

For HR Use

# Employer Guide

Courtesy of Employer Flexible



## STEP UP PROGRAM DISCLAIMER

The authors and publishers disclaim any liability and responsibility to any person or entity regarding this program. Instead, every user individually assumes all risk of injury, loss or damage caused or alleged to be caused by the implementation of this program, be it direct, indirect, special, incidental or consequential.

The materials, ideas, concepts, principles and proposals contained in this program are intended to improve individual general wellness by providing good, practical information to help healthy adult individuals in their fitness efforts.

This program makes no health claim and is not designed to help cure, heal or correct any illness, metabolic disorder or medical condition. The authors and publishers of this program are not health care professionals. They have compiled information they believe to be accurate and helpful from various sources to make suggestions and recommendations on how to design and implement a walking wellness program.

Program materials should not be construed as medical advice. It is recommended that the program be implemented under the supervision of a qualified and licensed fitness or health professional.

All individuals are encouraged to consult with their primary health care providers before making any changes to their diets, beginning an exercise program or taking supplements of any kind. All participants are urged to start slowly and gradually, to engage in safe exercise routines and practices and to discontinue their participation in the program if they experience discomfort, distress or any sign of injury.

Consulting with a health care provider before enrolling in the program is particularly recommended for individuals over the age of 35, minors, expecting or breastfeeding mothers, and individuals with diabetes, chronic hypertension, high blood cholesterol, cardiovascular disease or any other illness, disease, health problem, medical condition or metabolic disorder requiring special dietary needs.

This program utilizes self-recording and reporting methodology to track progress and award prizes. Administrators should be aware of the potential for fraud.

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# Introduction to Step Up

The objective of the Step Up program is to promote health and wellness in the workforce. Healthier employees are more productive, take fewer sick days and make fewer hospital visits. Healthier employees also tend to be more energetic and possess a greater ability to focus and remain on task. Establishing a walking wellness competition among your employees may result in higher productivity and could promote more active lifestyles that result in future health benefits.

The aim is for individuals (or teams) to increase the distance they walk every week for the duration of the program. Prizes may be awarded at various points when participants reach significant progress benchmarks. In addition, the individual or team that logs the farthest distance after 10 weeks wins the competition and a grand prize.

**Healthier employees are more productive, requiring fewer sick days and hospital visits.**

Engaging employees in a company-wide competition:

- Encourages socializing among employees
- Creates a dialogue between employer and employees
- Creates a competitive atmosphere that encourages commitment
- Publicly acknowledges employees, which has been shown to increase participation and success
- Fosters a healthy, active workforce
- Shows employees that their employer cares about their well-being

## Program Administration

You will have several decisions to make when deciding exactly how to tailor your Step Up program, but the first and most important concerns the program's administration.

How you structure your program should depend on the size of your company. Ideally, you will designate a Step Up Program Coordinator who will confidentially handle all wellness check-ins and administrative duties. If designating a Program Coordinator is not possible, self-reporting from your employees may be an option.

## Program Coordination

Assign an employee to plan and run the Step Up program. This person will be the Program Coordinator. The Coordinator's responsibilities include:

- Overseeing pedometer readings, distance recording and program communications
- Customizing and distributing Step Up materials

- Communicating with employees through email, social media and office advertising about Step Up
- Setting up pedometer reading stations, suggesting walking routes and recording goals and future steps
- Keeping track of incentive-eligible employees and ensuring distribution of incentives
- Publicly acknowledging successful employees and coordinating a Step Up celebration
- Determining a Step Up Winner and distributing contest awards

## Conducting Check-ins

### Designated Program Coordinator Check-ins

1. Establish a specific date and time for pedometer readings through email, newsletters or social media, and give point-of-contact information for questions employees may have.
2. To get the greatest amount of participation, schedule one or two times throughout the day that employees may check in.
3. To maintain the privacy of participants, conduct pedometer readings in an area with little traffic.
4. If the number of participants is high, or employees are dispersed, select assistants to help conduct pedometer readings.
5. At the kickoff check-in, record each employee's name and initial pedometer reading as well as his or her personal walking goals for the upcoming week, and store the information in a Step Up spreadsheet.
6. At each subsequent check-in, record the current pedometer readings and goals for the following week.
7. Every week, tally up each contestant's personal pedometer readings. The person(s) with the most steps at the end of the program is the Step Up Winner. Other winners may also be named for having the most steps in a weekly or bi-weekly period, or for meeting all of their declared walking goals.

### Self-reporting Check-ins

If you use the self-reporting method, have your employees conduct, record and report their own pedometer readings, walking goals and success rates. Although self-reporting eliminates the need to designate an employee to keep track of all of the check-ins, reporting may be less reliable. This method is *not* recommended if you are offering cash or prize incentives.

1. Set a deadline for pedometer readings and goals to be reported for that day or week and also a deadline to submit step goals for the next week.
2. Remind participants of deadlines through email, newsletters or social media and give point-of-contact information for questions employees may have.
3. Emphasize use and location of provided pedometers, walking routes and other measuring equipment.

## Employee Communications

Employee communication is vital to the success of a wellness program, and remaining in continuous contact with your employees is always important. The more conversation there is surrounding your walking wellness program, the more likely your employees are to participate. Developing a healthy lifestyle change is hard, so your employees will need reinforcement and support.

Keeping up with their progress and informing them of upcoming deadlines, competition events, healthy tips and words of encouragement will not only help you keep a pulse on your employees, but will also encourage them to live a healthier lifestyle, and ultimately help your company reach its goals for the program.

See the Communication Library below for examples of daily social media posts, weekly emails and other materials, and contact Core Benefit Services, Inc. for Step Up posters.

### Outreach and Announcements

- Add an announcement to your workplace newsletter.
- Post flyers in the break room, cafeteria or other high-traffic areas.
- Spread information by word of mouth.
- Send out group emails giving people the opportunity to sign up for the challenge.
- Post an announcement on your corporate intranet.
- Use social media to advertise the opportunity (Facebook® event, email calendar, corporate social networks).
- Have your company's leadership publicly announce their participation.
- If possible, create a walking route in your company's building, neighborhood or office park using maps and signs. Encourage your employees to use the route. It may also be possible to partner with a local restaurant to offer a small discount to employees who walk over during their lunch break.

**Words of encouragement will not only help you keep a pulse on your employees, but encourage them to live a healthier lifestyle.**

- Host a company-sponsored walking event or scavenger hunt to create buzz and boost employees' total steps for the week.

## Social Media

Help employees adopt healthy behaviors by increasing peer influence through social networking.

Using social media in the Step Up program allows employees to challenge each other to participate in ways that traditional stand-alone fitness programs cannot. The peer-to-peer dynamics of social media can increase employee participation and engagement.

By regularly sending your employees informative, up-to-date health and wellness articles about exercise and nutrition, as well as other people's success stories, you are encouraging long-term health. Even standard announcements about program specifics like the Step Up start date, deadlines and awards, and any company walking events can be very successful at generating buzz and increasing participation.

### Twitter

Consider using a corporate Twitter® account to post health and wellness articles, mileage or step-counter updates and success stories. When employees "follow" you, they will receive overall wellness information as well as examples of how others are embracing a healthier lifestyle. Also, encourage the use of the hashtag #StepUp or a company-specific hashtag (#XYZcompanyStepUp) to promote company-wide interaction. This wellness program can be continued long after the Step Up program ends if it is successful.

