

McDermott
Will & Emery

Amy Gordon
McDermott Will & Emery
agordon@mwe.com
312-984-6931

www.mwe.com

Boston Bruxelles Chicago Düsseldorf Houston Londres Los Angeles Miami Milan Munich New York Orange County Paris Rome Silicon Valley Washington, D.C.

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Examples of Wellness Programs- HIPAA Compliance

- A program that rewards participants with a \$1,000 reduction off of their annual medical plan premiums for walking three times per week, but participants must walk or else they fail to qualify for the reward
 - ✓ Size of reward: The reward may not exceed 30% of the cost of coverage (employer + employee)
 - ✓ Reasonable design: The program must be reasonably designed to promote health or prevent disease
 - ✓ Frequency of opportunity to qualify: The program must give eligible individuals the opportunity to qualify for the reward at least once a year
 - X Uniform availability: The reward must be made available to all similarly situated individuals **(including making available a reasonable alternative standard)**
 - X Notice: The plan must disclose in all plan materials describing the terms of the program the availability of other means of qualifying for the reward or the possibility of waiver of the otherwise applicable standard

Examples of Wellness Programs- ADA Compliance

- A program that rewards participants with a \$1,000 reduction off of their annual medical plan premiums for walking three times per week, but participants must walk or else they fail to qualify for the reward
 - ✓ Size of reward: The reward may not exceed 30% of the cost of coverage (employer + employee)
 - ✓ Reasonable design: The program must be reasonably designed to promote health or prevent disease
 - ✓ Voluntary
 - X Uniform availability: A reasonable alternative must be made available
 - X Confidentiality: There is nothing describing the confidentiality of medical records obtained as part of the program, assuming there are records

Examples of Wellness Programs- HIPAA Compliance

- An individual must attain a particular BMI Score at the beginning of the plan year to qualify for health coverage offered by the employer. If he/she does not, then he/she will not meet the eligibility rules for coverage. All records will be maintained in accordance with the plan's privacy practices and procedures
- X Size of reward: The reward may not exceed 30% of the cost of coverage (employer + employee)
- ✓ Reasonable design: The program must be reasonably designed to promote health or prevent disease
- ✓ Frequency of opportunity to qualify: The program must give eligible individuals the opportunity to qualify for the reward at least once a year
- X Uniform availability: The reward must be made available to all similarly situated individuals **(including making available a reasonable alternative standard)**
- X Notice: The plan must disclose in all plan materials describing the terms of the program the availability of other means of qualifying for the reward or the possibility of waiver of the otherwise applicable standard

Examples of Wellness Programs- ADA Compliance

- An individual must attain a particular BMI Score at the beginning of the plan year to qualify for health coverage offered by the employer. If he/she does not, then he/she will not meet the eligibility rules for coverage. All records will be maintained in accordance with the plan's privacy practices and procedures
- X Size of reward: The reward may not exceed 30% of the cost of coverage (employer + employee)
- X Reasonable design: The program must be reasonably designed to promote health or prevent disease
- X Voluntary
- X Uniform availability: A reasonable alternative must be made available
- ✓ Confidentiality: There is information describing the confidentiality of medical records obtained as part of the program

Examples of Wellness Programs- HIPAA Compliance

- An employer sponsors a group health plan. The annual premium for employee-only coverage is \$2,400 (of which the employer pays \$1,800 per year and the employee pays \$600 per year). The plan implements a wellness program that offers a \$240 rebate on premiums to participants who don't use tobacco. The communication provides that if a participant cannot quit using tobacco because it is unreasonably difficult due to a medical condition, then reasonable alternatives are available. All records will be maintained in accordance with the plan's privacy practices and procedures
- ✓ Size of reward: The reward may not exceed 50% of the cost of coverage (employer + employee)
- ✓ Reasonable design: The program must be reasonably designed to promote health or prevent disease
- ✓ Frequency of opportunity to qualify: The program must give eligible individuals the opportunity to qualify for the reward at least once a year
- ✓ Uniform availability: The reward must be made available to all similarly situated individuals (including making available a reasonable alternative standard)
- ✓ Notice: The plan must disclose in all plan materials describing the terms of the program the availability of other means of qualifying for the reward or the possibility of waiver of the otherwise applicable standard

Examples of Wellness Programs- ADA Compliance

- An employer sponsors a group health plan. The annual premium for employee-only coverage is \$2,400 (of which the employer pays \$1,800 per year and the employee pays \$600 per year). The plan implements a wellness program that offers a \$240 rebate on premiums to participants who don't use tobacco. The communication provides that if a participant cannot quit using tobacco because it is unreasonably difficult due to a medical condition, then reasonable alternatives are available. All records will be maintained in accordance with the plan's privacy practices and procedures
- X Size of reward: The reward may not exceed 30% of the cost of coverage (employer + employee)
- X Reasonable design: The program must be reasonably designed to promote health or prevent disease
- X Voluntary
- X Uniform availability: A reasonable alternative must be made available
- ✓ Confidentiality: There is information describing the confidentiality of medical records obtained as part of the program