

**Table 1: Classification of Reported Breaches into Categories**

<b>Source of Breach</b>	<b>Criteria for Inclusion</b>	<b>Example Entries</b>
Carelessness/Negligence <sup>a</sup>	<ul style="list-style-type: none"><li>• Generally used terms such as “inadvertently” and “accidentally”</li><li>• Exhibited the common trait of unintentional violation of established policies</li></ul>	<ul style="list-style-type: none"><li>• “<i>The covered entity (CE) ... reported that its business associate (BA) ... impermissibly mailed the protected health information (PHI) of 802 individuals to the wrong recipients.</i>”</li><li>• “<i>...a workforce member inadvertently emailed a spreadsheet containing the protected health information...</i>”</li><li>• “<i>... emailed patients without using the blind-copy function...</i>”</li></ul>
Phishing and ransomware <sup>a</sup>	<ul style="list-style-type: none"><li>• Explicitly stated phishing or ransomware as the primary cause of the breach</li></ul>	<ul style="list-style-type: none"><li>• “<i>... reported that its business associate (BA) experienced a ransomware attack affecting the electronic protected health information (ePHI) of approximately 15,680 individuals.</i>”</li><li>• “<i>... an employee was the victim of an email phishing scheme that affected the electronic protected health information (ePHI) of 685 individuals.</i>”</li><li>• “<i>The covered entity’s (CE) computer system was attacked by a ransomware virus that encrypted files ... and damaged the network operating system rendering all of the CE’s files unusable.</i>”</li></ul>

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Technical improper disclosure<sup>a</sup>

- A result of coding impropriety, software bugs, and insecure configurations that led to PHI exposure
  - Generally described as occurring due to technical errors or misconfigurations
- *“The covered entity (CE) ... reported that unauthorized individuals accessed protected health information (PHI) due to a system administrator’s incomplete installation of a web content management platform.”*
  - *“...the business associate (BA), reported that an employee inadvertently misconfigured the settings on one of its computer servers, which made the server accessible over the Internet.”*
  - *“The covered entity (CE) ... reported that a programming error exposed the electronic protected health information (ePHI) of 11,536 individuals via its mobile application.”*

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Cyber-attack or external hacking attempts<sup>b</sup>

- Generally used terms such as “victim of a cyber-attack” and “hacking attempt” by external threat actors towards the organization
  - Unlike phishing or ransomware, there were no clear enabling actions by employees, vendors and other internal actors
- *“...the covered entity (CE), reported that it was the victim of a cyber-attack involving the electronic protected health information (ePHI) of 20,418 individuals...”*
  - *“The covered entity (CE), ... reported that its business associate (BA) ... was the victim of a cyber-attack involving the electronic protected health information (ePHI) of 33,730 individuals.”*
  - *“the covered entity (CE) ... discovered a cyber-attack as the malware was in the process of encrypting information in*
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*the CE's computer system. ... Its investigation revealed that the cyber-attack's likely entry point was via remote desktop connection."*

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Malicious insider<sup>b</sup>

- Described direct actions by an employee or business associate that facilitated a cyber breach for personal gains or the enrichment of another individual/entity
- *"...an employee emailed the protected health information (PHI) of 950 individuals to other members of a research study without authorization."*
- *"...an employee ... was arrested for fraud and the CE subsequently determined that she impermissibly accessed and used at least one patient's protected health information..."*
- *"...an employee improperly disclosed protected health information (PHI) with the intent to sell it to an unauthorized third party."*

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Theft

- Described incidents such as burglary and physical theft by external actors
  - *"...the covered entity (CE), reported that a computer was stolen that contained 27,113 patients' files of a newly acquired medical practice..."*
  - *"...unknown persons broke into the covered entity's (CE) legal and audits offices, ransacked the offices and paper files, vandalized property, and started a fire that set off the building's*
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*sprinkler system, which caused water damage to many documents and workstations.”*

- *“...the covered entity (CE), reported that documents containing the protected health information (PHI) of approximately 616 individuals was stolen during looting due to civil unrest...”*

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<sup>a</sup>Unintentional human factors.

<sup>b</sup>Malicious human factors.