Twitter has a character limit per message. The use of @ symbols can be used to "mention" or reply to specific users. Hashtags followed by a topic (#topic) can be used to group your tweet into a specific category. Anyone can sign up and "follow" or subscribe to your specific feed of posts on Twitter. Twitter is a great way of making regular announcements, but will probably result in less interaction among co-workers. Messages are also much more concise and use more abbreviations than a Facebook® post.

An example tweet: 2 days until walking check-ins! Push yourself to the finish line. Can anyone beat @TonySmith? He's ahead by 2,000 steps! #StepUp

For an introduction to Twitter, visit [www.business.twitter.com](http://www.business.twitter.com).

### Facebook

Using Facebook (or similar sites), employees can invite co-workers to join an online group and become more involved. For example, if some of your employees are interested in running, create a "Walking Club" group where members can post dates and times of group walks, local races they plan on running outside the office, local hiking trails or goals such as walking a certain number of times each week.

**Employers can offer a variety of taxable and non-taxable incentives to employees who participate in a wellness program.**

Facebook does not use hashtags, but it also has no limit on the number of characters in each post. “Groups” can be created for specific events. The use of @ symbols can be used to “tag” or acknowledge specific people if they are part of your group. Creating a Step Up Facebook Group would be a great central social media access point for all of your employees.

An example post: Only 2 days until walking check-ins! Push yourself to the finish line. Can anyone beat Tony Smith’s record of 4 consecutive weeks increasing his steps goal?

For an introduction to Facebook, visit [www.facebook.com/business](http://www.facebook.com/business).

### **Type and Frequency of Posts/Tweets**

Keeping your employees engaged is important. This will require continual posts and updates. Each week you should do at least:

- One tweet or post announcing who logged the most steps this week
- One tweet or post about walking
- One tweet or post about nutrition

You should also do a final tweet or post in the last week congratulating the winners.

Generally, the more you can interact with your employees, the better. It doesn’t have to be complicated—a post is quick and easy, and will really show your employees how invested you are in their well-being.

## **Celebrating Success**

### **Employee Incentives**

In order to increase participation, it is best to incentivize participation and success. Employers can offer a variety of taxable and non-taxable incentives to employees who participate in an exercise or wellness program.

**NOTE:** This section offers some suggestions for the types of incentives that may work best for a walking program. For an explanation of additional types of incentives, please see Appendix A.

### **REWARD SYSTEMS: PARTICIPATION VS. RESULTS**

Employer incentives can be based on participation or on results. Under the participation model, employers provide incentives to all individuals in the program just for participating. Under the results model, employers can choose whether to provide the incentive to all individuals who reach a predetermined goal or just to the top performers. Incentives under both models can either be taxable or tax-exempt.

**TIP:** For the Step Up Program, consider using a combination of both participation and results models. You could provide a small prize for all participants, such as the pedometer they will use



throughout the program. Then you could also offer a slightly larger prize for all participants who meet their personal goals (for example, a gift card) and a grand prize for the employee with the highest number of steps after the 10-week period. Refer to the materials below for an overview of the legal implications of offering these rewards.

### **CASH AND CASH EQUIVALENT INCENTIVES**

Cash and cash equivalent incentives are taxable incentives. These incentives are taxed in the same way bonuses or discretionary employer gifts are taxed. For the most part, an employer's liability with this type of incentive is limited to the tax implications of giving discretionary employee compensation.

Examples:

- Cash, bonuses and gifts
- Gift certificates

### **FRINGE BENEFIT INCENTIVES**

Independent employee fringe benefits (such as free health risk assessments) are subject to the [rules](#) issued by the Internal Revenue Service (IRS). To make sure these fringe benefits remain independent, employers should *not* offer them in connection with group health plan benefits.

Examples:

- Merchandise (water bottles, headphones, mugs, shirts, running shoes, etc.)
- Employer-sponsored gym memberships or 10 sessions with a personal trainer
- Employee discounts on employer products
- A trophy for the winner or for the winning team
- Raffle items for the runners-up or top participants, such as a treadmill
- A trip to a health spa or a membership at a local fitness center

### **PUBLIC RECOGNITION**

Publicly or privately acknowledging an employee's job well done is an effective, and free, way to reward hard work and boost morale.

Examples:

- Mention employee accomplishments in employee newsletter, email, social media, etc.
- Ceremony presenting trophy and awards
- Poster including winners' names

**Unhealthy lifestyles contribute to seventy-five percent of employers' health care costs and productivity losses.**

## Return on Investment (ROI)

Wellness programs are an investment in both your employees' well-being and your organization's bottom line. To be confident in your wellness programs, you need to be able to measure their success.

Lifestyle modification wellness programs, such as Step Up, support your company's bottom line. Inactive lifestyles have long been linked to obesity, and a growing body of research suggests that sitting for long periods of time can contribute to a host of health concerns. The sedentary character of an office setting can affect your employees' health, regardless of their level of conditioning. A small investment in a workplace wellness program like Step Up has the potential to save your company considerable treatment costs for illnesses associated with sedentary lifestyles.

According to Forbes, 75 percent of employers' health care costs and productivity losses can be attributed to unhealthy lifestyles, and every dollar invested in wellness programs results in saving between \$3 and \$4 in health care costs.

Advantages of wellness programs:

- Reduced health care costs
- Stronger recruitment and retention
- Decreased number of sick days
- Reduction in workers' compensation and disability claims
- Better overall work atmosphere and health

Although previous studies show successful returns on investment for other wellness programs, how do you calculate your own organization's ROI?

Step Up is a measurable program. In addition to tracking step counts, consider tracking statistics like health care expenses, number of sick days and the productivity of participants and non-participants separately. You can break down the results using non-private demographic information. You can also use surveys to ask employees to report on their health, productivity and morale.

Collecting this information can help you evaluate ROI over time and make comparisons between the groups (although some people argue that those who are more health-conscious are more likely to participate). You may also be able to correlate increased employee activity with health care savings and productivity.

A common recommendation for measuring ROI on a wellness program is to collect at least two years' worth of data before drawing specific conclusions.

Below are some examples of what your ROI could look like:

- Saved \$50 per participant (statistics)
- Employee satisfaction rose 36 percent (surveys)
- Productivity/sales increased 45 percent (statistics)

### **How do you obtain ROI data?**

In a program like Step Up, there are two ways to collect data that you can use to calculate ROI: through charting changes employee fitness and activity level as well as employee participation, satisfaction and morale level.

#### **BASELINE WALKING INFORMATION**

The best way to obtain ROI data is to measure your employees' initial step count and exercise level before starting the program and compare it to their total step count at the end of the program. This will allow you to determine how many employees are meeting recommended guidelines for exercise, a key predictor for general health. This information may be especially relevant for employers that operate in office settings, where many employees remain sedentary for large portions of the day.

To record initial walking information, host a kick-off meeting one or two weeks prior to the launch of the Step Up program and distribute the pedometers. Instruct employees on how to use the pedometers and have them record their steps for the next week as they go about their regular routine. Be sure to stress that these numbers do not count as part of the program and will in no way impact their chances for winning. Record the initial numbers when employees report back the following week at the official start of the program. After the program is over, compare the initial information with the weekly and final results.

#### **EMPLOYEE SATISFACTION SURVEYS**

Seeing whether your employees are excited about a program such as Step Up can help you gauge the program's effectiveness. If a survey shows that employees enjoyed the program, it would likely be successful upon reimplementation.

By asking your employees if they would be interested in a wellness program like Step Up, you are not only setting the groundwork for implementing the program, you are also showing your employees that you are listening to their requests.

