

Customer Identification Program (CIP)

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Overview

Optum Financial utilizes industry leading partners for identify verification under CIP to meet “Know Your Customer” requirements, anti-money laundering and anti-terrorism, Office of Foreign Assets Control (OFAC) and Specially Designated Nationals (SDN) checking as required by the USA PATRIOT Act and other regulations.

Optum Financial collects the following information as part of the census/enrollment process: first name, last name, physical/residential address, date of birth, Social Security number and phone number. This information is used to verify the employee’s identity as part of the aforementioned requirements. While the CIP process will not begin until the appropriate demographic information is collected, including a physical (non-PO Box address), the timeline for resolution is a combined 90 days from the enrollment date.

Impact of CIP failure on contributions

For employees who fail CIP, the health savings account (HSA) will be pending until CIP is resolved. The HSA account cannot be established until CIP is resolved, and therefore contributions cannot be deposited into the account until CIP has passed and the account can be opened. During the process of attempting to resolve the CIP failure or receipt of an invalid physical address, Optum Financial will accept, but hold, all contributions in a pending status. This means contributions for accounts that are pending CIP resolution will be included on the Contribution Funding Request to the employer. The funds received will be held in a non-interest-bearing clearing account until the HSA account is established and they can be deposited into the HSA account. If the employee does not respond, requested documentation is not provided, or is otherwise unable to resolve a CIP failure within 90 days from the initial outreach, the HSA will be declined and the account will not be established. Any pending payroll contributions will be returned to the employer within one week.

Resolution of CIP failure (requirements)

Immediately upon CIP failure, Optum Financial will reach out to the employee requesting the necessary document(s) required to resolve the failure. This outreach is either in the form of a letter or via email, if provided to Optum Financial with employee demographic information. Three follow-up notifications are then sent again after 15 days, 45 days and 65 days from the initial notification. The letters and emails clearly state what is required in order for Optum Financial to resolve CIP and proceed with establishing the HSA account. If the employee does not respond within 90 days from initial notification, Optum Financial will decline the account.

The Employer Dashboard provides real-time, transparent information regarding the status of all accounts requiring CIP. In the Employer Dashboard, by selecting the CIP Dashboard option, the employer has transparency into which employees have pending accounts and what is required in order to resolve CIP failures. The employer may also upload documents in the CIP Resolution Center on the Employer Dashboard to facilitate timely passage of CIP. Items such as I-9, W-2 or Driver’s License can usually be relied on to resolve any CIP issue.

Valid forms of identification required for CIP resolution can be uploaded to the Resolution Center by the employee in the Optum Financial participant portal.

The following is a list of scenarios which may prevent an individual from passing the CIP process*:

- Name does not match OFAC registry listing
- SSN was issued prior to date of birth
- SSN registered as deceased
- DOB does not match with SSN
- SSN does not match name and address

* Does not provide a complete and comprehensive list – just a sample.

Documentation to resolve CIP failure

Below are 2 matrices that is representative of documentation that may be accepted by the employer and the employee in the event of a CIP failure.

Acceptable documents from employee:

