



# PULSE

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## BianLian Group Targets Boston Children's Health Physicians in Recent Cyberattack

This is one of at least 60 confirmed ransomware attacks the cyberthreat group has committed in 2024 alone.

**B**oston Children's Health Physicians (BCHP) [recently notified patients](#) of a significant data breach resulting from a cyberattack involving one of its IT vendors.

BCHP, a multi-specialty health care group with over 300 clinicians serving Connecticut and New York, revealed that it had initiated its [incident response protocols](#) immediately after discovering the breach.

The cyberattack was first identified on Sept. 6, 2024, when BCHP's IT vendor detected unusual activity on its systems. By Sept. 10, 2024, BCHP confirmed that an unauthorized third party had gained access to its network and stolen certain files.

The compromised data reportedly included information about current and former employees, patients, and guarantors. This data potentially exposed sensitive details such as names, Social Security numbers, billing information, dates of birth, addresses, driver's license



numbers, medical record numbers, and health insurance details. However, BCHP assured patients that its electronic health record (EHR) systems were on a separate network and remained unaffected by the breach.

The BianLian cyberthreat group, known for its ransomware attacks on critical infrastructure, claimed responsibility for the cyberattack. BianLian has been actively involved in at least 60 confirmed ransomware attacks in 2024 alone. The group's actions have drawn attention from the FBI and the Cybersecurity and Infrastructure Security Agency (CISA), which [issued warnings](#) in

May 2023 regarding BianLian's activity, specifically targeting critical infrastructure entities.

As a precaution, BCHP is offering complimentary credit monitoring services to those whose Social Security or driver's license numbers were affected.

"This cyberattack has exposed more than enough information about patients, guarantors, and employees to cause plenty of problems for the parties that have had their information exposed," said Chris Hauk, consumer privacy champion at Pixel Privacy.

Hauk emphasized the importance of affected individuals taking advantage

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of these credit protection services. Hawk also warned that those impacted should be wary of phishing attacks where bad actors might impersonate BCHP officials or other agencies in an attempt to further exploit the breach, [according to an article from Tech Target](#).

The attack has highlighted the vulnerability of third-party vendors in the health care sector, which continues to suffer from significant cyberattacks. BCHP has urged all individuals involved to remain vigilant as it continues to address the fallout from the breach.

#### Protect Yourself

Access ACA's [Safeguards Rule Resource Center here](#) for cybersecurity tips as well as insights from TPx, ACA's Safeguards security partner of choice. Webinar recordings related to the

Safeguards Rule are available at [ACA's Store](#) by selecting the Safeguards Rule topic.

It's critical to make sure your cyber liability insurance is current, and coverage is easy and affordable for ACA members. Collectors Insurance Agency (CIA), a subsidiary of ACA, provides members exclusive access to [risk management products and services](#) tailored to each members' specific needs. Cyber insurance is an ever-changing market, and with the help of CIA's partners members can obtain the coverage they need to meet today's—and tomorrow's—challenges.

Additionally, when you join ACA's [Cybersecurity Collective](#), you'll be connected to fellow cybersecurity enthusiasts who are ready to share

insights and offer guidance. You'll also be able to learn and share in our private LinkedIn group.

Don't miss out on this valuable resource! You or someone on your team can sign up for the Cybersecurity Collective in two easy steps: Visit [ACA's Cybersecurity Collective page](#) and agree to the terms of participation.

In your welcome email, follow the instructions to request access to our private LinkedIn group.

Lastly, a Collector article from the September/October issue provides resources and tips on how you can protect your company against ransomware attacks.

[Read it here.](#)

# CFPB Advisory Guidance on Medical Debt Collection to Take Effect Dec. 3

Compliance resources are available for members as ACA continues to advocate on your behalf about concerns with the new requirements.

**T**he Consumer Financial Protection Bureau announced a Dec. 3 effective date for guidance on medical debt collections issued through its [Advisory Opinion program](#)

The advisory opinion was [published on the Federal Register](#) Oct. 3.

"The bureau's advisory opinion program provides written guidance to assist regulated entities to better understand their legal and regulatory obligations through advisory opinions," according to the website.

This guidance creates new rules for medical account servicers and debt collectors that go beyond Fair Debt Collection Practices Act and Regulation F requirements for medical bill collections.

When agencies couch new legislative rules in terms of "advisory opinions," they violate the federal Administrative Procedure Act, [ACA International previously reported](#).

The CFPB's Oct. 1 advisory opinion creates a new definition for when a medical account is in "default," in addition to making other changes that conflict with statutory text and history. Beyond that, the CFPB conflates revenue cycle management for creditors, first-party servicers and debt collectors. Revenue cycle management involves collecting current medical bills, not defaulted debt under Regulation F and the FDCPA.

ACA [responded to the advisory opinion](#) in statements to the press as well as a [letter](#) (PDF) to lawmakers outlining the concerns with the guidance and the bureau's regulatory overreach.

## Compliance Resources

Here are some tips for debt collectors to consider when collecting medical bills.

Prohibited practices for collecting medical bills include:

- Collecting an amount not owed because it was already paid.
- Collecting amounts not owed due to federal or state law.
- Collecting amounts above what can be charged under federal or state law.

