

**JOHNSON COUNTY THREE-YEAR WELLNESS STRATEGY  
for the YEARS 2017-2019  
SUMMARY PLAN DESCRIPTION  
(as amended effective January 1, 2019)**

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## **Vendors and Roles:**

### Bravo Wellness:

Administers the County's incentive program.

- Contracts with screening vendor to receive and process Provider Screening Form verifying biometric values received from a physician or licensed medical provider.
- Records all biometric values for each participant to Bravo Wellness.
- Posts a Health Risk Assessment (HRA) – an on-line health survey – on its web-site for participants to access and complete.
- Records all participants who complete the HRA.
- Provides and maintains a wellness web portal to engage participants in healthy behaviors and activities.
- Records completion of approved tobacco cessation classes.
- Collects all pertinent documentation and determines the employee and spousal incentive status.
- Assumes co-fiduciary liability for reviewing and approving the reasonable alternative options and the medical appeals.
- Provides and maintains a web portal to enable participants to identify components and details of the biometric desired ranges to meet the Wellness and Tobacco Incentives.
- Posts results on participants' web portal and mails a Results Letter to the employee or spouse.

### Voya:

Deferred Compensation Plan administrator

- Reports participants who have taken the Financial Assessment to Bravo Wellness.

### Tria Health:

Administers the Tobacco Cessation program.

- Provides pharmacists to provide initial intake interview to determine which cessation program the employee or spouse desire.
- Provides the vendor that hosts and manages the webinar cessation option.
- Provides periodic reporting to Bravo of the employees and spouses who complete a cessation program.

### Johnson County:

Employer who provides comprehensive wellness programs to employees and spouses.

- Provides a reporting capability through Oracle Employee Self-Service for employees to declare whether they and covered spouses use or do not use tobacco as determined and defined by County's wellness tobacco policy.
- Provides and maintains a web portal (called *Wellness U*) to enable participants to identify components and details of employer-provided wellness programs.
- Sends periodic communications promoting the program and re-publicizing the resources to assist employees and spouses with understanding the program.

- Sends a secured monthly eligibility file to Bravo Wellness so they have a record of all employees and spouses who are enrolled in the County’s medical plan along with pertinent effective date.

**Reporting Schedule:**

Tria Health, Voya and the County send periodic files to Bravo as instructed by the County. The reporting schedule usually starts out monthly during the first few months of the wellness campaign but begin sending bi-weekly reports beginning in June when more employees and spouses are finalizing their wellness and tobacco activities.

**Eligibility:**

The County offers a voluntary wellness program. An employee and spouse (participant) can choose to participate or not and is still eligible to enroll in the County’s medical plan, if they desire. If an employee and/or spouse voluntarily participate in the County’s wellness program, these eligibility rules apply to earn the Wellness and Tobacco Incentives:

- The participant is enrolled in the County’s medical plan.
- The participant must have an effective date of medical coverage before May 2 of the respective calendar year for which the Incentive is being sought.
- If the participant’s effective date is May 2 or after, he/she will automatically earn the Incentives for the remainder of the current and the following year. However, if the employee’s effective date is before May 2 but the spouse’s is after May 2, only the spouse automatically earns the Incentive and the employee must earn it by completing one of the program options.

The Incentives are awarded the year following the qualification period, i.e. completion of the below components in 2017 earn the Incentive(s) in 2018 and so on. An employee effective under the medical plan June 1, 2018 automatically receives both the Wellness and Tobacco Incentives for 2018 and 2019 but needs to complete the Incentive Components in 2019 to earn the Incentives in 2020.

- The wellness campaign period, during which the participant must complete the Incentive Components, begins January 1 and ends August 31 of each respective year.
- A participant is considered a tobacco user if they have used tobacco more than once per month for the past 12 months.

Incentive Components

**Wellness Incentive:**

There are two program options participants can choose from to earn the Wellness Incentive: 1) an outcomes-based program; and 2) a participation-based program. Spouses who participate in the outcomes-based program but do not need to complete the Health Risk Assessment (HRA).

Option 1: Outcomes-based:

There are two components of the outcomes-based program that an employee must complete: 1) completion of biometric testing with satisfactory results and 2) completion of a either a Health Risk Assessment or Financial Assessment.

