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HSA CIP Process and FAQ

What is a CIP Check?

CIP stands for Customer Identification Program. All banks are required to perform this check whenever a person wishes to open an account through them in accordance with the USA Patriot Act. The CIP is intended to enable the bank to form a reasonable belief that it knows the true identity of each customer. The CIP rule implements Section 326 of the USA Patriot Act and requires each bank to implement a written CIP that is appropriate for its size and type of business and that includes certain minimum requirements.

I already have an HSA. Does Avidia Bank still have to perform the CIP Check even though I have an HSA through another bank?

Yes, Avidia Bank is required by the USA Patriot Act to perform the CIP Check every time a new participant opens an account with them, regardless of whether you have or have had an HSA elsewhere.

How long does the CIP Check take?

After your enrollment is complete, you will receive an email asking you to read and agree to Avidia Bank's disclosures and agreements, which is required in order for the CIP Check to begin. Once this is completed, Avidia's system performs an automated CIP Check. When this is performed, some records will be flagged because they fail the Identity Verification review, which is the first step of the process. If you pass this initial step, your account is opened and you will receive an email containing a Welcome Kit from avidiaHSA@flex-admin.com.

If you fail the aforementioned first step of the process, you will receive a request for additional documentation within 24-48 hours of failing the initial automated CIP Check. This request will arrive in an email from HSA@AvidiaBank.com and will list examples of the type of information that they are requesting in order to verify your identity and open your account. An example of what this email will look like is on page 4.

If no response is made within 15 days of the first CIP request, you will receive a second notice from Avidia Bank. If still no response is received within 90 days of the first notice, you will receive a CIP Expiration Letter informing you that your Avidia HSA Application has been denied. You may be able to reapply. Please contact your employer or FBA to reapply.

Can I still have contributions posted to my account if I have not passed the CIP Check?

No. Until you pass the CIP Check, your application has not yet been approved, meaning that your account is not open. Until your account is opened, no deposits can be made into your account, regardless of whether they are employee or employer funds. Funds will be placed on hold until your account is opened.

What types of things may cause me to fail the initial CIP check.

To help prevent failing the initial CIP Check, ensure that you are entering your legal demographic information when completing your enrollment. Your name should be entered exactly the same way that it appears on your Driver's License and Social Security Card. You should also enter your home/physical address as your home address. Entering a PO Box as your home address may cause you to fail the initial CIP Check.

Other things that typically cause you to fail the initial CIP Check is a recent name change due to a marriage or divorce or a recent address change, for example.

Where do I send my requested documentation to?

Please send all requested documentation to Avidia Bank directly. It is recommended that you either fax or mail your documentation. Please see information below:

Fax: (844) 560-6760

Mail: Avidia Bank, PO Box 161390, Altamonte Springs, FL 32714

Example CIP Request Email



September 20, 2017

Thank you for your recent Avidia HSA application.

Your application is currently being reviewed. However, in order to fight the funding of terrorism, Customer Identification Program ("CIP") regulations issued under the US PATRIOT ACT require financial institutions, including Avidia Bank, to obtain and verify certain identifying information for each person who opens an account.

At this time, we were unable to verify the identifying information provided when you submitted your application to open an Avidia HSA. Therefore, we are requesting the documentation indicated below be provided before we can complete the processing of your Avidia HSA account application.

Please provide a copy of one of the following:

- Valid State Drivers License
- · Valid State Issued ID
- Valid Passport

And please also provide a copy of the following:

· Social Security Card

And please also provide a recent copy of one of the following, dated within the past 30 days:

- · Utility Bill
- Paystub
- · Phone Bill
- Bank Statement
- · Insurance Statement

Please send the requested documentation within 14 days from the date of this letter, to the address listed below. Failure to submit the required documents within the 14 days, may result in your HSA account application being denied.

Please print a copy of this notification and send with the requested documentation to Avidia Bank, PO Box 161390, Altamonte Springs, FL 32714 or by fax to (844) 560-6760.

To communicate faster and more efficiently with you about future items, please go to your online account and enter your preferred email address.

If you have any questions, please contact Avidia Bank HSA Customer Service at 855-472-9399 option 4 to speak with a banking professional.

Thank you,

Avidia Bank PO Box 161390 Altamonte Springs, FL 32714

Avidia Bank Investment Setup and Information

One of the major benefits of an HSA is having the ability to invest the funds you contribute, even further growing the value of your HSA funds over time. In addition to having tax-advantaged funds to pay for healthcare, many financial advisors have begun to view HSA investment opportunities as on par, or above, the value gained from contributing to a 401(k).

