



NOTICE REGARDING WELLNESS PROGRAM

MaineHealth Works on Wellness (“WOW!”) Health and Wellbeing Program 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 may 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 may also be asked to take a urine analysis for tobacco use depending on whether MaineHealth has tobacco usage test results from prior years. You are not required to complete the HRA, take the tobacco urine analysis or participate in any other medical examinations.

Employees who choose to participate in the wellness program may be eligible to receive incentives as follows:

- Employees who complete the HRA by December 31, 2019 may earn points that may be redeemed for a cash value. Completion of the HRA is optional and employees will be offered additional activity programs on the Virgin Pulse platform to earn points to redeem for between \$35.00 and \$150.00 every six months, depending on the type and amount of activity programs completed. Employees do not need to be enrolled in a MaineHealth health plan but must be regularly scheduled to work at least 20 hours per week at a benefits-eligible MaineHealth entity and be eligible for coverage under MaineHealth benefits plans to receive this incentive.
- Employees enrolled in a MaineHealth health plan at any point in 2019 who tested negative for tobacco in 2018 will each avoid paying a \$1,200 tobacco fee applied to 2019 health insurance premiums.
- Employees enrolled in a MaineHealth health plan at any point in 2019 who were not enrolled in a MaineHealth health plan in 2018 can avoid paying a \$1,200 tobacco fee applied to 2019 health insurance premiums by taking a urine analysis and testing negative for tobacco within 60 days of eligibility for the 2019 health plan.
- Employees enrolled in a MaineHealth health plan who have tested positive for tobacco can rescreen at any time by taking a urine analysis, and will avoid paying the tobacco fee on a prorated basis for the remainder of 2019 if they test negative.
- Employees enrolled in a MaineHealth health plan who have tested positive for tobacco can avoid paying the \$1,200 tobacco fee and/or have the 2019 tobacco fee reimbursed by completing the “Quit for Life Program” by December 31, 2019.

Although employees are not required to complete activity programs on the Virgin Pulse platform such as the HRA, participate in the tobacco screening or Quit for Life program, only those who do so will receive incentives described above.

Additional incentives of up to \$200 in Healthy Paybacks may be available for employees who participate in certain health-related activities, including reimbursement or rewards for certain eligible physical fitness, nutrition, general wellness, eligible weight management, and stress management programs and/or expenses. If you are unable to participate in any of the activities 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 the HR Solution Center.

The information from your HRA and other activity programs within Virgin Pulse will be used 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, including health coaching, diabetes prevention and employee assistance, as listed on the Health and Wellbeing program website and Virgin Pulse platform. 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 Health and Wellbeing program and MaineHealth may use aggregate information it collects to design a program based on identified health risks in the workplace, the Health and Wellbeing 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.

You will not be required to agree to your health information being 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 required to waive the confidentiality of your health information as a condition of participating in the wellness program or receiving an incentive offered in connection with the wellness program. 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 individuals who will receive your personally identifiable health information are certain members of Virgin Pulse, NorDx, Solera Health, Optum Quit for Life, Anthem Blue Cross Blue Shield, and the HDMS Management System 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.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact the HR Solution Center at (207) 661-4000.

Collection of Genetic Information

Under the Genetic Information Nondiscrimination Act of 2008 (“GINA”), “genetic information” includes an employee’s family medical history. The above notice describes the type of genetic information that may be obtained including an optional question on the HRA related to family medical history, the general purposes for which it will be used, and confidentiality protections and restrictions against disclosure of identifiable genetic information. Employees can decline to answer questions related to family medical history but still receive the incentives described above.

By checking this box, you acknowledge that you have read the above notice in its entirety; you understand that the MaineHealth Works on Wellness (“WOW!”) Health and Wellbeing Program is a voluntary wellness program, and you knowingly and voluntarily authorize collection of your health information pursuant to this program as described in this notice.

1. Do you accept and consent to the terms linked above? (You must consent to the terms in order to participate in the wellness program.)

Yes/No