

To support the member colleges ("Members") of the Virginia Private Colleges Benefits Consortium, Inc. ("VPCBC") in their promotion of health and wellness among benefit-eligible employees, VPCBC provides access to a variety of wellness programs and services ("Wellness Program" or "Program") at no cost to the employee. The Wellness Program is completely voluntary and is available to all benefit-eligible employees. The Program is also available to spouses of employees, provided the spouse is enrolled in the Virginia Private Colleges Benefits Consortium, Inc. Health and Welfare Plan ("Health Plan").

The Wellness Program may include a health risk assessment and/or biometric screen, which may include the collection of a blood sample and lifestyle questionnaire to assist in evaluating the health status and health improvement opportunities for participants. The Program may also include health coaching to assist participants in identifying lifestyle habits and behaviors that may negatively impact health as well as strategies and activities that may be beneficial for health improvement. In addition, periodic health challenges and individual and group activities designed to provide health and wellness education and support may be made available.

Participation incentives may be, but are not required to be, offered by Members. The type, amount, timing, and qualification requirements of any participation incentive are at the sole discretion of each Member and will be lawfully determined and set forth in Member communications to participants. No participation incentives are offered by VPCBC. Participation incentives may be amended by Members from time to time, which may

require necessary steps to ensure that an incentive is provided in accordance with all applicable laws. Members may take all necessary actions to address the taxation of an incentive, including but not limited to treating the amounts as taxable income on reports and, to the extent consistent with other applicable laws, withholding amounts from an employee's wages to pay for taxes owed by the employee with respect to a participation incentive.

There is no commitment or guarantee that any amounts paid to or for the benefit of an employee participating in the Wellness Program will be excludable from the employee's gross income for federal,

Schedule R  
Virginia Wesleyan University Wellness Program

This Schedule R describes the wellness plan design for Virginia Wesleyan University ("the College") Wellness Program ("the Program")

R.1 Plan Information

- Plan Sponsor The Plan Sponsor of the Program is identified as Virginia Private Colleges Benefits Consortium.
- Plan Administrator The Plan Administrator of the Program is identified as the College.
- Plan Fiduciary The Plan Fiduciary of the Program is identified as Virginia Private Colleges Benefits Consortium.
- Delegation of Powers For information regarding the delegation of certain functions relating to the Program, see the Virginia Private Colleges Benefits Consortium, Inc. Health and Welfare Plan WAP Fund Plan Document and Summary Plan Description.
- Power of Plan Administrator Subject to the limitations of the Program and

## R.2 General Program Design

- The College offers a Wellness Program arrangement that promotes health and disease prevention.
- The Program does not coordinate with a group health plan; it is a standalone wellness plan.
- The Program is participatory only in that it does not provide a reward and does not condition eligibility for a reward on a participant's satisfaction of a standard related to a health factor.

## R.3 Eligibility

- All benefit eligible employees and spouses are eligible to participate in the Program.

## R.4 Rewards and Incentives

Eligible participants may qualify for an incentive/reward at least once per year.

The following types of rewards/incentives are provided to participants in the Program (including but not limited to):

- Group health plan (re)-7[(G)reGc 0.039 /Cnoup n rewadu8 (ti)1 TfeGc 0gr982.22 Td [(C /C2

Commonwealth of Virginia, except to the extent such laws are preempted by ERISA or other federal law.

- Federal Tax Disclaimer Nothing in this document shall be construed to ensure the taxability of any reward or incentive provided as a part of the Program.
- Questions For questions relating to the Program, Program notices, or how to receive a reasonable accommodation (if applicable), participants should contact the Plan Administrator.