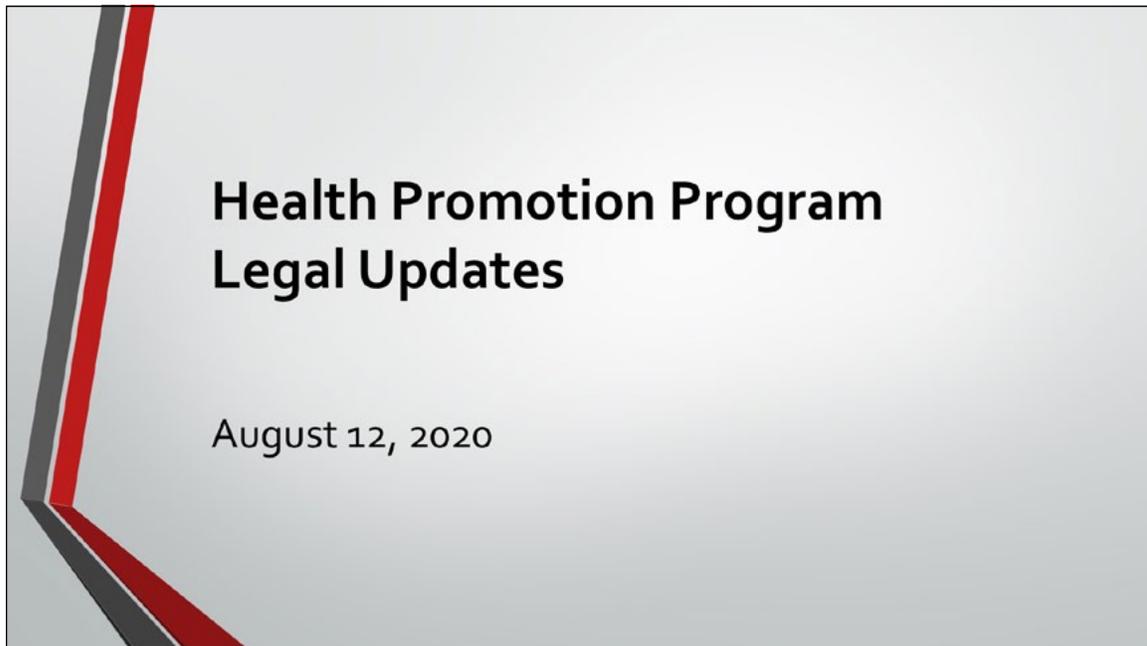
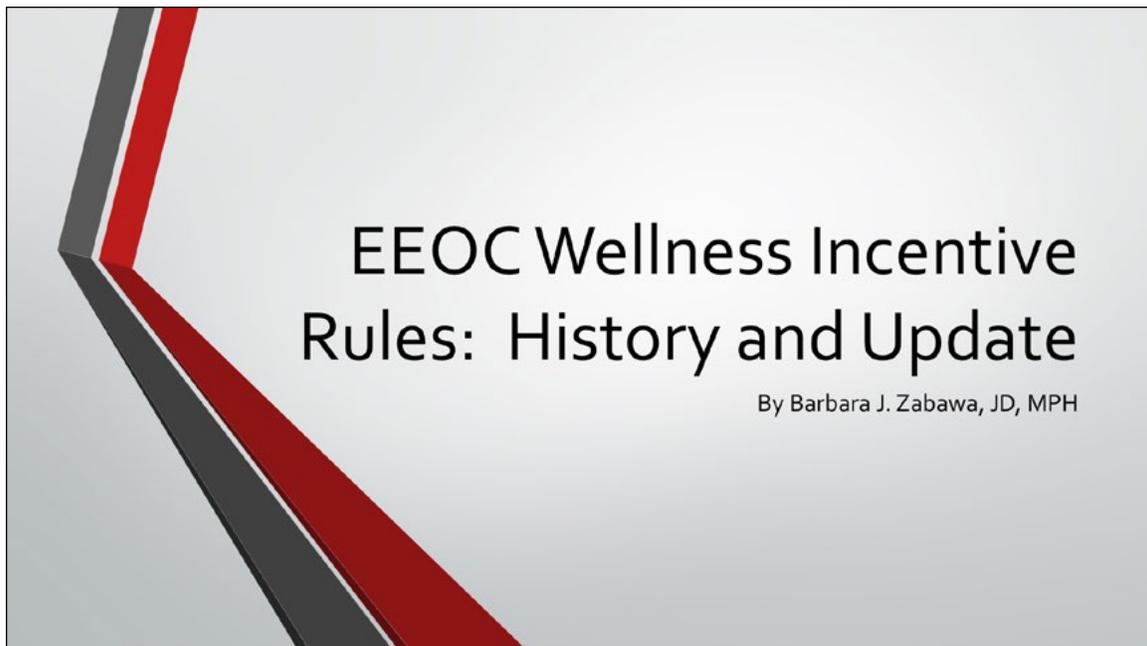


Health Promotion Program Legal Update: Q3 – 2020 (August 12, 2020)

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Health Promotion Program Legal Update: Q3 – 2020 (August 12, 2020)

Barbara J. Zabawa, JD, MPH

Agenda

- History of the ADA and GINA Rules
 - Rules
 - Lawsuits
- Update about proposed rules
- Key Takeaways

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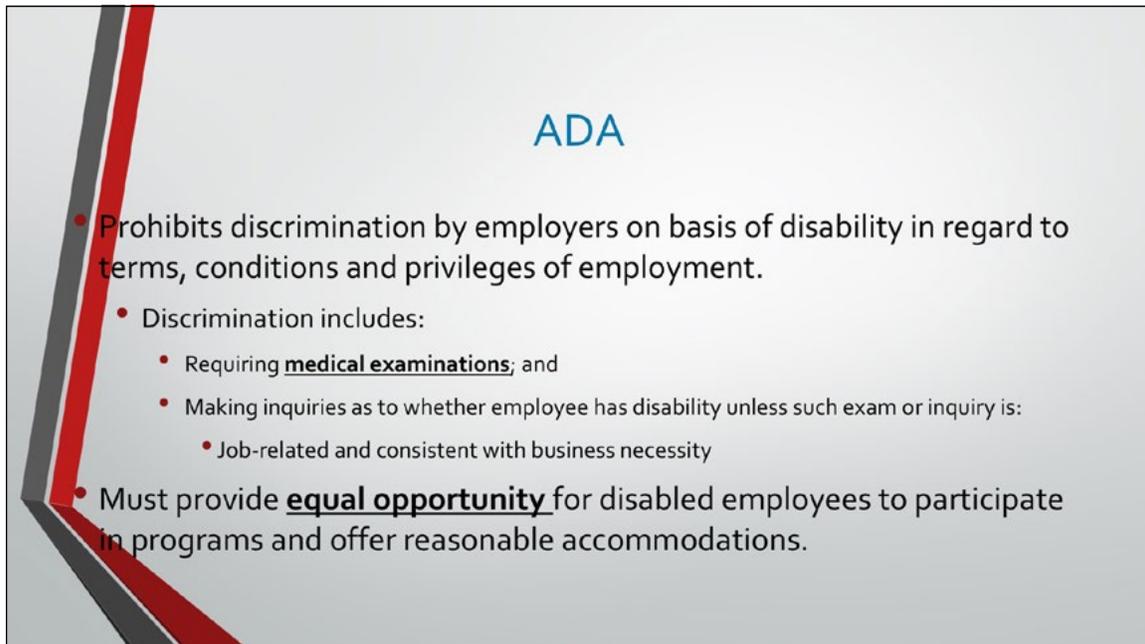
ADA and GINA



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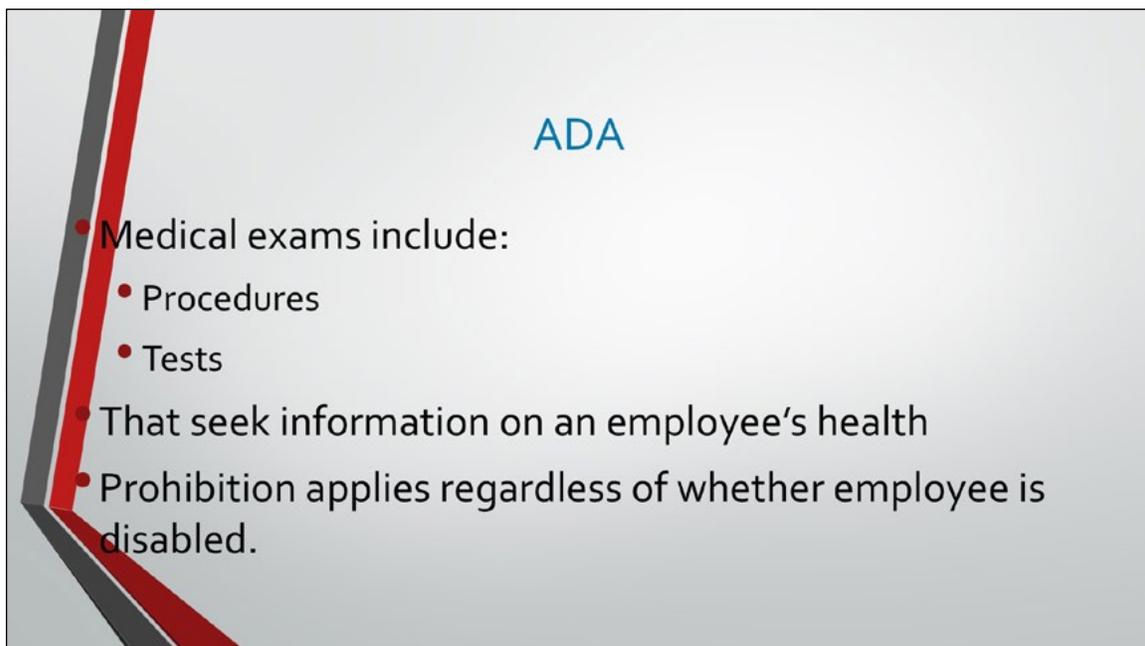
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ADA

- Prohibits discrimination by employers on basis of disability in regard to terms, conditions and privileges of employment.
 - Discrimination includes:
 - Requiring **medical examinations**; and
 - Making inquiries as to whether employee has disability unless such exam or inquiry is:
 - Job-related and consistent with business necessity
 - Must provide **equal opportunity** for disabled employees to participate in programs and offer reasonable accommodations.

