

NOTICE REGARDING WELLNESS PROGRAM

The Montefiore To Your Health! program is a voluntary wellness program available for all employees at Montefiore Medical Center. 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.

Montefiore's To Your Health! Program is a partnership between Associate Wellness, Healing Arts, Care Guidance, and Occupational Health Services. Privacy information included in this notice pertains solely to the services provided by Associate Wellness within Community & Population Health, and their contracted covered vendors.

If you choose to participate in the Montefiore To Your Health! Associate Wellness program, you will have access to multiple programs, as well as direct care services. Participation in nutrition counseling or supportive wellness counseling will include the collection of associate medical information that is accessed by the wellness program provider. Non-medical information may be accessed by individuals administering the program on an as needed basis by designated individuals for program evaluation.

Associates may also be asked to register on the Montefiore Wellness Portal and complete a voluntary online health assessment 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).

You may also be asked to complete a biometric screening, which is voluntary and will include a blood test and collection of your Body Mass Index (BMI) determined by height and weight, blood pressure, and lab work to check cholesterol and glucose levels. The biometric screening can be completed with your physician, or you can have the biometric screening completed at Montefiore as part of the Associate Health Improvement Program each quarter, at multiple sites across the Montefiore Medical Center system.

Personal Protected Health Information from direct care appointments, the portal health assessment, and contracted vendors programs, such as weight reduction programs and the companies that operate the portal, are housed either securely within Associate Wellness, in the secure Montefiore wellness portal or in secure systems within our partner programs. This information is only accessed by designated associates within Community & Population Health on an as needed basis to make referrals to covered contracted vendors, provide guidance and recommendations to improve health, or for program evaluation. The information from your biometric screening may be used to provide you with information to help you understand your current health and potential risks, or for referrals within the wellness program. You are encouraged to share your results or concerns with your own doctor as the biometric screening results are not considered medical care. Referrals to To Your Health! partners (Care Guidance, Healing Arts, OHS), or other departments within Montefiore, would not occur without explicit consent from the associate.

You are not required to participate in the Montefiore To Your Health! wellness program. However, employees who choose to participate in the wellness program may be eligible to receive cash incentives by completing certain wellness program participation requirements such as completing the portal health assessments, or meeting certain participation criteria. Specifically, if you participate in the biometric screening and are identified as being moderate or higher risk you can earn incentives for improving your biometric measures when verified information shows an improvement towards low risk.

Although you are not required to complete the portal health assessment, participate in programming, visit your health care provider, or improve your biometric measures, only employees who do so will be eligible to receive the cash incentives. Participation in multiple Associate Wellness programs, including those tied to incentives, may be contingent on an associate's registration on the wellness portal.

If you are unable to participate in activities or achieve any of the health outcomes required to earn an incentive, or it is medically inadvisable for you to do so, due to a medical condition, you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting the Director, Associate Wellness at toyourhealth@montefiore.org or 347.418.4733.

Frequently Asked Questions (FAQs)

What information are we collecting?

Associate Wellness securely collects information reported on your portal health assessment, through your biometric screening (Body Mass Index (BMI) determined by your height and weight, blood pressure, and lab work to check cholesterol and glucose levels), provided to contracted Associate Wellness vendors, submitted during program referrals, provided during your direct care services, or completed on a program evaluation.

What will we do with the information we collect?

The information from all services provided through Associate Wellness, including covered vendors and biometric screenings will remain private within Associate Wellness in Community & Population Health.

The information will be used to provide you with information to help you understand your current health and potential risks, referral options, and to verify the improvement in your biometric measures.

What are the restrictions on who gets the information we collect?

We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and Montefiore Medical Center may use aggregate information it collects to design a program, and identifiable information to refer to contracted programs within Associate Wellness, the Montefiore Associate Wellness program will never disclose any of your personal information either publicly or to Montefiore Medical Center as 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.

How do we protect your information?

All medical information obtained through Montefiore's Associate Wellness Program will be maintained separate 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. In-person Associate Wellness Health Coaching records may be incorporated into your medical records, but not your employee files or records. 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.

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.

Contact Information

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact the Director, Associate Wellness at toyourhealth@montefiore.org or 347.418.4733.