

# NOTICE REGARDING PLNU WELLNESS PROGRAM

The PLNU Wellness Program is a voluntary wellness program available to all employees at PLNU. 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 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, Triglycerides, LDL, HDL, and Total Cholesterol. 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 may receive a variable month incentive as well as an annual incentive of up to \$200 in rewards for earned points through tracked challenges and health-related activities (Community Challenges, Wellness Workshops, etc.). Although you are not required to complete the HRA, only employees who do so will be able to redeem rewards.

If you are unable to participate in any of the tracked challenges and health-related 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 WellRight at [support@wellright.com](mailto:support@wellright.com).

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, and may also be used to offer you services through the PLNU Wellness Program, such as monthly education and events. You also are encouraged to share your results or concerns with your own doctor. The PLNU Wellness Program does not receive access to any individual medical information, but rather receives aggregate data based on participants as a whole that can be used to identify health risks and aid in planning the wellness year.

## 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 PLNU Wellness Program and Point Loma Nazarene University may use aggregate information it collects to design a program based on identified health risks in the workplace, the PLNU Wellness 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 PLNU Wellness Program, or as expressly permitted by law. Medical information that personally identifies you that is provided in connection with the PLNU 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 PLNU 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 PLNU Wellness Program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the PLNU wellness program will abide by the same confidentiality requirements. The only individuals who will receive your personally identifiable health information are a biometric screening technician or a health coach in order to provide you with services within the PLNU Wellness Program.

In addition, all medical information obtained through the PLNU 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 PLNU Wellness Program will be used in making any employment decision. To further protect employees, the PLNU Wellness Admins will delete personal health documentations (medical screenings results, medical history and record information, etc.) that are submitted as proof of challenge completions in order to receive incentives. 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 PLNU 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 PLNU 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 PLNU Wellness Program at [PLNUWellness@pointloma.edu](mailto:PLNUWellness@pointloma.edu).

## **Leaderboard Privacy**

If you do not wish to have your name listed on the challenge leaderboards, there is a setting in WellRight that allows you to hide your name. Please note, this setting will remove your name from all challenge leaderboards.

Please feel free to update your challenge leaderboard preferences by completing the following steps:

1. In WellRight, hover your mouse/pointer over your profile icon (located in the top right hand corner).
2. Click on your name, this will direct you to the User Profile page.
3. On the User Profile page, select the checkbox next to "Hide name from Leaderboards".
4. To activate and save your updated settings, click the "Save" button. You will immediately see a "User Profile-Update Successful" notification confirming your changes.