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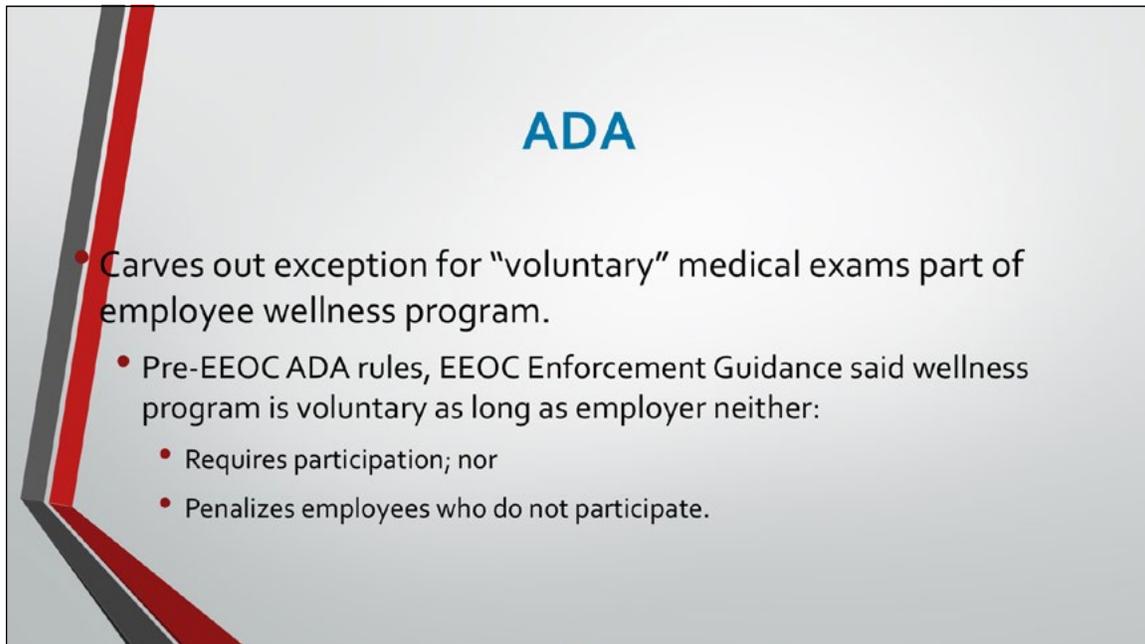
ADA

- Medical exams include:
 - Procedures
 - Tests
- That seek information on an employee's health
- Prohibition applies regardless of whether employee is disabled.

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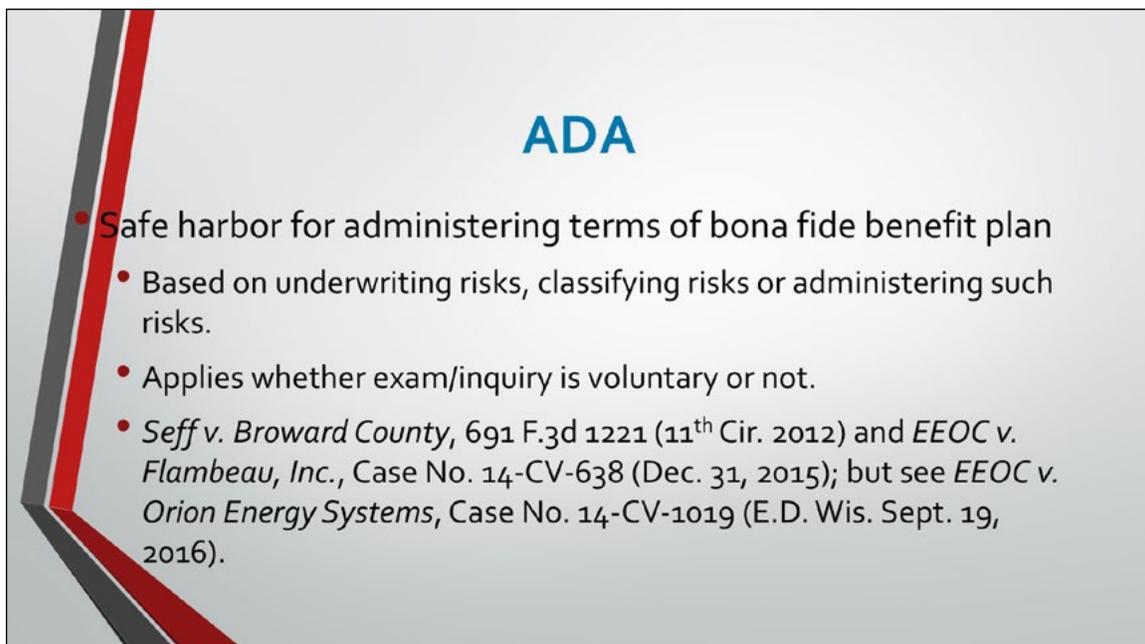
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ADA

- Carves out exception for “voluntary” medical exams part of employee wellness program.
 - Pre-EEOC ADA rules, EEOC Enforcement Guidance said wellness program is voluntary as long as employer neither:
 - Requires participation; nor
 - Penalizes employees who do not participate.

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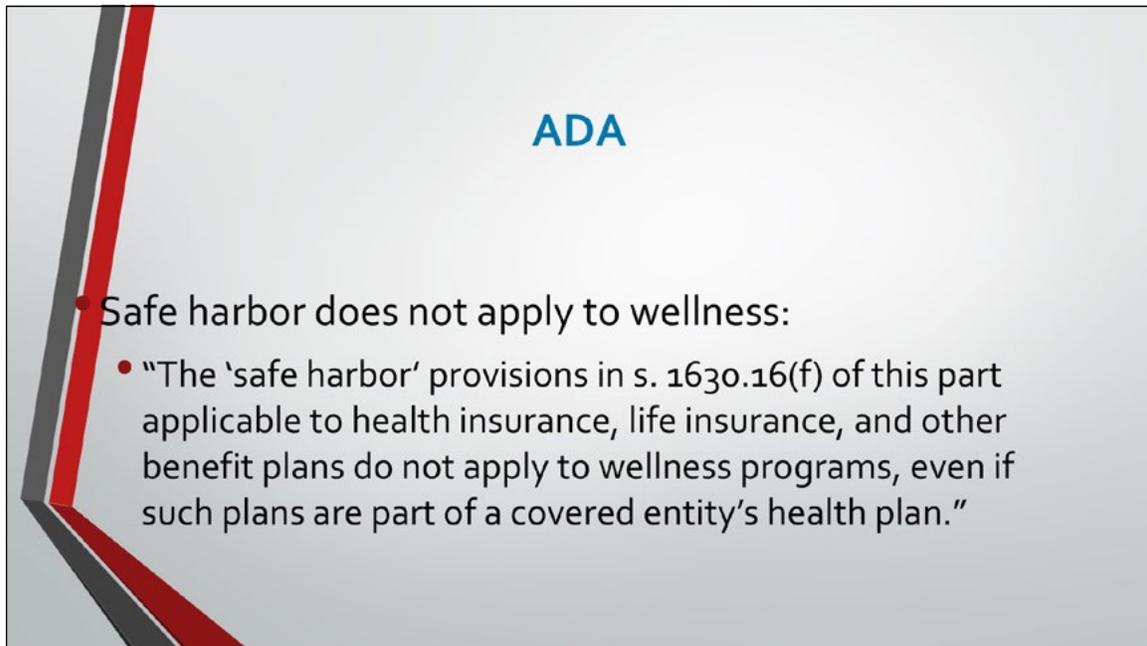
ADA

- Safe harbor for administering terms of bona fide benefit plan
 - Based on underwriting risks, classifying risks or administering such risks.
 - Applies whether exam/inquiry is voluntary or not.
 - *Seff v. Broward County*, 691 F.3d 1221 (11th Cir. 2012) and *EEOC v. Flambeau, Inc.*, Case No. 14-CV-638 (Dec. 31, 2015); but see *EEOC v. Orion Energy Systems*, Case No. 14-CV-1019 (E.D. Wis. Sept. 19, 2016).

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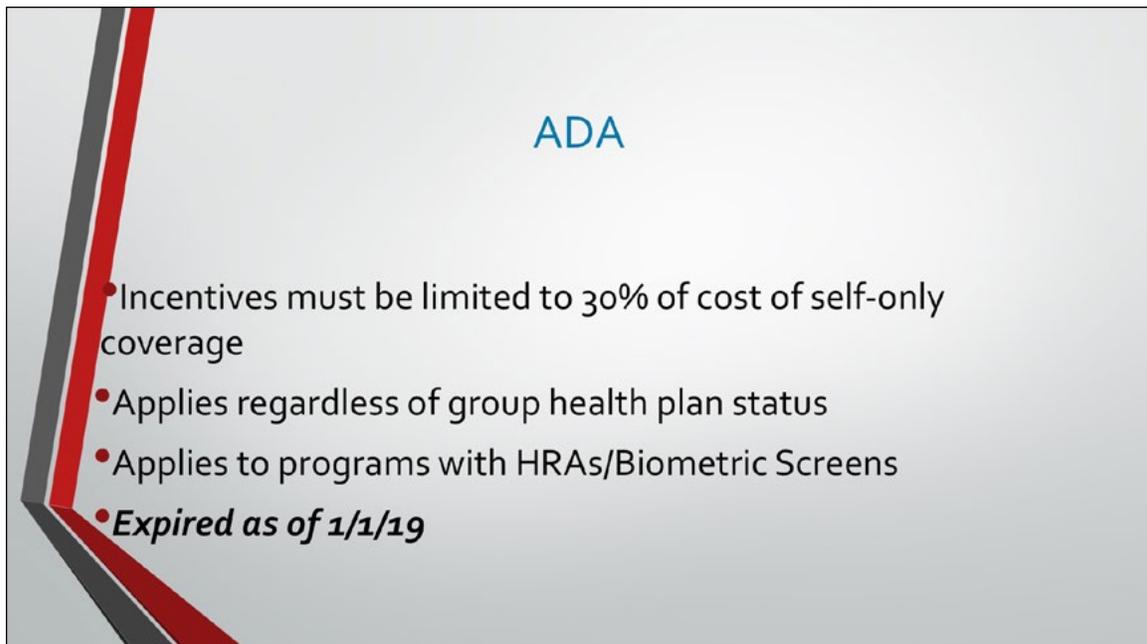
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ADA

- Safe harbor does not apply to wellness:
 - “The ‘safe harbor’ provisions in s. 1630.16(f) of this part applicable to health insurance, life insurance, and other benefit plans do not apply to wellness programs, even if such plans are part of a covered entity’s health plan.”

