

## **NOTICE REGARDING WELLNESS PROGRAM**

Dickinson College's wellness program is a voluntary program available to all employees. Some portions of the program are available to all employees, whereas other portions are available only to full-time 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.

Full-time employees who choose to participate in the wellness program in order to be eligible to earn incentives 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). Full-time employees will also be asked to complete a biometric screening, which includes a blood test for Total Cholesterol, HDL Cholesterol, LDL Cholesterol, Triglycerides, and Fasting Glucose, along with blood pressure and BMI. Other optional blood tests offered include the Live Well Health Screen, Ferritin, HbA1c and/or TSH. You are not required to complete the HRA or to participate in the blood test or other medical examinations.

However, employees who choose to participate in the wellness program will be eligible to receive incentives to be determined each year. Although you are not required to complete the HRA or participate in the biometric screening, only employees who do so will be eligible to receive incentives.

Additional incentives may be available for employees who participate in certain wellness-related activities. ([For a listing of wellness program and incentive options](#), please visit Totara via the Gateway.) If you are unable to participate in any of the wellness-related activities, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting Jeanette Diamond at 717-254-8084.

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. Dickinson College may use aggregate information it collects to design a program based on identified health risks in the workplace, but medical information that personally identifies you is not provided to the college in connection with the wellness program.

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 include a physician of your choice if you participate in a biometric screening.

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.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact Debra Hargrove at 717-245-1901.