AUTHORIZATION FOR RELEASE OF “GENETIC INFORMATION” AND REQUIRED NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT (ADA) (ADA AND GINA NOTICE/AUTHORIZATION)

Alyfe Wellbeing Strategies has agreed to provide wellness services for the employer. As part of the wellness services, Alyfe Wellbeing Strategies may collect health information, including “genetic information,” from you such as through a health assessment or screening. “Genetic information” includes an employee’s family medical history information as well as information from an employee’s family member, such as a spouse, regarding that family member’s “manifestation of disease or disorder.” In other words, a health questionnaire may ask a question about an employee’s family medical history. Or, a health screening may reveal that an employee’s family member has high cholesterol or diabetes, for example. Such information would qualify as “genetic information” under the Genetic Information and Nondiscrimination Act (GINA). As part of providing these wellness services, the employer must provide you with notice and authorization regarding the collection of health and “genetic information.”

Our wellness program intends to collect from your health history and current health condition information through a health assessment or screening. These are tools designed for adults 18 years or older and do not provide medical advice or medical diagnoses. You should consult your healthcare provider about any questions you may have regarding the information you receive through the health assessment or screening. You and your healthcare provider are responsible for all medical treatment decisions.

We need health assessment or screening information from you so that we can provide follow-up wellness services, such as coaching and education, that meet your specific health needs. You are not required to provide any health or genetic information. However, employees or spouses who choose to participate in the wellness program may be eligible to receive an incentive from the employer. Employees who refuse to answer any family medical history questions will still be eligible for the full incentive.

Any “genetic information” or other health information you provide will remain confidential and not be disclosed to the employer except in aggregate form. That is, we will combine your personal information with other participants’ information to create group information that does not identify any one person. This aggregate information will not be used to re-identify you. This means that the employer will not receive any “genetic information” that identifies you as the source of that information. The only people who will see your individually identifiable “genetic information” are you and the professionals providing the wellness services. No one in the employer’s workplace should have access to your individually identifiable “genetic information.”

Other than manifestation of disease or disorder information, spouses of employees are not asked to provide any other type of genetic information, such as the spouse’s own family medical history or genetic test results, to qualify for an incentive.

If you choose to provide genetic information as part of the wellness activity, please know that it is illegal for the employer to:
• Persuade you to allow the sale, exchange, sharing, transfer or other disclosure of your genetic information or to waive the confidentiality protections of your genetic information;
• Discriminate against the employee in terms of employment-related decisions, such as hiring, firing, pay, job assignments, promotions, layoffs, training, fringe benefits or other terms or conditions of employment.
• Deny an employee a financial reward because the employee’s spouse fails to meet a certain blood pressure, cholesterol level or blood glucose level.

In addition, it is illegal for your health plan to use your genetic information for underwriting purposes, such as to make decisions about your eligibility for health insurance benefits, the calculation of your premium or contribution amounts.

Any other health information you provide through the wellness program will also be protected from improper use and disclosure. Alyfe Wellbeing Strategies abides by the applicable privacy and security rules under the Health Information Portability and Accountability Act (HIPAA) to ensure that your health information stays safe and secure.

Although Alyfe Wellbeing Strategies may use aggregate information it collects to design a program based on identified health risks in the workplace, Alyfe Wellbeing Strategies will never disclose any of your personal information either publicly or to the employer, except as necessary to administer the wellness program or as expressly permitted by law. Health 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. In other words, 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.

Your health information will not be sold, exchanged, transferred, or otherwise disclosed, in either identifiable or de-identified form, 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 outlined in this Notice and Authorization.

In addition, all medical information obtained through the wellness program will be maintained separate from your employee personnel records. Alyfe Wellbeing Strategies encrypts health information that we store electronically. 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 delete your information at any time by contacting your administrator. However, we will not be able to delete your combined, de-identified information.** If you have questions or concerns regarding this notice and authorization, please contact Alyfe Wellbeing Strategies at 1-866-668-7438.