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ADA

- Incentives must be limited to 30% of cost of self-only coverage
- Applies regardless of group health plan status
- Applies to programs with HRAs/Biometric Screens
- ***Expired as of 1/1/19***

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AARP v. EEOC

- AARP sued EEOC in October 2016
- Argued ADA and GINA incentive maximums of 30% total cost of self-only coverage
 - Arbitrary
 - Unjustified
- AARP complained that EEOC used to say “voluntary” medical exams meant no incentives, now the rules say 30% incentive limit still is “voluntary.”

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AARP v. EEOC

- In August 2017, the District Court of the District of Columbia ruled in favor of AARP.
- Refused to defer to EEOC’s judgment in interpreting meaning of “voluntary”
- Questioned whether EEOC truly evaluated incentive limit
 - Stakeholder concern that 30% incentive level likely to be coercive for employees with low incomes
 - Affect disproportionately those with disabilities

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AARP v. EEOC

- Court evaluated evidence about incentive amounts
- Pointed to a RAND study that found “high powered” incentives of 20% or ore might place disproportionate burden on lower-paid workers.
- Disagreed that 30% incentive limit harmonized with HIPAA/ACA incentive rules
 - ADA and GINA incentives apply to “self-only coverage” and to all wellness programs, regardless of group health plan status, as well as to participatory programs that collect health information
 - HIPAA/ACA incentive rules apply only to health contingent wellness programs that are part of a group health plan, and apply to cost of coverage employee enrolled in.

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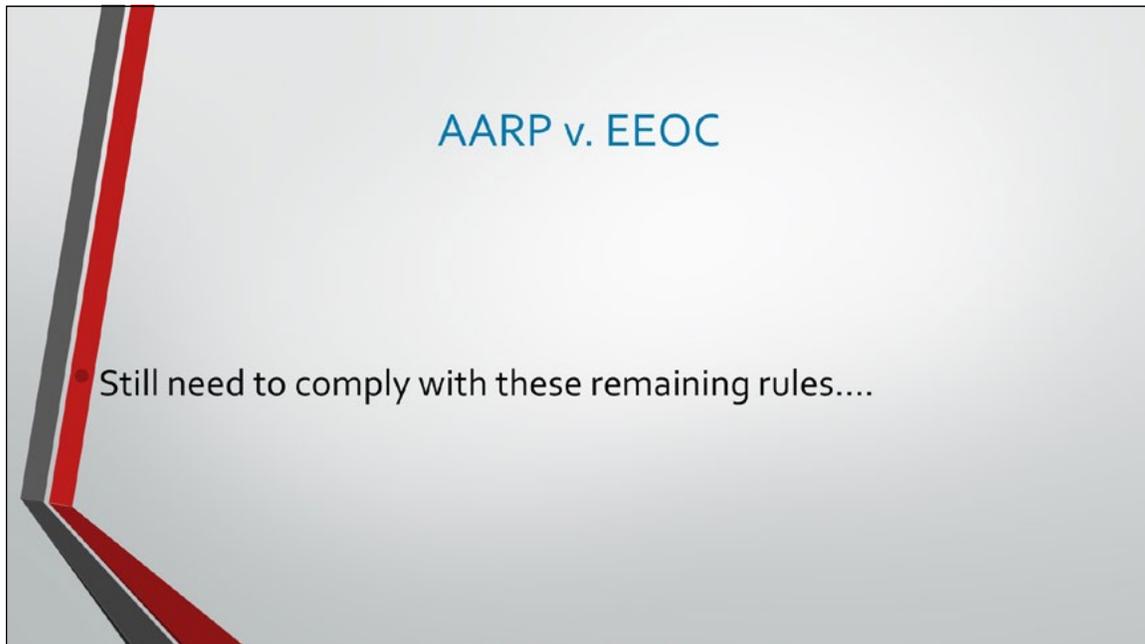
Changes to ADA

- EEOC struck 29 CFR s. 1630.14(d)(3) or “Section (d)(3)”
 - Incentives (financial or in-kind) will not render wellness program involuntary if maximum incentive does not exceed 30% of total cost of self-only coverage.
 - GONE as of 1/1/19

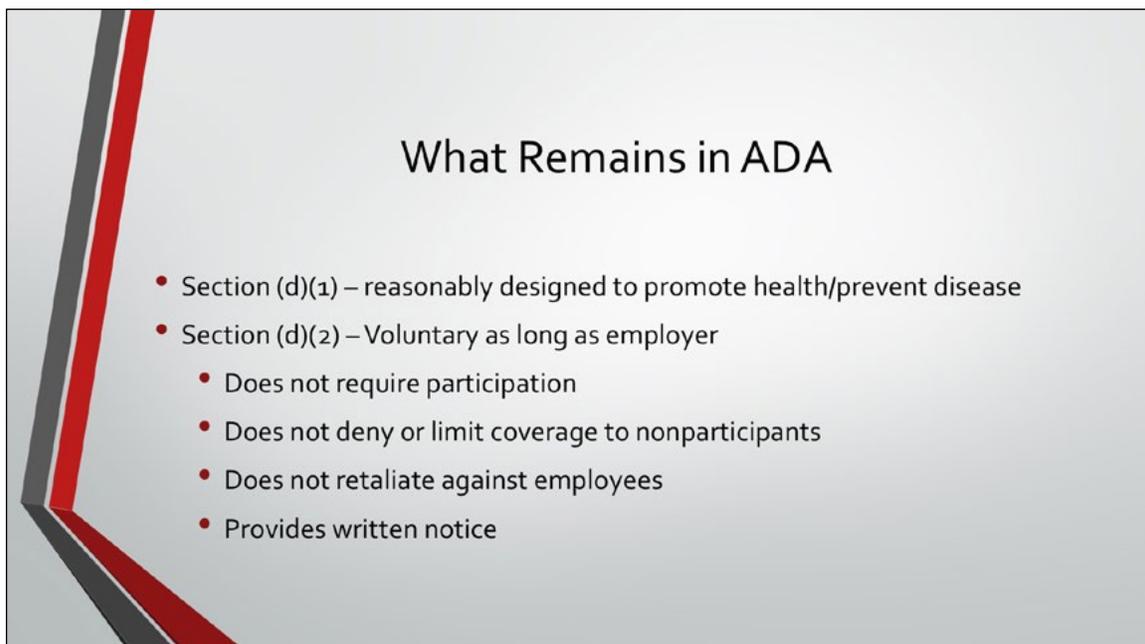
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ADA

- Notice requirement applies even in absence of incentives
- Notice must contain following:
 - Be understandable
 - Describe type of medical information obtained
 - Describe specific purposes for which information will be used
 - Who will receive information
 - Restrictions on disclosure of medical information
 - Methods employer will use to prevent improper disclosure

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What Remains in ADA

- Section (d)(4) – Employers should receive aggregate employee health info only unless needed to administer plan
- Section (d)(5) – Even if employer complies with ADA wellness rules, **including the limit of incentives** under the ADA, employers must still comply with other laws
- Section (d)(6) – The ADA safe harbor does not apply to wellness programs, even programs part of an employer's health plan.

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ADA – Safe Harbor

- Safe harbor for administering terms of bona fide benefit plan
 - Based on underwriting risks, classifying risks or administering such risks.
 - Applies whether exam/inquiry is voluntary or not.



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Court Interpretations

- *Seff v. Broward County*, 691 F.3d 1221 (11th Cir. 2012)
- *EEOC v. Flambeau, Inc.*, Case No. 14-CV-638 (Dec. 31, 2015).



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Health Promotion Program Legal Update: Q3 – 2020 (August 12, 2020)

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Flambeau

- Employee-only program tied to **group health plan**
 - Biometric testing and HRA
 - Health insurance offered only to those employees who completed HRA and biometric test

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Flambeau

- Company used information to:
 - Identify health risks and common medical conditions
 - Estimate cost of providing insurance
 - Set premiums
 - Evaluate need for stop-loss insurance
 - Adjust copays



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Flambeau

- Court found in favor of Flambeau
 - Applied ADA insurance safe harbor provision
 - Allows employer to establish/administer terms of bona fide benefit plan based on:
 - Underwriting risks
 - Classifying risks
 - Administering such risks.
 - Wellness program requirement was a “term” of its benefit plan



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Flambeau

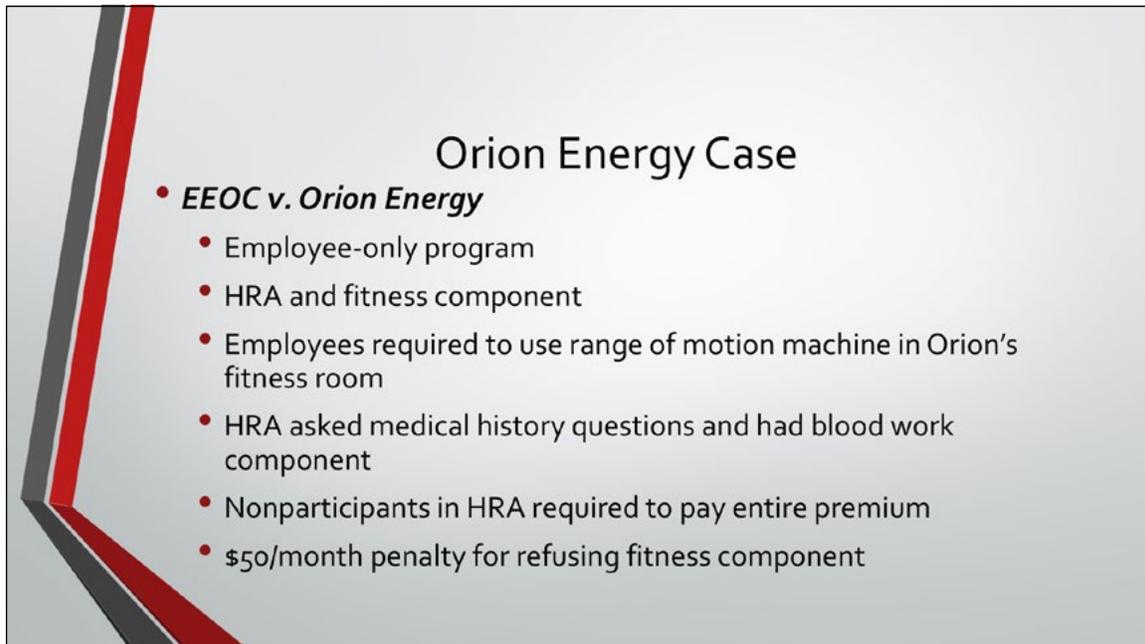
- Difference between safe harbor and voluntary medical exam exception is “obvious.”
 - Safe harbor applies to medical exams tied to group health plan.
 - Voluntary medical exam exception applies when medical exams not tied to group health plan.