Data that could not be verified	Documents required to resolve CIP One of the following for each category that is applicable
Name	Driver's License (current, unexpired): State-Issued Driver's License, U.S. Military Driver's License, U.S. Dept. of State Driver's License Identification Card (current, unexpired): State-Issued ID Card, U.S. Military ID Card, U.S. Passport Card State-Issued Permit (current, unexpired, does not include temporary licenses) Social Security Card – issued by Social Security Administration (OHS “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 U.S. Citizenship and Immigration Services form: Permanent Resident Card (aka, Green Card), 1-766 Card – Employment Authorization Document (as seen on web)
DOB	Driver's License (current, unexpired): State-Issued Driver's License, U.S. Military Driver's License, U.S. Dept. of State Driver's License Identification Card (current, unexpired): State-Issued ID Card, U.S. Military ID Card, U.S. Passport Card Birth Certificate U.S. Visa Naturalization Certificate U.S. Citizenship and Immigration Services form: Permanent Resident Card (aka, Green Card), 1-766 Card – Employment Authorization Document (as seen on web)
SSN	Social Security Card – issued by Social Security Administration (OHS “Work Only” authorization accepted); the fraud & operations compliance department may require another form of documentary evidence to support this document Pay Stub dated within past 30 days only if it reflects full SSN or TIN Social Security Benefits Award Letter Military Service Record – OD214 (only if it reflects SSN) Acceptable dated within 5 years: IRS Form W-2, IRS Form 1099, IRS Form 5498, IRS Form 1098
Address	Driver's License (current, unexpired): State-Issued Driver's License, U.S. Military Driver's License, U.S. Dept. of State Driver's License Lease Agreement (Negotiated within the past 12 months; or month-to-month negotiated within the past 6 months) Vehicle Registration Card (current, unexpired) Bill/Statement with address – generated within past 30 days (unless quarterly statement, then most recent): Utility Bill (e.g., home phone, mobile phone, cable, water, sewer, electric, gas, or oil), Pay Stub/Voucher, Bank Statement/Credit Card Statement, Mortgage Statement, Insurance Statement (e.g., home, auto), Investment Statement

Accepted from the employer:

Data that could not be verified	Documents required to resolve CIP One of the following for each category that is applicable
Name	Driver's License (current, unexpired): State-Issued Driver's License, U.S. Military Driver's License, U.S. Dept. of State Driver's License
	Identification Card (current, unexpired): State-Issued ID Card, U.S. Military ID Card, U.S. Passport Card
	State-Issued Permit (current, unexpired, does not include temporary licenses)
	W-2 provided by employer
	I-9 Employment Eligibility Verification – provided by employer and certified
	U.S. Citizenship and Immigration Services form: Permanent Resident Card (aka, Green Card), 1-766 card – Employment Authorization Document
DOB	Driver's License (current, unexpired): State-Issued Driver's License, U.S. Military Driver's License, U.S. Dept. of State Driver's License
	Identification Card (current, unexpired): State-Issued ID Card, U.S. Military ID Card, U.S. Passport Card
	I-9 Employment Eligibility Verification – provided by employer and certified
	U.S. Citizenship and Immigration Services form: Permanent Resident Card (aka, Green Card), 1-766 card – Employment Authorization Document
SSN	Pay Stub dated within past 30 days only if it reflects full SSN
	W-2 provided by the employer
	I-9 Employment Eligibility Verification – provided by employer and certified
Address	Driver's License (current, unexpired): State-Issued Driver's License, U.S. Military Driver's License, U.S. Dept. of State Driver's License
	W-2 provided by employer
	I-9 Employment Eligibility Verification – provided by employer and certified

CIP process flow

Optum Financial verification process



Employer collects and submits employee data in enrollment process to Optum Financial



Optum Financial collects data and transmits to trusted vendor for identity verification



Key demographic information is evaluated and validated through pre-defined risk thresholds, and a response is returned to Optum Financial



Pass

- Establishes HSA account
- Account details provided in welcome letter to employee
- Account ready to receive contributions



Fail



Fail

1



2



3

Pass

A failure puts an account into a pending status and kicks off notifications for additional information, and introduces a 90-day countdown until the account is declined

Employee or employer can provide additional documentation to verify identity. Documentation can be uploaded by employee or employer, via Resolution Center tools, and quick resolution is achieved through Optum Financial system auto-match

- Establishes HSA account
- Account details provided in welcome letter to employee
- Account ready to receive contributions



Fail

Repeat Step 2 if fails again

If documentation is not provided to pass the account within the 90-day time limit, the account will be declined any any pending payroll contributions will be returned to the employer. Contributions are returned to the Employer via ACH Credit Invoice, to review the detailed breakdown of the returned contributions, access the Employer Dashboard and select the 'Reports' tab and access the 'Contribution Returns' report.

