

Wellness Program Disclosure

The Employee Health and Wellness Program is a voluntary wellness program available to all ProHealth Care employees. This ProHealth Care Notice for Employer-Sponsored Wellness Program (Employer Notice), and including the ProHealth Care Health, Dental and Vision Plan Notice of Privacy Practices (Notice of Privacy Practices), tells how medical information about you obtained through the Employee Health and Wellness Program may be used, disclosed and protected by ProHealth Care, and how you can get access to this information. Please review these Notices carefully.

ProHealth Care and the ProHealth Care Health, Dental and Vision Plan are dedicated to keeping your Employee Health and Wellness Program health information private and secure. We are providing the following information to assure you that your information is treated as confidential, and used only for health plan administration, wellness program and other limited authorized purposes. When we release your health information, we make reasonable efforts to limit the use and release only the minimum necessary information, and to those persons needed for the specific purpose.

The Employee Health and Wellness Program is designed and administered according to federal rules and laws permitting employer-sponsored wellness programs. Together they seek to improve employee health, identify potential health risks, prevent disease and protect your privacy. This authority includes the Americans with Disabilities Act of 1990 (ADA), the Genetic Information Nondiscrimination Act of 2008 (GINA), the Health Insurance Portability and Accountability Act (HIPAA), and the Affordable Care Act of 2010 (ACA), among other laws.

To summarize, as an employer offering a wellness program and a group health plan we are required by law to maintain the privacy of your health information and to provide you with these Notices of our legal duties and privacy practices with respect to your health information. These Notices provide you with the following important information:

- What type of medical information will be obtained in the Employee Health and Wellness Program and the specific purposes for which it will be used by ProHealth Care (Employer Notice), and the ProHealth Care Health, Dental and Vision Plan (Notice of Privacy Practices),
- Protections from disclosure of an employee's medical information publicly, and by ProHealth Care as your employer and as an ADA covered entity (Employer Notice);
- How the ProHealth Care Health Dental and Vision Plan as a HIPAA covered entity specifically uses and discloses your protected health information, HIPAA restrictions on disclosure and sharing of information, the methods used to prevent improper disclosure including compliance with HIPAA regulations (Notice of Privacy Practices), your HIPAA privacy rights with regard to your protected health information (Notice of Privacy Practices), and
- Our Health, Dental and Vision Plan obligation to you concerning the use and disclosure of your protected health information (Notice of Privacy Practices).

EEOC Notice Regarding What Medical Information Is Obtained Through The ProHealth Care Employee Health and Wellness Program

Employee Health and Wellness is a voluntary ProHealth Care wellness program intended to continually improve health for ProHealth Care employees. Additional economic incentives are available to employees and covered spouses who choose to participate in certain wellness activities, including WellAware 2020 -2021, a voluntary health risk assessment (HRA) health survey, biometric screening, and who obtain a negative nicotine test score.

- The HRA is a web-based (OneCommunity) health survey that asks you a series of questions about health-related activities, to identify individual injury risk factors, modifiable risks, health needs, behaviors, medical conditions and chronic diseases (e.g., cancer, diabetes, hypertension or heart disease).
- The biometric screening measures height, weight, blood pressure, fasting lipid profile (cholesterol, LDL, HDL, triglycerides), blood glucose.

Employee Health and Wellness also includes incentives through a comprehensive, six-month medically supervised Weight Management Program, a three-month program of wellness and dietician coaching Jump Start Program, and an individualized, holistic care Diabetic Improvement Program. Participation in these programs may also require obtaining medical information through biometric screening measures and other patient information to assess medical, behavioral, physical and nutritional needs and to motivate positive change.

If it is unreasonably difficult due to a medical condition for you to achieve the standards for incentives or reward under this program, or if it is medically inadvisable for you to attempt to achieve the standards, call us at (262) 560-4915 and we will work with you to develop another way to qualify.

This information and other incentives are intended to promote health, manage disease, and provide follow-up results, interventions and options to improve health outcomes to benefit you and our community. It may also be used to offer you services through the wellness program. You are encouraged to share your results or concerns with your own doctor. The Wellness Program experience, combined with education, community support, other resources and personal motivators, creates momentum and a path for achievable, sustainable, positive change.

Protections from Disclosure of Medical Information Publicly and by ProHealth Care

Individual information is collected and maintained on separate forms, in encrypted electronic files. This is separate from your personnel records and treated as a confidential medical record. Medical information collected through the Employee Health and Wellness Program will not be disclosed publicly and may never be used to make decisions regarding your employment. It only may be provided to your employer, ProHealth Care, in aggregate terms that do not disclose, or are not reasonably likely to disclose your identity, or the identity of other specific individuals, except for these specific, limited purposes:

- Individual information may be provided to ProHealth Care as sponsor, as needed to administer the ProHealth Care Health, Dental and Vision Plan (as further discussed in the Notice of Privacy Practices section, “How ProHealth Care Health, Dental and Vision Plan May Use or Disclose Your Health Information”);
- Individual information may be provided to ProHealth Care as needed to carry out specific activities related to the ProHealth Care Employee Health and Wellness Program, and to offer you services or information related to your health and potential risks through the wellness Program; or
- Individual medical information may be provided to your ProHealth Care supervisors or managers in limited situations to assist persons with disabilities in accordance with confidentiality and non-discrimination laws. (e.g., ADA compliance, if you request a reasonable accommodation; first aid to disabled person in the case of emergency).

This Notice for Employer-Sponsored Wellness Program is effective for the ProHealth Care Health, Dental and Vision Plan year effective January 1, 2021.