

## EEOC NOTICE REGARDING WELLNESS PROGRAM

The MMIA Employee Benefits Wellness Program 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 biometric screening, which will include a blood test that measures complete blood count, full metabolic chemistry panel and lipid test. You are not required to participate in the blood test or other medical examinations.

However, employees who choose to participate in the Wellness Program can earn incentives that total up to \$200 for four different programs. Although you are not required to participate in the biometric screening, only employees who do so will receive these incentives.

Eligible employees, retirees, and spouses can earn incentives in the following four programs:

1. Attending a biometric screening between July 1 – September 30, 2022
2. Achieving a group employee participation rate of 80% or higher between July 1 – September 30, 2022
3. Engaging with a Take Control health coach on a follow-up call to discuss screening results and refer participants to plan-specific resources between July 1 – November 4, 2022
4. Watching a short video and taking a quiz based on the content of the video before September 30, 2022

If you are unable to participate in any of the 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 MMIA Employee Benefits at 1-800-635-3089 option 4.

Results from your biometric screening and the follow-up call 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 MMIA Employee Benefits program, such as Disease Management. 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 MMIA may use aggregate information it collects to design a program based on identified health risks, MMIA Employee Benefits 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.

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 MMIA Employee Benefits at 1-800-635-3089 option 4.