EE Communications

Participant Initial Notice

Communication channel: Email if email address on file; otherwise, send letter

Audience: Participant

Subject: Your HSA: Further action is required

Dear <First Name>,

We are very pleased to receive your enrollment for a health savings account (HSA) through your employer, <employer name>. 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 the following documentation. Any contributions made by you or your employer will not be made available to you until your account is opened.

Reason for request	Documentation needed
<Pending Reason – Example: Documentation is required to verify full name with Social Security Number>	< Documents Required to Resolve CIP – Example: Driver’s License (current, unexpired): State-Issued Driver’s License, U.S. Military Driver’s License, U.S. Dept of State Driver’s License>

<registered user>**This is a secure and easy process.** Simply sign in to <Link to Participant CIP Dashboard for registered user> and you will be prompted to upload the required documentation.

<Instructions for CIP Dashboard/Resolution Tool>

<non-registered user>**This is a secure and easy process.** Simply sign in to <Link to Participant CIP Dashboard for non-registered user>. Once you have validated your identity, you will be able to upload and submit the required documentation. <Instructions for CIP Dashboard/Resolution Tool>

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 <L9 SERVICE NUMBER> <L33 CUSTOMER SERVICE HOURS>

Participant CIP Documentation Rejection Notice

Communication channel: Email if email address on file; otherwise, send letter

Audience: Participant
Subject: Submitted HSA documentation was insufficient
Date<date letter/email generated>

Dear <first name>,
Thank you for submitting documentation on <Date Submitted> to open your health savings account (HSA). Unfortunately, the provided documentation could not be verified, and your account cannot be opened.

Documentation received	<Documentation type received>
Reason not accepted	<Documentation Reject Reason>

You still have time! You have <days until declined> days from the date of this notice to resubmit the information required: <Documents Required to Resolve CIP>. As a reminder, we must be able to verify this personal information before we open your HSA, as required by the USA PATRIOT Act.

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

<registered user version>**Act now!** Simply sign in to the Optum Financial myCYC mobile app or <Link to Participant CIP Dashboard for registered user> and you will be prompted to upload the required documentation. <Instructions for CIP Dashboard/Resolution Tool >

<non-registered user>**Act now!** Simply sign in to the Optum Financial Resolution Center via this secure link <Link to Participant CIP Dashboard for non-registered user> to upload and submit the required documentation.

<Instructions for CIP Dashboard/Resolution Tool >

Thank you, <first name>, for your prompt attention to this important issue.

Sincerely,
Customer Care Center <L9 SERVICE NUMBER> <L33 CUSTOMER SERVICE HOURS>

Participant CIP Passage Notice

Communication channel: Email if email address on file; otherwise, send letter

Audience: Participant

Subject: Your account review was successful

Body:

<FirstName>,

Great news! The documentation submitted to open your health savings account (HSA) has been reviewed and accepted. Your account will now be opened and we will promptly send additional important account information to your mailing address.

<If pending contribution amount >0 then> You have \$<Pending Contributions> in pending account contributions that will be applied to your HSA. If you've used personal funds to pay for eligible expenses after your plan effective date, you may request reimbursement online or through the myCYC mobile app.

We're excited to bring you this convenient way to save for your medical expenses. Download the CYC mobile app, myCYC, today to stay connected when you're on the go. Access your account online at <L11 WEBSITE ADDRESS><D29 NAVIGATION STEPS>.

Sincerely,

Customer Care Center <L9 SERVICE NUMBER> <L33 CUSTOMER SERVICE HOURS>

Participant Account Declined Notice

Communication channel: Email if email address on file; otherwise, send letter

Audience: Participant

Subject: Your HSA could not be opened

Dear <first name>,

Thank you for allowing us to assist you in opening a health savings account (HSA) through your employer, <employer name>.

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.