1. Biometric screening

- a. Between January 1 and August 31, the participant will have a health screening offered at various County work sites or by a qualified health professional that consists of the following tests:
    - i. Blood pressure reading;
    - ii. Body mass index (BMI) determination - by taking height and weight measurements or by waist measurement; and
    - iii. A fasting blood draw to measure glucose, HDL cholesterol, and triglyceride levels.
  - b. Receive an on-site County or personal physician screening. County screenings are provided at no cost to participants and are conveniently located at sites throughout the County during year. To obtain your physician screening, you must bring a Provider Screening Form to your doctor's appointment to have your physician complete and fax or scan it to Bravo Wellness. This Form along with a listing of all screening dates and sites and for instructions on how to register for a screening appointment, access *Wellness U* or the Bravo web-site.
  - c. The County encourages participants to obtain their lab values from their personal physician. The County's medical plans cover preventive exams, including an annual physical, at one-hundred percent with no out-of-pocket expense to the participant.
  - d. To pass each biometric, the participant must attain the designated Desired Range or better according to the annual Strategy. The desired ranges are available using the Bravo web portal or by accessing *Wellness U*.
  - e. If the participant does not meet the required number of (four of five in 2019) desired ranges, the participant can: (1) appeal the results; (2) complete a Bravo-approved reasonable alternative; or (3) request that Bravo work with the participant's personal physician to determine the medically appropriate Reasonable Alternative. See details of these options below under the subject lines "Reasonable Alternatives" and "Medical Appeals".
2. Complete the online Health Risk Assessment (HRA) or Financial Wellness Assessment between January 1 and August 31 (does not apply to a spouse).
- a. For instructions on how to access the HRA, employees should review the Bravo web-site or the instructions posted on *Wellness U*. Employees do not have to have their biometric results when completing the HRA. Those results will automatically populate when they are uploaded by the employee's health care provider and processed by Bravo Wellness.
  - b. The Financial Assessment is available on the Voya website.

Option 2: Participation-based:

The employee and/or spouse must complete eight (8) program activities using the minimums and maximums stated below:

1. Complete at least one group challenge (maximum of two).
  - Two group challenges will be offered. Each will be considered one program activity.
2. Complete at least two personal challenges (maximum of 16).
  - Over 40 challenges will be offered. Completion of two will be considered one program activity.
3. Complete at least one On-line Health University Course (maximum of seven).
  - Seven Course are available.
4. Walk an average of 7,500 per day during a County-specified period by recording steps through the Bravo portal.
5. Complete an on-site health screening or physical examination (results of the screening do not affect the incentive).
6. Complete the Bravo on-line Health Risk Assessment (HRA) or the Voya Financial Assessment (available to employees only). Spouses do not need to complete the HRA and this activity is not available to spouses.

All activities will be recorded on the Bravo Wellness web portal so participants can view their progress towards meeting the eight activities to earn the Wellness Incentive.

### **Tobacco Incentive**

There are two components to the Tobacco Incentive: 1) an annual declaration of use or nonuse; and 2) for tobacco users, completion of a cessation program.

- Tobacco Use Attestation – Using the County’s Oracle Employee Self-Service Program (SSHR), under Extra Information, the employee will declare whether the employee or the employee’s spouse is a regular tobacco user. The employee must declare use or non-use for BOTH employee and spouse.
- If the participant is a regular tobacco user, each tobacco user must complete an approved Tria Health tobacco cessation program. Use the links under Wellness U for declaration instructions and one of the two approved Tria Health cessation classes.
- The employee will receive an e-mail confirmation from Oracle after successfully completing this declaration of tobacco use/non-use. The employee should save this e-mail. Once the employee’s screening results are reported to Bravo, the tobacco status will be uploaded and recorded by Bravo.

***If the employee or spouse desires to undertake a reasonable alternative or if achieving the biometric standards under Option 1, the activities under Option 2, or tobacco cessation is unreasonably difficult due to a medical condition or is medically inadvisable, the Results Letter from Bravo Wellness will include information on how to work with Bravo and/or the employee or spouse’s physician on an alternative program (e.g. a walking or exercise program, dietary plan, or a physician approved course of treatment), file an appeal, or retest.***

There are two distinct options that help you achieve your biometric standards and assist with tobacco cessation. These programs are:

## 1. Reasonable Alternatives

### a. Self-Proposed (*Successful completion satisfies all the targeted biometric goals*)

Self-proposed Reasonable Alternatives can be used to satisfy all unmet biometric results for employees who selected Option 1 and activities under Option 2 that cannot be met due to a medical condition or because it is medically inadvisable.