#### **EMPLOYEE PARTICIPATION**

Because general employee participation in wellness programs is linked to better overall wellness, the percentage of employees who choose to participate in the program can be an easily measured benchmark for the wellness program. Tracking it from year to year could provide an idea its effectiveness at your organization.

## **ADDITIONAL METRICS**

While the previous data collection methods are recommended for this walking program, some employers may want to collect additional information to assess the ROI of their wellness programs. These metrics are usually used for wellness programs designed to meet health objectives that go beyond Step Up's generalized goal of increasing employee physical activity levels.

For more information on these metrics, please see Appendices B and C.

**NOTE:** Many employers conduct health risk assessments at the beginning of wellness programs to obtain quantifiable data about employees' health risks and overall wellness. A full health risk assessment may not be needed for a light exercise wellness program like Step Up. However, if you're still interested in pursuing a full risk assessment prior to program implementation and would like more information on how to conduct an assessment, including an overview of possible legal implications, see Appendix B.

# Program Timeline & Checklist

## Four Weeks Prior to Start

- Designate Program Coordinator
  - Determine whether Program Coordinator will need any assistants
- Determine incentives
- Purchase pedometers for your group
- Determine how/where/when to conduct wellness check-ins
- Prepare promotional materials
- Determine social media strategy
- Decide which measurements to utilize for ROI (distance, number of steps, ratio of active vs. passive time, calories burned, etc.)
- Determine whether to develop a nearby walking route in or around the office building that employees can use during their lunch or break time
- Determine whether to organize a company-sponsored walking event

## Three Weeks Prior to Start

- Send out Step Up Program Announcement
  - Respond to any interested parties with Response Email
- Send out reminder notice about the signup deadline
- Post announcement poster in high-traffic areas
- Map out nearby walking route and/or company-sponsored walking event
  - Contact nearby stores and restaurants to set up possible partnerships/promotions along the walking route

## Two Weeks Prior to Start

- Finalize sign-ups and, if applicable, walking teams
- After signup deadline has passed, send out Information Email/flyer
- Distribute Employee Guide and waivers

- Launch social media campaign with initial posts

### **One Week Prior to Start**

- Program Coordinator hosts kick-off meeting, distributes pedometers or other recording equipment, demonstrates how to use them, and asks employees to record their steps while going about their daily routine; this will be used as the baseline for both wellness goals and ROI measurements
- Collect employee waivers
- Post signs in permitted areas along designated walking route, and draw up a map of route to distribute to employees
- Tweet/post as recommended

### **Week 1**

- Send out Week 1 email communication
- Tweet/post recommended social media posts
- Record every participant's walking/fitness goals
- Program Coordinator conducts initial wellness check-ins and distributes walking route flyers
  - Program Coordinator records initial statistics and new goals in Step Up Spreadsheet

### **Week 2**

- Send out Week 2 email communication
- Announce date of corporate-sponsored walking event, if having one
- Tweet/post recommended social media posts
- Place Week 2 Poster in high-traffic areas
- Program Coordinator conducts wellness check-ins and equipment reading
  - Program Coordinator records statistics and new goals in Step Up Spreadsheet

### **Week 3**

- Send out Week 3 email communication
- Tweet/post recommended social media posts

- Program Coordinator conducts wellness check-ins and equipment reading
  - Program Coordinator records statistics and new goals in Step Up Spreadsheet

#### **Week 4**

- Send out Week 4 email communication
- Tweet/post recommended social media posts
- Place Week 4 Poster in high-traffic areas
- Program coordinator conducts wellness check-ins and equipment reading
  - Program Coordinator records statistics and new goals in Step Up Spreadsheet

#### **Week 5**

- Send out Week 5 email communication
- Tweet/post recommended social media posts
- Program Coordinator conducts wellness check-ins and equipment reading
  - Program Coordinator records statistics and new goals in Step Up Spreadsheet

#### **Week 6**

- Send out Week 6 email communication
- Tweet/post recommended social media posts
- Place Week 6 Poster in high-traffic areas
- Program Coordinator conducts wellness check-ins and equipment reading
  - Program Coordinator records statistics and new goals in Step Up Spreadsheet

#### **Week 7**

- Send out Week 7 email communication
- Tweet/post recommended social media posts
- Program coordinator conducts wellness check-ins and equipment reading
  - Program coordinator records statistics and new goals in Step Up Spreadsheet

#### **Week 8**

- Send out Week 8 email communication

- Tweet/post recommended social media posts
- Place Week 8 Poster in high-traffic areas
- Program Coordinator conducts wellness check-ins and equipment reading
  - Program Coordinator records statistics and new goals in Step Up Spreadsheet

### **Week 9**

- Send out Week 9 email communication
- Tweet/post recommended social media posts
- Program Coordinator conducts wellness check-ins and equipment reading
  - Program Coordinator records statistics and new goals in Step Up Spreadsheet

### **Week 10**

- Send out Week 10 email communication
- Tweet/post recommended social media posts
- Place Week 10 Poster in high-traffic areas
- Program Coordinator conducts wellness check-ins and equipment
  - Program Coordinator records statistics and new goals in Step Up Spreadsheet

### **Week 11**

- Send out final email communication
- Host a company-wide walk-a-thon for a last-minute wellness drive
- Tweet/post Winner information

### **Six Months after Finish**

- Send out Long-term Results survey



# Employer Communication Library

## Recommended Weekly Facebook® Posts and Twitter™ Tweets

### Social Media Posts/Tweets – Week 1

- Who is going to win #StepUp? Let the games begin!
  - It's beautiful outside today! Go for a walk! #StepUp
  - Think about it—exercise give you endorphins, endorphins make you happy, happy people are awesome! #StepUp
  - Think eating healthy needs to be expensive? Think again! Check out these healthy, inexpensive ingredients: [bit.ly/174xw](http://bit.ly/174xw) #StepUp
  - A journey of 1,000 miles begins with a single step! Convert your steps to miles here: <http://abt.cm/1bofu7x> #StepUp
  - Check out this site for a good route to walk near you! [www.mapmyrun.com](http://www.mapmyrun.com) #StepUp

### Social Media Posts/Tweets – Week 2

- Happy Monday! What are your #StepUp goals for this week?
- For those of you interested in running, but who don't run regularly, check out this article from @WebMD: [bit.ly/fvghW2](http://bit.ly/fvghW2) #StepUp
- Looking for some good outdoor trails in your neighborhood? Discover some gems here: [bit.ly/2FizgmS](http://bit.ly/2FizgmS) #StepUp
- Looking to shape up for swimsuit season? Here are 51 of the best fat-burning exercises around: [bit.ly/ftAEx8](http://bit.ly/ftAEx8) #StepUp
- No time for a long walk? Tips for incorporating 2,000 extra steps into your daily routine: <http://abt.cm/1eR7r2h> #StepUp

### Social Media Posts/Tweets – Week 3

- Congrats to [insert employee name] with the most steps this week! #StepUp
- Involve the entire family in your exercise plans—make going for a walk a family event! #StepUp
- Looking for more ways to walk more? Look no further: [huff.to/1k4YCrA](http://huff.to/1k4YCrA) #StepUp

- Feeling a little under the weather? Did you know that exercise can actually boost your immune system? #StepUp
- The little things add up—take the stairs today! #StepUp
- Planning a long walk? Here are some great healthy, portable snacks to take along: [bit.ly/1gHg5yR](http://bit.ly/1gHg5yR) #StepUp

#### **Social Media Posts/Tweets – Week 4**

- You lead a busy life, but here are a few ways to sneak exercise into your daily routine: [bit.ly/1cH9930](http://bit.ly/1cH9930) #StepUp
- What are your fitness secrets? Tell us how you make time for exercise! #StepUp
- Remember mall walkers? Indoor track suits may be cheesy, but it's a great way to walk during bad weather. #StepUp
- Sitting at your desk all morning? Go for a walk over lunch! It will stretch your legs out and move you closer to the leaderboard. #StepUp
- It's Friday! Did you meet your #StepUp goals for this week?

