

Plan designs from the leader in employee wellness compliance.

Bravo's knowledge of compliance with federal regulations that impact wellness plan designs and incentives separates us from all other wellness vendors in the market.

Our founder and CEO, Jim Pshock, is a nationally recognized author and speaker who is deeply knowledgeable about federal wellness regulations and compliance. Pshock helped to define The Final Wellness Rules for Group Health Plans alongside the Department of Labor (DOL), Internal Revenue Service (IRS) and Centers for Medicare and Medicaid Services (CMS). He was also a co-author of the Joint Consensus Statement on a "Reasonably Designed Employer-Sponsored Wellness Program Using Outcomes-Based Incentives." Pshock is an active member of the Population Health Alliance (PHA) and co-chair of the Government Affairs Committee for the Health Enhancement Research Organization (HERO).

Jim leads an internal compliance team that includes the advice and council of a wellness advisory board of industry experts, including Gregory Seeley, LPA (an ERISA and insurance law specialist), Dr. Joseph Berley M.D. (Bravo's consulting medical director), John Harris FAWHP, industry expert, Mike Motta, and nationally recognized wellness expert Michael O'Donnell, Ph.D., MBA MP.

These relationships, paired with Pshock's expertise, position Bravo at the forefront of the evolving wellness landscape.

Co-fiduciary Responsibility for All Appeals and Alternatives Designs

Bravo is here to protect you and help ensure your program adheres to various laws and regulations, including the Affordable Care Act (ACA), Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), the Health Insurance Portability and Accountability Act (HIPAA), DOL, IRS, the Equal Employment Opportunity Commission (EEOC) and even state laws.

We stand fully behind each of our clients regarding our incentive designs and take co-fiduciary responsibility for what we advise and administer regarding appeals and alternatives.

COMPLIANCE EXPERTS



Jim Pshock
Founder and CEO
Privacy Officer



Maureen Pallas
Manager, Contracts
and Compliance

HIPAA Privacy

Protected health information (PHI) is a critical component of any healthcare organization. We take HIPAA privacy laws very seriously and have the appropriate agreements in place with our partners and yours. Bravo has robust processes for our technology security and completes a voluntary SOC 2 Type 2 audit annually.

These agreements include:

- ▶ **Business Associate Agreement (BAA):** This contract is sent and signed immediately, and it ensures that PHI is guarded in accordance with HIPAA guidelines. Any other subcontractors that administer aspects of your wellness plan will be required to sign a BAA as well.
- ▶ **BA-to-BA Disclosure:** This document is engaged if Bravo is requested to provide data to a third party under your health plan operations. Typically, these are other vendors you might send data to for disease management, coaching outreach or other services.
- ▶ **FTP Credentialing:** We require authorization to allow access to a secure FTP site for approved parties to post and/or receive files. The FTP site allows you to obtain the payroll/results file and, upon your approval, provides access to other vendors for files we may post securely. Each person who accesses the site is required to have unique credentials. These must be received before any file exchange.

“We depend on Bravo’s expertise to ensure our outcomes-based program is compliant. They do a great job of educating their clients through one-on-one meetings and regularly host webinars on the ever-changing landscape of the wellness regulations.”

— **Kellie McLaughlin**

Human Resources, Health, Wellness
and Safety Manager

Graco, Inc.

LET’S TALK

Bravo provides expert consulting, communications and administration that leverages the power of the regulations without putting employers in harm’s way, all while protecting employees health information. Let us take on the challenge of navigating this complex space so that you can focus on what really matters: *your people*.

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