

## NOTICE REGARDING WELLNESS PROGRAM

The Healthy Lifestyle Rewards Program is a voluntary wellness program available to all benefits eligible 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 will also be asked to complete a biometric screening, which will include a blood test for cholesterol, glucose, or similar. You are not required to complete the HRA or to participate in the blood test or other medical examinations. However, the Healthy Lifestyle Rewards Program only asks for receipts or explanation of benefits, which do not include personal medical information.

However, employees who choose to participate in the wellness program will receive an incentive in the form of a stipend for earning points on the Healthy Lifestyle Reward Passport, "Rewards Passport." Although you are not required to complete the HRA or participate in the biometric screening, only employees who do so will receive points on their Rewards Passport.

Additional incentives, up to 15 points on the Rewards Passport, may be available for employees who participate in certain health-related activities such as attending a meditation circle, receiving an annual immunization, participating in a holistic wellness activity, participating in a walking/ running program or achieve certain health outcomes such as maintaining weight, losing weight, or gaining weight as appropriate. 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. You may request a reasonable accommodation or an alternative standard by contacting Hope Meixell at 610.861.1527.

The information from your HRA 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. You also are 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. Although the wellness program and Moravian College may use aggregate information it collects to design a program based on identified health risks in the workplace the Healthy Lifestyle Rewards Program 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.

In addition, all medical information obtained through the wellness program will be maintained separate from your personnel records and no information you provide as part of the wellness program will be used in making any employment decision. The Healthy Lifestyle Rewards Program only uses receipts, explanation of benefits, signatures, or names on rosters as substantiation; all of which do not include personal medical information.

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 Jon Conrad at 610.861.1527.