

## Wellness Program Notices

### **HIPAA Notice of Reasonable Alternative Standards (for Health-Contingent Wellness Programs)**

Your health plan is committed to helping you achieve your best health. Rewards for participating in a wellness program are available to teammates who are enrolled in a Roper St. Francis Healthcare (RSFH) medical plan. If you think you might be unable to meet a standard for a reward under this wellness program, you might qualify for an opportunity to earn the same reward by different means. Contact us at [WellnessWorksTeam@rsfh.com](mailto:WellnessWorksTeam@rsfh.com) and we will work with you (and, if you wish, with your doctor) to find a wellness program with the same reward that is right for you in light of your health status.

### **EEOC Notice (for Wellness Plans that include Disability-Related Inquiries or Medical Examinations)**

#### **NOTICE REGARDING WELLNESS PROGRAM**

Wellness Works is a voluntary wellness program available to all teammates. The program is administered according to federal rules permitting employer-sponsored wellness programs that seek to improve teammate 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 answer a voluntary tobacco use question and electronically sign the notice and consent to participate. You will also be asked to (1) complete a wellness exam with your primary care provider or OB/GYN; (2) complete a personal health assessment; and (3) earn 50 points for various wellness activities, which are described at <https://wellnessworks.rsfh.com>. Your spouse will also be asked to complete a wellness exam with his/her primary care provider or OB/GYN if he/she will be covered on a RSFH medical plan. You are not required to participate in the Wellness Works Program.

However, teammates who choose to participate in the Wellness Works Program will receive a reduction to their Health Plan contributions for completing the requirements of the program and receiving a status of Qualified. Although you are not required to participate in the wellness program, only teammates who do so will receive premium incentive associated with a status of Qualified.

The information from your personal health assessment 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 wellness program, such as a weight management program, smoking cessation, disease management and diabetes program. You also are encouraged to share your results or concerns with your own doctor.

#### ***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 Roper St. Francis Healthcare may use aggregate information it collects to design a program based on identified health risks in the workplace, the Wellness Works Program 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. 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 individuals who will receive your personally identifiable health information are RSFH's Cerner Wellness account representatives, 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 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, please contact Human Resources at 843-720-8400.