



University  
Health

# The Good, The Bad, and The Ugly of Cybersecurity

YOUR PARTNER FOR HEALTHY  
**CHANGE**



Bill Phillips  
EVP, Chief Information Officer  
University Health  
[Bill.Phillips@uhtx.com](mailto:Bill.Phillips@uhtx.com)

Serina Rivela  
VP/Chief Legal Officer  
University Health  
[Serina.Rivela@uhtx.com](mailto:Serina.Rivela@uhtx.com)

1

## Change Healthcare

### HHS intervenes in Change Healthcare hack

[HHS intervenes in Change Healthcare hack \(Theckershospitalreview.com\)](#)

HHS said March 5 it would help accelerate payments to hospitals affected by the Change Healthcare cyberattack and institute other workarounds for providers.

HEALTH CARE Published February 22, 2024 12:10pm EST

### Pharmacies nationwide report outages in wake of cyberattack

Change Healthcare said it became aware of the 'outside threat' on Wednesday morning, disconnecting their systems for security purposes.

### THA, AHA Push for More Help on Cyberattack, Seek Hospital Data

THA and the American Hospital Association are continuing work to help membership sort out the implications of the Optum/Change Healthcare cyberattack this week as the federal government announced flexibilities for hospitals to account for the breach – steps that AHA deemed to be an inadequate response.

The Feb. 21 ransomware attack on Change Healthcare – part of Optum and owned by UnitedHealth Group – is believed to have been perpetrated by the [cybercrime group](#) known as BlackCat or ALPHV, according to reports. Change handles a reported 15 billion health care transactions per year and touches one of every three patient records.

Suspected nation-state associated cyber security threat actor

### BlackCat Reportedly Behind Change Healthcare Incident

The BlackCat group has reportedly claimed responsibility for the [ongoing cyber-attack against Change Healthcare](#), stating on its dark web site that it exfiltrated 6TB of data from the firm. However, the claim was subsequently removed without explanation.

#### Action:

- Severed all connections and blocked domains
- Communicated impact to our organization
- Sent letter to Change Healthcare
- Monitor daily

The U.S. Department of Health and Human Services' Office for Civil Rights (OCR) just announced an [investigation](#) into the recent cyberattack that affected Change Healthcare.

Cyber threats of this magnitude are on the rise, with over [134 million](#) individuals impacted by breaches in 2023, a 141% increase from 2022.



6302 Medical Group  
San Antonio, Texas 78229

February 23, 2024

Attn: General Counsel  
11000 Optum Circle  
Eden Prairie, MN 55344

Re: Change Healthcare Network Cybersecurity Incident

Dear General Counsel,

On February 22, 2024, University Health was made aware Change Healthcare network suffered a cybersecurity attack. University Health's immediate concern is whether this incident also posed a serious threat to our system and we will proceed accordingly.

While we complete our internal risk assessment we request that [OptumInsight](#), Inc. and/or Change Healthcare provide the following:

- (1) Weekly status updates;
- (2) Written notification when the environment is clean;
- (3) A formal written privacy incident notice; and,
- (4) Agreement to notify me on all future notices via e-mail.

This information will assist us in performing our required due diligence. I look forward to hearing from you.

Sincerely,

Bill Phillips  
Executive V.P., Chief Information Officer



2

# BlackCat



## BlackCat Adapts Techniques Following Law Enforcement Operation

The advisory said that BlackCat actors are employing improvised communication methods by creating victim-specific emails to notify of the initial compromise.

For example, affiliates offer to provide unsolicited cyber remediation advice as an incentive for making a payment, such as "vulnerability reports" and "security recommendations" to prevent future attacks.

- The US government has warned the healthcare sector that it is now the biggest target of the BlackCat ransomware group.
- The joint advisory from the FBI, the Cybersecurity and Infrastructure Security Agency (CISA) and the Department of Health and Human Services (HHS), noted of the nearly 70 leaked victims of BlackCat since mid-December 2023, healthcare has been the most commonly victimized industry.
- This follows a post by a BlackCat administrator encouraging affiliates to target hospitals in early December in response to [law enforcement action](#) taking down the Russian-speaking group's leak site.
- The group [appeared to "unseize"](#) its leak site shortly after the announcement.
- BlackCat, also known as ALPHV, is reportedly behind the ongoing cyber incident affecting health tech firm Change Healthcare, which was first reported on February 21.



3

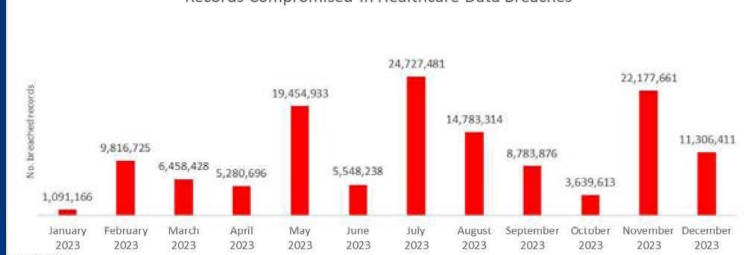
## 2023 Healthcare Data Breaches

- More than 2,600 organizations worldwide had data stolen in the attacks, with the healthcare industry among the worst affected
- 95% of all identity theft incidents reportedly come from compromised healthcare records
- Phishing attacks were used as the first stage of an attack. 45% of all successful data breaches in healthcare were due to phishing