Should you decide to resubmit a new HSA enrollment request, please contact your employer.

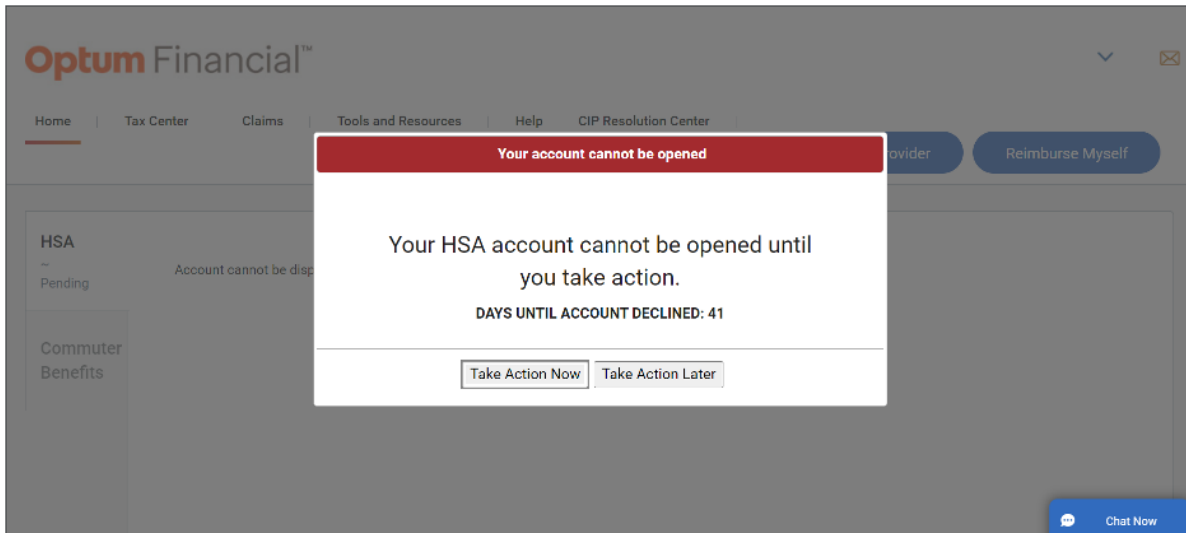
We hope that you reconsider opening an HSA in the future, and we look forward to assisting you at that time.

Sincerely,

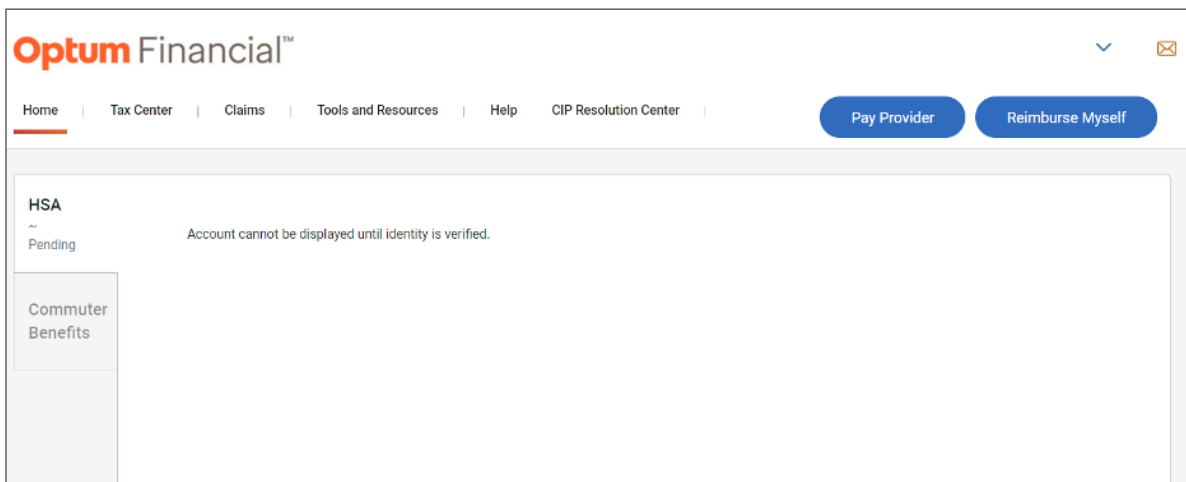
Customer Care Center <L9 SERVICE NUMBER> <L33 CUSTOMER SERVICE HOURS>

