

## **NOTICE FOR Novant Health, Inc. – SPONSORED WELLNESS PROGRAM (Surest/Medical Waivers) (Revisions Effective January 2024)**

The Novant Health well-being portal is a voluntary wellness program offered under the Novant Health, Inc. Group Benefit Plan (the “Plan”) that is to all team members who are either enrolled in the Surest medical plan option under the Plan or waive medical coverage but are benefits eligible, and certain spouses. The Novant Health well-being portal is administered by Navigate Wellbeing Solutions. Team members who enroll in the Surest medical plan or waive medical coverage but are benefits eligible will have access to the Novant Health well-being portal. The Novant Health well-being portal 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 have the option to complete a voluntary health assessment or “HA” that asks a series of questions about your health-related activities and behaviors and whether you have or had certain medical conditions (for example, cancer, diabetes, or heart disease). You are not required to complete the HA or other medical examinations.

However, team members and certain covered spouses who choose to participate in the wellness program will receive an incentive for completing activities, determined by Novant Health, for completing certain wellness program activities. The Novant Health well-being portal incentives are in the form of points that can be redeemed in the Navigate Live Amplified Rewards Mall. Although you are not required to complete the HA or complete activities, employees who are both enrolled in the Surest medical plan and complete the HA may receive the maximum incentives for all activities in the Novant Health well-being portal of up to \$250/year for covered team members. The maximum incentive for benefit-eligible team members who waive medical coverage for all activities in the Novant Health well-being portal is up to \$100/year.

Team members enrolled in the Surest medical plan and those who waive medical coverage, who complete a HA in the Novant Health well-being portal, will receive 1500 and 1250 points, respectively.

***For all eligible Surest participants and team members who waive medical coverage*** – If you think you might be unable to meet a standard for a reward under this wellness program, you might qualify for an opportunity to earn the same reward by different means. Contact Novant Health Human Resource Service Center at 800-890-5420 to talk through options and reasonable accommodations. We will work with you (and, if you wish, your doctor) to find a wellness program with the same reward that is right for you in light of your health status.

***For participants who may have an impairment*** – If you are unable to participate in any of the program events, activities or goals, you may be entitled to a reasonable accommodation for participation, or an alternative standard to earn rewards. For work-site accommodations please contact the Novant Health Human Resource Service Center at 800-890-5420. Surest plan enrollees and those who waive medical coverage can contact Novant Health Human Resource Service Center at 800-890-5420 for accommodations with other Novant Health well-being portal options.

The information from your HA 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 e-learning videos, individual challenges or other similar 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 Novant Health, Inc. may use aggregate information it collects to design a program based on identified health risks in the workplace, Surest and the Novant Health well-being program 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 a decision 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 personally identifiable health information that Surest and the Novant Health well-being program receive will only be used by a health coach or medical professional in order to provide you with services under the wellness program.

In addition, all medical information obtained through the wellness program will be maintained separately 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. Although no one can prevent all cyber-attacks, Surest and the Novant Health well-being program have information security programs consisting of people, process, and technology – including encryption and monitoring tools designed to protect electronic information. We maintain safeguards intended 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.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact the Novant Health Human Resources Service Center at 800-890-5420.

DM\_US 199552544-3.071028.0029