

NOTICE FOR WILLIAMSON COUNTY GOVERNEMENT AND WILLIAMSON COUNTY BOARD OF EDUCATION-SPONSORED WELLNESS PROGRAM

The Williamson County wellness programs are voluntary wellness programs available to all employees. The program is administered by the Williamson County Benefits Department 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 may be asked to complete a voluntary health risk assessment or “HRA” that asks a series of questions about your health-related activities and behaviors and whether you have or have had certain medical conditions (for example, cancer, diabetes, or heart disease). You may also be asked to complete a biometric screening, which will include a blood test for total cholesterol, HDL cholesterol, LDL cholesterol, triglycerides, glucose, and/or other applicable test type. You are not required to complete the HRA or to participate in the blood test or other medical examinations.

However, employees and spouses that are enrolled in the medical plan with the Health Savings Account (HSA) that choose to participate in the Health Assessment through Cigna will receive an incentive which will be direct deposited into the employees HSA for completing the incentive activities. Although you are not required to complete the HRA or participate in the biometric screening, only employees and covered spouses that do so will receive the HSA incentive as outlined in the plan document.

If you are unable to participate in any of the program events, activities or goals because of a disability, you may be entitled to a reasonable accommodation for participation, or to an alternative standard for rewards. For work-site accommodations, please contact Williamson County Risk Management at (615)790-5466 ; for accommodations with online, phone, or other Williamson County wellness programs, please contact The Williamson County Benefits Department at (615)595-1270.

If you choose to participate in the assessment or screening, you will be asked to authorize the release of your HRA and biometric screening results to Cigna. 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, such as online coaching, telephonic coaching, and/or other applicable services. 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 The Williamson County Benefit Plan may use aggregate information it collects to design a program based on identified health risks in the workplace, The Williamson County Benefit 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 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 individual(s) who will receive your personally identifiable health information is (are) a registered nurse, a doctor, a health coach, or other individual, 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, and no information you provide as part of the wellness program will be used in making an employment decision. Although no one can prevent all cyber-attacks, Williamson County has an information security program consisting of people, process, and technology – including encryption and monitoring tools designed to protect electronic information. We maintain safeguards to protect the security of your information. In the event a data breach, as defined by law, occurs involving information you provide in connection with the wellness program, we will notify you as required by law.

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.

For additional information regarding privacy protections, please refer to the notice of privacy practices posted on the Williamson County Benefits Department website www.williamsoncounty-tn.gov/mybenefits.

If you have questions or concerns regarding this notice or about protections against discrimination and retaliation, please contact Gina Crawford at (615)595-1270 or ginac@williamson-tn.org.