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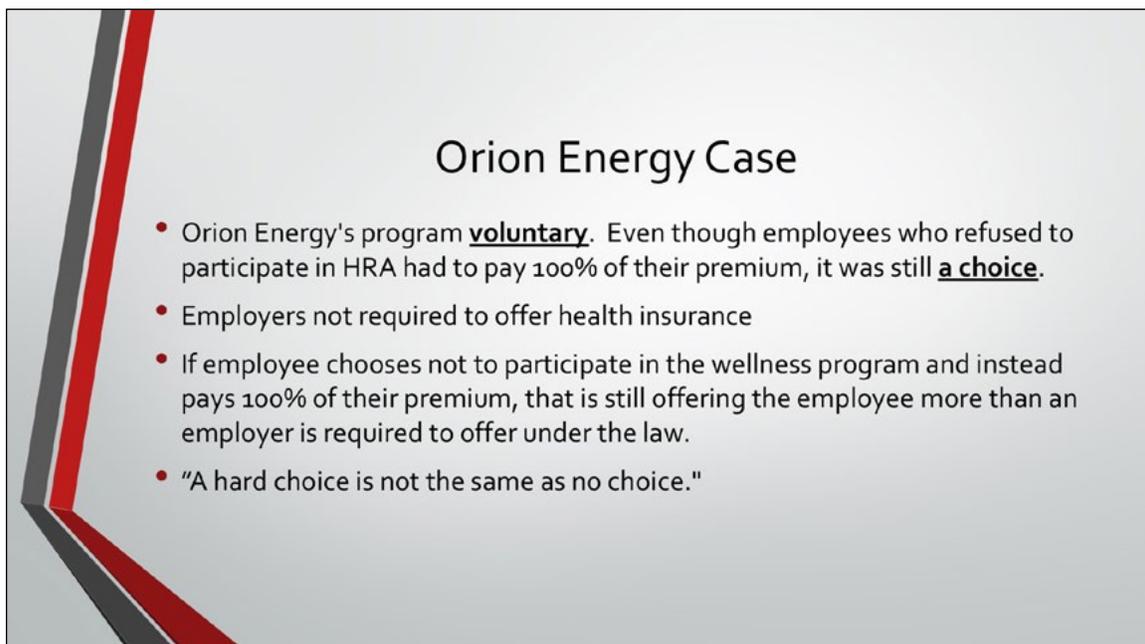
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Orion Energy Case

- ***EEOC v. Orion Energy***
 - Employee-only program
 - HRA and fitness component
 - Employees required to use range of motion machine in Orion's fitness room
 - HRA asked medical history questions and had blood work component
 - Nonparticipants in HRA required to pay entire premium
 - \$50/month penalty for refusing fitness component

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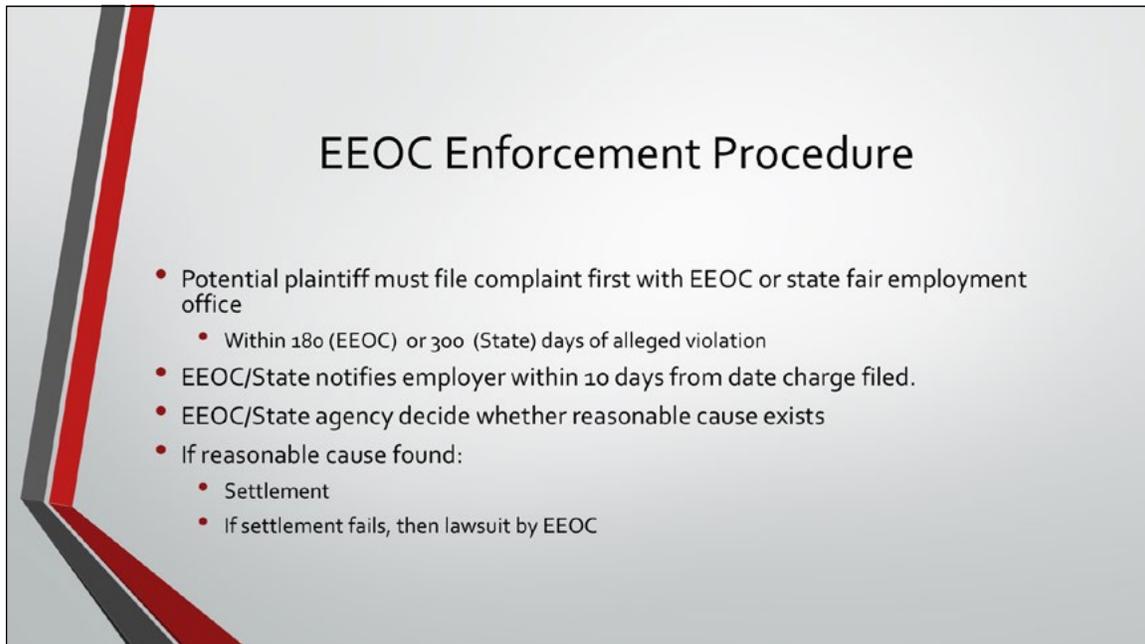
Orion Energy Case

- Orion Energy's program **voluntary**. Even though employees who refused to participate in HRA had to pay 100% of their premium, it was still **a choice**.
- Employers not required to offer health insurance
- If employee chooses not to participate in the wellness program and instead pays 100% of their premium, that is still offering the employee more than an employer is required to offer under the law.
- "A hard choice is not the same as no choice."

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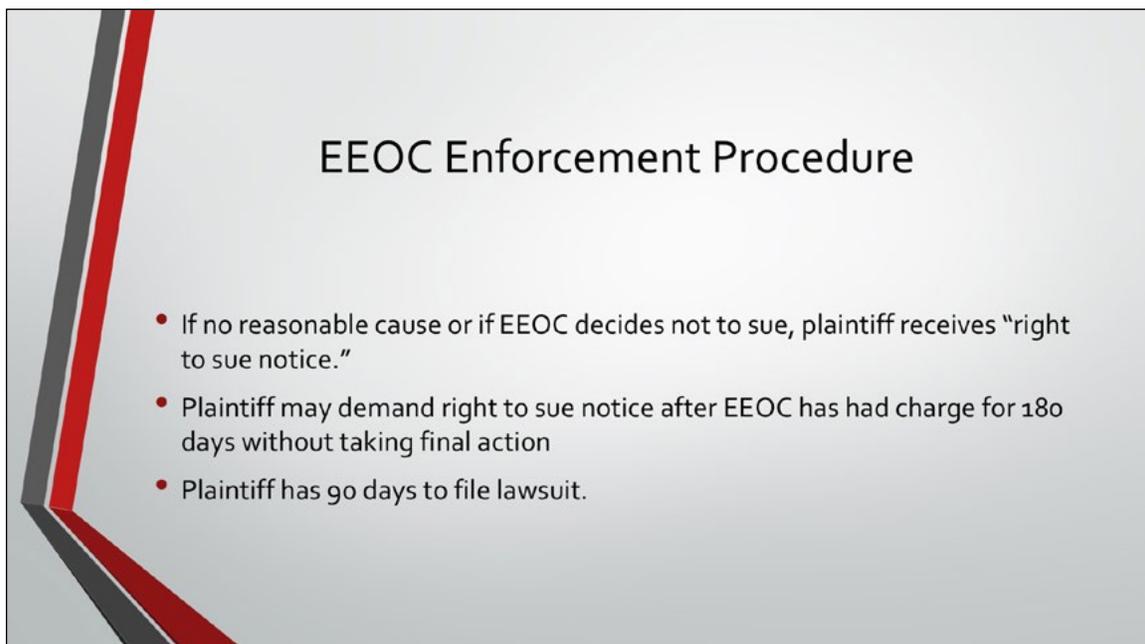
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EEOC Enforcement Procedure

- Potential plaintiff must file complaint first with EEOC or state fair employment office
 - Within 180 (EEOC) or 300 (State) days of alleged violation
- EEOC/State notifies employer within 10 days from date charge filed.
- EEOC/State agency decide whether reasonable cause exists
- If reasonable cause found:
 - Settlement
 - If settlement fails, then lawsuit by EEOC

