Health and Wellness Programs
Political Subdivisions and IEBP making Texas Healthier

2019 Compliant
March 6, 2018 @ 10:00 AM

2016-2017 Healthcare Revolution, IEBP Transformation

Political Subdivision Value Based Collaborative Teaming Synergy
Managing the Multi-Facet Solution to Healthcare Costs and Performance Based Clinical Outcomes
24/7/365 Ease of Access for Active, Dependent and Retiree Benefits

Chapter 172 Political Subdivision and Private Sector Collaboration

Accessibility of culturally and linguistically sensitive services for a diverse membership providing medical/behavioral health, wellness, chronic and complex performance based healthcare benefits. IEBP utilizes HITECH Technology services to provide ease of access to the captured through the IEBP Performance Improvement Plan activities with the 2016 healthcare revolution.
Board of Trustees: 2017-2018 Plan Year

MISSION STATEMENT
To provide excellent service offering competitive health benefits and administrative services to eligible municipalities and other governmental entities in Texas and other states by utilizing innovative, viable, affordable alternatives while maintaining financial integrity

TRUSTEES AT LARGE
Appointed by Chair
Gayle Sims
Dr. Lew White
Mike Slye
Glen Metcalf
Richard Browning Retirement
Larry Fields

Ex-officio Trustees
Bennett Sandlin
Terry Henley
Andres Garza

TRUSTEE SUPPORT

- Direct the organization in the best interests of the members
- Protect the interests of the organization’s membership
- Respect the membership by listening, communicating and understanding their interest
- Reflect on the organization’s performance
- Select talented people to lead the organization
- Inspect the performance of the organization
MyIEBP Trusted Advisor in All Things Healthcare

- March 6, 2018: Political Subdivisions and IEBP making Texas Healthier - Invest in the Health and Wellbeing of the Political Subdivision Employee

- March 27, 2018: Chapter 172 Requirements for Political Subdivisions in Texas (Marjorie)

- April 3, 2018: Supplemental Benefits (American Fidelity)

- April 19, 2018: LTD, STD, Life (Standard)


- May 17, 2018: Member Annual Conference - IEBP Trusted Healthcare Advisors “Everything Healthcare” and Benefit Subject Matter Experts

- May 22, 2018: Member Annual Conference - IEBP Trusted Healthcare Advisors “Everything Healthcare” and Benefit Subject Matter Experts

- May 24, 2018: Self-Funded Managing the Transformed Stop Loss Relationship
MyIEBP Trusted Advisor in All Things Healthcare

- June 7, 2018: Plan Design Options in Managing the Healthcare Contribution/Premium Cost and impact to OOP cost for Covered Individuals. Defined Contribution, Choice and Select Medical, Choice and Select Rx, Spousal Plans, Value Tiered Networks, On-Site Clinic
- June 21, 2018: Consumer Centered Plans, Making the Most of the Pretax Dollar with a Defined Contribution Plan
- July 10, 2018: IE BP Making the Membership Experience Positive - Patient Advocacy, Plan Advisor, Health Advisor, Website Network Upgrade, MyIEBP Educational Tools
- July 26, 2018: Effective Management of the Prescription Dollar
- July 31, 2018: Self-Funded Employers "What makes-up the Cost of the Healthcare Risk" Underwriting, Stop Loss, Attachment Factor, Medical, Rx, Trends in Utilization Part I
- August 7, 2018; Feb 27, 2018: Self-Funded Employers "Managing the Healthcare Risk" Admin Cost, Stop Loss, Utilization, Commission Fees, Network Access, OON, Part II
- September 6, 2018: To Be Determined
2017 Lessons Learned

• Reach out to Membership Improvement
• Self Contained Health and Wellness Services to minimize additional health and wellness services that would create covered individual out of pocket expenses
• Heart Health Screening
• Positive Results Follow-Up with Covered Individual
• Protected Health Information Improvement
• On-Site Location Coordination with Provant
• IEBP Support for member registration and confirmation
• Fecal Occult On-Site or Community Provider Option
  – Pick-up with seventy two hours
• Fecal Occult Pick-Up to ensure turnaround time
• Hub Locations for smaller employer participation
• Consolidate services to one vendor for improved coordination, standardization of membership interface and improved electronic billing
Membership Communication

• Prior to Healthcare Event
  – Employer Introduction Letter
    • 90 Day Notification
  – Sixty Day Out Reminder Notification
  – Thirty Day Out Reminder Notification
    • Two Week Out Reminder Notification
  – IEBP Single Sign On for Health and Wellness on-site scheduling