#### **Social Media Posts/Tweets – Week 5**

- Congrats to [insert employee name] with the most steps this week! #StepUp
- Remember your New Year's resolution? Stay motivated to keep working on your wellness goals! #StepUp
- Have you been taking the stairs? Think you're fit enough to conquer these extreme staircases? [huff.to/1bonVQg](http://huff.to/1bonVQg) #StepUp
- Catch a little cabin fever lately but don't feel like a run? Go for a walk! [bit.ly/UWlQSM](http://bit.ly/UWlQSM) #StepUp
- Remove the temptation—don't keep junk food in the house! Healthy snacks will help you stay on track. #StepUp
- Check out these healthy food options. They're tasty AND nutritious! [bit.ly/92C6zC](http://bit.ly/92C6zC) #StepUp

#### **Social Media Posts/Tweets – Week 6**

- Did you know walkers can be Olympic athletes? Racewalking has been an official Olympic event for over 100 years! #StepUp

- Walking can help decrease the risk of heart attack and the risk of developing Type 2 diabetes. #StepUp
- Want more steps in your day? Conquered regular walking? Pick up the pace for greater health benefits: [nyti.ms/1ipmGSY](https://nyti.ms/1ipmGSY) #StepUp
- Interested in memoirs that vividly detail life-changing, awe-inspiring walks? Check out great books here: [abt.cm/1aZgDoi](https://abt.cm/1aZgDoi) #StepUp
- Mix up your meetings by going for a walk with your co-workers! [bit.ly/1gkMOkp](https://bit.ly/1gkMOkp) #StepUp

### Social Media Posts/Tweets – Week 7

- Congrats to **[insert employee name]** with the most steps this week! #StepUp
- Are you getting enough water? If you're consistently tired from walking, the reason might be dehydration [bit.ly/1doSHFI](https://bit.ly/1doSHFI) #StepUp
- Did you know 41% of trips are one mile or less? This means literally running your errands is cheap, health and practical. #StepUp
- Long walks are no fun without the right shoes! Make sure your shoes have the right amount of cushion and good arch support. #StepUp
- Feeling blue? Going for a 30-minute walk three to five times a week is a proven mood lifter. #StepUp
- We've all attempted a diet and failed. Walking can be a key component for prolonged success #StepUp

### Social Media Posts/Tweets – Week 8

- Congrats to **[insert employee name]** with the most steps this week! #StepUp
- Want to stay healthy? Walk more! Walking has been described as a "miracle drug" for cancer prevention. #StepUp
- Where do you like to walk? Share your favorite routes with the community! #StepUp
- Pacing in the waiting room? Awkward. Pacing at home while on the phone? Brilliant. #StepUp
- Even if you exercise often, your body needs a lot of nutrients, water and a well-balanced diet to keep it working at 100%. #StepUp
- Looking for more steps to pad your #StepUp score? Walk around your house while brushing your teeth.

## Social Media Posts/Tweets – Week 9

- Take a victory lap—**[insert employee name]** has reached all **[his/her/their]** wellness goals so far. Almost there! #StepUp
- Want to know how many calories you burn walking? Enter your pedometer information here to find out: [abt.cm/1ap53lR](http://abt.cm/1ap53lR) #StepUp
- You're probably wondering how many calories you need to fuel your active lifestyle. Find out here: [bit.ly/Lvlsly](http://bit.ly/Lvlsly) #StepUp
- Check your BMI (the supreme fitness metric) here: [1.usa.gov/1aHAVvu](http://1.usa.gov/1aHAVvu) #StepUp
- What are your favorite healthy recipes? Share them with the community! #StepUp
- Think you're too busy to work out? Check out these great 10-minute workouts! [bit.ly/7Jxp3c](http://bit.ly/7Jxp3c) #StepUp

## Social Media Posts/Tweets – Week 10

- A week before the finale, **[insert employee name]** took the cake (or, fruit) by logging **[insert number of steps]**. Finish strong! #StepUp
- It's the final stretch for Step Up! Keep your pedal to the metal and finish strong. #StepUp
- Make today a day of personal bests! You've come a long way, keep it up! #StepUp
- Almost there! Feeling fatigued? Here are eight healthy ways to boost energy! [bit.ly/11Rj4RW](http://bit.ly/11Rj4RW) #StepUp
- Only one day left! Are you feeling confident? Share your proudest moment so far. #StepUp
- Today is the day! Congratulations, you made it! Have you placed your ##StepUp?
- *Winning tweet/post:* **[insert employee name]** wins **[insert year]** Step Up with a total distance of **[insert number of steps]**! Wow! All of your hard work paid off. Great job!

## Social Media Posts/Tweets – Special Events

- Join other employees on **[insert date]** for **[insert fitness event]** to boost your step count! #StepUp
- Introducing Tasty Tuesdays! First Tuesday of every month, will provide a nutritious snack in the break room. #StepUp

- Step up! [Insert fitness event] is only [insert number] days away. For more info, or to sign up, go to [insert room]. #StepUp
- It's not too late to sign up for [insert fitness charitable event]! Sign up by [insert date] to help make a difference. #StepUp
- Good news! [Insert gym or athletic club] is offering a discount to employees. Call [insert gym or club number] for info. #StepUp

## **Introductory Emails – Sample Templates**

### **Announcement Email**

Hello Employees,

is pleased to announce the Step Up competition!

Step Up is a program designed to promote walking as a way to meet healthy, long-term, sustainable fitness and wellness goals, along with nutrition and regular heart-healthy exercise.

The goal is for individuals to reach their personal fitness goals each week for the duration of the program. The individual or team with the most goals accomplished after 10 weeks wins!

The winning participant will be awarded with [insert incentives].

To sign up, contact the Step Up Program Coordinator, [insert contact].

The final day for sign-ups is [insert date].

If you have any questions, feel free to contact [insert contact].

Happy exercising!

### **Reminder Email**

Hello Employees,

Only a few days left before the Step Up sign-up deadline! Sign up today to get moving and have a chance at winning [insert incentives] if you're crowned the Step Up Winner!

To sign up, contact the Step Up Program Coordinator, [insert contact].

Sign up today! Don't delay!

The final day for sign-ups is [insert date].

If you have any questions, feel free to contact [insert contact].

Let's get active!

### **Last Chance Reminder**

Hello Employees,

Today is your last chance to sign up for the Step Up competition! The initial wellness check-ins will take place on [insert date] at [insert location].

Sign up with a friend for some extra motivation. Remember, whoever wins Step Up will get [insert incentives].

To sign up, contact the Program Coordinator, [insert contact], before (insert date/time).

Don't give up before you start! Sign up today!

### **Welcome/Thanks for Joining Email**

Welcome to the [insert year] Step Up competition!

We look forward to helping you reach your fitness goals by helping you incorporate more walking and less sitting into your daily routine. This competition is about improving health and fitness and having a good time while bettering yourself.

If you stay motivated and give it your all, you will walk away a stronger, healthier individual—and if you are crowned the winner of Step Up, you will be awarded [list incentives].

The initial check-in will be held at [insert time/place]. Please come with a Week 1 goal in mind.

Remember to encourage your co-workers and support one another as you try to achieve your Step Up goals.

