

Notice for Employer-Sponsored Wellness Programs

The following Notice is provided to you regarding employee health information CMU collects in relation to the Your Health, It's Central wellness program.

NOTICE REGARDING CMU WELLNESS PROGRAM

The Central Michigan University (CMU) Your Health, It's Central rewards program, currently provided by Virgin Pulse, is a voluntary wellness program available to all benefits eligible staff, fixed-term and medical faculty, post-doctoral research fellows and their spouses / other eligible individuals (OEI) enrolled in a CMU BCBSM health plan. 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 rewards program you will have the option 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 also have the option to complete an annual physical and biometric screening that measures fasting blood glucose, total cholesterol, LDL, HDL and triglycerides. You are not required to complete the HRA or participate in the annual physical or biometric screening in order to receive rewards.

However, participants who choose to complete the HRA will receive 1,000 points per plan year (July 1 – June 30). Participants can also receive points for submitting proof of annual physical (500 points) and annual biometric screening (500 points). Forms are available online at <https://www.cmich.edu/fas/hr/HRCentralHealthImprovement/Pages/Wellness-Rewards-Program.aspx> or found on the "Programs" page on the Virgin Pulse platform.

Employees can be eligible to receive up to \$400 per plan year and spouses/OEI can earn up to \$200 per plan year by participating in the rewards program. All eligible participants can receive **one** complimentary activity tracker device. In addition, employees who meet eligibility criteria are eligible for the gain-sharing incentive (see [Gain-Sharing Overview](#)). If you are unable to participate in any of the program activities required to earn incentive points, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting Virgin Pulse Member Services at 1-888-671-9395 or by clicking on the "Chat" tab on the right hand side of your home page.

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 wellness program, such as lifestyle and behavior modification challenges, activities and resources. 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 Central Michigan University may use aggregate information it collects to design a program based on identified health risks in the workplace, Your Health, It's Central 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 provided in connection with the wellness program that personally identifies you, 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 is Virgin Pulse 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 Benefits & Wellness at 989-774-3661 or benefits@cmich.edu.