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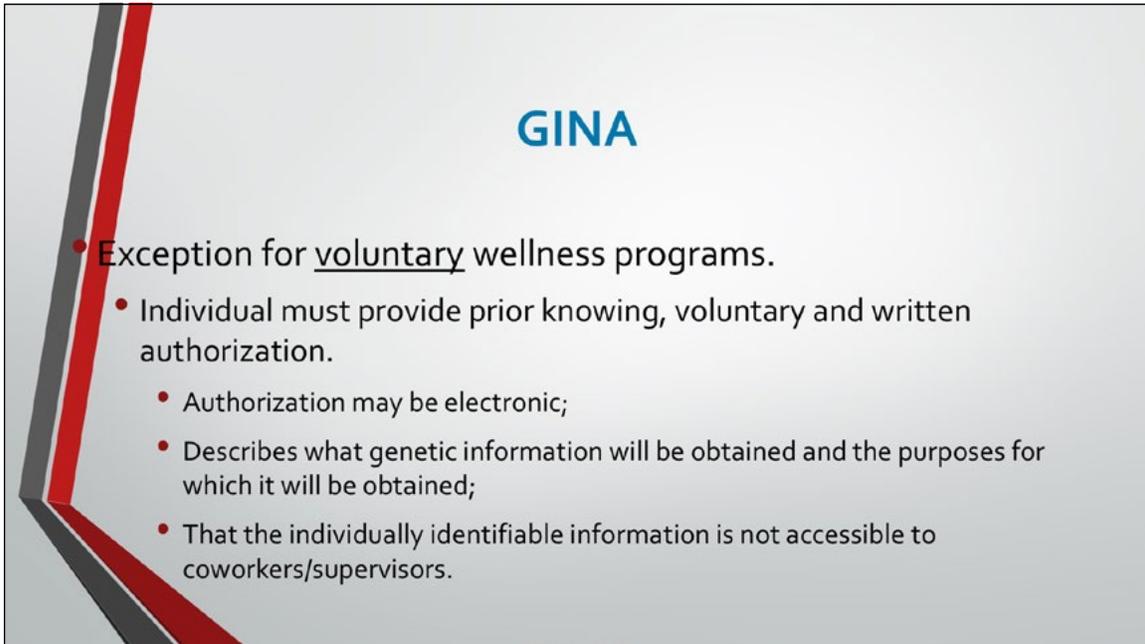
EEOC Enforcement Procedure

- If no reasonable cause or if EEOC decides not to sue, plaintiff receives "right to sue notice."
- Plaintiff may demand right to sue notice after EEOC has had charge for 180 days without taking final action
- Plaintiff has 90 days to file lawsuit.

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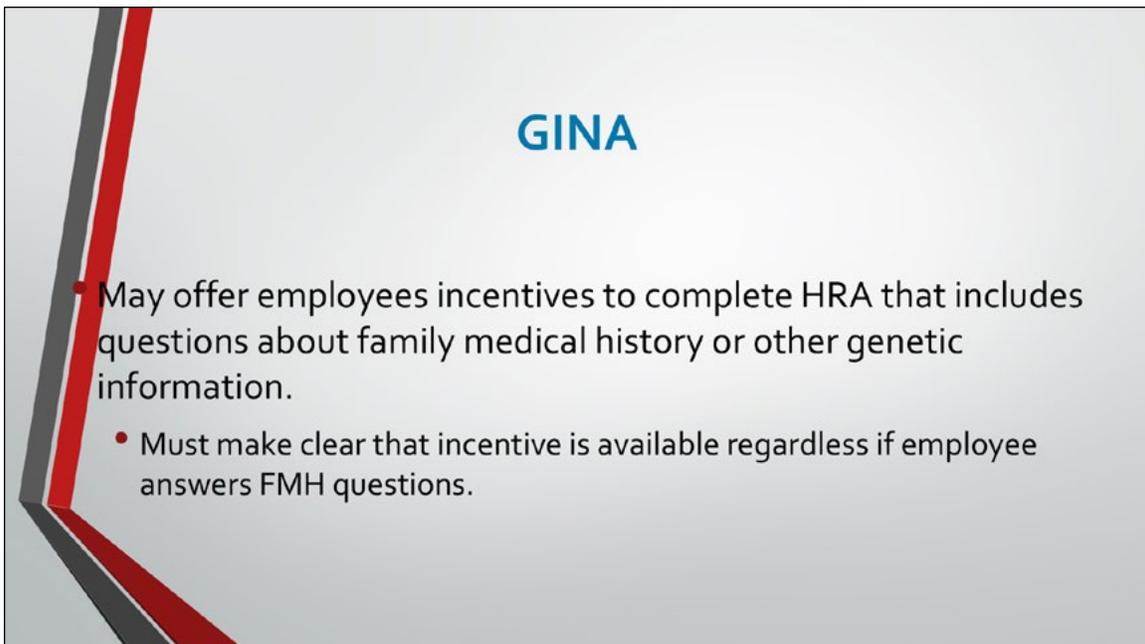
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GINA

- Exception for voluntary wellness programs.
 - Individual must provide prior knowing, voluntary and written authorization.
 - Authorization may be electronic;
 - Describes what genetic information will be obtained and the purposes for which it will be obtained;
 - That the individually identifiable information is not accessible to coworkers/supervisors.

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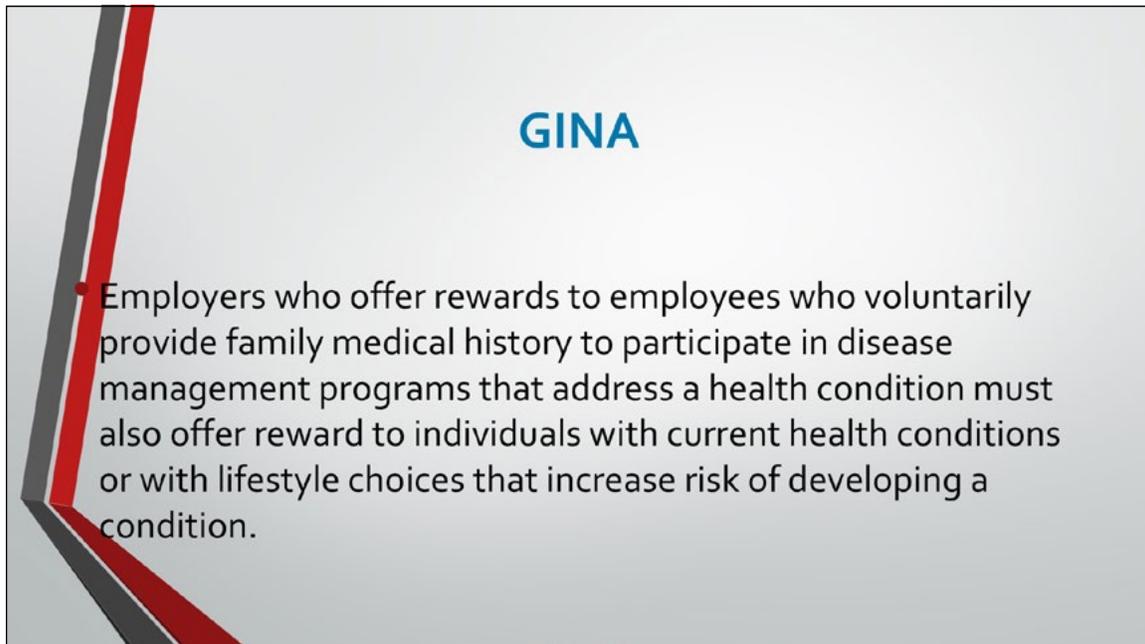
GINA

- May offer employees incentives to complete HRA that includes questions about family medical history or other genetic information.
 - Must make clear that incentive is available regardless if employee answers FMH questions.

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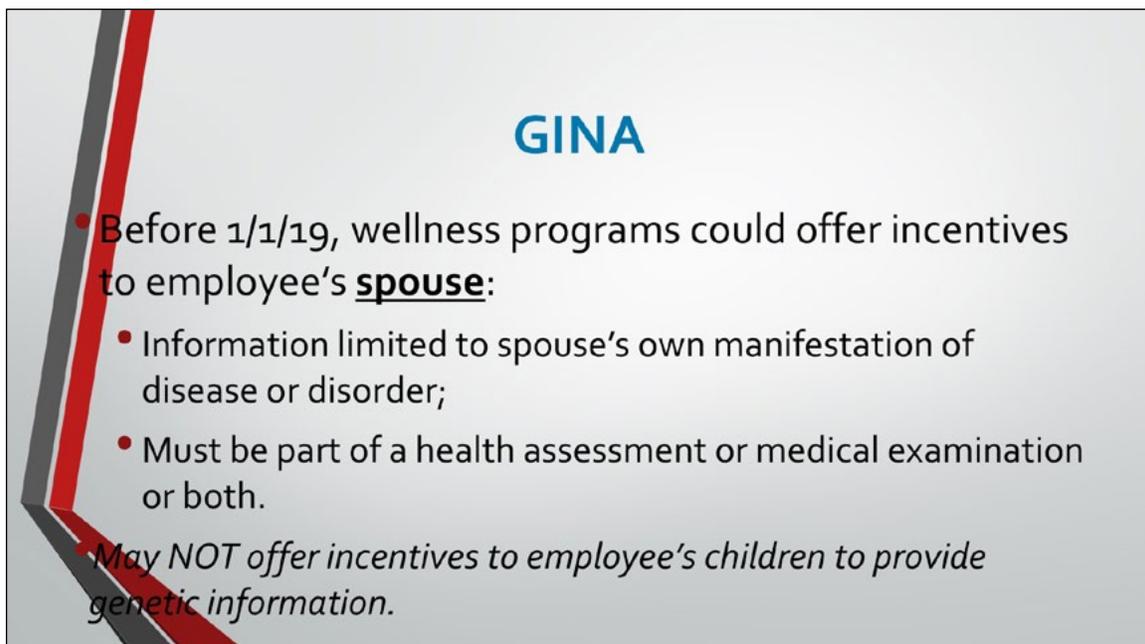
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GINA

- Employers who offer rewards to employees who voluntarily provide family medical history to participate in disease management programs that address a health condition must also offer reward to individuals with current health conditions or with lifestyle choices that increase risk of developing a condition.

