

EMPLOYEE ASSISTANCE PROGRAM

SUMMARY PLAN DESCRIPTION

This document is the Summary Plan Description for Tel Hai's Employee Assistance Program (EAP) effective July 1, 2023. This summary provides an overview of the plan and your rights and obligations with respect to the EAP. It is designed to assist you in taking full advantage of your benefits under the EAP and to meet the disclosure requirements of the Employee Retirement Income Security Act of 1974 ("ERISA"). Care has been taken to be sure that this summary is accurate in describing the plan. However, in the event of a conflict between this summary and the provisions of the Plan contract, the Plan contract will govern.

Name of Plan

The plan is known as the Employee Assistance Program of Tel Hai.

Plan Identification Numbers

The Employer Identification Number for Tel Hai is 23-2039189, and the plan number of the Employee Assistance Program is 501.

Type of Plan and Funding

The EAP is a welfare plan that is paid for entirely by Tel Hai's general operating funds. No employee contributions are required. However, in the event the EAP must refer participants to other resources, the employee is responsible for payment of services rendered outside of the EAP. Other benefit programs may be available to help offset the cost of such services.

Fiduciary

Tel Hai Retirement Community
Honey Brook, PA

Records

Records of the EAP are maintained on a calendar year basis.

Plan Sponsor and Administration

Tel Hai Retirement Community
Honey Brook, PA

Legal Matters

Tel Hai Retirement Community
Honey Brook, PA

Eligibility

All full-time and part-time employees and their immediate family members (spouses, domestic partners, any children up to age 26, whether or not they reside with parent or are dependent on parent, any family member permanently residing with the eligible

employee), employees who have separated from Tel Hai for any reason for up to 30 days after the date their employment ends, are eligible to participate in the EAP as of their first day of employment.

EAP Overview

An Employee Assistance Program (EAP) is a benefit set up by your employer to provide you with assistance in dealing with those personal concerns that may affect your work and home life. Employee talent and productivity are an organization's greatest assets. Your health, both physical and emotional, is essential to your personal success and to our organization. Some of the areas covered by the EAP include: managing stress and change, family and relationship concerns, parent/child issues, stress/anxiety, depression, legal concerns, financial issues, substance abuse, child/elder care, education planning, weight management, work performance issues, and retirement.

Tel Hai has retained Personal Assistance Services (PAS) to provide your EAP services. PAS is an independent provider of professional life management services and not affiliated with your employer.

A trained consultant will listen to your concerns, answer any questions you have about EAP benefit and arrange appropriate EAP services for you. Depending on your situation, the use of EAP life management, wellness, phone coaching and/or in-person counseling services are available. Your consultant will be trained in the EAP service you have chosen to use. The staff includes licensed Master's and PhD level mental health professionals, nutritionists, attorneys, certified financial planners, specialists in child and eldercare services and trained crisis workers. He or she will help you sort out problem areas and develop an action plan to solve them.

Assessment, short-term counseling and referral services are available for concerns such as:

- Anxiety
- Depression
- Domestic violence
- Eating disorder
- Financial insecurity
- Gambling addiction
- Grand-parenting
- Grief and loss
- Illness
- Internet addiction
- Job stress
- Job transition
- Life balance
- Marital issues
- Panic disorders
- Parenting

- Post-traumatic stress
- Relationship issues
- Stress
- Substance abuse

In some situations, an EAP counselor may refer you (or your covered dependent) to your health plan for benefits.

The EAP also provides the following life management services:

- Budget and debt/financial consultation
- Career coaching
- Health coaching
- Dependent care (child care; elder care) consultation
- Education planning
- Organization and productivity coaching
- Identity theft consultation
- Legal consultation and document preparation (e.g., wills)
- Parenting consultation
- Retirement consultation
- Weight and nutrition counseling
- Tobacco cessation coaching

Confidentiality

PAS complies with and exceeds the requirements of both federal and state privacy regulations, in order to protect your confidentiality. The PAS standard Notice of Privacy Practices is attached to this Summary. If you choose to use the EAP, no one will know unless you tell them or you give PAS specific, written consent to disclose information to a third party about your participation in the EAP. The only exceptions to this policy are in life threatening situations, cases of child or elder abuse when written consent cannot be obtained or when the law and legal rules require reporting.

Costs

Your EAP is a pre-paid benefit provided to you by your employer. There will be no charge for any service covered under your EAP benefit. Should your consultant recommend a referral to a specialist or longer-term care provider for care outside the parameters of the EAP benefit, the referral is made to quality providers and with your best interests in mind. PAS receives no reimbursement from the outside specialist for making the referral. Your consultant may recommend self-help groups or providers that have sliding scale fees. If the provider charges, a fee, the costs may be covered under your medical benefits plan. However, it is your financial responsibility to pay for services provided outside of your EAP benefit.

