

NOTICE REGARDING WELLNESS PROGRAM

JPS Enliven Monetary Incentive Employee Wellness program is a voluntary wellness program available to all employees from October 1, 2021 – September 30, 2022. 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., cancer, diabetes, or heart disease). You will also be asked to complete a biometric screening, which will include a blood test for Cholesterol, Blood Pressure, weight, waist circumference, and Body Mass Index. You are required to complete the Health Risk Assessment, and to participate in the biometric screening and/or other medical examinations in order to qualify for other incentives.

Employees who choose to participate in the Awareness portion of the *JPS Enliven* wellness program will receive a WellCredit incentive of up to \$100 for the completion of the Health Risk Assessment and Biometric Screening goals. Only employees who complete the Health Risk Assessment and participate in the biometric screening will receive incentives. Additional WellCredits of up to \$200.00 are available for employees who participate in at least four of these health-related Education activities such as Webinars, Workshops, Education, and Nutrition Challenges. WellCredits of up to \$200 are available for employees who participate in Action Activities such as Step Challenge, Cigna Telephonic Health Coaching, Preventive Screenings, Healthy Blood Pressure, Healthy Cholesterol Ratio, Healthy Blood Sugar Level, Gym memberships, Become a Wellness champion, and Flu Shots. 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 reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting Cigna at 800CIGNA24 or downloading the Reasonable Accommodation form from myCigna.com.

The information from your Health Risk Assessment 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 such as Telephonic Health Coaching or online education resources. You are also 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 (PHI). Although the *JPS Enliven* Monetary Incentive Employee Wellness Program and *JPS Health Services* may use aggregate information it collects to design a program based on identified health risks in the workplace, *JPS Health Services* 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 (PHI) is a Cigna Registered Nurse, your Provider/Doctor, or a Cigna health Coach 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. Any reportable data is de-identified and not disclosed. Appropriate precautions will be taken to avoid any data breach, and in the event, that 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 the Human Resources Total Rewards Department at HRTotalRewards@jpshealth.org or 817-702-1030, option 4, option 1.