• Electronic Registration for On-Site Event
  – Registration Confirmation
  – One Week Prior to Event Notification
  – One Day Prior to Event Notification
  – Registration required 10 days prior to event

• Appropriate IEBP Covered Individual Access
  – Daily Eligibility File for Medical covered individuals eighteen years and older

• Availability of Covered Individual Results
  – Some results available day of event
  – Available on Health and Wellness Ports within 7-10 days

• IEBP Program Results
  – Annual Update

• Flu Shot Availability
  – September - March
  – Some members are scheduled for 2nd site visit for flu shots (20 covered individual requirement)
### On-Site BioIQ/Provant (20 Scheduled Individuals)

IEBP is always looking for new and innovative ways to invest in our membership's health and wellbeing. Access your Personal Health Record and Wellbeing Health Assessment by logging in at [iebp.org](http://iebp.org).

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<tr>
<th>Age &amp; Gender Biometric Screenings</th>
<th>Female 18-20</th>
<th>Female 21-29</th>
<th>Female 30-35</th>
<th>Female 36-39</th>
<th>Female 40-49</th>
<th>Female 50</th>
<th>Female 51-73</th>
<th>Female 74+</th>
<th>Male 18-39</th>
<th>Male 40-50</th>
<th>Male 51-70</th>
<th>Male 71+</th>
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<td>Fecal Occult - CPT 82270 (including colonoscopy and sigmoidoscopy as a qualifier)</td>
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<td>PAP - CPT 88141; 88155; 88142-88154; 88164-88167; 88174-88175 (every three (3) Calendar Years for females ages 30-50)</td>
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*Pap Smear Recommendation per American College of Obstetricians and Gynecologists (ACOG): If a partial hysterectomy or a total hysterectomy and both the uterus and cervix are removed for a cancerous or precancerous condition, regular pap smears remain important and will be required under the IEBP Biometric Screening Guidelines. ACOG recommends individuals may stop having pap smears, if a total hysterectomy for a non-cancerous condition has occurred.*

September-March Influenza Immunization Vaccine

Eligible CPT Codes:

- 90471-Immunization Administration
- 90674 (egg free) and 90688

Retinopathy Screening procedure code 92227 available for Diabetic Covered Individuals (plan deductible and out of pocket will apply) 08 scheduled covered Individuals

BMI ≥30 HBA1C (Potential Pre diabetic population)
Intuitive Participant Portal

In addition to the health screenings, members will have access to an intuitive participant portal. This portal guides participants through all aspects of a screening program, from scheduling an appointment and viewing results, to accessing resources and tracking health improvements over time.

IEBP has created on-site centralized local sites for some of our smaller groups to access. The retinopathy screening services require 8 participants and biometric screenings require 20 participants, and the Assured Imaging Bus for on-site 3D mammograms and heart healthy screenings require 30 participants. Hub sites have been identified to service the IEBP smaller employers. Flu Shot administration is available September-March. Some sites will access their biometric screenings and have a return visit for the flu shot administration (20 participant requirement).
Schedule Your Reserved Appointment

To schedule your reserved appointment, please follow the below sign up instructions.

1. Log in to iebp.org and enter your username. Your username is Example.Participant.

2. Once logged in, click on the "Choose your preferred screening option" link, located on the Health Dashboard tab.

3. Select the event you wish to attend and then your preferred timeslot.

4. Click "register".
On-Site Health and Wellness Screening Requirements

1. You must provide your confirmation number and IEBP Medical Benefit Care

2. Fasting is required for your on-site screening. You should avoid consuming food and beverages (except water) for 8-12 hours prior to your screening.

3. Drinking plenty of water before your screening is highly recommended.
On-Site Assured Imaging Bus (30 scheduled individuals)

- 3D Mammogram Bus
- Heart Health Screening
1. **Wellness Information limited to General Information Program, not related to Health Plan**

- General educational programs give employees (and sometimes family members) information about health related issues such as healthy eating habits or benefits of regular exercise.
  - Workplace healthcare posters
  - Newsletters with articles on the benefits of healthy eating or general nutritional information
  - Lunch-n learn sessions on health related topics
  - Healthy food choices in vending machines or cafeteria
2. Wellness program limited to participation in certain health related activities with no reward for participating?

