

NOTICE REGARDING WELLNESS PROGRAM ADMINISTRATION

Baystate Healthy 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 complete a voluntary health risk assessment (HRA) or health questionnaire (HQ) 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 cholesterol and glucose. You are not required to complete the HRA/HQ or to participate in the blood test or other medical examinations.

However, any benefit-eligible employee who chooses to participate in the wellness program will receive an incentive of \$50 for participating in the annual online HQ and completing a biometric health screening, at their annual preventive exam, through their own primary healthcare provider. Although it is not required to complete the HRA/HQ or participate in the biometric screening, only employees who do so will receive the \$50.

Participants who meet at least 3 of the 5 biometric target values, earn \$100. These include (blood pressure less than 130/85, Fasting HDL greater than or equal to 40mg/dl (male) or Fasting HDL greater than or equal to 50mg/dl (women), Fasting Triglycerides less than 150mg/dl, Fasting Blood Glucose less than 100 mg/dl or HbA1C less than 5.7%, body mass index (BMI) less than 25 and/or waist circumference less than 35 inches for women or less than 40 inches for men. Participants who meet less than 3 of the biometric target values can earn the \$100 by completing 4 sessions with a WebMD Health Coach.

Additional incentives of up to \$100 may be available to participants who complete certain health-related activities including health coaching and a stress management/resiliency program, meQuilibrium. In addition, those who participate in other various health related activities, including fitness challenges, tracking fitness and food intake, etc., will be entered into a monthly raffle drawing.

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 Baystate Healthy at 413-794-4939.

The information from your HRA/HQ 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 health coaching, nutrition, fitness or tobacco cessation resources. You also are encouraged to discuss your results and care plan with your primary healthcare provider.

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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 Baystate Health may use aggregate information it collects to design a program based on identified health risks in the workplace, Baystate Healthy 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.

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 individuals who will receive your personally identifiable health information are health coaches, individuals employed by Interactive Health, Inc. and WebMD Health Services in order to provide you with services under the wellness program. In addition, your personal health information, including information from the time of your first enrollment in any of Baystate Health's health programs, will be included in a data report that will be provided to a data management company contracted by Baystate Health, in order to help plan and evaluate health and wellness programs offered to employees. Baystate Health will receive a group summary of the information in the data report but your personal information will not be identified in the group summary.

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 Baystate Healthy at 413-794-4939.