

Virginia Private Colleges Benefits Consortium, Inc. 2024 Wellness Program

To support the member colleges (“Members”) of the Virginia Private Colleges Benefits Consortium, Inc. (“VPCBC”) in their promotion of health and wellness among benefit-eligible employees, VPCBC provides access to a variety of wellness programs and services (“Wellness Program” or “Program”) at no cost to the employee. The Wellness Program is completely voluntary and is available to all benefit-eligible employees. The Program is also available to spouses of employees, provided the spouse is enrolled in the Virginia Private Colleges Benefits Consortium, Inc. Health and Welfare Plan (“Health Plan”).

The Wellness Program may include a health risk assessment and/or biometric screen, which may include the collection of a blood sample and lifestyle questionnaire to assist in evaluating the health status and health improvement opportunities for participants. The Program may also include health coaching to assist participants in identifying lifestyle habits and behaviors that may negatively impact health as well as strategies and activities that may be beneficial for health improvement. In addition, periodic health challenges and individual and group activities designed to provide health and wellness education and support may be made available.

Participation incentives may be, but are not required to be, offered by Members. The type, amount, timing, and qualification requirements of any participation incentive are at the sole discretion of each Member and will be lawfully determined and set forth in Member communications to participants. No participation incentives are offered by VPCBC. Participation incentives may be amended by Members from time to time, which may include requirements for obtaining an incentive.

Members may take reasonably necessary steps to ensure that an incentive is provided in accordance with all applicable laws. Members may take all necessary actions to address the taxation of an incentive, including but not limited to treating the amounts as taxable income on reports and, to the extent consistent with other applicable laws, withholding amounts from an employee’s wages to pay for taxes owed by the employee with respect to a participation incentive.

There is no commitment or guarantee that any amounts paid to or for the benefit of an employee participating in the Wellness Program will be excludable from the employee’s gross income for federal, state, or local income tax purposes. It shall be the obligation of each employee to determine whether any payment or incentive under the Wellness Program is excludable from the employee’s gross income for federal, state, and local income tax purposes.

Wellness vendor Notice of Privacy Practices may be accessed at the following links:

- <https://www.ebix.com/privacy>
- <https://members.healthadvocate.com/Shared/Disclosures?contentType=LegalAndPrivacy>

All questions, complaints and appeals concerning the Wellness Program may be directed to the Plan Administrator at the following address:

Tim Klopfenstein
Virginia Private Colleges Benefits Consortium, Inc.
1 Cedar Hill Court, Suite D
Bedford, VA 24523

Schedule R
Virginia Wesleyan University Wellness Program

This Schedule R describes the wellness plan design for the Virginia Wesleyan University (“the College”) Wellness Program (“the Program”).

R.1 Plan Information

- **Plan Sponsor.** The Plan Sponsor of the Program is identified as Virginia Private Colleges Benefits Consortium.
- **Plan Administrator.** The Plan Administrator of the Program is identified as the College.
- **Plan Fiduciary.** The Plan Fiduciary of the Program is identified as Virginia Private Colleges Benefits Consortium.
- **Delegation of Powers.** For information regarding the delegation of certain functions relating to the Program, see the Virginia Private Colleges Benefits Consortium, Inc. Health and Welfare Plan Wrap-Around Plan Document and Summary Plan Description.
- **Power of Plan Administrator.** Subject to the limitations of the Program and any governing law, the Plan Administrator will from time to time establish rules for eligibility to participate in the Program, the administration of the Program, the selection and distribution of rewards/incentives and the transaction of its business. The Plan Administrator will have final discretionary authority to make such decisions and all such determinations shall be final, conclusive, and binding.
- **Funding and Payments.** For information regarding the funding of the Program, see the Virginia Private Colleges Benefits Consortium, Inc. Health and Welfare Plan Wrap-Around Plan Document and Summary Plan Description.
- **Claims and Appeals Procedures.** For information regarding the claims and appeals procedures for the Program, see the Virginia Private Colleges Benefits Consortium, Inc. Health and Welfare Plan Wrap-Around Plan Document and Summary Plan Description.
- **Amendment and Termination of the Plan.** For information regarding the amendment or termination of the Program, see the Virginia Private Colleges Benefits Consortium, Inc. Health and Welfare Plan Wrap-Around Plan Document and Summary Plan Description.
- **Distribution of Assets Upon Termination.** For information regarding the distribution of assets upon termination of the Program, see the Virginia Private Colleges Benefits Consortium, Inc. Health and Welfare Plan Wrap-Around Plan Document and Summary Plan Description.

R.2 General Program Design

- The College offers a Wellness Program, an arrangement that promotes health and disease prevention.
- The Program does not coordinate with a group health plan, it is a standalone wellness plan.
- The Program is participatory only in that it does not provide a reward and does not condition eligibility for a reward on a participant's satisfaction of a standard related to a health factor.

R.3 Eligibility

- All benefit eligible employees and spouses are eligible to participate in the Program.

R.4 Rewards and Incentives

Eligible participants may qualify for an incentive/reward at least once per year.

The following types of rewards/incentives are provided to participants in the Program (including but not limited to):

- Group health plan premium reduction in the amount of \$15.00 per month.

The incentive/reward does not exceed the following percentage for the plan in which the employee and dependent are enrolled: 30%.

R.5 Health Information

- A health risk assessment does not need to be completed in order to qualify for an incentive (i.e., a reward or penalty) as part of the Wellness Program.
- A biometric screening does not need to be completed in order to qualify for an incentive (i.e., a reward or penalty) as part of the Wellness Program.
- Employee medical information is kept in a separate medical file.

R.6 Notices

- The College provides a notice of the existence of the Program.
- The College provides a notice containing a list of Program benefits in the Program materials.

R.7 Multiple Arrangements

The College's Program consists of only one Wellness Program, the Program.

R.8 Miscellaneous

- **Governing Law.** The Program is intended to be construed, and all rights and duties hereunder are to be governed, in accordance with the laws of the

Commonwealth of Virginia, except to the extent such laws are preempted by ERISA or other federal law.

- **Federal Tax Disclaimer.** Nothing in this document shall be construed to ensure the taxability of any reward or incentive provided as a part of the Program.
- **Questions.** For questions relating to the Program, Program notices, or how to receive a reasonable accommodation (if applicable), participants should contact the Plan Administrator.