

Table 1: Classification of Reported Breaches into Categories

Source of Breach	Criteria for Inclusion	Example Entries
Carelessness/Negligence ^a	<ul style="list-style-type: none"> • Generally used terms such as “inadvertently” and “accidentally” • Exhibited the common trait of unintentional violation of established policies 	<ul style="list-style-type: none"> • <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> • <i>“...a workforce member inadvertently emailed a spreadsheet containing the protected health information...”</i> • <i>“... emailed patients without using the blind-copy function...”</i>
Phishing and ransomware ^a	<ul style="list-style-type: none"> • Explicitly stated phishing or ransomware as the primary cause of the breach 	<ul style="list-style-type: none"> • <i>“... reported that its business associate (BA) experienced a ransomware attack affecting the electronic protected health information (ePHI) of approximately 15,680 individuals.”</i> • <i>“... an employee was the victim of an email phishing scheme that affected the electronic protected health information (ePHI) of 685 individuals.”</i> • <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>

Technical improper disclosure^a

- 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.”*

Cyber-attack or external hacking attempts^b

- 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."

Malicious insider^b

- 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."*

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...”*

^aUnintentional human factors.

^bMalicious human factors.