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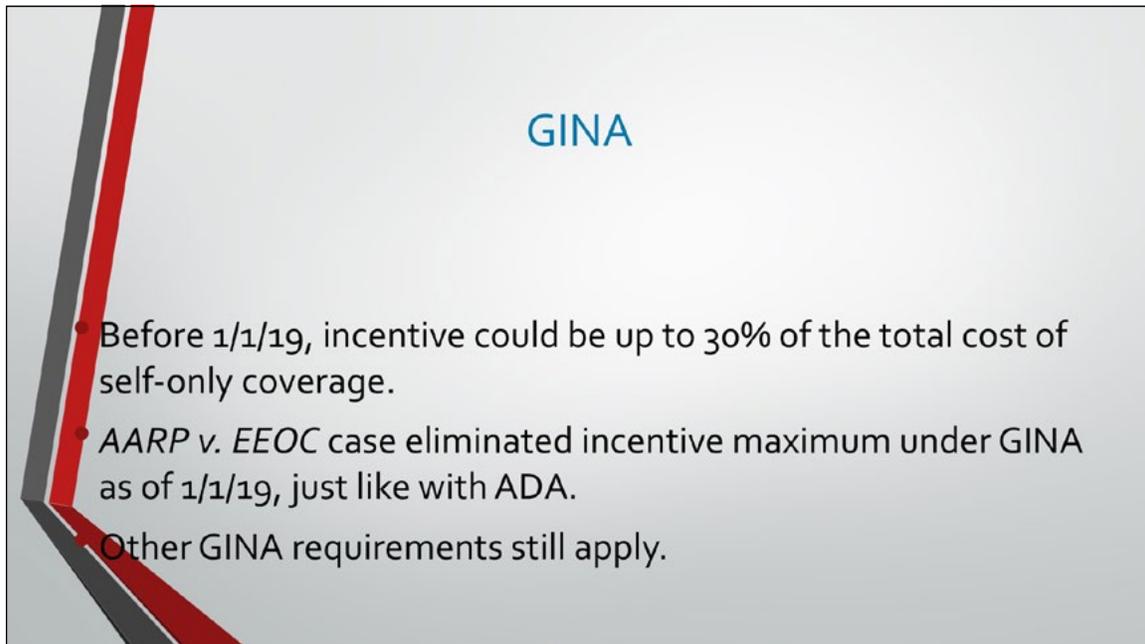
GINA

- Before 1/1/19, wellness programs could offer incentives to employee's **spouse**:
 - Information limited to spouse's own manifestation of disease or disorder;
 - Must be part of a health assessment or medical examination or both.
- *May NOT offer incentives to employee's children to provide genetic information.*

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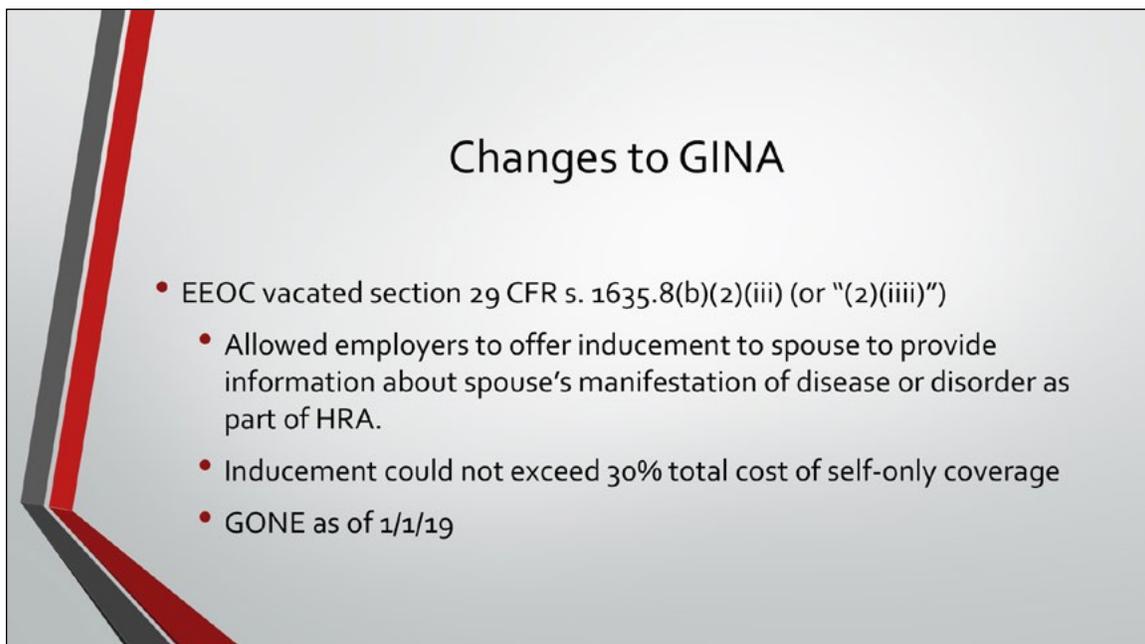
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GINA

- Before 1/1/19, incentive could be up to 30% of the total cost of self-only coverage.
- *AARP v. EEOC* case eliminated incentive maximum under GINA as of 1/1/19, just like with ADA.
- Other GINA requirements still apply.

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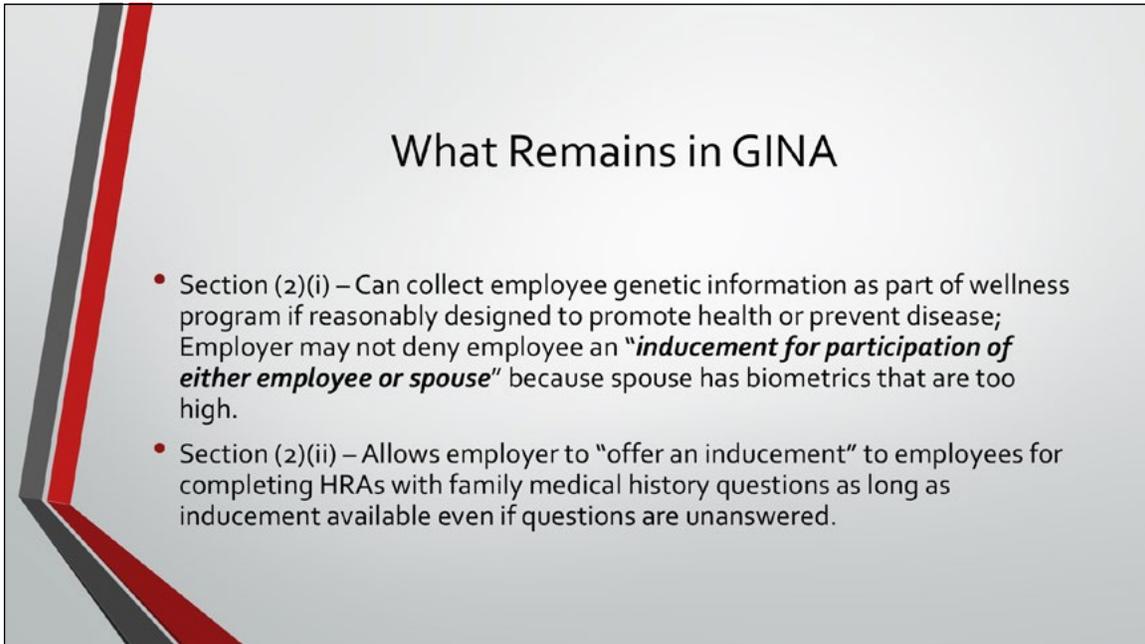
Changes to GINA

- EEOC vacated section 29 CFR s. 1635.8(b)(2)(iii) (or "(2)(iii)")
 - Allowed employers to offer inducement to spouse to provide information about spouse's manifestation of disease or disorder as part of HRA.
 - Inducement could not exceed 30% total cost of self-only coverage
 - GONE as of 1/1/19

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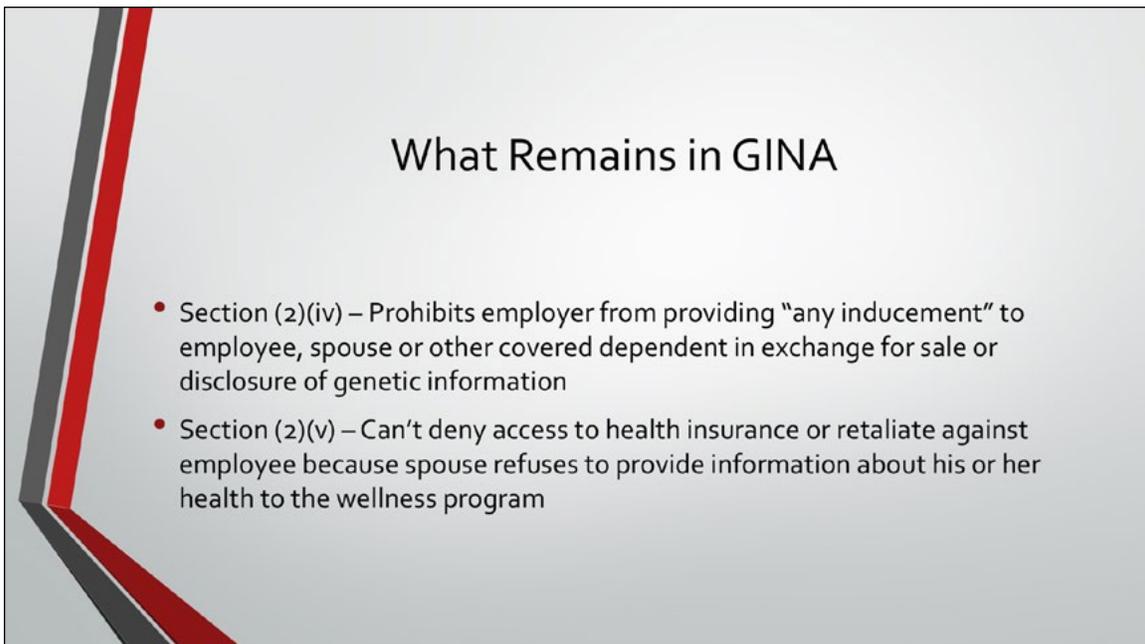
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What Remains in GINA

- Section (2)(i) – Can collect employee genetic information as part of wellness program if reasonably designed to promote health or prevent disease; Employer may not deny employee an “**inducement for participation of either employee or spouse**” because spouse has biometrics that are too high.
- Section (2)(ii) – Allows employer to “offer an inducement” to employees for completing HRAs with family medical history questions as long as inducement available even if questions are unanswered.