Good luck, and let the games begin!

### **Walking Route Email**

Hello Employees,

In order to help you meet your Step Up goals, we've set up a walking route for you to explore during your break and lunch times. The route begins at [insert location] and ends at [insert location] with signs posted along the way to keep you headed in the right direction.

See you on the walking trail!

### **Partnership Email**

Hello Employees,

To give you even more incentive to walk, we've partnered with [insert business]. All employees are eligible for a [insert discount].

Walk over to [insert business] whenever you have free time to take advantage of this great offer and add some extra steps to your weekly total!

Working out never felt so good!

## Company-sponsored Walking Event Email

Hello Employees,

Since Step Up has begun, we've really enjoyed the chance to explore the surrounding area while taking responsibility for our health and well-being. But one thing we've haven't done is all going for a walk together.

So that's why we're announcing the Step Up Walk-a-Thon. The walk-a-thon takes place on [insert date] at [insert time]. The office will close at [insert time], and attendance will be taken upon arrival. Healthy food and drinks will be available at the finish line. PTO is required for employees not attending and not working. We strongly encourage everyone to attend—it's a great way to mix exercise and socializing, not to mention stirring up a little friendly competition. Step Up!

## Weekly Communication Email Templates

### Week 1

Hello Employees,

Thanks for signing up for the Step Up competition!

Actually, thank yourself. Your body will as long as you stay determined and have a good time!

Wellness check-ins for the week of [next week] will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: A common mistake for beginners when trying to walk fast is lengthening the stride (overstriding). Overstriding is biomechanically inefficient and can slow you down. It will burn more calories because it's inefficient (which might be a good thing), but you may burn fewer calories overall because you don't walk as far due to fatigue. Instead of overstriding to walk faster, concentrate on a powerful push off with your back leg, keeping your foot close to the body as it lands. This is what elite walkers do.

Happy exercising!

### Week 2

Hello Employees,

We're one week into Step Up! How are you holding up?

Hopefully you accomplished or exceeded your goals for Week 1, but if not, use this week as your comeback.

Congratulations to following employees for logging the most steps in the past week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Congratulations are also in order for the following employees who met their desired walking goals for Week 1:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Wellness check-ins for the week of [next week] will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: The sole of a walking shoe should be flexible with more bend in the toe than a running shoe. You are more likely to get blisters if the shoe is too stiff. Make sure you can bend and twist the toe area of your walking shoe.

Happy exercising!

### **Week 3**

Hello Employees,

Are you starting to get into your Step Up groove?

If so, congratulations! If not, you still have plenty of time to get rolling.



Congratulations to following employees for logging the most steps in the past week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

It's only Week 3, but the following people have met their goals every week so far:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

After two weeks, here is the Step Up leaderboard:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Wellness check-ins for the week of [next week] will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: A human's average walking speed is 3 to 4 miles per hour (mph), though your own speed depends on your leg length and how quickly you can move your legs.

Happy exercising!

## **Week 4**

Hello Employees,

What is working and what is not? By now, you should be eliminating all of your bad habits and focusing on what works for you!

Congratulations on accomplishing the most steps last week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

As of Week 4, the following people have met their goals every week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

After three weeks, here is the Step Up leaderboard:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Wellness check-ins for the week of [next week] will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: A sedentary lifestyle is terrible for your waistline. A sedentary person may only average 1,000 to 3,000 steps a day. A reasonable goal for most people is to increase average daily steps each week by 500 per day until you can easily average 10,000 per day.

Happy exercising!

## Week 5

Hello Employees,

At the Step Up halfway point, the competition is heating up!

Take some time to reflect on the first half to make sure you can finish strong. The number one spot is still within reach as long as you put your mind to it!

Congratulations on logging the most steps in the past week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

As of Week 5, the following people have met their goals every week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

After four weeks, here is the Step Up leaderboard:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Wellness check-ins for the week of [next week] will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: Walk to a beat. A recent study from the Journal of Sports & Exercise Psychology found that music literally keeps you moving. When people walked in time to fast-tempo music

(approximately over 120 beats per minute) with a strong rhythm, they ended up walking 15 percent longer than those who sweated in silence.

Happy exercising!

## Week 6

Hello Employees,

The finish line is in our sights and now more than ever we need to pick up the pace to finish strong. Are you still motivated?

Congratulations to the following employees for Stepping Up more than anyone else this week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

After five weeks, weekly goals have increased. But the following people still met their goals last week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

And after five weeks, here is the Step Up leaderboard:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Wellness check-ins for the week of [next week] will be at [location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: Once you reach a baseline of 30 minutes of power walking, you can speed up even more by training with intervals. Intervals are where you set up work to active rest ratios (work: active rest) to push your body and improve your cardiorespiratory fitness. Here is an example of how to do intervals:

1. Walk at your normal pace for three minutes, then
2. Increase the speed for one minute, then
3. Go back to your normal speed for another three minutes, then
4. Repeat this 1:3 cycle for your entire workout.
5. Over time, increase the work and decrease the active rest.

Happy exercising!

## Week 7

Hello Employees,

We are starting to see some great results. In order to stay motivated, we need to think about what motivates us to work hard. Focus on what is important to you in life and use it to motivate your workout!

Congratulations on logging the most steps in the past week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Congratulations on meeting your goals for the last week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]

4. [Insert employee]

5. [Insert employee]

After six weeks, here is the Step Up leaderboard:

1. [Insert employee]

2. [Insert employee]

3. [Insert employee]

4. [Insert employee]

5. [Insert employee]

Wellness check-ins for the week of [next week] will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: Nothing derails a workout plan faster than injury. Warming up, safe equipment and regular stretching all contribute to a safe and healthy workout.

Happy exercising!

## Week 8

Hello Employees,

Only a couple of weeks left, so try to have your best one. Focus and hard work can help put up a “wow” pedometer number this week.

Congratulations on logging the most steps in the past week:

1. [Insert employee]

2. [Insert employee]

3. [Insert employee]

4. [Insert employee]

5. [Insert employee]

Congratulations on meeting your goals for the last week:

1. [Insert employee]

2. [Insert employee]

3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

After seven weeks, here is the Step Up leaderboard:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Wellness check-ins for the week of [next week] will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: Run! It can take up to six months for a new runner to fully acclimate his or her body to running, but it's worth it. Running can fight osteoporosis, boost the immune system and raise your self-esteem.

Happy exercising!

## Week 9

Hello Employees,

Wow. You made it all this way. Do you notice the difference? A healthy body is a happy body. Keep going strong and you will keep feeling good!

Congratulations on logging the most steps in the past week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Congratulations on meeting your goals for the last week:

1. [Insert employee]

2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

We are nearing the end of Step Up! After eight weeks, here is the Step Up leaderboard:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Wellness check-ins for the week of [next week] will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: Staying hydrated during intense workouts can save your life. If you produce minimal sweat, have a dry mouth, feel muscle weakness or have a headache or dizziness, you may be dehydrated. Eating fluid-filled foods such as fruits and vegetables and taking water breaks instead of coffee breaks can ensure that you will be properly hydrated.

Happy exercising!

## **Week 10**

Hello Employees,

This is it. The homestretch. You could slow down and coast into the finish line, but there is a group of people behind you just waiting for you to give up. Don't give in, finish strong!

Congratulations on recording the most steps in the penultimate week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]



Congrats to the employees who keep meeting their goals week after week:

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

Finally, with one week left, congrats to the employees at the top of the leaderboard!  
Can anyone else climb to number 1 by the end of the week?

