

GREGORY N. BRESCIA  
GBRESCIA@GRSM.COM

MARK ISHMAN  
MISHMAN@GRSM.COM

**GORDON & REES**  
**SCULLY MANSUKHANI**  
**YOUR 50 STATE PARTNER™**

ATTORNEYS AT LAW  
500 MAMARONECK AVE, SUITE 503  
HARRISON, NY 10528  
WWW.GRSM.COM

November 15, 2024

**VIA EMAIL** (consumer\_protection@ag.idaho.gov)

Attorney General's Office  
Consumer Protection Division  
P.O. Box 83720  
Boise, ID 83720-0010

**Re: Notification of Data Security Incident**  
**Our File No: 1362061**

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To Whom It May Concern:

Our client, ESHA, Inc (“ESHA”), a revenue cycle management company, understands the importance of protecting personal information and is making this notification to your Office in accordance with applicable law following a recent data security incident.

On July 19, 2024, ESHA became aware of a data security incident that impacted its server infrastructure and took its systems offline. ESHA immediately undertook efforts to restore its servers and undertook additional affirmative steps to safeguard the security of data maintained on its systems. ESHA also simultaneously retained a forensic investigation firm to determine the nature of the security compromise and identify any individuals whose information may have been compromised.

In accordance with ESHA’s business associate agreements with the covered entities, on September 17, 2024, ESHA issued notification letters. Within the notification letters, ESHA provided a summary of the security incident inclusive of the mitigation and restoration actions taken by ESHA as a result of the security incident. ESHA has also requested confirmation from the covered entities as to whether or not they elect to delegate the duty to report the security incident to the individuals. To date, we have received confirmation from a select number of covered entities and intend to provide notice of the incident to all potentially impacted individuals by November 15, 2024.

The forensic investigation determined that access to ESHA’s systems occurred on approximately July 13, 2024 through July 17, 2024. The investigation also identified certain files that may have been accessed or acquired in connection with the incident. In continuing its thorough investigation, ESHA undertook a comprehensive manual review process to review these files and identify the specific individuals with person information contained therein. This comprehensive manual review process concluded on or about September 16, 2024.

On or about August 5, 2024, the external forensic investigation firm confirmed that the data security involved the unauthorized access to ESHA's system. The forensic investigation confirmed that, during this brief period of unauthorized access, there was unauthorized access to and/or acquisition of certain files maintained on ESHA's systems. As a result, ESHA undertook a comprehensive and time intensive review of all files that may have been accessed and/or acquired in connection with the incident to determine the presence of any PII and/or PHI contained therein, as well as the associated practices and individuals, in order to comply with ESHA's obligations in connection with the incident. This comprehensive review process was completed on or about September 16, 2024, at which point ESHA determined that there was PII and/or PHI contained within the files that may have been accessed and/or acquired in connection with the incident.

As stated above, following the data security incident, ESHA immediately undertook all efforts to restore its servers, and also undertook additional affirmative steps to safeguard the security of data maintained on its systems. ESHA retained a forensic investigation firm to thoroughly investigate the incident and providing notification to all individuals whose personal information may have been accessed and/or acquired in connection with the incident in an abundance of caution. ESHA has obtained confirmation to the best of its ability that the information is no longer in possession of the third party(ies) associated with this incident, and it is entirely possible that any specific personal and/or protected health information *was not compromised* as a result of the incident. Nonetheless, ESHA has also offered to the impacted individuals access to complimentary credit monitoring. Please be advised that we are continuing to work closely with leading security experts to identify and implement measures to further strengthen the security of ESHA's systems to help prevent this from happening in the future.

ESHA began mailing notification letters on November 15, 2024 to all individuals whose personal and/or protected health information may have been accessed and/or acquired in connection with the incident. Of these individuals, we are of the belief that one (1) individuals is a Idaho resident. We anticipate that it will take five days for individuals to receive this letter. If an individual does not receive a letter, but would like to know if he or she was potentially affected by this incident, or if an individual has any questions or would like additional information, they may call ESHA's dedicated assistance line at 888-458-5630 between the hours of 9:00am to 9:00pm EST, Monday through Friday.

Should you have any questions or wish to further discuss, please do not hesitate to contact the undersigned.

Sincerely

Gregory N. Brescia

cc: Mark Ishman