

## EEOC Notice Regarding Well-Being Programs

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Your employer offers a voluntary wellness program available to all participants and covered spouses. The program is administered according to applicable 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 may be given the opportunity to complete a voluntary health risk assessment, called Health Check, 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 may also have the opportunity to complete a biometric screening, called Blueprint for Wellness<sup>®</sup>, which will include a blood test for information about your heart, kidney function, cholesterol, and other health factors. You are not required to complete Health Check or Blueprint for Wellness.

There are financial incentives for participating in the above programs. The incentives are different for participants in the HealthFlex Plan and all other participants, as described below:

- **Participants in the HealthFlex Plan:** Participants and covered spouses who choose to complete the Health Check will avoid paying extra on the following year's HealthFlex deductible. In addition, participants and spouses who choose to complete a Blueprint for Wellness screening will earn \$100 in Pulse Cash through Virgin Pulse<sup>®</sup>, with the opportunity to earn Wellness Credits depending on their health measures. Although you are not required to complete the Health Check or participate in the Blueprint for Wellness screening, only participants and spouses who do so will receive the incentives described above. Additional incentives of up to \$150 in Pulse Cash may be available for participants and spouses who participate in certain health-related activities. or achieve certain healthy results or improved results on the Blueprint for Wellness screening.
- **All Well-Being Program Participants:** The Health Check, Blueprint for Wellness and the additional incentive of \$150 in Pulse Cash do not apply to standalone Virgin Pulse participants and spouses. Participants and spouses can earn a designated amount of Pulse Cash per quarter for tracking activity and healthy habits. Points will be applied towards each level to earn the total incentive for the calendar year.

For HealthFlex participants, the information from your Health Check and the results from your Blueprint for Wellness 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, emotional health supports, diabetes prevention, and more. You are also encouraged to share your results or concerns with your own doctor.

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. HealthFlex participants may request a reasonable accommodation or an alternative standard by email—[incentiverequest@wespath.org](mailto:incentiverequest@wespath.org), or by U.S. mail—Wespath Benefits and Investments Attention: Incentive Request, 1901 Chestnut Avenue, Glenview, IL 60025. Participants in other well-being programs should contact their plan sponsor for a reasonable accommodation.

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<sup>1</sup> Specifically, \$250 extra for the individual deductible and \$500 extra for the family deductible. For the H3000 plan, beginning in 2022, the \$500 extra will also apply to the individual out-of-pocket maximum.

<sup>2</sup> See a list of actions eligible for Wellness Credits by clicking [HERE](#).

## **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 Wespath may use aggregate information it collects to design a program based on identified health risks in the workplace, we will never disclose any of your personal information either publicly or to your employer, church, supervisor, or other entity in the UMC, 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 may receive your personally identifiable health information are Virgin Pulse health coaches or Omada diabetes prevention program coaches if you choose to participate in their 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. Your personally identifiable data is not shared with your employer, HR department, or benefits office. 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 a Health and Wellness representative at Wespath by calling 1-800-851-2201. Select option 2 and then select 0. Representatives are available business days from 8:00 a.m. to 6:00 p.m., Central time (excluding holidays).