



## **NOTICE REGARDING WELLNESS PROGRAM**

The NMC Employee Wellness program, Be Well, is a voluntary wellness program available to all employees. 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 are not required to complete the HRA.

However, full-time, and part-time employees who choose to participate in the wellness program will receive an incentive of \$25 for completing the HRA within the deadline. Full-time and part-time employees who have a spouse enrolled in the medical plan can earn \$25 for their spouse's completion of the HRA within the deadline, as well. Although completion of the HRA is not required, only eligible members who do so will receive \$25.

Additional incentives of up to \$225 may be available for full-time and part-time employees who participate in certain health-related activities. Full-time and part-time employees who have a spouse enrolled in the medical plan can also earn up to \$225 for their spouse's participation, as well. If you are unable to participate in any of the health-related activities, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting [wellness@nmcinc.org](mailto:wellness@nmcinc.org).

The information from your HRA will be used to provide you with information to help you understand your current health and potential risks. You also are encouraged to share your results or concerns with your own doctor.

Please see wellness portal at [www.myactivehealth.com/NMC](http://www.myactivehealth.com/NMC) for additional information regarding components and incentives offered for participating in the Be Well Program.



## **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 Northwestern Medical Center may use aggregate information it collects to design a program based on identified health risks in the workplace, Be Well 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 members of the wellness program 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 524-1056