The participant can discuss options for a Reasonable Alternative with his/her physician. The County encourages employees and spouses to work with their physician to identify alternatives that would be most helpful to address any health risks. Once your doctor has made these recommendations, send it to or call Bravo to self-propose this program to Bravo Appeals staff by calling Bravo at 1-844-275-4731 to request and complete the Bravo Reasonable Alternative Form. It is Bravo's responsibility to provide the employee and/or spouse with this Form and advise if other necessary documentation may be needed.

Participants can also work directly with Bravo to identify areas where changes could be implemented to improve or maintain fitness. Participants may contact Bravo (1-844-275-4731) directly to propose a personal goal(s) and **follow completion requirements agreed upon with Bravo**. Bravo does not share personal health information with the County and works directly with the employee to achieve a personal goal. Participation and completion of the Walk Kansas program would be an example of this type of reasonable alternative.

The following are required to be approved for a Reasonable Alternative and intended to assist participants to track healthy behaviors:

- Create 3 Goals.
- Track what has been done in 30 days to meet those goals.
- Obtain a Reasonable Alternative (RA) Form (from Bravo's Appeal staff).
- If form is completed, it will be approved.
- Prescription Medication verification (if doctor prescribed new medications to assist with lowering specific biometrics).
  - List this information on the RA form & include a copy of the prescription.

### b. Bravo Participatory Programs (*Successful completion satisfies only the targeted biometric goal*)

To provide additional options for a Reasonable Alternative, Bravo has developed and offers specific On-Line Health University courses and programs. These programs are designed to address a specific biometric that that was not within the Desired Range for. A list of these programs is accessible through the employee's and/or spouse's Bravo web account under "Resources".

<b>Biometrics</b>	<b>Activities</b>
BMI/WC	LivingLean
Blood Pressure	LivingEasy
HDL	LivingFit
Triglycerides	LivingLean
Glucose	LivingWell

These programs are subject to change on an annual basis.

## **2. Medical Appeal Rights**

Medical Appeals are available only to participants who have chosen to participate in Option 1 to earn the Wellness Incentive. The availability of Medical Appeals allows participants to work with their physician and submit a medical appeal to address a targeted biometric which did not meet the Desired Range. The following are the allowed types of medical appeals:

### **Type 1 Appeal – dispute the accuracy of the results**

A type I appeal allows participants to dispute the accuracy of their results produced at their health screening or with their physician. The appeal requires medical documentation within 30 days after the screening or by November 30 of the stated qualifying year, signed by an approved healthcare provider (M.D., D.O., P.A., or N.P.), which meets the employer goal.

### **Type 2 Appeal – medical exception**

A participant may submit a medical exception appeal if he or she believes that the standard is unreasonably difficult to achieve due to a medical condition or if it is medically inadvisable for the individual to meet the employer goal or a suitable reasonable alternative. Participants must submit a medical reason why the goal or alternative is not achievable for a given participant and must include a healthcare provider statement (e.g., pregnancy) of the reason that the standard cannot be achieved or alternative should not be attempted at this time. Bravo Wellness will approve this type of appeal only upon receipt of a waiver of the requirement or reasonable alternative from the employee’s healthcare provider.

### **Type 3 Appeal – goal met mid-plan year**

A Type III appeal rewards participants who have made improvements to their health after legitimately missing the initial health goal. Participants don’t have to wait until next year’s screening to earn the reward; however, the incentive will be effective at a time set by the employer. This appeal is initiated by the participant when they submit new biometric data in the program year to show they now pass the number of metrics to needed to earn the wellness incentive.

#### **Type 4 Appeal – disabilities**

To accommodate employees with disabilities, as defined under the Americans with Disabilities Act, as amended (ADAAA), that prevent them from achieving the County's goals, Bravo will administer a Type IV appeal. Participants may submit a Type IV Appeal form documenting the physical or mental health condition that limits them from successfully achieving the goal. Participants may include documentation from their health care provider, but they are not required to have their health care provider sign the form. An employee may also submit an FMLA healthcare certification – which the employee can obtain from the Johnson County Department of Human Resources if the employee does not possess a copy – to document the nature of his or her condition. Participants submitting a Type IV Appeal must submit the form and adequate documentation to reasonably establish the existence and nature of their disability.

