

Health Savings Accounts: Administrative Guide

Customer Identification Program (CIP) for Account Holders

What is CIP?

The Customer Identification Program (CIP) is followed to verify the identity of each HSA participant to fulfill the requirements of the Know Your Customer requirements under the USA PATRIOT Act. Optum Financial is required to obtain, verify, and record information that identifies each person who opens an account, including a Health Savings Account (HSA). Therefore, when your employees apply for an HSA, Optum Financial will need to collect certain information about each of your employees in order to complete the identity verification process.

The required information includes:

- Full legal name
- Current physical residential address (non-U.S. addresses and P.O. Boxes are not permitted*)
- Date of birth
- Government-issued identification number (typically, social security number)

Employees Who Pass CIP

The majority of participants pass the identity verification process on the first review and without the participant having to take additional steps. Once your employees satisfactorily complete the identity verification process, they will receive a welcome letter and payment card for the Optum Financial HSA. Once they receive this information and the plan date is effective, they may begin to utilize and contribute to the Optum Financial HSA

* If the employee has only provided a P.O. Box address, the account will remain in "Wait" status and will not begin the CIP Process; a physical address is required for CIP. A notification is sent to the employee either via email or letter depending on whether Optum Financial has the employee email address on file. If an email is on file, the email will default to the personal email address on file with a URL link to update the address. The employee has 90 days to update the address AND complete the remaining CIP process. If the address update is not resolved within 90 days, the CIP status will move to declined, the account status moves to declined, the HSA policy is cancelled, and pending contributions are returned. Notification will also be given to the employee of the decline either via email or letter depending on whether Optum Financial has the email address on file.

Employees Whose Identifies Could Not Be Verified

If the Bank Custodian is unable to verify an employee's identity, the Bank Custodian may contact the employee for additional information, such as a copy of the driver license, W-2, Social Security Card, or other identifying documents. Should the employee receive a letter or request from the Bank Custodian, the employee must submit documentation within 90 days to resolve the issue.

Notifications are sent out during the following timeframes:

- Same day
- 15 days (date from when account originally hit Pending status)
- 45 days (date from when account originally hit Pending status)
- 65 days (date from when account originally hit Pending status)

An example of this notification can be found in the Employee Notices section of this document.

Requested documentation should be submitted directly from the employee to the Resolution Center. Employees who have been asked for identification are instructed to upload the required documentation to a secure site.

In the event employees are unable to upload documentation, they may contact Customer Care at 833-881-8158 to discuss the possibility of providing documentation to Optum Financial via email. Optum Financial is able to accept the employees' documentation only once employees have acknowledged the risk presented by email communication and release Optum Financial from any and all liability for improper disclosures and/or breaches of confidentiality due to use of mail, except those directly caused by Optum Financial's intentional misconduct. Once the documentation is received, it will be uploaded to the employees' online portal.

Once the account holder has successfully passed CIP, any pending contributions to the account will generally post within 2 business days.

Employee Account Closure

If applicable documentation is not received within 90 days to resolve CIP successfully, the employee's CIP status moves to declined, the Optum Financial Account status moves to declined, the HSA policy is cancelled, and pending contributions are returned to the employer as a credit. Additionally, the State of Wisconsin will revert the employee's health plan to a non-HDHP, effective as of the date the health insurance was effective or the date the qualifying life event took place. Employees are not able to change their non-HDHP with their employer once it has been reverted and passed the deadline. This is the State of Wisconsin plan design for the HDHP HSA program. Unless the employee has a mid-year qualifying life event to change their health plan, the employee will need to wait until the next It's Your Choice (IYC) Open Enrollment election to enroll in the HSA.

Notification that the employee's HSA could not be opened will be made to the employee either via email or letter depending on whether Optum Financial has the email address on file. An example of this notification can be found in the Employee Notices section of this document.

Reporting Features

The following reports, available in the Employer Dashboard, are helpful resources for Administrators.

Account Balance and Administrative Reports

Report Name	Report Description
HSA Pending Accounts	Employees who have not completed the account opening process so their HSAs are pending; contributions submitted for the HSA will be unable to post.
Active Employees with Closed HSAs	Employees with active enrollment in the HSA for a selected plan year, but the HSA is closed so contributions will not post.

Funding and Contribution Reports

Report Name	Report Description
Contributions for an Employee	All contributions for a selected Employee for a given date range.
Contribution Invoice Discrepancies	Differences between contributions submitted and what posted for the selected funding invoice.
Pending Contribution Details	Contributions that have not been posted because the employee has not yet completed the setup process.
Unsettled Contribution Detail	The Unsettled Contribution Detail Report can either be displayed on the Employer Dashboard or in a CSV file via Email.

Employee Notices

Optum Financial sends out notices to alert employees to the status of their account opening, and to provide helpful information on what documentation is needed to finalize account opening.

Notifications to employees whose identifies could not be verified

This notification is sent out multiple times, according to the following timeframes:

- Same day
- 15 days (date from when account originally hit pending status)
- 45 days (date from when account originally hit pending status)
- 65 days (date from when account originally hit pending status)

Subject Line: Your HSA: Further Action is Required

Dear <Employee First Name>

We are very pleased to receive your enrollment for a Health Savings Account (HSA) through your employer, State of Wisconsin. However, additional information is required from you before we can open your account.

Due to regulations established by the USA PATRIOT Act, we need to verify some personal information about you. Before your HSA can be opened, you will need to submit one form of documentation for each reason listed in the table below. Any contributions made by you or your employer will not be made available to you until your account is opened.

