

## NOTICE REGARDING WELLNESS PROGRAM

Minooka Consolidated School District 201's Wellbeing Program is a voluntary wellness program available to all employees and spouses. 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., diabetes, or heart disease). You will also be asked to complete a biometric screening, which will include a 37 panel blood test for anemia, infections & certain cancers; heart disease & stroke; kidney diseases; nutritional and gastrointestinal disorders; liver and gallbladder issues, diabetes. You are not required to complete the HRA or to participate in the blood test or other medical examinations.

However, employees on the BCBS Minooka Medical plan who choose to participate in the wellness program will be eligible to receive a monthly savings on their 2019 premium cost for completing the HRA and participating in the biometric screening. Although you are not required to complete the HRA or participate in the biometric screening, only employees who do so will be eligible to receive the monthly savings on their 2019 premium cost.

An additional incentive of up to \$100 may be available for employees who achieve certain health outcomes based on LDL and HDL cholesterol, triglycerides, blood pressure and glucose. If you are unable to achieve the health outcomes required, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting CHC Wellbeing at 866.373.4242.

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 wellness program, such as health coaching and e-Learning courses. 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 Minooka may use aggregate information it collects to design a program based on identified health risks in the workplace, CHC Wellbeing 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 individual(s) who will receive your personally identifiable health information are a CHC Wellbeing medical director, a CHC Wellbeing health coach, a CHC Wellbeing account manager 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 Minooka CCSD #201 at 815-467-6121, #3.

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***The intent of this analysis is to provide general information regarding the provisions of current legislation and regulation. It does not necessarily fully address all your organization's specific issues. It should not be construed as, nor is it intended to provide, legal advice. Your organization's general counsel or an attorney who specializes in this practice area should address questions regarding specific issues.***