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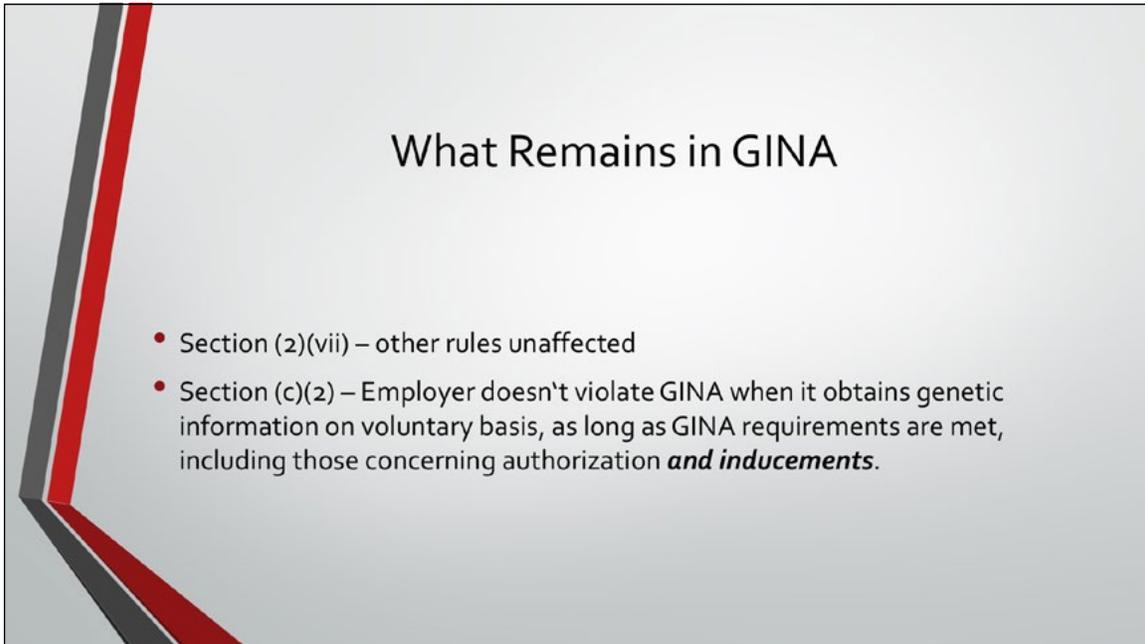
What Remains in GINA

- Section (2)(iv) – Prohibits employer from providing “any inducement” to employee, spouse or other covered dependent in exchange for sale or disclosure of genetic information
- Section (2)(v) – Can’t deny access to health insurance or retaliate against employee because spouse refuses to provide information about his or her health to the wellness program

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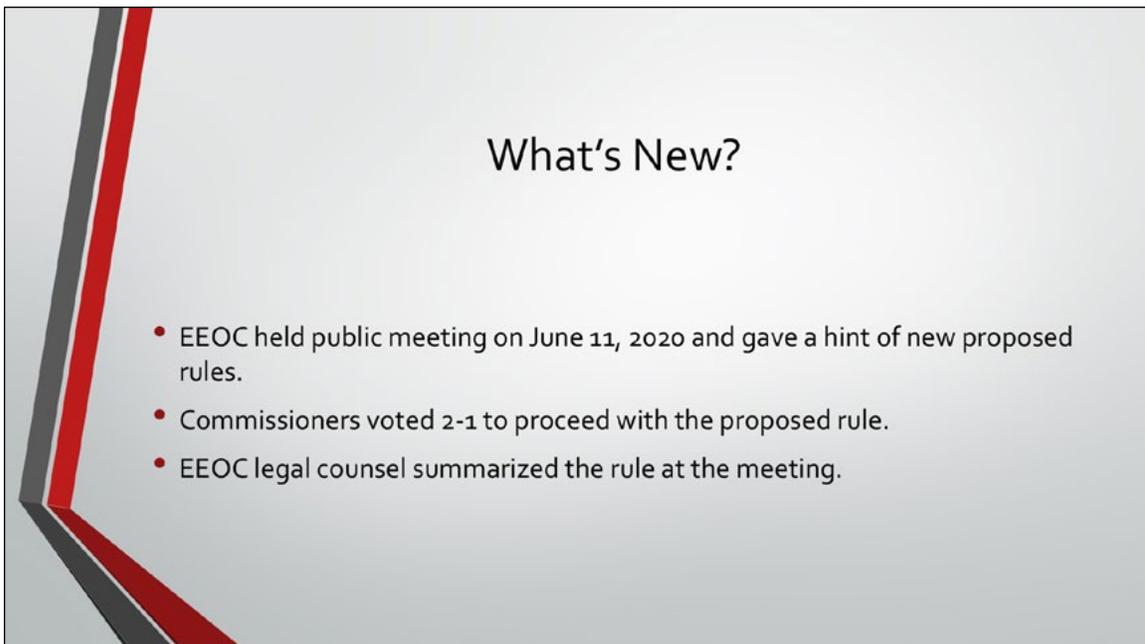
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What Remains in GINA

- Section (2)(vii) – other rules unaffected
- Section (c)(2) – Employer doesn't violate GINA when it obtains genetic information on voluntary basis, as long as GINA requirements are met, including those concerning authorization **and inducements**.

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What's New?

- EEOC held public meeting on June 11, 2020 and gave a hint of new proposed rules.
- Commissioners voted 2-1 to proceed with the proposed rule.
- EEOC legal counsel summarized the rule at the meeting.

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What's New?

- De minimis incentives only
 - Not clear how EEOC will define de minimis
 - IRS defines as t-shirts, water bottles, trinkets...

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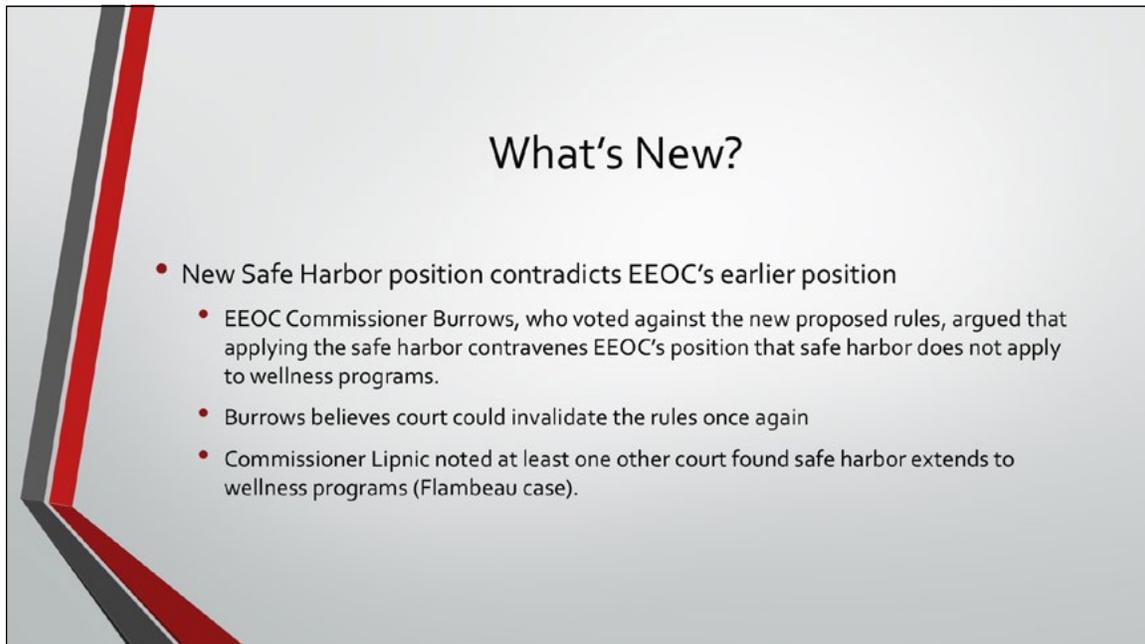
What's New?

- Insurance Safe Harbor Revived
- Would apply to health contingent wellness programs that meet ACA/HIPAA requirements
- Incentive could be up to 30% of premiums for plan participants who do not satisfy biometric targets or wellness activity participation

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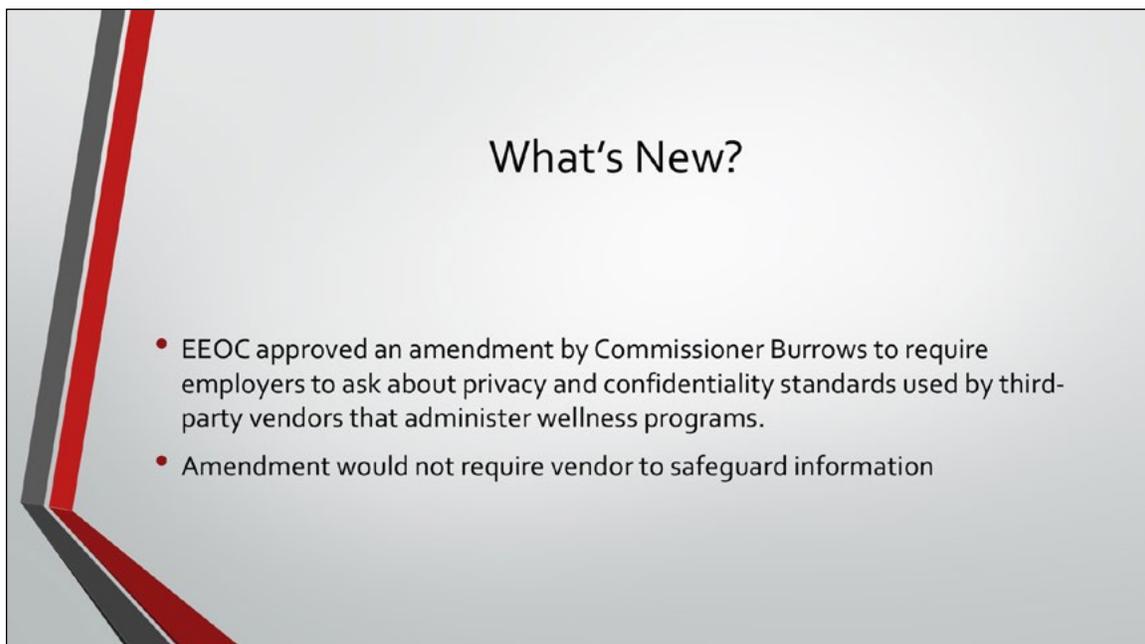
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What's New?