- Some wellness programs do more than provide general health-related information.
- They involve some type of participation by employees (and sometimes family members), but do not include a reward for participating.
  - An exercise bicycle or treadmill available to employees at lunch, before work, or after work
  - A walking program at lunch times that employees can join or not join
  - Individualized health coaching
  - Individualized exercise plan
  - Individualized healthy eating plan
3. Wellness program limited to participation in certain health related activities with a reward for participating that is not linked to your plan and is not itself a health plan

- Some wellness programs required participation by employees (and sometimes family members) to obtain a reward, but the reward is not related to the employer’s health plan. Examples include:
  - $20.00 gift certificate for attending smoking cessation classes
  - A T-shirt for attending educational classes
  - $50.00 for completing health assessments
  - Reimbursement of some of the membership costs to a gym
4. **Wellness program provides a reward based on participation in certain health related activities, regardless of results with a reward for participating that is tied to your health plan or is itself a health plan**

- A wellness program that requires employees (sometimes family members) to participate in order to receive a reward, and the reward is linked to the employer’s health plan. The reward is provided for participation regardless of results.
  - A reduction in the employee’s health plan contribution for completing a health risk assessment questionnaire
  - A deductible credit for participating in biometrics such as having blood pressure taken or a cholesterol level checked, regardless of the results.
  - A premium holiday for enrolling in a tobacco cessation program, whether or not the individual stops using tobacco.
  - Waiver of copayments for pregnant women who obtain prenatal care
5. Wellness program provides a reward based on completion of a specified activity with the reward linked to a health plan

- Some wellness programs require employees (and sometimes family members) to complete an activity in order to earn a reward, and the reward provided is linked to the health plan
  - A working program that provides a reduction in the employee’s health plan contributions if the employee walks at least 30 minutes a day
  - A reduction in the employee’s health plan contribution based on a specified dietary change such as reducing salt consumption
6. Wellness program provides a reward based on a health factor such as the results of a biometric test or certain health conditions such as meeting a specific biometric test result, and the reward is linked to your health plan

- Some wellness programs require employees (and sometimes family members) to satisfy a health-related standard and offer a reward that is tied to a health plan based on a health factor such as the results of a biometric test or a health condition such as meeting a specific biometric condition.
  - A reduction in the employee’s health plan contribution if the employee has a body mass index below 30
  - A reduction in the employee’s health plan contribution if the employee’s total cholesterol count below 200.
  - An increase in the employee’s health plan contribution if the employee uses tobacco products.
7. Reasonable Alternative Standard: The program must be available to all similarly situated individuals and must be given a reasonable alternative standard.

7. Federal Requirements

☐ Limit maximum reward
    A. Incentive is 30% of the total cost of self-only coverage under that plan
    B. 30% must be calculated using the cost for the least expensive group health plan
    C. 50% with the non-tobacco related programs

☐ Must be voluntary
    A. Cannot be denied coverage under any of the group health plans/cannot limit plan choice
    B. Participation may not be subject to any adverse employment action based on non-participation
8. Wellness program does not fit into any of the above categories, a review of the details of the program design will be needed to determine which federal rules may apply.

- **Note:** Wellness programs designed to reduce tobacco use are generally outcome-based programs.
- If the program provides a reward for attending a smoking cessation class, regardless of whether the individual does not smoke or stops smoking, it would be participatory. Otherwise, it is probably outcome-based.
- If your wellness program does not fit into any of the above categories, a review of the details of the program design will be need to determine which federal rules may apply.
Federal Requirements 2018

☐ Activity-only wellness programs are those that base the reward on a health-related activity like walking, exercising.

☐ Some programs include the use of a health risk assessment.

☐ Employers that provide wellness rewards in the form of “credits” that are assigned to an employee’s general purpose health Flexible Spending Account may want to limit the dollar amount to $500 or less.

A. Limiting the maximum dollar amount can help ensure that their health FSAs do not inadvertently lose their status as HIPAA-excepted benefits.
   i. In order to be an excepted benefit, a general purpose health FSA must have a maximum benefit that is limited to the greater of:
      a. 2x the employee’s salary reduction election or
   ii. The employee’s salary reduction amount plus $500. Under this rule if the employer assigned $600 in family wellness credits to an employee’s health FSA, and the employee elected a $0 salary reduction amount the FSA would not be an excepted benefit.