1. [Insert employee]
2. [Insert employee]
3. [Insert employee]
4. [Insert employee]
5. [Insert employee]

THE FINAL WELLNESS CHECK-INS will be at [insert location and time].

If you have any questions, feel free to contact [insert contact].

Walking tip: Add some inclines to your walk and you will torch some serious calories. Once you have established a steady routine of walking on flat terrain, try walking hilly routes one to two times a week. If there are no hills in your neighborhood, go to a local school and climb up and down the bleachers, or try the stairs in an office or apartment building.

Happy exercising!

## Final

Hello Employees,

Congratulations on 10 hard weeks of increased walking.

You've finally reached the end!

The [insert year] Step Up Winners are...

[Insert employee name]

[Insert employee name]

[Insert employee name]

[Insert employee name]

These individuals busted their tails by walking each week for the duration of the program.

Way to go!

Thanks to everyone for participating! Just because the Step Up program is over does not mean you have to stop being fit and healthy.

Keep working hard and continuing to set and reach your goals. Wellness is a lifelong process, and there is never a bad time to go for a walk.

If you have any questions, feel free to contact [insert contact].

Happy exercising!

## Appendix A: Additional Incentives & Legal Issues Regarding Incentives

### **GROUP HEALTH PLAN BENEFIT INCENTIVES**

Group health plan benefit incentives, reductions on group health plan premiums, and lower copayments and deductions for group health plans are attractive to employers and employees because they are often non-taxable and they add value to an employee's total compensation.

Examples:

- Additional flex credits for cafeteria plans
- Additional HSA or HRA contributions
- Discounts on health insurance premiums
- Reductions in health insurance copayments

However, the liability for employers that offer employee-benefit incentives is higher than for those offering cash or cash equivalents because of the many federal regulations that determine

the eligibility, availability, continuity and privacy of group health plan benefits, including limitations imposed by the Affordable Care Act (ACA).

While offering employee-benefit incentives for a weight-loss program is possible, employers should consider whether they are willing to take on additional compliance responsibility. Below is an overview of how different federal regulations affect incentives tied to group health plan benefits.

### **Affordable Care Act**

The ACA includes provisions to encourage the use of wellness programs. Effective for plan years beginning on or after **Jan. 1, 2014**, the ACA adopts the existing Health Insurance Portability and Accountability Act (HIPAA) nondiscrimination requirements for health-contingent wellness programs with some modifications. The ACA also increased the maximum reward that can be offered under these programs. The final wellness program regulations implement the ACA's nondiscrimination requirements for wellness programs. The final rules are intended to ensure that every individual participating in a wellness program can receive the full amount of any reward or incentive, regardless of any health factor.

Under the ACA, workplace wellness programs are divided into two general categories: participatory wellness programs and health-contingent wellness programs. This distinction is important because participatory wellness programs are not required to meet the same nondiscrimination standards that apply to health-contingent wellness programs.

#### *Participatory Wellness Programs*

Participatory wellness programs either do not require an individual to meet a health-related standard to obtain a reward or do not offer a reward at all. Participatory wellness programs comply with the nondiscrimination requirements without having to satisfy any additional standards, *as long as participation in the program is available to all similarly situated individuals, regardless of health status*. There is **no limit on financial incentives** for participatory wellness programs.

#### *Health-contingent Wellness Programs*

Health-contingent wellness programs require individuals to satisfy a standard related to a health factor in order to obtain a reward. There are two types of health-contingent wellness programs:

- **Activity-only wellness programs** require an individual to perform or complete an activity related to a health factor in order to obtain a reward (for example, walking, diet or exercise programs). Activity-only wellness programs do not require an individual to attain or maintain a specific health outcome.
- **Outcome-based wellness programs** require an individual to attain or maintain a certain health outcome in order to obtain a reward (for example, not smoking, attaining certain results on biometric screenings or meeting exercise targets). Generally, these programs have

two tiers: (1) a measurement, test or screening as part of an initial standard; and (2) a larger program that then targets individuals who do not meet the initial standard with wellness activities. Outcome-based programs allow plans and issuers to target specific individuals (for example, those with high cholesterol for participation in cholesterol reduction programs, or individuals who use tobacco for participation in tobacco cessation programs), rather than the entire population of participants and beneficiaries, with the reward based on health outcomes or participation in reasonable alternatives.

To protect consumers from unfair practices, health-contingent wellness programs are required to follow certain **standards related to nondiscrimination**, including a standard that limits the maximum reward that can be offered.

### **Nondiscrimination Standards for Health-contingent Wellness Programs**

Under HIPAA, group health plans and group health insurance issuers are prohibited from discriminating against individual participants and beneficiaries in eligibility, premiums or benefits based on a health factor. An exception to this rule allows benefits (including cost sharing), premiums or contributions to vary based on participation in a wellness program, if the program complies with certain nondiscrimination standards. The ACA codified the existing HIPAA regulations for wellness programs, while also increasing the maximum permissible reward that can be offered under health-contingent wellness programs.

The ACA final rules generally retain the proposed five requirements for health-contingent wellness programs. However, the final rules have reorganized these requirements, subdividing health-contingent wellness programs into activity-only wellness programs and outcome-based wellness programs. This change is intended to clarify the individuals to whom a reasonable alternative standard must be offered.

- **Frequency of opportunity to qualify.** Health-contingent wellness programs must provide eligible individuals with an opportunity to qualify for the reward **at least once per year**. This requirement applies to both activity-only and outcome-based wellness programs.
- **Size of reward.** The final rules limit the total amount of the reward for health-contingent wellness programs (both activity-only and outcome-based) with respect to a health plan, whether offered alone or coupled with the reward for other health-contingent wellness programs. The total reward offered to an individual under an employer's health-contingent wellness programs cannot exceed a specified percentage of the total cost of employee-only coverage under the plan.
- The ACA increased the amount of the maximum permissible reward from 20 percent to 30 percent of the cost of health coverage, effective for plan years beginning on or after Jan. 1, 2014. In addition, the maximum permissible reward is increased to 50 percent of the cost of health coverage for health-contingent wellness programs designed to prevent or reduce tobacco use.

- **Reasonable design.** Health-contingent wellness programs must be reasonably designed to promote health or prevent disease, whether activity-only or outcome-based. A wellness program is reasonably designed if it has a reasonable chance of improving the health of, or preventing disease in, participating individuals and is not overly burdensome, a subterfuge for discrimination based on a health factor, or highly suspect in the method chosen to promote health or prevent disease. To be considered reasonably designed to promote health or prevent disease, **outcome-based wellness programs** are required to provide a reasonable alternative standard to qualify for the reward for all individuals who do not meet the initial standard that is related to a health factor.
- **Uniform availability and reasonable alternative standards.** The full reward under a health-contingent wellness program (whether activity-only or outcome-based) must be available to all similarly situated individuals. To meet this requirement, all health-contingent wellness programs must provide a reasonable alternative standard (or waiver of the otherwise applicable standard) in certain circumstances. Plans and issuers are not required to establish an alternative standard before an individual requests one, as long as a reasonable alternative standard is provided (or the condition for obtaining the reward is waived) upon request.

All facts and circumstances are taken into account in determining whether a plan or issuer has provided a reasonable alternative standard, including, but not limited to, the following factors:

- If the reasonable alternative standard is completion of an educational program, the plan or issuer must make the educational program available or assist the employee in finding a program (instead of requiring an individual to find a program unassisted) and cannot require an individual to pay for the cost of the program.
- The time commitment required must be reasonable (for example, requiring attendance nightly at a one-hour class would be unreasonable).
- If the reasonable alternative standard is a diet program, the plan or issuer is not required to pay for the cost of food but must pay any membership or participation fee.
- If an individual's personal physician states that a plan standard (including the recommendations of the plan's medical professional) is not medically appropriate for that individual, the plan or issuer must provide a reasonable alternative standard that accommodates the recommendations of the individual's personal physician with regard to medical appropriateness. Plans and issuers may impose standard cost sharing under the plan or coverage for medical items and services furnished pursuant to the physician's recommendations.

