



Considerations for Screenings

2014 Prevention Campaign Fact Sheet



Vision of the [National Prevention Strategy](#): Working together to improve the health and quality of life for individuals, families, and communities by moving the nation from a focus on sickness and disease to one based on prevention and wellness.

Screenings require some special considerations when integrating them into a worksite health and wellness program. Please work with your **general counsel, Equal Employment Opportunity (EEO) office and/or benefits administrator** for guidance.

1. Legal Implications – When integrating screenings into a worksite health & wellness programs, agencies need to consider the implications under GINA, HIPAA, and the Rehabilitation Act.

[Genetic Information Nondiscrimination Act of 2009 \(GINA\)](#) – Under Title II of GINA, it is illegal to discriminate against employees or applicants based on genetic information. Family medical history is included in the definition of genetic information, because it is often used to determine whether someone has an increased risk of getting a disease, disorder, or condition in the future. Therefore, health risk appraisals (HRAs) should not include questions about family medical history unless the parameters of [29 CFR § 1635.8](#) are carefully followed.

[Health Insurance Portability and Accountability Act of 1996 \(HIPAA\)](#) – HIPAA requires employers to respect employee privacy with respect to their personal health. The employee is not required to reveal aspects of their care or treatment in the health and wellness program, and the agency must maintain high levels of confidentiality.

[Rehabilitation Act of 1973](#) – Section 508 of the Rehabilitation Act of 1973 requires Federal agencies to ensure all non-exempt electronic and information technology systems and products are accessible to individuals with disabilities.

2. Ethical Considerations* – Issues of data security, confidentiality, employee communications, and civil/employee rights are important ethical considerations when working with screenings for employees. Below are some recommendations to help tackle these issues.

- Work with your EEO office and be aware of the previously mentioned laws
- Establish procedures to protect the confidentiality and privacy of employees
- Collect surveys anonymously and protect privacy during data management and during reporting of results
- Participants should receive an orientation so they are well-informed about the screenings
- Participants should be free to accept or decline participating in any components of the screening without fear of consequences.

(*Adapted from [CDC – Assessment Tools](#), 2013; [CDC – Ethics Guidelines for Health Assessments](#), 2010)

3. Feedback & Follow-up – Each agency should determine how they will provide feedback, who will provide it, and in what ways they will follow-up with participants. Agencies can provide feedback through written reports, online reports, or instant kiosk-produced reports. Agencies may also decide on whether to provide a coaching session or conversation with the individual employee when presenting the report. The person who does the coaching could be a health educator, employee’s physician/clinician, or a specially trained member of the wellness program.

Each agency should decide the level of follow-up after doing screenings. Options include feedback only, feedback plus counseling, feedback plus health promotion programs, or referral for individual counseling. However, studies have shown that there is strong evidence that the use of [screenings with feedback when combined with health education programs can improve](#) one or more health behaviors or conditions in employee populations.

4. Incentives –Some agencies may decide to provide honorary or informal recognition to encourage employees to participate in screening programs. However, before implementing any incentive, you should work with your General Counsel and benefits officers to ensure that incentives are given in line with your agency’s awards program. Furthermore, some FEHB health plans provide such incentives for members who complete a health risk appraisal (HRA).

(Adapted from [CDC Healthier Worksite Initiative – Health Risk Appraisals](#), 2010)

RESOURCES & GUIDANCE FOR WORKSITE HEALTH & WELLNESS COORDINATORS

[U.S. Office of Personnel Management’s Health & Wellness Federal Tools & Resources Page](#)

From Governmentwide guidelines to sample resources and information on Federal agencies that play a key role in worksite health & wellness, many tools and resources are available on this website to help understand the basics of worksite health & wellness, explore issues in greater detail, and implement effective programs.

[CDC Workplace Health Promotion Employee Healthy Surveys](#)

This site provides suggestions for the design, delivery, and assessment of employee health surveys.

[CDC Healthier Worksite Initiative Health Risk Appraisals](#)

CDC Healthier Worksite Initiative has developed guidance and considerations for the use of Health Risk Appraisals in the workplace. This site includes considerations for use, the purpose of HRAs, identifying what your workplace wants from an HRA, important implementation aspects (ethics, technical features, mode of administration, use of incentives and more), and a checklist for planning HRA implementation.

[Veterans Health Administration’s Employee Health Promotion Disease Prevention \(EHPDP\) Guidebook](#)

This guidebook was written by a multidisciplinary task group to provide information and references appropriate for establishing and expanding EHPDP programs within the VHA. This guidebook is available as an example of an agency-level guidebook and provides templates, sample documents, references, and directives for use and modification by other Federal agencies.