

NOTICE REGARDING WELLNESS PROGRAM

There are two plan options in the Ascend to Wholeness Plan: Access and Accelerate. The Accelerate option provides more generous benefits and reduced cost-sharing to enrollees.

The Ascend to Wholeness Plan's wellness program is a voluntary wellness program available to employees of Seventh-day Adventist Organizations of the North American Division that participate in the Ascend to Wholeness Plan. 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.

The wellness program is a completely voluntary participatory-only program via which you are encouraged to earn points for activities such as tracking your calories, attending webinars, etc. You may enroll in the Access option of the Ascend to Wholeness Plan without earning any points. In order to enroll in the Accelerate option of the Ascend to Wholeness Plan in the next plan year, you must earn 80 participation points in the Ascend to Wholeness Plan's wellness program. All of the points you need may be earned via participatory activities such as tracking your calories, attending webinars, etc.

As an additional Plan benefit outside of the participatory wellness program described above, the Plan offers free voluntary biometric screenings and health risk assessments to all members.

You do not need to undergo a biometric screening or answer a health risk assessment in order to enroll in the Accelerate option.

If you do choose to answer a health risk assessment, you will be offered 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 had certain medical conditions (e.g., cancer, diabetes, or heart disease). If you do choose to undergo biometric screening, you will be offered a biometric screening, which will include a blood test for cholesterol, blood glucose, body mass index test, and your blood pressure. You are not required to complete the HRA or to participate in the blood test or other medical examinations.

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There are no financial incentives for participating in the biometric screening or health risk assessment. Employees who do participate will not be required to take paid leave for up to one hour to participate. If you are unable to participate due to a disability, you may be entitled to a reasonable accommodation. You may request a reasonable accommodation by contacting Adventist Risk Management at (888) 276-4732.

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 health coaching, care management, and applicable lifestyle programs. You also are encouraged to share your results or concerns with your own doctor. You will not be required to take any further action based on the results of your biometric screening or HRA.

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 your Seventh-day Adventist employer may use aggregate information it collects to design a program based on identified health risks in the workplace, the Ascend to Wholeness Plan wellness program will never disclose any of your personal information either publicly or to your 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) health coaches, registered nurses, clinical pharmacist, registered dietitian, team members of the Plan's care management program, and ARM as delegated health plan administrator in order to provide you with services under the wellness program.

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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. 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 the Ascend to Wholeness Plan's Privacy/Security Officer at the following address: Adventist Risk Management, P.O. Box 4288, Silver Spring, MD 20914-4288 or email, privacyofficer@adventistrisk.org.

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