Appointment Locations

Day, evening and weekend appointments are available for in-person counseling in most locations. Employees and dependents will have an opportunity to choose from a variety of office locations away from the workplace. Appointments will be scheduled in a way to

avoid your meeting another employee from Tel Hai. There is also the option of scheduling telephone consultations if that is more convenient.

Excluded Services

The EAP provides assessment, brief counseling, referral to treatment providers for long-term or specialized treatment and follow-up services. The following list of services is not provided by the EAP:

- Psychological, educational, neurological or psychiatric testing
- Long-term or specialized psychological treatment for complicated diagnoses
- Aversion therapy, hypnotherapy, or biofeedback
- Medical care, including psychiatric care, medication and medication management
- Inpatient or facility-based care
- Remedial and social skills education services, (such as treatment or services for cognitive rehabilitation, behavioral training, language disorders, learning disorders, etc.)
- Evaluations required by any government entity or official
- Court-mandated counseling, evaluations to be used in child custody proceedings, worker's compensation proceedings, criminal proceedings, or any other type of legal action
- Testimony in legal proceedings and reporting for legal purposes
- Evaluations for fitness for duty determinations
- Preparation of documentation for determination of disability, FMLA documentation, excuses for leave of absence or time off
- Services by providers who are not in PAS' provider network
- Preparation of income taxes or consultation on tax audits
- Legal representation
- Legal consultation regarding work-related issues; guidance on workplace issues when the employee sues, or threatens to sue Tel Hai

Supervisory Referrals

Your supervisor may refer you to the EAP if you request assistance with a personal problem. Your supervisor may also recommend your participation in the EAP if you are experiencing job performance or attendance problems or if you have violated certain company policies. While your supervisor will expect you to do all that you can to resolve personal concerns that affect job performance, your participation in the EAP is voluntary. Your continued employment depends upon the successful resolution of your job performance problems and/or policy violations.

Plan Continuance

While Tel Hai expects to continue the EAP indefinitely, it reserves the right to amend or terminate the plan at any time for any reason through its normal policy approval process.

Termination of Benefits

Eligibility to initiate services from the EAP will end on the date the Plan Sponsor discontinues the plan, or 30 days after the date you are no longer employed, whichever occurs first. However, coverage may continue while you are on an approved leave of absence that is protected by the Family and Medical Leave Act of 1993. Also, under certain circumstances, you may be allowed to continue EAP coverage upon termination of employment. For more information about this continuation option, contact the plan administrator.

ERISA Rights

As a participant in the EAP, you are entitled to certain rights and protections under the Employee Retirement Income Security Act of 1974 (ERISA). These include the right to receive certain plan information and the right to file a lawsuit if you believe your rights have been violated.

ERISA provides that all plan participants shall be entitled to:

- Examine, without charge, at the plan administrator's office, all plan documents, including contracts and copies of all documents filed by the plan with the U.S. Department of Labor, such as annual reports and plan descriptions.
- Obtain copies of all plan documents and other plan information upon written request to the plan administrator. The plan administrator may make a reasonable charge for the copies.
- Receive a summary of the plan's annual financial report. The plan administrator is required by law to furnish each participant with a copy of this summary annual report.
- Obtain a statement telling you whether you have eligibility to receive a benefit. If you do not have a right to a benefit, the statement will describe the conditions under which you may obtain the right to the benefit. This statement is free of charge.

In addition to creating rights for plan participants, ERISA imposes duties upon the people who are responsible for the operation of the employee benefit plan. The people who operate your plan, called "fiduciaries" of the plan, have a duty to do so prudently and in the interest of you and other plan participants and beneficiaries. No one, including your employer or any other person may fire you or otherwise discriminate against you in any way to prevent you from obtaining a benefit or exercising your rights under ERISA. If your claim for a benefit is denied, in whole or in part, you must receive a written explanation of the reason for the denial. You have the right to have the plan administrator review and reconsider your claim.

Under ERISA, there are steps you can take to enforce the above rights. For instance, if you request materials from the plan administrator and do not receive them within 30 days, you may file suit in a federal court. In such a case, the court may require the

administrator to provide the materials and pay you up to \$100 a day until you receive the materials, unless the materials were not sent because of reasons beyond the control of the plan administrator. If your claim for benefits is denied in whole or in part after a final review, you may file suit in a state or federal court.

