Notice for Employer-Sponsored Wellness Programs

The following Notice is provided to you regarding employee health information UVM collects in relation to the UVM Wellness Program.

NOTICE REGARDING WELLNESS PROGRAM

University of Vermont’s 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. If you choose to participate in the wellness program, the University of Vermont will request that you complete a voluntary health risk assessment or “HRA” that asks a series of questions about 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 encouraged to complete a biometric screening and have an annual preventive care visit with your primary care provider. However, employees who choose to participate in the wellness program will receive an incentive of being entered into a raffle to receive a prize (value up to $200) for completing the HRA. Although you are not required to complete the HRA or participate in the biometric screening or have an annual preventative care visit, only employees who do so will receive the potential to win a raffle prize.

If you are unable to participate in the HRA, biometric screening, a preventative care visit or any of the health-related activities required to earn an incentive as part of UVM’s Wellness Program, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation by contacting the Affirmative Action & Equal Opportunity Office at 802-656-3368.

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. You are also 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 the University of Vermont may use aggregate information collected to design a program based on identified health risks in the workplace, the wellness program will never disclose any of your personally identifiable information either publicly or to the University, except as necessary to respond to a request from you for a reasonable accommodation or an alternative standard. You may request a reasonable accommodation by contacting the Affirmative Action & Equal Opportunity Office at 802-656-3368. Medical information that personally identifies you that you provide 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.

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 to receive 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 (are) [indicate who will receive information such as “a registered nurse,” “a doctor,” or “a health coach”] 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. 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. 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 Human Resources Services at hrsinfo@uvm.edu or 802-656-3150.

Source: https://www.eeoc.gov/laws/regulations/ada-wellness-notice.cfm