whose information was included in the documents would be extremely hazardous and instead recommended secure destruction as soon as possible. After retaining those records which could be safely salvaged, an appropriate document destruction vendor was engaged, we received confirmation that the remaining records were securely removed from the site on May 20, 2020 and are in the process of being destroyed.

Many of the records were decades old, and likely contained outdated information in addition to paper medical records and billing statements including full names, addresses, telephone numbers, dates of birth, Social Security numbers, insurance information, dates of service, and/or clinical and diagnostic information. At this time, there is no evidence indicating that information from these

records has been used by anyone to cause harm to or compromise the identity of our patients. Nonetheless, we are reporting this matter out of an abundance of concern for our patients' privacy.

We take our patients' privacy very seriously and recommend that they remain vigilant for signs of identity theft and review financial account statements on a regular basis for any fraudulent activity. It is also recommended that patients review their explanation of benefit statements that they receive from their health insurance providers and follow up on any items not recognized.

For more information from the Federal Trade Commissions about protecting your personal identity, visit [www.ftc.gov/idtheft](http://www.ftc.gov/idtheft).

**For further questions or additional information regarding this incident, a dedicated toll-free response line has been set up at 855-917-3531. The response line is available Monday through Friday, 9 a.m. to 9 p.m. EDT.** Note: the records were unsafe to handle so we will not be able to tell whether a certain individual's records were improperly dumped. There were a few exceptions – if you receive a letter in the next week also notifying you of the incident, your records were identified.