

# 2022 Notice Regarding Wellness Programs

## Renew You in 22 Wellness Program for ECU Health Team Members

Update July 2022



The Renew You in 22 ECU Health wellness program is a voluntary wellness program available to all team members, regardless of benefit status to support team members in their personal health and wellness goals. The program is administered by ECU Health Wellness and Wellworks For You 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 including biometrics, lab testing and Know Your Number 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 wellness consult and set wellness goals. You may be offered other wellness services such as lifestyle coaching, care management, disease management, exercise, nutrition and stress management services. Team members will need to complete the Health Risk Assessment by November 30, 2022 to qualify for an incentive if offered. A t-shirt or other prizes may be awarded for participation in the health risk assessment or wellness activities.

If you are unable to participate in any of the health-related activities or achieve any of 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 Wellworks For You at 800-425-4657.

The information from your HRA 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. You also are encouraged to share your results or concerns with your own doctor.

### **PROTECTIONS FROM DISCLOSURE OF MEDICAL INFORMATION**

ECU Health Wellness & Lifestyle Medicine is the provider of the program on behalf of ECU Health. Wellworks For You is a contracted vendor of ECU Health Wellness & Lifestyle Medicine. We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and ECU Health may use aggregate information it collects to design a program based on identified health risks in the workplace, Wellworks For You and ECU Health Wellness & Lifestyle Medicine 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.

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when responding to this request for medical information. "Genetic information" as defined by GINA, includes an individual's family medical history, the results of an individual's or family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

Any protected health information (PHI) as defined under the Health Insurance Portability and Accountability Act (HIPAA) created, received, used or maintained as part of the Program shall be treated as set forth in the Notice of Privacy Practice (NPP) applicable to the Program. A copy of the NPP is available to you from ECU Health Wellness.

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 the Wellworks For You team, ECU Health Wellness and Lifestyle Medicine team, and any medical providers providing services to you in accordance with your voluntary participation in wellness program services. Your WellScreen data will be stored in the ECU Health EPIC medical record for the Wellness and Lifestyle Medicine Clinic as the provider of this program. Your personally identifiable data may be disclosed to a third party, your Health Plan, ECU Health Population Health, ECU Health Care Management or other authorized individuals for legitimate business purposes such as to administer wellness Incentives, analyze program outcomes or connect you to resources to help you treat or manage your medical conditions.

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 ECU Health Wellness at 252-847-5590 or the ECU Health Privacy Officer at 252-847-6545.