- New Safe Harbor position contradicts EEOC's earlier position
 - EEOC Commissioner Burrows, who voted against the new proposed rules, argued that applying the safe harbor contravenes EEOC's position that safe harbor does not apply to wellness programs.
 - Burrows believes court could invalidate the rules once again
 - Commissioner Lipnic noted at least one other court found safe harbor extends to wellness programs (Flambeau case).

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What's New?

- EEOC approved an amendment by Commissioner Burrows to require employers to ask about privacy and confidentiality standards used by third-party vendors that administer wellness programs.
- Amendment would not require vendor to safeguard information

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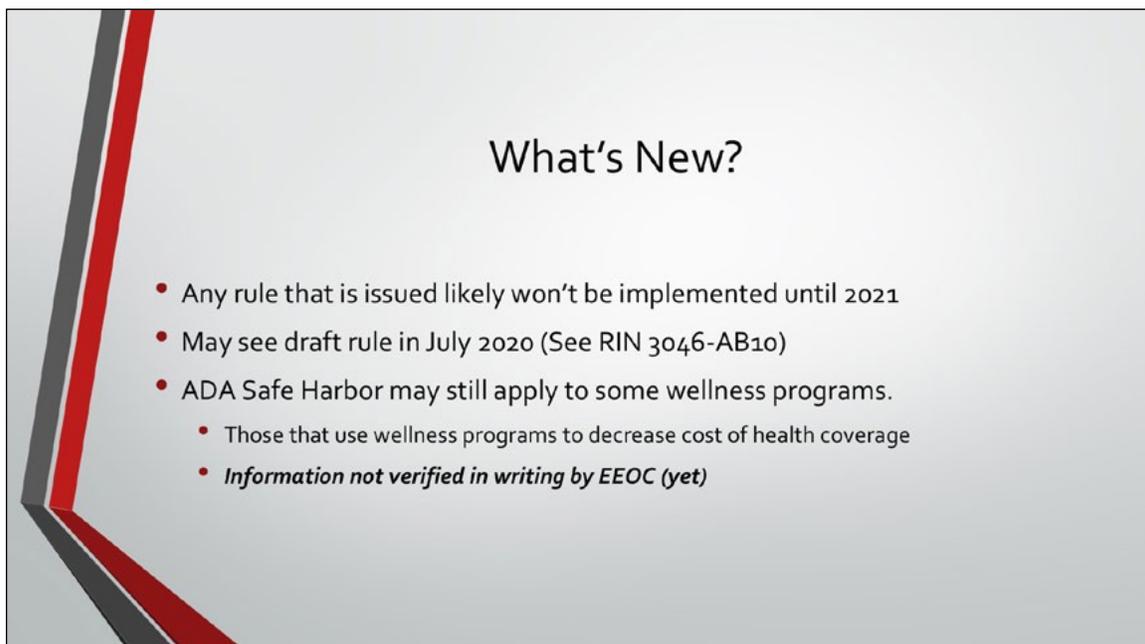
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What's New?

- EEOC emphasized proposed rules were early in the process
- Significant feedback likely and changes will likely be made
- GINA not the focus of the hearing
- Proposed rules forwarded to OMB, then released to public
- EEOC Spring Regulatory Agenda indicates a July 2020 release date (proceed with caution).

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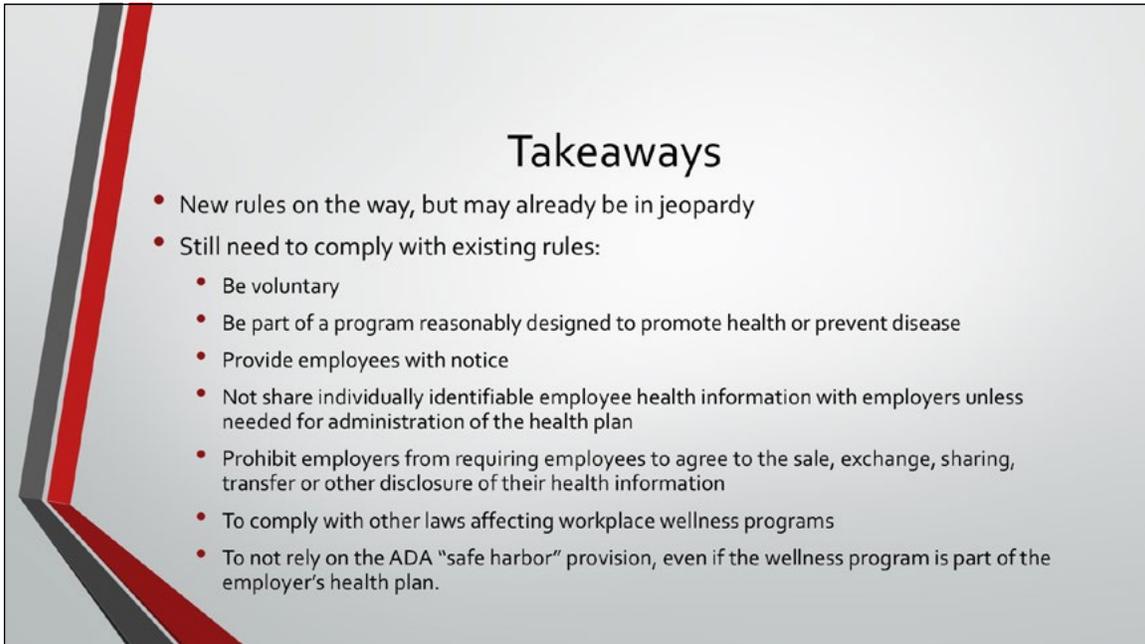
What's New?

- Any rule that is issued likely won't be implemented until 2021
- May see draft rule in July 2020 (See RIN 3046-AB10)
- ADA Safe Harbor may still apply to some wellness programs.
 - Those that use wellness programs to decrease cost of health coverage
 - *Information not verified in writing by EEOC (yet)*

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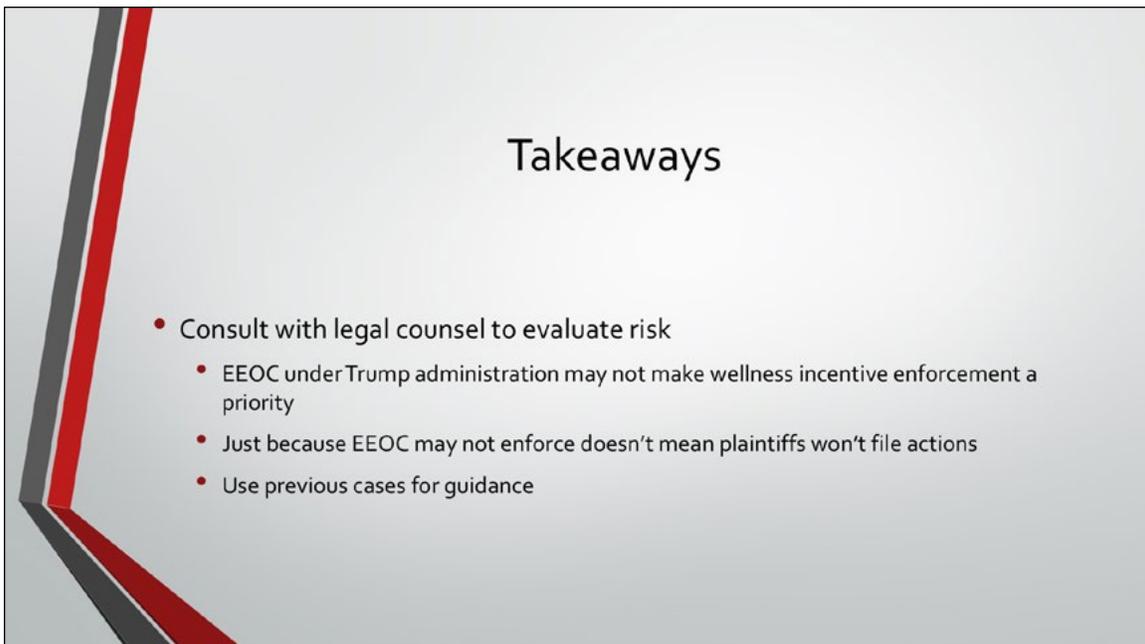
Barbara J. Zabawa, JD, MPH



Takeaways

- New rules on the way, but may already be in jeopardy
- Still need to comply with existing rules:
 - Be voluntary
 - Be part of a program reasonably designed to promote health or prevent disease
 - Provide employees with notice
 - Not share individually identifiable employee health information with employers unless needed for administration of the health plan
 - Prohibit employers from requiring employees to agree to the sale, exchange, sharing, transfer or other disclosure of their health information
 - To comply with other laws affecting workplace wellness programs
 - To not rely on the ADA "safe harbor" provision, even if the wellness program is part of the employer's health plan.

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Takeaways

- Consult with legal counsel to evaluate risk
 - EEOC under Trump administration may not make wellness incentive enforcement a priority
 - Just because EEOC may not enforce doesn't mean plaintiffs won't file actions
 - Use previous cases for guidance

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Takeaways

- Offer Employees a choice between screening or other wellness activities
 - Give RAS for participatory HRAs/biometric screens



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Which of the following is true about the EEOC's rules discussed at the June 11, 2020 hearing?

A

The OMB needs to review them before being released to the public.

B

They are in draft form.

C

They are subject to change.

D

All of the above.

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Which type of wellness program could be excluded from the insurance safe harbor under the proposed rules?

- A Participatory
- B Activity-based
- C Outcomes-based
- D B & C only

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Questions?

- For more information, contact:
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