Many of the requirements regarding uniform availability and reasonable alternative standards apply in different ways depending on whether the program is an activity-only wellness program or an outcome-based wellness program.

An activity-only wellness program must allow a reasonable alternative standard (or waiver of the otherwise applicable standard) for obtaining the reward for any individual for whom, for that period, it is unreasonably difficult due to a medical condition to satisfy the otherwise applicable standard, or medically inadvisable to attempt to satisfy the otherwise applicable standard.

An outcome-based wellness program must allow a reasonable alternative standard (or waiver of the otherwise applicable standard) for obtaining the reward for any individual who does not meet the initial standard based on the measurement, test or screening.

Under an **activity-only wellness program**, a plan or issuer may seek verification (such as a statement from an individual's personal physician) that a health factor makes it unreasonably difficult to satisfy, or medically inadvisable to attempt to satisfy, the otherwise applicable standard, as long as it is reasonable under the circumstances.

Under an **outcome-based wellness program**, it is not reasonable to seek verification (such as a statement from an individual's personal physician) that a health factor makes it unreasonably difficult to satisfy, or medically inadvisable to attempt to satisfy, the otherwise applicable standard **as a condition of providing a reasonable alternative to the initial standard**.

#### *Notice of Other Means of Qualifying for the Reward*

Plans and issuers are required to disclose the availability of a reasonable alternative standard to qualify for the reward (and, if applicable, the possibility of waiver of the otherwise applicable standard) in all plan materials describing the terms of a health-contingent wellness program (both activity-only and outcome-based). The disclosure must include contact information for obtaining the alternative standard and a statement that recommendations of an individual's personal physician will be accommodated.

For **outcome-based wellness programs**, this notice must also be included in any disclosure that an individual did not satisfy an initial outcome-based standard.

If plan materials merely mention that a wellness program is available, without describing its terms, this disclosure is not required. For example, a summary of benefits and coverage that notes that cost-sharing may vary based on participation in a diabetes wellness program, without describing the standards of the program, would not trigger the disclosure.

The following language, or substantially similar language, can be used:

*Your health plan is committed to helping you achieve your best health. Rewards for participating in a wellness program are available to all employees. If you think you might be unable to meet a standard for a reward under this wellness program, you might qualify for an opportunity to earn the same reward by different means. Contact us at **[insert contact information]** and we will work with you (and, if you wish, with your doctor) to find a wellness program with the same reward that is right for you in light of your health status.*

Plans and issuers may modify the sample language to reflect the details of their wellness programs, provided that the notice includes all of the required content described in the final regulations. Additional sample language is available in the final rules in examples illustrating the requirements for outcome-based wellness programs.

### **Health Savings Accounts (HSA)**

To retain their tax-exempt status, HSA contributions must *not* exceed the employee's maximum contribution for the year or violate its nondiscrimination rules. Exceeding HSA contribution limits may subject employees to a **35 percent excise tax**.

HSA discrimination rules change slightly depending on whether the HSA is part of an employer-sponsored cafeteria plan. Under a cafeteria plan, HSA contributions lose their tax-exempt status if they favor highly compensated individuals or extend additional benefits only to key employees.

HSAs outside of a cafeteria plan must follow the comparability rule, meaning that benefits must be the same for employees within the same high-deductible health plan category; these plans include self-coverage, coverage for self plus one, coverage for self plus two and coverage for self plus three or more.

### **Health Reimbursement Accounts (HRA)**

Nondiscrimination rules for HRAs prohibit favoring highly compensated individuals by establishing lower eligibility requirements or by offering increased benefits. This rule applies even if the HRA is part of a self-insured medical expense reimbursement plan.

A fitness program can violate HRA nondiscrimination rules if the incentives offered favor highly compensated individuals. To avoid this, the program should not base its maximum incentive amount on an individual's employment compensation, age or years of service.

### **The Consolidated Omnibus Budget Reconciliation Act (COBRA)**

If the program provides **medical care** or **benefits** to participants, the program will be subject to COBRA regulations. The definition of medical care and benefits under COBRA is broad and includes medical examinations, cholesterol screenings, flu shots, reimbursement of health club dues and payment of some cash incentives to employees.

In addition, programs subject to COBRA must allow employees to continue participating if a qualifying event occurs. Individuals who elect to continue their participation in the program must receive the same open enrollment and special enrollment rights as other participants. Other specific COBRA requirements include providing:

- An initial notice to each wellness or disease-management program participant and his or her spouse when coverage begins;
- An election notice to each qualified beneficiary regarding his or her rights and obligations with respect to qualifying events;

- A notice of availability to certain individuals who may expect to receive COBRA continuation coverage;
- Continued participation in the program for the 18 or 36 months required by law (depending on the qualifying event); and
- A notice of termination when COBRA continuation coverage terminates before the end of the maximum coverage period.

### **The Employee Retirement Income Security Act (ERISA)**

A program is subject to ERISA if it is funded or maintained by the employer for the purpose of providing, among other things, medical, surgical or hospital care and benefits to participants and their beneficiaries. The definition of medical services includes diagnosis and prevention. For this reason, fitness programs that offer significant screening benefits as part of their incentives may be subject to ERISA.

Programs subject to ERISA must comply with claim procedures, summary plan descriptions (SPDs) and summary of material modifications (SMMs) requirements. To avoid compliance issues, employers can combine these programs with their major medical plans and other employee welfare benefits. If combined, the program can be funded with assets from the combined ERISA plans.

If not combined, the stand-alone program must independently meet ERISA requirements. To comply with ERISA, employers must:

- Ensure independent funding (program must *not* be funded with ERISA);
- Document the terms, provisions and structure of the program;
- Follow the program's terms, including a strict adherence to fiduciary standards;
- Provide SPDs and SMMs to program participants (note that under the ACA, employers must provide a summary of benefits and coverage in addition to SPDs and SMMs);
- File a form 5500 annually, *unless* an exception applies; and
- Establish and follow claim procedures (the ACA requires enhanced internal claims and appeal requirements as well as external review procedures).

Furthermore, ERISA prohibits employers from interfering with the ability of any employee to obtain any right or benefit that he or she is entitled to receive.

### **The Genetic Information Nondiscrimination Act (GINA)**

Employer obligations regarding GINA vary depending on whether the program is part of a group health plan.



If the program is part of a group health plan, employers are subject to Title I, which prohibits offering incentives for completing a health risk assessment that asks for **genetic information**. Genetic information includes genetic tests and asking for a family medical history. This restriction applies even if the employer wants to collect the information merely to implement cost-sharing measures or to provide rebates, discounts or other premium differentials for employees who complete the assessment or participate in the program.

To avoid this issue, employers can refrain from offering an incentive for completing health risk assessments or provide an assessment that does not request genetic information.

If the program is *not* part of a group health plan, it is subject to Title II of GINA, which prohibits employment discrimination on the basis of genetic information. Under Title II, employers are prohibited from requesting, requiring or purchasing an employee's genetic information, *unless*:

- The employee provides the genetic information voluntarily (employee is *not* required and there is *no* penalty for declining to provide the information);
- The employee provides an informed, voluntary and written authorization;
- The genetic information is only provided to the individual receiving genetic services and the health care professionals or counselors providing the services; and
- The genetic information is only available for the purposes of the services and is *not* disclosed to the employer except in aggregate terms.

