Wellness Program Checklist

This checklist will help guide you to create a wellness program suited to your unique business and employee needs.

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Designing an employer-sponsored wellness program requires considerable thought and planning.

Use this checklist to help you evaluate and select a program that aligns with your organization's goals while providing a valuable benefit to employees.

Take the following steps to help decide whether your company should sponsor a wellness program:

- [ ] Decide what outcomes are most important, such as improving safety, reducing healthcare costs, decreasing absenteeism, or increasing employee morale, to name a few.
- [ ] Consider surveying employees, reviewing benefits, or conducting a health risk assessment to determine areas of interest.
- [ ] Collaborate with stakeholders on how a wellness program may fit in with the organization's goals and the value it may bring to the company.
- [ ] Consider creating a wellness committee of various stakeholders.
- [ ] Establish a budget for funding a program.
- [ ] Consider common wellness program types, such as those promoting weight management, tobacco cessation, better nutrition, health screenings, disease management, or physical activity.
- [ ] Classify the program as participatory or health contingent (activity only or outcome based).
- [ ] Decide whether offering incentives or rewards to employees is warranted, and evaluate which federal and state compliance requirements apply to the program, such as those under the Americans with Disabilities Act (ADA), Genetic Information Nondiscrimination Act (GINA), Affordable Care Act (ACA), and Health Insurance Portability and Accountability Act (HIPAA).
- [ ] If offering an incentive, calculate the maximum allowable amount (not to exceed 30% of the total cost of coverage, or 50% for tobacco-related programs) based on the applicable cost of coverage used to determine the plan's COBRA rate. If offering more than one health-contingent wellness program, combine the value of the applicable incentives to ensure the total does not exceed the allowable limit.
- [ ] Confirm a reasonable alternative standard (RAS) is built into the design for any activity-based or outcome-based program and identify any ADA or GINA add-ons needed if the program includes a medical exam, biometric screening, or spousal/family component.
- [ ] If the program collects medical or biometric data, confirm it will be kept in separate, confidential files apart from personnel records with disclosure limited to those who need it to administer the program.

- [ ] Confirm the program is offered on a nondiscriminatory basis to all similarly situated employees.
- [ ] If considering a tobacco surcharge or discount, confirm your verification method and review applicable state law.
- [ ] Determine whether the plan is insured or self-funded, and review state-specific wellness and tobacco law restrictions.
- [ ] Meet with your insurance broker who can provide assistance with research and recommendations of external vendors.
- [ ] If a vendor will administer the program or handle health data, determine whether a Business Associate Agreement or other data protection terms are needed.
- [ ] If the incentive changes employee premium contributions or plan elections, determine whether a cafeteria plan amendment is needed.
- [ ] Confirm that required plan document language and employee notices are prepared and distributed. Retain documentation relating to RAS offers, physician-requested alternative standards, and notice distribution.
- [ ] Create a communication plan for sending surveys, launching the program, gathering feedback, and regularly reminding employees about the plan and its features.

Once your program is in place, take these steps to maintain the program and ensure its success:

- ☐ Gather feedback from all stakeholders to ensure the organization's goals and desired outcomes are being met while providing a valuable benefit to employees.
- ☐ Compare actual program outcomes with the goals established during the program design.
- ☐ Review participation, program-feature utilization, incentive redemption, cost, and employee feedback to determine whether the program remains effective.
- ☐ Maintain consistent communication with employees about the program to encourage participation.
- ☐ Consider a midyear employee survey to gather feedback about the program.
- ☐ Review participation rates, RAS utilization rates, and incentive redemption rates.
- ☐ Review metrics to help determine if the right program is in place.
- ☐ Confirm that any notice and other compliance requirements, such as those under the ADA, GINA, ACA, and HIPAA, have been met.
- ☐ Confirm the annual requalification opportunity requirement is being met based on the plan materials.
- ☐ Check for changes in applicable federal or state law, agency guidance, or new program features that would require a program redesign or renewal update.
- ☐ Review budget allowance and employee feedback prior to plan renewal to determine whether changes are needed.
- ☐ Schedule a meeting with your insurance broker and external vendors prior to plan renewal to review participation, feedback, and potential changes.
- ☐ Review and update the program, and communicate any changes to employees well before the plan renewal date.

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