Member Portal experience

Pop-up upon login:



View if the user selects "Take Action Later".



View when user selects “Take Action Now”

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Customer Identification Program (CIP) Resolution Center

CIP ID:

First Name

Last Name:

SSN #: :

Date of Birth: :

Address:

Pending Reason:

- Documentation is required to verify last name with Social Security Number
- Documentation is required to verify full name

Documentation Required:

(1) To verify name, one of the following will be required:

[Upload Documents](#)

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- Permanent Resident Card (aka, Green Card)
- 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
- State Issued Permit (current, unexpired, does not include temporary licenses)
- State-Issued Driver's License (current, unexpired)
- State-Issued ID Card (current, unexpired)
- U.S. Dept. of State Driver's License (current, unexpired)
- U.S. Military Driver's License (current, unexpired)
- U.S. Military ID Card (current, unexpired)
- U.S. Passport Card (current, unexpired)
- U.S. Visa (current, unexpired)

(2) To verify social security number, one of the following will be required:

- IRS Form 1098 (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 W-2 (must be dated within 5 years)
- Military Service Record - DD214 (only if it reflects SSN)
- Paystub dated within past 30-days only if it reflects full SSN or TIN
- Social Security Benefits Award Letter
- 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

[Upload Documents](#)

View when user selects “Upload Document”.

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CIP Resolution Center

* Document Type

Please select a document type

* Document File

Choose File | No file chosen

Upload Document

When uploading documents to the resolution center, please ensure they are less than 10MB in size and are one of the following acceptable file types: pdf, .jpg, .jpeg, .png, .bmp, .gif, .tif. Attempts to submit files that are too large or not of an acceptable file type will error.

* = required field

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Flexible spending accounts (FSAs), dependent care assistance programs (DCAPs), health reimbursement arrangements (HRAs), Commuter and Parking Benefits, Tuition Assistance Plans, Adoption Assistance Plans, Surrogacy Assistance Plans, Wellness Benefits, and Lifestyle Accounts (collectively, "Employer-Sponsored Plans") are administered on behalf of your plan sponsor by ConnectYourCare, LLC, and are subject to eligibility and restrictions. Employer-Sponsored Plans are not individually owned and amounts available under the Employer-Sponsored Plan are not FDIC insured.

CIP confirmation

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Thank you for providing us the required documentation. We will review and let you know if we have any questions. Otherwise you will receive an email from us letting you know your account is opened.

Upload Additional Documents

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Employer Portal experience

Customer Identification Program (CIP) Status Dashboard

Use the auto-complete search box below to find the employer whose employee's CIP order you would like to view. Clicking "Submit" will display the applicable CIP Orders on the CIP Dashboard.

Employer

Type Employer Name

CIP Status:

Pending

CYC Account Status:

All

Date Enrollment Received From:

12/08/2023

Date Enrollment Received To:

03/07/2024

CIP Status Date Change From:

CIP Status Date Change To:

Days Until Account Declined Min:

Days Until Account Declined Max:

☐ Display Full SSN

- By selecting this option, you are certifying that there is a business need to view the full SSN

Display Report

Email Report

Customer Identification Program (CIP) Resolution Center

Participant

Please input name or last 4 of SSN

CIP ID:

First Name:

Last Name:

SSN #:

Date of Birth:

Address:

Phone:

Pending Reason:

Documentation Required:

Upload Documents

