

Important Information About the Smart Choices/Healthy Rewards Program

The Smart Choices/Healthy Rewards Wellness Program is **voluntary** and is designed to **promote health or prevent disease**. The term Wellness Program includes both:

- a. ways that we help individuals identify and reduce health risk factors, like elevated blood pressure or excess weight, along with
- b. ways to help individuals with chronic conditions, like diabetes, take better care of their condition, for example by working with a coach to encourage you to take the medication the doctor prescribes for your chronic condition.

The Smart Choices/Healthy Rewards Program also offers **incentives** for participation (such as for completing a Health Risk Appraisal questionnaire). Only Employees/Retirees/Domestic Partners enrolled in one of our Smart Choices medical plan options have the opportunity to qualify for Smart Choices/Healthy Rewards Program incentives. Incentives are able to be achieved at least **once a year**. The **time commitment required to achieve incentives in our Smart Choices/Healthy Rewards Program is reasonable**. The Smart Choices/Healthy Rewards Program incentives have been reviewed and in accordance with law, do not exceed 30% of the total cost of employee-only coverage under the plan (including employee & employer contributions).

If you think you might be unable to meet a standard for a certain reward under our Smart Choices/Healthy Rewards Program, you might qualify for an opportunity to earn the same reward by a different means. If an individual has physical disabilities or a medical condition such that it is unreasonably difficult or medically inadvisable due to their medical condition to satisfy the standards of the Wellness Program, then **reasonable alternative standards** will be made available upon request. If the individual's personal doctor states that the alternative is not medically appropriate, a more accommodating alternative will be provided.

Contact the Fund Office for information on the Smart Choices/Healthy Rewards Program and for information on reasonable alternative standards and accommodations. We will work with you and, if you wish, your doctor, to find a Smart Choices/Healthy Rewards Program standard with the same reward that is right for you in light of your health status.

Notice Regarding the Wellness Program

The Smart Choices/Healthy Rewards Wellness Program is a **voluntary** wellness program available to participants enrolled in the group health plan and is designed to **promote health or prevent disease**. 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 Smart Choices/Healthy Rewards Wellness Program you will be asked to complete a voluntary health risk questionnaire or "HRQ" 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 taking measurements such as height, weight and blood pressure, as well as a blood test for cholesterol, blood glucose, and/or nicotine. You are not required to complete the HRQ, participate in the screening, blood test or other medical examinations.

However, individuals who choose to participate in the Smart Choices/Healthy Rewards Program will receive an incentive of accrual of HRA monies and three additional months of excess contributions in the member's cash bank. Although you are not required to complete the HRA or participate in the biometric screening, only members who do so will receive the incentives.

In accordance with federal laws, if your Spouse wants to participate in the Smart Choices/Healthy Rewards Wellness Program, he or she must complete an authorization form before performing the Health Risk Questionnaire, health exam, or biometric screenings components of the Smart Choices/Healthy Rewards Program.

The information from your HRQ 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 the Care Counseling Service. You also are encouraged to share your results or concerns with your own doctor.

Protections from Disclosure of Medical Information

The Plan is required by law to maintain the privacy and security of your personally identifiable health information.

Information collected from Smart Choices/Healthy Rewards Program participants will only be received by the Plan Sponsor in aggregate form. Although the Smart Choices/Healthy Rewards Program and the Board of Trustees may use aggregate information it collects to design a program based on identified health risks in the workplace, our group health plan 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 Smart Choices/Healthy Rewards 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 Smart Choices/Healthy Rewards Program, and you will not be asked or required to waive the confidentiality of your health information as a condition of participating in the Smart Choices/Healthy Rewards Program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the Smart Choices/Healthy Rewards Program will abide by the same confidentiality requirements. The only individual(s) who will receive your personally identifiable health information are a provider or a care counselor in order to provide you with services under the Smart Choices/Healthy Rewards Program.

In addition, all medical information obtained through the Smart Choices/Healthy Rewards Program will be maintained separate from your personnel records, and no information you provide as part of the Wellness Program will be used in making any employment decision. Appropriate precautions will be taken by the group health plan to avoid any data breach, and in the event a HIPAA 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 Smart Choices/Healthy Rewards 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 Fund Office at 1-800-922-9902.