

## **NOTICE REGARDING WELLNESS PROGRAM**

The Northern Arizona University HealthyU Wellness Incentive Program is a voluntary wellness program open to all NAU employees who have selected the NAU Blue Cross Blue Shield of Arizona (BCBSAZ) health insurance plan. Blue Cross Blue Shield of Arizona contracts with Sharecare (a third-party wellness platform provider hired by BCBSAZ) to manage and protect all medical and non-medical information entered into the required wellness assessment called “RealAge Test” on the BCBSAZ Sharecare wellness portal.

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 wellness assessment (titled “the RealAge Test”) 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 provide current biometric measures, which include results from a blood test for total cholesterol, HDL/LDL cholesterol, triglycerides, and blood glucose. In addition, the wellness assessment will ask for your current measures of height, weight, waist circumference and blood pressure.

This is a voluntary program, and you are not required to complete the wellness assessment, have a preventive health exam, or other medical examinations. However, only employees who choose to participate in the wellness program and complete the requirements listed above will be able to complete “level one” which is worth 50 points and will provide a \$50.00 wellness payment included in their paycheck in February of 2023. Should you choose to complete level one and continue earning more points, you may earn and record an additional 250 points by engaging in variety of health and wellness activities to earn “level two” which will provide a \$300 wellness payment included in your paycheck in February 2023. Please note: to be eligible for the wellness payment, the NAU employee must be currently employed at NAU at the time of payout (February 2023). Complete instructions on how to earn and record points may be found at [nau.edu/healthyU](http://nau.edu/healthyU).

Although you are not required to complete the RealAge Test wellness assessment or participate in any of the health and wellness activities associated with the HealthyU program, only employees who do so will be eligible to receive one of the two incentives noted above.

If you are unable to participate in any of the HealthyU wellness program-related activities, you may request a reasonable accommodation or an alternative standard by contacting NAU Disability Resources by e-mail at [DR@nau.edu](mailto:DR@nau.edu) or call 928-523-8773.

The information from your RealAge wellness assessment and the results from your preventive care exam will be used to provide you with information on your current health status and potential risks. You also are encouraged to share your results or concerns with your primary healthcare provider.

### **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 HealthyU Wellness Program and Northern Arizona University (NAU) may use aggregate information (unidentifiable, grouped data) to design a program based on identified health

risks in the workplace, the HealthyU Wellness Program will never disclose any of your personal information either publicly or to your 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 shared with your supervisors or managers and may never be used to make decisions regarding your employment or health benefits. The information entered on your wellness assessment (RealAge Test) is not seen by BCBSAZ or by NAU.

The web site is managed by a third party, Sharecare, and they are required by law to keep all information separate from BCBSAZ and NAU. While Sharecare provides BCBSAZ with aggregate data, your individual results will not be identifiable. 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.

In addition, biometric results and wellness assessment responses will never be shared with anyone and are stored on an encrypted server with Sharecare. All medical information will be maintained separate from your personnel records, information stored electronically will be encrypted, and no information you provide 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, you will be notified 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.

### **Please Do Not Provide Genetic Information**

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when responding to this request for medical information. 'Genetic information' as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

If you have questions or concerns regarding this notice, please contact the Office of Employee Assistance and Wellness at 928-523-1552 or e-mail [healthyU@nau.edu](mailto:healthyU@nau.edu). If you have questions or concerns about protections against discrimination and retaliation, please contact Disability Resources at 928-523-8773 or e-mail at [DR@nau.edu](mailto:DR@nau.edu).