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Correspondence Memorandum

Date: April 22, 2016
To: Group Insurance Board
From: Sarah Bradley, Program Manager, Wellness and Disease Management
Subject: Well Wisconsin Updates

This memo is for informational purposes only. No Board action is required.

This memo highlights utilization of the Department of Administration's (DOA) contract for a vendor to provide worksite biometric screenings, 2015 participation in the \$150 Well Wisconsin incentive program, updates to program eligibility, and third party administration of the program.

Overview of Well Wisconsin

2015 was the second year of the uniform wellness incentive approved by the Group Insurance Board in 2013. All contracted health plans are required to issue \$150 to adult members who complete a biometric screening and a health plan-administered health risk assessment (HRA).

DOA's Contract for Worksite Biometric Screenings

Members have the option to complete the biometric screening with their physician or at a worksite biometric screening event. To improve the availability of worksite biometric screenings, DOA has contracted with OptumHealth since December 2013 to provide onsite biometric screening to all employer groups participating in the State of Wisconsin Group Insurance Program. These contract costs are covered by the employer health insurance administrative fee paid to ETF. For 2014 and 2015 the wellness fee portion of the administrative fee was \$0.80 per employee per month. In 2016 that was lowered to \$0.40 based on 2014 and 2015 expenditures. Total cost for the 2015 contract activity was approximately \$511,000.

Table 1 on the following page summarizes the employer group utilization for DOA's OptumHealth contract, listing the number of events held and the number of individuals screened by employer group type. Overall, use of the contract services increased by 21% in 2015. This was primarily due to increased utilization by the University of Wisconsin campuses and University of Wisconsin Hospital and Clinics.

Reviewed and approved by Lisa Ellinger, Director, Office of Strategic Health Policy
Lisa Ellinger
Electronically Signed 5/10/16

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GIB	5.18.16	3E

Table 1: OptumHealth Contract Utilization

Employer Group	2014		2015		% change # screened
	# of events	# of participants* screened	# of events	# of participants* screened	
State Agencies	113	7,982	105	8,485	6%
University of Wisconsin Campuses	15	3,836	30	5,317	39%
Wisconsin Public Employers	24	1,133	23	1,052	-7%
University of Wisconsin Hospital and Clinics	14	854	29	1,791	110%
Total	166	13,805	187	16,645	21%

**Participant for 2014 and 2015 may be employee, annuitant or eligible family member (spouse, domestic partner or adult dependent of employee/annuitant).*

Member Participation Rates for Well Wisconsin

ETF assisted employer groups with promotion of Well Wisconsin in 2015 by providing printed promotional materials for use in the workplace and hosting the Well Wisconsin Expo in May of 2015 in downtown Madison. Despite the increase in utilization of the OptumHealth contract and added employer level promotion, participation for 2015 increased over 2014 by less than 1%.

Table 2: Well Wisconsin Participation Rates

Well Wisconsin Incentive	2013**	2014	2015
Members Eligible to Participate*	190,918	197,100	204,610
Completed Well Wisconsin Incentive Requirements	22,257	25,588	27,640
Overall Participation Rate	11.7%	12.9%	13.5%

**Participant for 2013 – 2015 may be employee, annuitant or eligible family member (spouse, domestic partner or adult dependent of employee/annuitant).*

***Participation at piloted health plans prior to uniform \$150 incentive.*

Health Plan Variation in Program Promotion and Administration

Although Well Wisconsin is designed to provide a uniform wellness incentive to all participants in the State of Wisconsin Group Insurance Program, there is significant variation in the participant experience by health plan ranging from the length and complexity of the HRA, the type of incentive payment (check or debit card), timeliness of incentive payment, overall program promotion by the health plan and follow-up services provided to participants. Although the overall participation in Well Wisconsin in 2015 was 13.5%, participation within each health plan varied by over 25%, with three health plans reaching participation levels of over 25%, ten plans with participation between 11% and 19%, and five plans with participation under 10%.

Table 3: Well Wisconsin Participation Rates by Health Plan

Health Plan Name	2015 Participation	Change from 2014
Gundersen	32.22%	3.62%
Group Health Cooperative-SCW	26.05%	-7.91%
WEA Trust	23.42%	1.52%
HealthPartners	19.96%	13.08%
Security	19.10%	3.19%
Group Health Cooperative – Eau Claire	18.09%	-4.57%
Network	17.61%	3.60%
Medical Associates	16.20%	-1.09%
Health Tradition	15.21%	3.14%
UHC	13.62%	1.17%
Arise	13.04%	-3.65%
Anthem	12.70%	3.91%
Unity	11.52%	3.78%
MercyCare	8.92%	2.09%
Dean	8.32%	-1.57%
Humana	7.92%	-1.77%
Physicians Plus	5.91%	1.99%
WPS	3.77%	-1.43%
Total	13.51%	0.52%

In addition to the approximately \$4.1 million in incentive payments issued in 2015 for Well Wisconsin, several health plans offered additional incentive or reward programs such as reimbursement for fitness club memberships, group fitness classes, or community supported agriculture programs. Based on health plan reported payment data provided to ETF for employer group tax purposes, approximately \$1.1 million was issued by health plans in 2015 for incentive and rewards programs other than payment for Well Wisconsin.

2016 Eligibility Changes for Well Wisconsin

When Well Wisconsin was introduced for 2014, the incentive was made available to all adults over 18 years of age enrolled in group health insurance. In 2014 the U.S. Equal Employment Opportunity Commission (EEOC) filed several lawsuits against employers, including two Wisconsin based employers, for wellness programs considered by the EEOC to violate the Americans with Disabilities Act (ADA) and the Genetic Information Nondiscrimination Act (GINA). It should be noted that these programs were deemed allowable under the existing regulations of the Affordable Care Act for wellness programs.

In 2015, the EEOC issued two notices of proposed rulemaking meant to clarify employer wellness program compliance under ADA and GINA. The proposed rule change to GINA essentially states that the EEOC currently considers collecting current or former health status information on an employee's spouse or dependents as part of a voluntary wellness program

to be a violation of GINA. The proposed rule change to GINA would permit the employee's spouse to participate in a voluntary wellness program, but would not allow any other dependent of the employee to participate. After reviewing the current EEOC lawsuits, the proposed rule change to GINA and ADA, and consulting with the Board's benefit consultant – Segal Consulting – ETF notified the contracted health plans and employer groups that adult dependents would no longer be eligible for Well Wisconsin effective January 1, 2016. ETF will continue to monitor the proposed changes to ADA and GINA and the final impact, if any, they may have on the wellness programs offered as part of the State of Wisconsin Group Insurance Program.

Third Party Administration

The Request for Proposals for the administration of wellness and disease management programming was issued April 25, 2016. Metrics that staff will evaluate as part of this transition include participation rates, employer group activity such as worksite promotion and hosting of workplace biometrics, and consistent availability and utilization of follow-up services. All are valuable indicators of opportunities to increase participation and address health outcomes. A single administrator will also increase the availability of consistent aggregate program data and help identify areas for reducing program costs.

Staff will be at the Board meeting to answer any questions.