

Notice Concerning Employee Wellness Program

Spring 2018 Campaign

Rules published on May 17, 2016, under the Americans with Disabilities Act (ADA) require employers that offer wellness programs that collect employee health information to provide a notice to employees informing them what information will be collected, how it will be used, who will receive it, and what will be done to keep it confidential.

NOTICE REGARDING WELLNESS PROGRAM

Hoo's Well is a voluntary wellness program available to all active employees and spouses enrolled in the University of Virginia Health Plan (but does not include those retirees who may be working but are on the retiree plan). The program is administered according to federal rules permitting employer-sponsored wellness programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act, as applicable, among others.

Incentives of up to \$200.00 may be available for employees and spouses who participate in certain health-related activities, such as completing 52 workouts (30 minutes or 7,000 steps per day equals one workout), or achieve certain health outcomes. If you are unable to participate in any of the health-related activities or achieve any of the health outcomes required to earn an incentive, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting AskHR@virginia.edu or call the HR Service Team at 434-982-0123. Tobacco users can earn a \$200.00 incentive once The Tobacco Cessation Program is completed.

Protections from Disclosure of Medical Information

We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and the University of Virginia Health Plan may use aggregate information it collects to design a program based on identified health risks in the workplace, Hoo's Well will never disclose any of your personal information either publicly or to the employer, except as necessary to respond to a request from you for a reasonable accommodation needed to participate in the wellness program, or as expressly permitted by law, such as for the design and operation of other wellness and care coordination programs. Medical information that personally identifies you that is provided in connection with the wellness program will not be provided to your supervisors or managers and may never be used to make decisions regarding your employment.

Your health information will not be sold, exchanged, transferred, or otherwise disclosed except to the extent permitted by law to carry out specific activities related to the wellness program, and you will not be asked or required to waive the confidentiality of your health information as a condition of participating in the wellness program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the wellness program will abide by the same confidentiality requirements. The only individual(s) who will receive your personally identifiable health information is (are) health care providers and other care coordination/disease management program personnel in order to provide you with services under the wellness program.

In addition, all medical information obtained through the wellness program will be maintained separate from your personnel records, information stored electronically will be encrypted, and no information you provide as part of the wellness program will be used in making any employment decision. Appropriate precautions will be taken to avoid any data breach, and in the event a data breach occurs involving information you provide in connection with the wellness program, we will notify you as required by law.

You may not be discriminated against in employment because of the medical information you provide as part of participating in the wellness program, nor may you be subjected to retaliation if you choose not to participate.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact Joseph Esposito HIPAA Privacy Officer; jesposito@virginia.edu; 434-924-3552.

Notice Concerning Employee Wellness Program

Fall 2018 Campaign

Rules published on May 17, 2016, under the Americans with Disabilities Act (ADA) require employers that offer wellness programs that collect employee health information to provide a notice to employees informing them what information will be collected, how it will be used, who will receive it, and what will be done to keep it confidential.

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Hoo's Well is a voluntary wellness program available to all active employees and spouses enrolled in the University of Virginia Health Plan (but does not include those retirees who may be working but are on the retiree plan). The program is administered according to federal rules permitting employer-sponsored wellness programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act, as applicable, among others. If you choose to participate in the wellness program you will be asked to complete a voluntary health risk assessment or "HRA" that asks a series of questions about your health-related activities and behaviors and whether you have or had certain medical conditions (e.g., cancer, diabetes, or heart disease). You will also be asked to complete a biometric screening, which will include a blood test for Total Cholesterol and Glucose screenings. You are not required to complete the HRA or to participate in the blood test or other medical examinations.

However, employees and spouses who choose to participate in the wellness program will receive an incentive of up to \$500.00 for HRA, Biometrics, and a completion of an activity. Although you are not required to complete the HRA and/or participate in the biometric screening, only employees who do so will receive up to \$300.00.

Additional incentives of up to \$200.00 may be available for active employees and spouses who participate in certain health-related activities, such as by completing 52 workouts (30 minutes or 7,000 steps per day equals one workout), or achieve certain health outcomes. If you are unable to participate in any of the health-related activities or achieve any of the health outcomes required to earn an incentive, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting AskHR@virginia.edu or call the HR Service Team at 434-982-0123. Tobacco users can earn a \$200.00 incentive once The Tobacco Cessation Program is completed.

The information from your HRA and the results from your biometric screening will be used to provide you with information to help you understand your current health and potential risks, and may also be used to offer you services through the Hoo's Well wellness program and other wellness and care coordination programs offered by the University; examples of such programs are BeWell, Health Advocacy, Disease Management, and Lifestyle Coaching. You also are encouraged to share your results or concerns with your own doctor.

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Your health information will not be sold, exchanged, transferred, or otherwise disclosed except to the extent permitted by law to carry out specific activities related to the wellness program, and you will not be asked or required to waive the confidentiality of your health information as a condition of participating in the wellness program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the wellness program will abide by the same confidentiality requirements. The only individual(s) who will receive your personally identifiable health information is (are) health care providers and other care coordination/disease management program personnel in order to provide you with services under the wellness program.

In addition, all medical information obtained through the wellness program will be maintained separate from your personnel records, information stored electronically will be encrypted, and no information you provide as part of the wellness program will be used in making any employment decision. Appropriate precautions will be taken to avoid any data breach, and in the event a data breach occurs involving information you provide in connection with the wellness program, we will notify you as required by law.

You may not be discriminated against in employment because of the medical information you provide as part of participating in the wellness program, nor may you be subjected to retaliation if you choose not to participate.

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