

**Schedule N**  
**Roanoke College Wellness Program**

This Schedule N describes the wellness plan design for the Roanoke College (“the College”) Wellness Program (“the Program”).

**N.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.

## **N.2 General Program Design**

- The College offers a Wellness Program, an arrangement that promotes health and disease prevention.
- The Program coordinates with a group health plan, that is by offering financial rewards under the medical plans (such as reductions or waivers of premiums, copayments, or deductibles) to those who participate in wellness or disease-management programs, or who attain certain program goals.
- 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.

## **N.3 Eligibility**

- All benefit eligible employees are eligible to participate in the Program.
- Dependents are not eligible to participate in the Program.

## **N.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):

- Wellness-related items, t-shirts, gift cards, food, etc.

The incentive/reward does not exceed the following percentage of the employee-only cost of coverage: 30%.

## **N.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.
- Medical information provided through a third-party provider or administrator to the employer only comes in de-identified format containing only that information necessary to administer the Wellness Program (i.e., to process an incentive/reward).
- Employee medical information is kept in a separate medical file.

## **N.6 Notices**

- The College provides a notice of the existence of the Program.
- The College provides a notice regarding its reasonable alternative standards.

## **N.7 Multiple Arrangements**

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

## **N.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.