### Top 10 Organizations Affected

Name of Covered Entity	State	Covered Entity Type	Individuals Affected	Cause of Data Breach
HealthEC LLC	NJ	Business Associate	4,452,782	Hacking incident (Data theft confirmed)
ESO Solutions, Inc.	TX	Business Associate	2,700,000	Ransomware attack
Transformative Healthcare (Fallon Ambulance Services)	MA	Healthcare Provider	911,757	Hacking incident (Data theft confirmed)
Electrostim Medical Services, Inc. dba EMSI	FL	Healthcare Provider	542,990	Hacking incident
Cardiovascular Consultants Ltd.	AZ	Healthcare Provider	484,000	Ransomware attack (Data theft confirmed)
Retina Group of Washington, PLLC	MD	Healthcare Provider	455,935	Ransomware attack
CompleteCare Health Network	NJ	Healthcare Provider	313,973	Ransomware attack (Data theft confirmed)
Health Alliance Hospital Mary's Avenue Campus	NY	Healthcare Provider	264,197	Hacking incident (Data theft confirmed)
Independent Living Systems, LLC	FL	Business Associate	123,651	Hacking incident (MOVEit)
Pan-American Life Insurance Group, Inc.	LA	Health Plan	105,387	Hacking incident (MOVEit)
Meridian Behavioral Healthcare, Inc.	FL	Healthcare Provider	98,808	Hacking incident

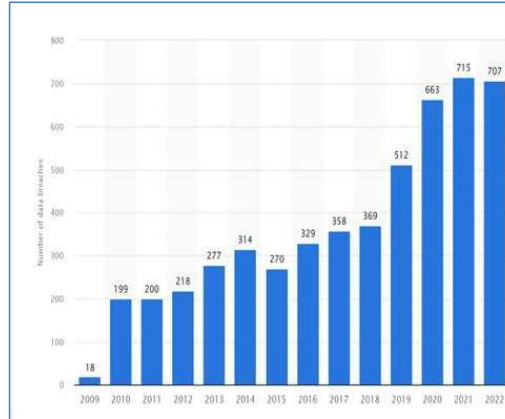
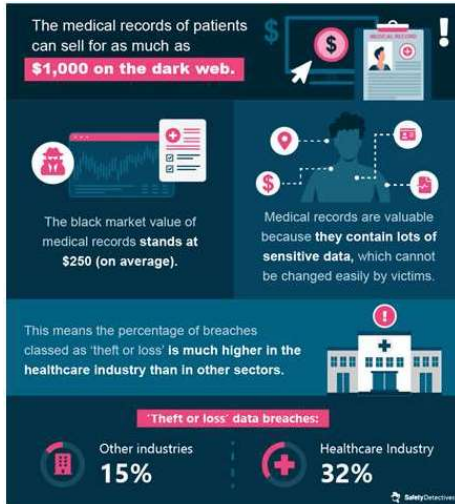
Records Compromised in Healthcare Data Breaches



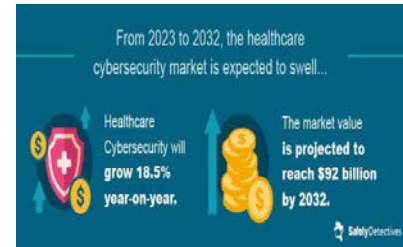
4

# Why Target Healthcare

- Contains a greater and broader amount of personal information, more than employers or banks
- Serves as a larger pool of potential victims
- Financial data has a finite lifespan, healthcare information lives forever
- PHI can be monetized and exploited
- PHI is 10-70x more valuable than credit card information



Healthcare Data Breaches

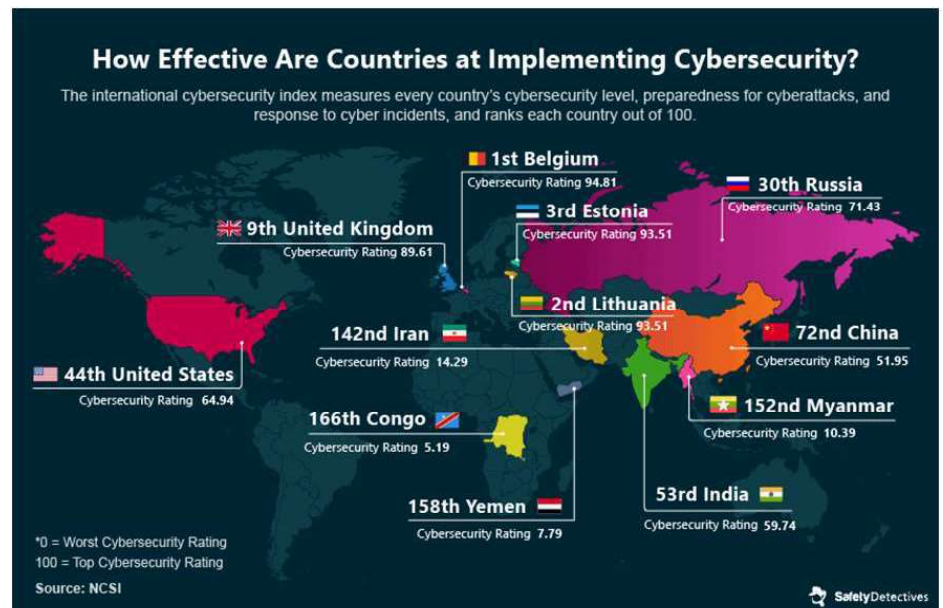


5

# Cybersecurity Rating by Nation

So, which countries are best placed to deal with cybersecurity incidents in healthcare?

The national cybersecurity index measures a nation's cybersecurity level, preparedness for cyberattacks, and response to cyber incidents.



6

Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the [UT Law CLE eLibrary \(utcle.org/elibrary\)](https://utcle.org/elibrary)

Title search: The Good, The Bad, and The Ugly of Cybersecurity

Also available as part of the eCourse

[2024 Health Law eConference](#)

First appeared as part of the conference materials for the  
35<sup>th</sup> Annual Health Law Conference session

"The Good, The Bad, and The Ugly of Cybersecurity"