A participant who documents his or her disability will be treated as if he or she successfully completed the applicable standard or standards – for example, documentation of diabetes will permit an automatic credit for the glucose screening metric.

#### **Results Letter:**

Each participant who voluntarily chooses to earn the Wellness and/or Tobacco Incentives will receive a Results Letter from Bravo Wellness advising of their Incentive status. If Option 1 is chosen, the health screening or physician's exam serves as a "gatekeeper" and no Results Letter is sent or posted to the individual's Bravo web account until the screening or exam is reported and recorded. Thus, as an example, a participant will not receive "credit" for meeting the Tobacco Incentive until the screening or exam is recorded. This will not apply once the wellness campaign ends. By mid-September, all participants are sent a Results Letter advising of their final Incentive disposition for the specific wellness year regardless of which activities were or were not completed.

Bravo sends the Results Letter in two methods: 1) posts on the participant's personal Bravo web account, if one is created, and a copy can be accessed and reviewed at any time; and 2) sends a paper copy by regular mail to the participant's mailing address on file (included in monthly eligibility file). Instructions on how to create a personal account are posted on *Wellness U*.

The Results Letter is the definitive source to determine whether the participant qualifies for the Incentive(s) or not. It is a formal document generated by Bravo Wellness and contains the following information:

- Wellness Campaign ending date (when activities must be completed by);
- Activities that must be completed, if an employee or spouse chooses to participate, to earn the Incentives;
- The Incentive Status for each Wellness and Tobacco;
- Appeal deadline date;
- The status of each activity and biometric goal and whether or not it met the goal;
- Reasonable Alternative Options;
- Appeal Rights; and
- Tobacco Incentive and Program Resources

### **Incentive Structure:**

The County is responsible for creating the Incentive Structure which determines the contribution differential for the employees' payment for medical coverage, subject to applicable federal regulations and guidelines (which specify a maximum amount). The stated amount applies regardless of which plan option or coverage tier the employee is enrolled in. The County uses a budget-neutral incentive method. The amounts of the contribution differential incentive are stated below by incentive type and by year.

<u>Year:</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
Wellness:			
Employee:	\$50	\$60	\$70
Spouse:	n/a	n/a	\$40
Tobacco:	\$30	\$35	\$40

The Incentive is applied during the year following the applicable wellness campaign. For example, the Incentive applied in 2018 was awarded for wellness activities performed in the 2017 wellness campaign. The only exception to this rule is if a participant files and is approved for a Type 3 Medical Appeal.

### **Wellness Incentive Apportionment:**

The County is also responsible for creating how the differential is applied based on who completed the pertinent activities. Since the 2017- 2019 Wellness Strategy includes spouses (see Spousal Participation section below), to encourage spousal participation even if the employee chooses not to participate, the following apportionment will apply.

<u>Wellness Incentive:</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
<u>Coverage Tier:</u>			
Individual:	\$50	\$60	\$70
Does Not Meet:	\$ 0	\$ 0	\$ 0
Employee + Spouse			
Both Meet:	\$50	\$60	\$110
Employee Only Meets:	\$50	\$60	\$70
Spouse Only Meets:	\$20	\$30	\$40
Neither Meets:	\$ 0	\$ 0	\$ 0
Family:			
Both Meet:	\$50	\$60	\$110
Employee Only Meets:	\$50	\$60	\$70
Spouse Only Meets:	\$20	\$30	\$40
Neither Meets:	\$ 0	\$ 0	\$ 0
<u>Tobacco Incentive:</u>			
Employee and Spouse Meets:	\$30	\$35	\$40
Neither Meets:	\$ 0	\$ 0	\$ 0

### **Spousal Participation:**

To enable spousal participation the County will:

- Provide activities needed to enable completion of both options, including reasonable alternatives, which are not centered or reliant on the County workplace.
- Separately communicate the wellness requirements, notices, and all needed documents and resources directly to spouse members.
- Ensure that the County and its employees do not receive any information about whether employees and family members passed any of the five individual outcome standards other than in aggregate numbers; rather, simply whether the individual members earned the incentive.
- Send Result Letters to employees and spouses separately to protect the confidentiality of each.

### **Administrator Notices:**

Historically, federal regulatory agencies have been concerned with the need to protect employee and spouse privacy and genetic information when biometric screenings and a Health Risk Assessment (HRA) are components of an employer's wellness program. Bravo specifically lists the uses of the lab data they gather on County employees and spouses so an interested party can review the details – Bravo on their web-site and the Provider Screening Form and the County on *Wellness U*.