# NEWS & NOTES

## Decline in Patient Trust of Health Care Providers as Social Media Becomes Preferred Health Information Source

A new [YouGov and Healthline Media poll](#) found that fewer than half of American patients consider their health care provider their top source for health information. Only 37% of respondents prefer their doctor for medical guidance, while many are turning to social media platforms, particularly YouTube. This trend is more pronounced among younger generations, with 67% of Gen Z and 63% of millennials using social media for health and wellness advice. Despite this, 77% of respondents expressed skepticism about the reliability of trends shared online, with women and younger patients showing a more positive outlook compared to those with chronic illnesses.

The survey also revealed concerning gaps in preventive care. Less than half of patients have had an annual physical in the past year, and only 37% have visited the dentist. Preventive screenings, such as mammograms, gynecological exams, and colonoscopies, are being neglected, with significant portions of patients missing these essential services. Healthline Media's Dr. Jenny Yu emphasized the importance of these screenings for early detection and long-term health outcomes.

[Read more here.](#)

## CarePoint Health and Hudson Regional Hospital Form New Management System

CarePoint Health, a three-hospital system based in Jersey City, and Hudson Regional Hospital in Secaucus, New Jersey, have agreed to affiliate under a

new management services organization (MSO) called Hudson Health System, [according to a Becker's Hospital Review article.](#)

The partnership was approved by CarePoint's nonprofit board of trustees and involves a certificate-of-need application for Hudson Regional to operate Bayonne Medical Center. The MSO will integrate both nonprofit and for-profit hospitals, including CarePoint's Hoboken University Medical Center and Christ Hospital as nonprofits, while Bayonne Medical Center operates for profit.

[Read more here.](#)

## CFPB Advisory cont. from page 2

- Collecting amounts for services not received.
- Misrepresenting the nature of legal obligations.
- Collecting unsubstantiated medical bills.

The FDCPA prohibitions interact with other federal and state laws in a variety of ways. This could create liability for debt collectors operating in the medical debt market, specifically under sections 1692e(2)(A) and 1692f(1), which impose strict liability.

It also requires medical account servicers in the ARM industry to oversee the provision of medical services and assignment of billing codes when providers "seek greater compensation for more serious, more urgent, or more involved forms of care."

The advisory opinion also puts the responsibility on debt collectors to monitor how hospitals offer charitable care or account statements. Finally, the opinion requires servicers and collectors in the ARM industry to apply amorphous state law notions of what is "reasonable" to charge for medical services. It warns collectors that they might violate the FDCPA if they collect more than what a judge might award in the context of a lawsuit.

Overall, there are several concerning and problematic so-called interpretations in this opinion.

ACA continues to review the guidance to provide compliance resources to its members.

To start:

This [chart \(PDF\)](#) outlines the Fair Debt Collection Practices Act requirements in the advisory opinion. These [ACA SearchPoint](#) documents also offer FDCPA and Regulation F compliance information: [Health Care Collections and Third-Party Communications](#) (PDF) [State Hospital Billing and Collection Practices](#) (PDF) [Unfair, Deceptive or Abusive Acts and Practices](#) (PDF)

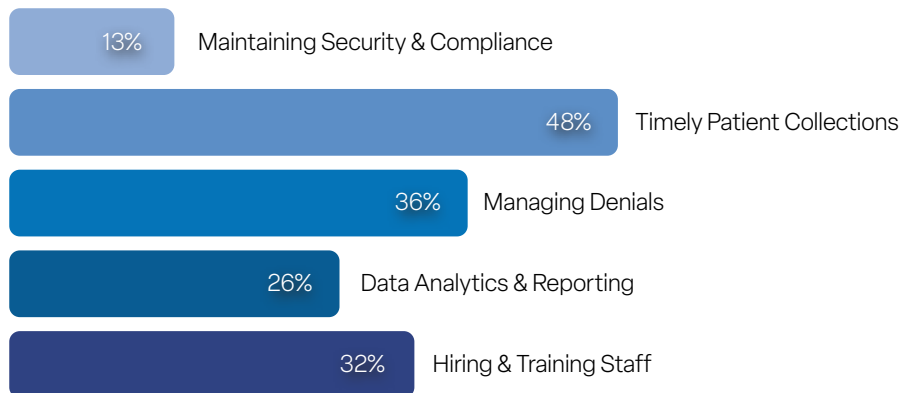
## Health Care Leaders Face Challenges in Patient Collections and Staff Training

A 2024 survey of 176 health care professionals by Salucro Healthcare Solutions found that nearly 50% of leaders cite timely patient collections as the top challenge in revenue cycle management, followed by managing denials (36%) and hiring and training staff (32%). Leaders also reported concerns with data analytics (26%) and security compliance (13%). Only 16% rated their systems as highly efficient, with hands-on revenue cycle leaders less satisfied than executives.

According to Salucro researchers, digital payment platforms show potential, but adoption is slow. Most respondents require new systems to integrate with existing workflows, with 96% emphasizing this need. However, 69% still use paper billing, and patient resistance to digital solutions (26%) and security concerns (21%) present significant barriers. The survey found that many health care leaders (49%) are likely to invest in new revenue cycle technology within 12 to 18 months to streamline operations and cut costs.

[Read more here.](#)

### The Biggest Challenges Facing Teams in Healthcare Revenue Cycle Management



**Source:** 2024 Healthcare Provider Fintech Insights Report, Salucro Healthcare Solutions. <https://tinyurl.com/2vavzpwz>



is a monthly bulletin that contains information important to health care credit and collection personnel. Readers are invited to send comments and contributions to:

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