If it should happen that plan fiduciaries misuse the plan's money, or if you are discriminated against for asserting your rights, you may seek assistance from the U.S. Department of Labor, or you may file suit in a state or federal court. The court will decide who should pay court costs and legal fees. If you are successful, the court may order the person you have sued to pay these costs and fees. If you lose, the court may order you to pay these costs and fees, for example, if it finds your claim is frivolous.

If you have any questions about your plan, you should contact the plan administrator. If you have any questions about this statement or about your rights under ERISA, you should contact the nearest Office of Labor Management Services Administration, U.S. Department of Labor listed in your telephone directory.

PERSONAL ASSISTANCE SERVICES

Notice of Privacy Practices

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Personal Assistance Services uses your health information for treatment, to obtain payment for treatment, for administrative purposes, and to evaluate the quality of care that you receive. Your health information is contained in a medical record that is the physical property of Personal Assistance Services.

How PAS May use or Disclose Your Health Information

For Treatment. PAS may use your health information to provide you with medical treatment or services.

For example, a mental health care provider will record information in your record that is related to your treatment. This information is necessary for health care providers to determine what treatment you should receive. Health care providers will also record actions taken by them in the course of your treatment and note how you respond to the actions.

For Payment.

EAP: If your treatment is provided by your Employee Assistance Program, the service has been prepaid and no health information will be disclosed to your employer or any other payor for purposes of receiving payment.

INSURANCE: If the cost of your treatment is being covered by your insurance, PAS may use your health information and disclose information to others for purposes of receiving payment for treatment and services that you receive. For example, a bill may be sent to you or a third-party payor, such as an insurance company or health plan. The information on the bill may contain information that identifies you, your diagnosis, your treatment or supplies used in the course of treatment.

For Health Care Operations. PAS may use and disclose health information about you for operational purposes. For example, your health information may be disclosed to members of the clinical staff, risk or quality improvement personnel, and others to:

- evaluate the performance of our staff;
- assess the quality of care and outcomes in your case and similar cases;
- learn how to improve our facilities and services; and
- determine how to continually improve the quality and effectiveness of the health care we provide.

Appointments. PAS may use your information to contact you to provide appointment reminders or information about treatment alternatives or other health-related benefits and services that may be of interest to you.

Required by Law. PAS may use and disclose information about you as required by law. If a use or disclosure is required by law, PAS will only provide the minimum necessary to comply. For example, PAS may disclose information for the following purposes:

- for judicial and administrative proceeding pursuant to legal authority;
- to report information related to victims of abuse, neglect or domestic violence; and
- to assist law enforcement officials in the law enforcement duties.

Public Health. Your health information may be used or disclosed for public health activities such as assisting public health authorities or other legal authorities to prevent or control injury, disability, or for other health oversight activities.

Health and Safety. Your health information may be disclosed to avert a serious threat to the health or safety of you or any other person pursuant to applicable law.

Government Functions. Specialized government functions such as protection of public officials or reporting to various branches of the armed services that may require use or disclosure of your health information.

Your Health Information Rights

You have the right to:

- request a restriction on certain uses and disclosures of your information as provided by 45 CFR§164.522; however, PAS is not required to agree to a requested restriction;
- obtain a paper copy of the notice of information practices upon request;
- inspect and obtain a copy of your health record as provided for in 45CFR§164.524;
- amend your health record as provided in 45CFR§164.526;
- request communications of your health information by alternative means or at alternative locations;
- revoke your authorization to use or disclose health information except to the extent that action has already been taken; and
- receive an accounting of disclosures made of your health information as provided by 45 CFR§164.528.

You may lodge a complaint to PAS and to the Department of Health and Human Services if you believe your privacy rights have been violated. You will not be retaliated against for filing a complaint.

Obligations of Personal Assistance Services

PAS is required to:

- maintain the privacy of protected health information;
- provide you with this notice of its legal duties and privacy practices with respect to your health information;
- abide by the terms of this notice;
- notify you if we are unable to agree to a requested restriction on how your information is used or disclosed;
- accommodate reasonable requests you may make to communicate health information by alternative means or at alternative locations;
- obtain your written authorization to use or disclose your health information for reasons other than those listed above and permitted under law.

PAS reserves the right to change its information practices and to make the new provisions effective for all protected health information it maintains. Revised notices will be made available to you by mail if you are receiving treatment when revisions to our information practices are implemented.

Contact Information

If you have any questions or complaints, please contact:

Privacy Officer
Personal Assistance Services
9735 Landmark Parkway, Suite 17
St. Louis, MO 63127
800-356-0845