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February 11, 2015

Matthew Fitzsimmons Assistant Attorney General Office of the Connecticut Attorney General 110 Sherman Street Hartford, CT 06105

Kurt Swan
Insurance Program Manager
Director, Market Conduct Division
Connecticut Insurance Department
153 Market Street
Hartford, CT 06103

Re: Anthem Data Security Investigation

Dear Mr. Fitzsimmons and Mr. Swan:

I write to provide a response to Attorney General Jepsen's February 5 and February 9 letters regarding the recent cybersecurity attack on Anthem, and to provide further information to the questions that have been discussed with the Department of Insurance. Attorney General Jepsen's February 9 letter indicates that it was sent on behalf of the Attorneys General of nine other states; we therefore are sending a copy of this response with your colleagues in those states.

Anthem shares your offices' concerns about this attack, and we are committed to protecting our members' personal information from misuse. To that end, Anthem acted quickly in investigating this attack as soon as our team detected a potential issue, and promptly notified law enforcement, regulators, our customers and members, and the public about the attack and our investigation. We also have been cooperating with federal law enforcement in their ongoing investigation of this attack.

Anthem acted quickly in sharing information about its notification plan, and the protections it is providing for members. Anthem put a notice of the cybersecurity attack on our home page, at www.anthem.com. We also established a dedicated page, www.anthemfacts.com, which explains Anthem's remediation of the attack and describes the types of information that Anthem's investigation to date indicates were subject to the attack. On our website and in our news releases, Anthem has been clear that we plan to individually notify consumers whose information may have been accessed in this attack.

Anthem has also stated, from the time of our initial announcement, that regardless of whether it is required by law, we will provide credit monitoring and identity protection services free of charge to impacted members. Most companies that provide such identity protection services in the wake of a cybersecurity event do so for one year. Anthem has decided to exceed this standard by offering identity protection along with credit monitoring and repair services to all impacted members for two years.

Our priority in making our initial announcement was to share timely, accurate information about the attack and to assure our customers that we are putting protections in place. Anthem announced a dedicated toll-free number that members can call with any questions or concerns. We also provided timely and relevant tools to help customers protect themselves; for example, we have cautioned customers to be alert for email "phishing" scams that often follow cybersecurity incidents. Anthem has been communicating information quickly, because we want to be transparent with our customers and members, because we want them to understand the services Anthem will provide, and because we want to help them be on alert for any suspicious activity. And, as we explained from the beginning, Anthem will provide identity repair assistance, credit and identity theft monitoring, and other services to consumers whose data was impacted in this attack.

Today, Anthem will announce further details on the services we are providing, and will announce that consumers may sign up for two years of identity protection and credit monitoring services, beginning this Friday. The company has contracted with an experienced, well-respected vendor to provide a comprehensive package to affected consumers that includes:

- 1. Identity repair services. An individual who suspects identity theft can call to receive remediation services to help restore the compromised accounts and the individual's identity. Importantly, this service is retrospective in nature in that individuals are not required to sign up or register in advance to obtain the benefit of these services; an affected individual may access these services when needed.
- 2. Credit monitoring. Individuals who register for this service will be enrolled to receive credit monitoring alerts from a national credit bureau.
- 3. Special protection for minors. The protections will include an identity theft product for minors that searches database for accounts tied to a minor's social security number at the three national credit bureaus, in national public records databases and in national utilities databases. If a minor's social security number is determined to have a credit record on file, our vendor will work to remove the credit history from the record and the minor's identity information will be placed in a high risk database with TransUnion. This will place a credit block on the minor's social security number until they are 17 years of age.
- 4. Identity theft insurance. For individuals who enroll, the company has arranged for \$1,000,000 in identity theft insurance, where allowed by law.

- 5. Identity theft monitoring/fraud detection. For members who enroll, data such as credit card numbers, social security numbers and emails will be scanned against aggregated data sources maintained by top security researchers that contain stolen and compromised individual data, in order to look for any indication that the members' data has been compromised.
- 6. Phone Alerts. Individuals who register for this service and provide their contact information will receive an alert when there is a notification from a credit bureau, or when it appears from identity theft monitoring activities that the individual's identity may be compromised.

The identity theft protections provided by these services will apply to protect members from the day of the potential exposure of their information. Information on how to enroll will be posted at www.anthemfacts.com.

Anthem has been working to arrange these services since the attack on our systems was discovered. Doing so has required enormous efforts and commitment of resources to ensure that our vendor can accommodate what we anticipate will be very high demand for these services. It is essential that we work with the vendor to develop the infrastructure to handle a high volume of calls and web traffic, and to train representatives to accurately answer specific questions from our members. We have been working around the clock so that when we provide members with information on how to obtain the credit and identity repair services, our team can provide a seamless process that allows members to access these services without delay or further frustration. Our goal is to provide both protection and peace of peace of mind to consumers.

We recognize that the Attorney General and the Department of Insurance have sent additional questions, to which Anthem will respond under separate cover. In the meantime, please do not hesitate to contact me with any questions.

Respectfully,

Jill Rubin Hummel

cc:

Anne Melissa Dowling, CFA, Deputy Commissioner of Insurance, Connecticut Insurance Department

Beth Cook, Counsel, Connecticut Insurance Department

Perry Zinn Rowthorn, Deputy Attorney General, State of Connecticut, Office of the Attorney General

Robert Clark, Special Counsel, State of Connecticut, Office of the Attorney General