Rules published on May 17, 2016, under the Americans with Disabilities Act ("ADA") require employers who offer wellness programs that collect employee health information to provide a notice to employees informing them what information will be collected, how it will be used, who will receive it, and what will be done to keep it confidential. This "Model EEOC Notice" will be distributed along with other federally-required notices as part of the annual Open Enrollment mailing. In addition, the Model Notice will be posted on the County's *Wellness U* web-site.

Before October 15 of each plan year, the County sends each employee two notices explaining these rights and terms: 1) Health Insurance Portability and Accountability Act (HIPAA) Notice of Privacy Statement, and 2) the EEOC Notice.

No County staff has access to employees' or spouses' lab values or any other health information unless the personal decision is made to share it when filing a County Appeal Form. The County is only notified by Bravo whether the employee and/or a spouse has earned the wellness and/or tobacco incentives and which option was completed to earn the Wellness Incentive. The County does receive aggregated reporting that analyzes how the County as a whole is doing as far as the biometrics but there is no possibility of any individual's biometrics being identified or reported.

### **Resources and Tools for Employees and Spouses:**

An integral part of the County's wellness program is the provision of the resources and tools to employees and spouses so they know how to earn the Incentives and step-by-step instructions are provided. The County has an intranet web-site devoted to the County wellness programs called *Wellness U*. The primary purpose is to create a user-friendly repository of all the County wellness programs and to focus on the components that must be completed if an employee chooses to earn the Wellness and Tobacco Incentives. Other information is included such as the details regarding the Fitness Program, Announcements of upcoming wellness program/event dates, and the Calendar to the on-site fitness classes.

TFM also utilizes an Internet site. This site is currently used to provide a resource to COBRA, VRIP and Retiree participants, including plan design options, rate information, and the applicable year plan calculator. Details regarding the Wellness Strategy is also included and is accessible from the Internet.

In addition to these two web-sites, email messages are sent to employees through the Wellness Coordinators and JOCO In the Know to bring the *Wellness U* resources to employees' attention and to remind employees of the site's availability for use. Each department has at least one Wellness Coordinator to act as the department's distributor of wellness-related email and Flyers. Larger Departments, such as Sheriff's and Corrections, have several Coordinators since there are multiple locations.

## **Communications**

The ability to reach participants and explain how to access the resources needed to enroll in programs or to earn the Incentives if they choose to participate in the County's voluntary wellness programs is critical to the success of the programs. As stated above, *Wellness U* is the primary focal point of all communication efforts and there is an ongoing project to improve the ease with which employees use the site.

The following communication methods will continue for the next three-year wellness strategy:

- *Wellness U* web-site (Intranet).
- Email reminders and information distributed through the Wellness Coordinators.
- Treasury web-site (Internet).
- Facebook. Benefits and Wellness has its own Facebook page which is periodically promoted.
- Postcards. These are mailed separately to employees and spouses at their residence to explain the steps required to earn the Incentives.
- Flyers. Notices for posting throughout the County that address specific components of the Wellness and Tobacco Incentives.
- Presentations. The County's Health Care Manager conducts periodic wellness presentations at the County main locations (Administration, Sunset and Northeast Offices), attends departmental staff meetings when invited, and may conduct other presentations to educate employees and spouses on the Incentives and wellness programs including the requirements to earn the Incentives.

## **County-Provided Appeal Option**

Employees and spouses can submit medical appeals directly to Bravo Wellness if they feel they could not attain the Desired Range for a lab value or complete the required Option 2 activities due to a medical reason.

The County also offers employees the ability to file an appeal directly to the County's Wellness Strategy Appeal Committee. Since the County offers a self-funded wellness program, it has the ultimate authority to determine if an employee or spouse should qualify for the Incentive. This appeal process allows participants to submit extenuating circumstances that may have caused the employee or spouse not to earn one or both Incentives. This usually occurs in a situation is when the employee was on FMLA or disability leave during a significant portion of the wellness campaign preventing the employee from performing the activities to earn the Incentives.

The Committee is composed of: TFM Assistant Finance Director; Benefits & Wellness Manager; HR Manager; members from the County's two largest departments Corrections and Sheriff's Office; and a member from the Department of Health and Environment. The composition can change based on availability and personnel changes.