Reason for Request <i><rows only display for employee's specific reasons></i>	Documentation Needed
Documentation is required to verify full name, with current residential address, and Social Security Number	Social Security Card - issued by Social Security Administration (DHS "Work Only" authorization accepted); The Fraud & Operations Compliance Department may require another form of documentary evidence to support this document, Paystub dated within past 30-days only if it reflects full SSN or TIN, Social Security Benefits Award Letter, Military Service Record - DD214 (only if it reflects SSN), IRS Form W-2 (must be dated within 5 years), IRS Form 1099 (must be dated within 5 years), IRS Form 5498 (must be dated within 5 years), IRS Form 1098 (must be dated within 5 years)
Documentation is required to verify last name with Social Security Number	State-Issued Driver's License (current, unexpired), U.S. Military Driver's License (current, unexpired), U.S. Dept. of State Driver's License (current, unexpired), State-Issued ID Card (current, unexpired), U.S. Military ID Card (current, unexpired), U.S. Passport Card (current, unexpired), State Issued Permit (current, unexpired, does not include temporary licenses), Social Security Card - issued by Social Security Administration (DHS "Work Only" authorization accepted); The Fraud & Operations Compliance Department may require another form of documentary evidence to support this document, Marriage Certificate Issued by the State, Divorce Decree Issued by the State, Permanent Resident Card (aka, Green Card), I-766 Employment Authorization Card
Documentation is required to verify full name with Social Security Number	Social Security Card - issued by Social Security Administration (DHS "Work Only" authorization accepted); The Fraud & Operations Compliance Department may require another form of documentary evidence to support this document, Paystub dated within past 30-days only if it reflects full SSN or TIN, Social Security Benefits Award Letter, Military Service Record - DD214 (only if it reflects SSN), IRS Form W-2 (must be dated within 5 years), IRS Form 1099 (must be dated within 5 years), IRS Form 5498 (must be dated within 5 years), IRS Form 1098 (must be dated within 5 years)
Documentation is required to verify full name and current residential address	State-Issued Driver's License (current, unexpired), U.S. Military Driver's License (current, unexpired), U.S. Dept. of State Driver's License (current, unexpired), Paystub dated within past 30-days only if it reflects full SSN or TIN, Lease Agreement (negotiated within the past 12 months; or month to month negotiated within the past 6 months), Vehicle Registration Card (current, unexpired), Utility Bill (for address within past 30 days), Bank/Credit Card/Investment Statement (with name and address received with past 30 days), Mortgage Statement (for address within past 30 days), Insurance Statement (with name and address received within past 30 days)

Reason for Request <rows only display for employee's specific reasons>	Documentation Needed
Documentation is required to verify full name with Social Security Number	Social Security Card - issued by Social Security Administration (DHS "Work Only" authorization accepted); The Fraud & Operations Compliance Department may require another form of documentary evidence to support this document, Paystub dated within past 30-days only if it reflects full SSN or TIN, Social Security Benefits Award Letter, Military Service Record - DD214 (only if it reflects SSN), IRS Form W-2 (must be dated within 5 years), IRS Form 1099 (must be dated within 5 years), IRS Form 5498 (must be dated within 5 years), IRS Form 1098 (must be dated within 5 years)

This is a secure and easy process. Simply log in to <UNIQUEURL>. Once you have validated your identity, you will be able to upload and submit the required documentation.

Pending receipt and approval of this required information, we will be authorized to open your HSA and will promptly send additional important account information.

Thank you for your prompt attention to this important matter.

Sincerely,
Customer Care Center
833-881-8158 24 hours a day, seven days a week

NOTE: THIS IS A SYSTEM GENERATED EMAIL. PLEASE DO NOT REPLY TO THIS EMAIL.

Notification sent when HSA documentation submitted is insufficient

Subject Line: Submitted HSA Documentation was Insufficient

Dear <Employee First Name>,

Thank you for submitting documentation on <DATE> to open your Health Savings Account (HSA). Unfortunately, the provided documentation could not be verified, and your account cannot be opened.

Documentation Received	Reason Not Accepted
<Documentation type – example: Social Security Card>	<Documentation reject reason – example: SSN Does Not Match>

Any contributions made by you or your employer will not be made available to you until your account is opened.

Act Now! Simply log in at <UNIQUEURL> and you will be prompted to upload the required documentation.

Thank you, <Employee First Name>, for your prompt attention to this important issue.

Sincerely,
Customer Care Center
833-881-8158 24 hours a day, seven days a week

NOTE: THIS IS A SYSTEM GENERATED EMAIL. PLEASE DO NOT REPLY TO THIS EMAIL.

Notification sent when an employee's HSA cannot be opened

Subject Line: Your HSA Could Not be Opened

Dear <Employee First Name>,

Thank you for allowing us to assist you in opening a Health Savings Account (HSA) through your employer, State of Wisconsin.

Unfortunately, although we have reached out to you several times, we have not received all required documentation needed to open your new HSA. This means that your request to open an HSA has been declined.

Since your HSA has been declined, any payroll contributions you intended to make have not been deposited and the funds will be returned to your employer.

Should you decide to resubmit a new HSA enrollment request, please contact your employer. We hope that you reconsider opening an HSA in the future, and we look forward to assisting you at that time.

Sincerely,

Customer Care Center

833-881-8158 24 hours a day, seven days a week



Health savings accounts (HSAs) are individual accounts administered or offered through Optum Bank®, Member FDIC, or ConnectYourCare, LLC, each a subsidiary of Optum Financial. HSAs are subject to eligibility requirements and restrictions on deposits and withdrawals to avoid IRS penalties. State taxes may apply. Fees may reduce earnings on account. This communication is not intended as legal or tax advice. Federal and state laws and regulations are subject to change.

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