



## NOTICE REGARDING WELLNESS PROGRAM

The wellness program provided by CEBCO (County Employee Benefits Consortium of Ohio) in partnership with Interactive Health is a voluntary program available to all employees and spouses enrolled in the CEBCO medical plan. The program is administered according to federal rules permitting plan-sponsored wellness programs to seek to maintain/improve employee health and prevent disease. The program is in compliance with 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 and/or your spouse chooses to participate in the wellness program you/your spouse 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 glucose, kidney function, liver function, cholesterol, and a complete blood count, among others. You are not required to complete the HRA or to participate in the biometric screening or any other activity offered through the wellness program.

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 any potential risks, and may also be used to offer you services through the wellness program, such as health coaching. 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 sponsors of the wellness program and your employer may use aggregate information collected to design a program based on identified health risks in the workplace, Interactive Health will never disclose any of your personal information either publicly or to your plan sponsor (CEBCO) or 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 are Interactive Health nurses and/or health coaches 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. 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.