An employer does not violate Title II when it offers financial incentives to employees for completing assessments with questions about family medical history, if the incentives are available regardless of whether the employees answer the questions.

### **The Americans With Disabilities Act (ADA)**

Nothing in the ADA prohibits employers from implementing programs that promote good health and prevent disease. However, the ADA does prohibit covered employers from denying disabled individuals an equal opportunity to receive the benefits or participate in programs available to other employees, solely because of their disability. ADA provisions regulate how employers can use health risk assessments and medical examinations when implementing a fitness program.

Employers cannot use assessments to discriminate against disabled individuals. For example, compliance issues may arise if an employee's score is affected by his or her disability and the employer does not provide reasonable accommodations to allow that employee to participate in the program. On the other hand, assessing a premium surcharge on smokers would most likely not trigger an ADA violation because nicotine addiction generally does not limit a major life activity, though it may raise HIPAA nondiscrimination or state law issues.

The ADA also prohibits employers from making medical inquires or requiring medical examinations, *unless* they are **job-related** and **consistent with business necessity**. This is done to

prevent employers from taking any adverse employment action against an employee based on the employee's actual or perceived disability.

However, the Equal Employment Opportunity Commission offers employers an exception and allows them to conduct voluntary medical examinations and activities (such as high blood pressure screenings). The exception applies if employees are not penalized for participating and the results remain confidential and are *not* used to discriminate against employees.

In addition, the ADA safe harbor exception allows employers to establish, sponsor, observe or administer the terms of a bona fide health plan that are based on "underwriting risks, classifying risks or administering such risks that are based on or not inconsistent with state law." This exception may not be used as a way to evade ADA requirements.

### **The Age Discrimination in Employment Act (ADEA)**

ADEA provisions are limited to individuals over the age of 40. For this reason, employers should construct their programs so that they do *not* reduce incentives, impose a surcharge or otherwise discriminate against individuals in this protected group.

### **Title VII of the Civil Rights Act**

Under Title VII of the Civil Rights Act of 1964, a fitness program cannot discriminate against its participants on the basis of race, color, religion, sex or national origin. This includes preventing discrimination regarding employee eligibility, the terms and conditions for coverage and any surcharges employees must pay to participate.

Employers should also note that under Title VII, it is unlawful to discriminate between men and women with regard to fringe benefits (including medical, hospital, accident and life insurance and retirement plans) even when third parties are involved. To avoid these problems, employers should avoid practices such as making distinctions on gender-specific criteria like gender-based BMI indices.

### **The Fair Labor Standards Act (FLSA)**

Fitness programs should have a voluntary participation policy. If participation in the program is mandatory or required, the time employees spend in lectures, meetings, trainings and any other activity associated with the program may be considered compensable time and may be subject to employee overtime wage pay requirements.

Employee participation in the program is voluntary if:

- Attendance at program activities is outside of the employees' regular working hours;
- Attendance at program activities is *not* required by the employer;
- Program activities are *not* related to the employees' job descriptions or responsibilities; and

- Employees do *not* perform any productive work while they participate in program activities.

## Appendix B: Full Risk Health Assessment

Before organizations roll out large wellness programs, they usually perform some kind of health risk assessment (HRA). HRAs usually measure an individual's:

- BMI
- Blood pressure
- Weight
- Waist size
- Blood glucose
- Body fat percentage
- VO2 max

For a more accurate idea of how the program is affecting your employees, it would be best to take these metrics before, during and after the program. By testing metrics before, during and after the program you will be able to see how productive your wellness plan is and how it affected your employees' health. Measurements after the program will also show you how participants were able to self-sustain activity and positive health indicators after the Step Up program concludes.

HRAs include three major aspects:

1. Questionnaire
2. Risk level calculation
3. Customized risk reports

Possible measurements of an HRA include:

- Demographic characteristics—age, sex
- Lifestyle—diet, exercise, smoking, alcohol intake
- Biometric data—weight, height, blood pressure, cholesterol
- Personal and family medical history\*
- Attitudes and willingness to change behavior in order to improve health

*\*Due to the Genetic Information Non-discrimination Act, family history questions may not be allowed if there is an incentive tied to the HRA.*

The information obtained from an HRA will allow you to break down absenteeism and health costs to specific demographics. You can tailor your programs to address these issues.

By providing employees with a handout of their HRA results, they can also be informed about their wellness and may be more inclined to make a personal wellness change.

There are many vendors that can customize HRA services for your organization.

## Appendix C: Additional Resources

To support your fitness initiatives every step of the way, Core Benefit Services, Inc. offers you instant access to a library of materials helpful to employees and employers. To access these resources, simply search all content on command for the appropriate document title.

Contact Core Benefit Services, Inc. with any questions or to access additional resources.

### Employee Posters

- Get in the Game! Poster
- The Benefits of Participating in a Wellness Program Poster
- Map it Out - Walking and Running Routes Poster
- Obesity Prevention Poster: Burning Calories
- Obesity Prevention Poster: Take the Stairs
- Take the Stairs...The Numbers That Count Poster
- Make Time for Fitness Poster

### Employee Flyers

- Fitness First: Exercise and Healthy Eating
- Fitness First: Exercise Programs
- Fitness First: Injury-free Workouts
- Fitness First: Walking
- Fitness First: Running
- Fitness First: Bike To Work
- One-minute Office Stretches
- One-minute Office Workout
- Test Your Fitness Level
- Get Active Outside

### Employer Resources

- Wellness Program: Needs & Interest Survey
- Workplace Wellness Program Implementation Timeline
- Workplace Wellness: Health Risk Assessments
- Workplace Wellness: Creating a Successful Wellness Team
- Workplace Wellness: Creating an Incentive Program
- Workplace Wellness: County Benchmark Data For Wellness Initiatives
- Workplace Wellness: Breathing Energy into a Wellness Team
- Workplace Wellness: Low-cost Wellness Strategies
- Workplace Wellness: Keeping Your Healthy Employees Healthy
- Workplace Wellness: Wellness Initiatives to Promote an Active Lifestyle
- Workplace Wellness: Wellness Initiatives to Promote Healthy Weight

- Workplace Wellness: Benefits of Data Collection for Your Wellness Program
- Workplace Wellness: Using Incentives in Wellness Programs
- Workplace Wellness: Program Implementation Timeline
- Workplace Wellness: Calculating Your ROI
- Workplace Wellness: Enhancing the Return on Your Investment
- Workplace Wellness: Focusing Your Efforts
- Workplace Wellness: Gain Senior Management Support for Wellness Programs
- Workplace Wellness: Results-oriented Wellness Programs
- Workplace Wellness: An Employer's Guide to Promoting Wellness in the Workplace
- Workplace Wellness: Sample Evaluation Tool and Measures
- Workplace Wellness: Maintaining Motivation and Interest
- Sample Social Media Posts for Health and Wellness
- Embracing Social Networking in Your Workplace Wellness Program
- Workplace Wellness: Getting Your Program Started
- Worksite Wellness: Small Steps to Healthier Employees (PPT Presentation)
- Prevention Newsletter: Everyday Health and Wellness
- 2014 Survey Results: Wellness Benefits
- Health Care Reform: Implications on Workplace Wellness Programs
- Communicating Wellness through Social Media
- 2017 National Health Observances
- Wellness Programs (Video)
- Plan Designs: What is a Wellness Program?