



Wespath

BENEFITS | INVESTMENTS

VERIFICATION/HEALTH SAVINGS ACCOUNTS

Customer Identification Program (CIP)



Health Savings Accounts are actual bank accounts, so for consumer protection, BNY Mellon may require an individual to verify their identity. This is the Customer Identification Program (CIP) and the regulations that govern this process are issued under the USA Patriot Act. If BNY Mellon is unable to verify a participant's identity within 90 days of the account being opened, the HSA will be closed. Participants may be contacted by WageWorks or BNY Mellon for the verification.

CIP Process Overview

Information needed to open the Health Saving Account (HSA) is sent to BNY Mellon and WageWorks by Wespath when an individual elects an HSA and accepts the Terms & Conditions of BNY Mellon.

- **First Review is automated:**

- **Verification by the "Non-Documentary" Method**

- In most cases, new customers who open new accounts directly with BNY MELLON will be verified through the Non-Documentary method. This process starts when BNY Mellon receives data from Wespath. The new customer information will then be matched against vendor-supplied databases to verify the customer's identity. Matches are determined based on matching the data provided by Wespath on behalf of the customer at account opening (or subsequent thereto), which may include name, government-issued identification number, and, for individuals, date of birth. **(The vast majority of individuals are verified through this review.)**

- **Second Review is manual:**

- If the data provided by Wespath doesn't match the available data about the customer, **action is required by the customer to prevent closing of the account.**

- The letters (see sample on reverse) request personally identifiable information. If you doubt the validity of the request, please contact WageWorks at **1-877-924-3967** or the Wespath Health Team at **1-800-851-2201** to prevent automatic closing of the account.

(continued)

- **Second Review is manual** (continued):
 - A **first letter** is sent 15–45 days after failed manual review
 - A **second letter** is sent on day 65 from the date the account was opened
 - If no response, the **account is closed** between 87–90 days
- **If the account is closed due to failure to complete the CIP process, the customer can reopen account and deposit funds within 60 days.***

*Call the Wespath Health Team at **1-800-851-2201** for assistance.

Participants can verify CIP status in the **HSA Hub** on WageWorks.

Go to Wespath.org → HealthFlex WebMD → My Health Benefits → Reimbursement Accounts (WageWorks) → **HSA Hub**

HSA Hub

The screenshot shows the HSA Hub interface with the following details:

- Election Amount:** \$0.00
- Cash Available Now:** \$6,303.65
- Investment Earnings History:**
 - 1 Year: 0.15%
 - Lifetime: 0.35%
- CIP Status:** Passed (9 Dec 2016) with a 'Manage Allocations' link.
- Summary Card:** CIP Status Passed (9 Dec 2016) with an information icon.

SAMPLE LETTER:

The sample letter includes the following content:

- WageWorks logo:** everyone benefits
- Initial Letter**
- Health Savings Account Services:** Attn: CIP TEAM, PO Box 9013, Providence, RI 02940-8013
- PERSONAL AND CONFIDENTIAL**
- Account:** [insert masked account number]
- Result ID #:** [insert Result ID]
- CIP Status:** [insert CIP Failure Reason]
- Insert Account Owner Name:** Address Line 1, Address Line 2, Address Line, City, ST Zip
- Message:** This letter is in reference to your Health Savings Account. TIME SENSITIVE-RESPONSE NEEDED
- Dear Participant:**
- Thank you for establishing a Health Savings Account with WageWorks through your employer [Client Name].**
- BNY Mellon performs various functions on behalf of WageWorks and BNY Mellon, including compliance with the Customer Identification Program ("CIP") regulations under the USA PATRIOT Act.** We have been unable to verify the identifying information provided when your account was opened. In order to comply with the regulations, we must verify your name, street address, date of birth, and Social Security number.
- As a result of this, we will need additional assistance from you. Please provide the following documentation, which corresponds to the CIP Status shown above, within 30 days of receipt of this letter:**
 - **Verification of your Name and/or Social Security Number**
 - Please provide a copy of your Social Security Card AND a copy of your driver's license or other government-issued ID or a paystub showing your name and FULL Social Security Number
 - **Verification of Your Date of Birth**
 - Please provide a copy your driver's license, passport or other government-issued ID, showing your name and birthdate.
 - **Verification of Your Residential Street Address**
 - Please provide a copy of your driver's license or other government-issued ID, a utility bill that is addressed to you at your current residential address (not a P.O. Box), a paystub showing your name and current residential street address, or your mortgage/rental agreement displaying your name and current residential street address.
- Please E-mail, fax or mail the requested documentation along with a copy of this letter to:**
- E-mail:** regopsqip@bnymellon.com **Fax:** 508-599-4080 **Attn:** CIP Team
- If you choose to email, please be sure to password protect and/or encrypt your document to protect your confidential information and put your Result ID (please see the top of this page for this information) in the subject line.**

The sample letter continues with the following content:

- WageWorks logo:** everyone benefits
- Regular Mail:** Health Savings Account Services, Attn: CIP TEAM, PO Box 9013, Providence, RI 02940-8013
- Overnight Mail:** Health Savings Account Services, Attn: Regulatory/Operations, 4400 Computer Drive, Westborough, MA 01581
- Thank you for your attention to this matter. If you need further assistance, please contact our Regulatory Solutions team at 1-844-292-3930. Our associates are available Monday through Friday 9 a.m. to 5 p.m., Eastern Time.**
- Sincerely,**
- BNY Mellon Regulatory Solutions Department**