

Notice Regarding Avila University's *Wellness Within* Program

Avila University's *Wellness Within* 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:

1. Through the medical provider of your choice, complete a biometric screening that includes, Height, Weight, Pulse, Blood Pressure, Blood Glucose, Total Cholesterol (HDL, LDL, and overall), and Triglycerides
2. Submit proof to Avila that you have completed this screening.

You will NOT be required to - and we ask that you don't - submit the results of such screening to Avila.

Enrolled employees and their spouses who are enrolled and complete the above requirements will receive an incentive of \$30.00 per month discount on their health insurance premiums (for employees) and/or \$20.00 per month (for spouses). The maximum discount an employee can receive is \$50.00 per month. Although you are not required to participate in the biometric screening, only those who do so will receive the discount.

Additional incentives of gift cards, tickets, etc. may be available for employees who participate in certain health-related activities such as educational webinars and focused challenges or achieve certain health outcomes step challenges or hydration challenges. 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:
Avila University Human Resources

The information regarding how many employees have obtained the biometric screening will be used to provide employees with additional health information and services such as educational webinars and focused challenges. 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 Avila University may use aggregate information it collects to design a program based on identified health risks in the workplace, Avila Wellness Within 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 will 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 the 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 is your doctor although the following individual(s) may receive information regarding whether you completed the biometric screening: Avila University Human Resources

In addition, all 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 contacting Avila University Human Resources.