



Notice Regarding Wellness Program

The new rules published on May 17, 2016, under the Americans with Disabilities Act of 1990 (ADA), require employers that offer wellness programs, which collect employee health information, to provide a notice to their employees informing them of what information is being collected, how it will be used, who will receive it and what will be done to keep it confidential.

Well Way 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 ADA, the Generic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act of 1996 (HIPAA), 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. You may have to complete a biometric screening, which will include blood test via a finger prick. You are not required to complete the HRA or to participate in the blood test or other medical examinations.

The information from your HRA and results from your biometric screening will be used by Cigna 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.

We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and Cigna may use aggregate information it collects to design a program based on identified health risks in the workplace, Well Way 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 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 order to provide you with services under the wellness and healthcare program, the only individuals who may receive your personally identifiable health information are: your Cigna Health Coach, you, and your physician.

In addition, all medical information obtained through the wellness program will be maintained by the healthcare carrier, not the School Board, it will be stored electronically and encrypted. No information provided as part of the wellness program will be used in making employment decisions. Appropriate precautions will be taken to avoid any data breach; if a breach occurs you will be immediately notified.

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 question or concerns regarding this notice, or about protections against discrimination and retaliation, please contact our wellness team at 305.995.7367.