

April 18, 2025

Paul Connell

+1 202 663 6067 (t)
+1 202 663 6363 (f)
paul.connell@wilmerhale.com

Via Federal Express

Rhode Island Office of the Attorney General
Attn: Data Breach Notification
150 South Main Street
Providence, RI 02903

Re: Breach Notification Update

Dear Attorney General Neronha:

I am writing on behalf of my client Change Healthcare Inc., a subsidiary of UnitedHealth Group Incorporated, in follow-up to a letter that was sent to your office on August 6, 2024. As part of its rolling notice process, Change Healthcare is undertaking extensive data review and substantial analysis, in addition to ongoing coordination with its customers. Change Healthcare estimates that it has mailed the vast majority of notice letters it expects to send to individuals and is now providing an interim update to the approximate number of individual notice letters that have been mailed to addresses in Rhode Island.

While the data breach notification law in your state generally does not require notice to the Attorney General where the reporting company makes notifications in compliance with other applicable federal data breach reporting requirements, Change Healthcare is nonetheless providing this update as a courtesy. Change Healthcare has provided notice under the Health Insurance Portability and Accountability Act (HIPAA) to the Department of Health and Human Services, Office for Civil Rights, as well as issued HIPAA media notice and provided a substitute notice link for customers to post on their own websites.

As of April 8, 2025, the approximate number of individual notice letters that have been mailed to addresses in your state is 264,407.

While this number represents Change Healthcare's best current estimate, it represents a snapshot in time as of April 8, 2025. Change Healthcare's (and its customers') analysis of the data remains ongoing, and Change Healthcare continues to mail additional letters on behalf of its customers as required.

Moreover, this estimate is subject to a number of important qualifications and may not reflect the final total estimated number of residents in each state whose personally identifiable information or protected health information was impacted as a result of the incident. Some individuals may

April 18, 2025

Page 2

have been sent more than one letter due to their data appearing in the impacted data in a way that is difficult or impossible to de-duplicate or was attributed to more than one Change Healthcare customer. Thus, the number of letters sent may be higher than the total number of unique individuals impacted. Furthermore, some potentially impacted individuals may not be identifiable as residents of a particular state because they lack sufficient addresses and are being provided substitute notice, and as such would not be sent notice letters or included within the count of letters mailed in a particular state. It is possible that the substitute notice population also includes duplicates. Analysis of individuals who may have changed their addresses under the National Change of Address registry also remains ongoing, as are the quality assurance procedures of Change Healthcare and the entities assisting Change Healthcare with the notice process, which may result in further de-duplication. Finally, there may be further data quality issues that Change Healthcare has not discovered despite its best efforts, and Change Healthcare reserves the right to update these numbers should new information come to light.

For the foregoing reasons, Change Healthcare expects that this interim estimate may change when its individual notice process is complete, and it cautions against relying on the number of letters sent as a true estimate of the total number of potentially impacted residents in your state. However, in an effort to provide your office with an update on the estimated number of individuals with potentially impacted data, Change Healthcare is providing its current best interim estimate as of April 8, 2025, and will provide an updated response as soon as practicable following the conclusion of its notice process.

* * *

Change Healthcare does not intend to, and does not, waive any applicable privilege. If it were found that any of the information provided constitutes disclosure of otherwise privileged matters such disclosure would be inadvertent.

Please do not hesitate to contact me if you have any questions.

Best regards,

Paul Connell

Paul Connell