

Notice for Employer-Sponsored Wellness Programs Devereux Advanced Behavioral Health Wise and Well Health and Wellness Program

The Devereux Advanced Behavioral Health Wise and Well Employee Wellness Program is a voluntary wellness program available to all employees participating in medical benefits. 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. If you choose to participate in the wellness program you will be asked to complete a voluntary Personal Health Profile (PHP) also known as a Health Risk Assessment or (HRA) that may ask a series of questions about your health related activities, behaviors, lifestyle or whether you have or had certain medical conditions (e.g., cancer, diabetes, heart disease). Devereux does not currently require biometric screening as part of our wellness program. You are not required to complete the PHP to participate in Medical or Rx benefits, but must complete it to participate in the wellness program.

Employees who choose to participate in the wellness program will receive an incentive. A discount of 10% is applied to the employee premium cost in the Medical Tiered Plan. Participants in the Medical HDHP will receive a contribution into their Health Savings Account of \$5 bi-weekly for those with single coverage or \$10 for family coverage. Although you are not required to complete the PHP, only employees who complete the PHP and receive 85 points through participation in the wellness program available through Health Advocate at www.healthadvocate.com/Devereux or by [calling 866-695-8622](tel:866-695-8622) will receive the incentive.

The 85 points can be earned in many ways and are received by logging into Health Advocate at www.healthadvocate.com/Devereux or by [calling 866-695-8622](tel:866-695-8622). Some examples of how to earn the incentive are: track weight, attest to not smoking or attend a smoking cessation program on-line, attend on-line mini seminars, participate in fitness activities, work with a health coach and attend center events. The Wise and Well Health and Wellness Program is based on participation, not by achieving any particular health outcomes. If you are unable to participate in any of the health-related activities 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 Jelsy Kravatz at 610-542-3093 or Jkravatz@devereux.org.

The information from your PHP will be used by Health Advocate to provide you with information to help you understand your current health and potential risks which you are encouraged to share and discuss your results or concerns with your own doctor. At no time does Devereux have access to your personal health information or personal health profile. Health Advocate shares only an aggregate report of the number of people who are participating and receiving points.

Protections from Disclosure of Medical Information

Health Advocate is required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and Devereux may use aggregate information to design a program based on identified health risks in the workplace, Health Advocate will never disclose any of your personal information either publicly or to Devereux, 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. You will be asked to complete a HIPPA Form allowing them to share any information prior to that information being shared. If you refuse to complete the form, no information will be shared.

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.

In addition, any medical information obtained through the wellness program will be maintained by Health Advocate which is separate from Devereux and your personnel records. Information stored electronically is stored at Health Advocate and will be encrypted; no information you provide as part of the wellness program will be used in making any employment decisions. 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, Health Advocate will notify you immediately.

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 as it relates to the health and wellness program, please contact Jelsy Kravatz at 610-542-3093 or Jkravatz@devereux.org.

