

## **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