☐ Health Insurance Portability and Accountability Act of 1996 (HIPAA) Nondiscrimination

☐ Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy and Security

☐ Mental Health Parity and Addiction Equity
Federal Requirements 2018

☐ Patient Protection and Affordable Care Act
   A. If a wellness program varies the deductible, copayments, coinsurance or coverage for any of the services listed in the Summary of Benefits and Coverage then the calculations for that treatment scenario must assume that the individual is participating in the wellness program and additional language must be included in the SBC.
      i. Note: These numbers assume the patient is participating in the IEBP diabetes wellness program. If you have diabetes and do not participate, your costs may be higher.

☐ Tax rules for rewards
   A. Incentive, cash equivalents rewards are taxable
   B. Example $50 gift card will have an additional $50 of income subject to wage withholding and employment taxes
   C. Rewards such as t-shirts, mugs qualify as de minimis fringe benefits under Internal Revenue Code Section 132 are not taxable to employees (IRS Publication 15-B Employer’s Tax Guide to Fringe Benefits: irs.gov/publications/p15b/ar02.html)
Federal Requirements 2018

☐ Be reasonably designed
  A. Health Insurance Portability and Accountability Act of 1996 (HIPAA) compliance
  B. Reasonable chance of promoting health or preventing disease
  C. Not overly burdensome
  D. Compliant with Americans with Disability Act (ADA) and Genetic Information Nondiscrimination Act (GINA) guidelines
  E. Age Discrimination in Employment Act (ADEA) prohibits employment discrimination against employees and job applicants on the basis of age with respect to benefits
  F. Fair Labor Standards Act (FLSA)
     i. Under the Fair Labor Standards Act (FLSA), nonexempt employees must be compensated at not less than time and one-half of regular pay for time worked over 40 hours in any given workweek.
     ii. Time need not be compensable if four conditions are met:
         a. Attendance is outside of the employee’s regular work hours
         b. Attendance is purely voluntary
         c. The lecture is not directly related to the employee’s job
         d. The employee does not do any productive work during the lecture
Federal Requirements 2018

☐ Annual opportunities

☐ Limit maximum reward
  A. Incentive is 30% of the total cost of self-only coverage under that plan
  B. 30% must be calculated using the cost for the least expensive group health plan
  C. 50% with the non-tobacco related programs

☐ Must be voluntary
  A. Cannot be denied coverage under any of the group health plans/cannot limit plan choice
  B. Participation may not be subject to any adverse employment action based on non-participation

☐ Provide a notice
  A. Program must provide notice
     i. Written for employee understanding
     ii. Clearly explains what medical information will be obtained and the purpose for which the medical information will be obtained
     iii. Identifies who will receive the medical information and how it will be used
     iv. States the restrictions on disclosures along with the methods that will be used to prevent improper disclosure
  B. Spouse must be provided with a notice containing specific information
  C. Under Employment Opportunity Commission (EEOC’s) regulations, the wellness program may also include completion of health risk assessments or biometric screenings for children, but the plan may not provide any incentive for completion of the HRA or biometric screening by children including adult and adopted children
Federal Requirements 2018

☐ Keep information confidential
☐ Provide reasonable accommodations
☐ COBRA

A. Provision of a General Notice
B. Provision of an Election Notice
C. Provision of a Notice of Unavailability (if applicable)
D. Wellness Coverage Information
E. Provision of Early Termination Notice (if applicable)
U.S. District Court abandons 30% financial incentive for employee health and wellness participation


- A federal court recently ruled that effective January 1, 2019, employer-sponsored wellness programs must be truly voluntary - meaning employers may no longer offer employees incentives (or threaten penalties) for participation involving medical exams or inquiries. The case, AARP v. EEOC, could change workplace wellness as we know it.

- The Equal Employment Opportunity Commission (EEOC) final rules, issued in May 2016, permit employers to offer a financial incentive of up to 30% of the cost of employee-only coverage to workers who participate in workplace wellness programs. The rules are intended to offer employers guidance on how to design their wellness programs to comply with the Americans with Disability Act (ADA) and the Genetic Information Nondiscrimination Act (GINA), which generally prohibit employers from collecting and using information about the health of workers and their families.

- HIPAA, as amended by the Affordable Care Act, allows health plans and insurers to offer incentives of up to 30% of the cost of coverage in exchange for an employee's participation in a health-contingent wellness program. Given possible prejudice to AARP members if the original rules stay in place, "and that the balance of the equities weighs in favor of vacatur in 2019, it would constitute manifest injustice to keep the rules in place beyond 2018," the court said.
Have a Great Day!

Your Time is Appreciated