A few key things you need to know as you begin:

- Devenir is the partner managing your HSA investment funds.
- You need to have a minimum \$1,000 balance to start making investments through Devenir with your HSA funds.
 Once enrolled, there is a \$2.50 monthly Investment Fee from Devenir, which is waived if your HSA cash account has a monthly average balance equal to or greater than \$3,000
- Your investments are self-directed You control which mutual funds your HSA funds will go into (like many 401k programs).
- You can manage your investments online: Log into https://fba.wealthcareportal.com to manage your HSA investments.

How to Enroll in Investments via the WealthCare Portal

- 1. Log into the online portal. Navigate to the account summary page and locate your HSA. Hover over My HSA and then click on HSA Investment Account. This will direct you to the HSA investment page.
- 2. Investment rules for your HSA bank custodian will display. You may need to meet a minimum account balance to apply for an investment account. If you don't meet the minimum balance requirement, the account application button will not appear. Click the button to start the application process.
- 3. Carefully review and accept any agreements to complete your application. Allow 2-3 business days for processing and approval of your application.

How to Transfer Funds from your HSA into your investments

You must transfer funds from your HSA to your investment account in order for any investments to actually occur. To transfer funds, follow the steps below.

- 1. From the HSA Investment Account page, click 'Transfer Money to Investments'.
- 2. Enter the amount you wish to transfer in the field highlighted below. Note: You must enter an amount between the listed minimum and maximum investment amounts.
- 3. Click 'submit'. Your transfer request is complete, and will occur within 2-3 business days.

You can set up an automatic funds transfer from your HSA to your investments account to make funding your HSA investments even easier! From the HSA Investment Account page, click 'Setup Automated Transfers'.

Simply select a threshold amount, and a minimum transfer amount. When your HSA account balance exceeds the threshold by at least the minimum transfer amount, funds will automatically be transferred to investments. Your HSA account balance is maintained at the threshold you select.

Save your changes when complete. You can edit or cancel future automatic transfers at any time.

How to Set Up Your Investment Plans after your Investment Account is Approved

- 1. From the HSA Investment Account page, click 'View/Trade your Investments'.
- 2. On the next screen, click 'enroll now'.
- 3. Verify your name, account number, address, and email address are correct. Click 'next'.
- 4. Specify the percentage you want to allocate to each investment fund. Allocation percentages must add up to 100%. Once you've populated your allocations, click 'next'.
- 5. Click 'enroll me'.
- 6. Finally, click 'ok' to complete your enrollment.

Investment Account FAQs

How often are investment options updated?

Investment options are updated on a quarterly basis and are available via your online account.

How long does it take to transfer funds?

It takes 1-2 business days to transfer money to/from your investment account.

How can I access my investment account?

You can access your investment account directly from your online HSA account at: https://fba.wealthcareportal.com.

Can I go below the \$1,000 threshold in my HSA?

No. When funds are transferred from your HSA to your investment account, the amount of the transfer cannot bring the balance of your HSA below your minimum investment threshold.

Can I use my investment funds to pay for qualified medical expenses?

No. You cannot make payments for qualified medical expenses directly from your investment account. If you wish to use funds from your investment account, the funds will first need to be transferred back into your HSA account.

What does 'self-directed' account mean?

Self-directed means that neither the HSA bank custodian, nor the investment partner, provides investment advice. You are responsible for selecting which investments are right for you. For investment advice, please seek a professional investment consultant.

Can the \$2.50 monthly Investment Fee from Devenir be waived?

If your monthly account balance maintains an average balance equal to or greater than \$3,000, the investment fee is waived. If your balance is less than \$3,000, this fee cannot be waived by Avidia Bank nor FBA.

Avidia HSA Banking Fees

Avidia Bank reserves the right to change, amend, or modify fees at any time. FBA does not have any control over these fees and cannot waive them.

The below fees will be in effect as of January 1, 2018 and may be in addition to existing fees that are listed in Avidia Bank's Agreements and Disclosures.

Levy Fee (per levy)	\$50.00
Non-Sufficient Funds (NSF), An insufficient funds item may be created by check, in-person	\$30.00
withdrawal or other electronic means	
Return Items (deposited)	\$7.00
Stop Payments (all items)	\$25.00
Paper Checks (book of 25 checks)	\$20.00
Abandoned Property Fee	\$50.00
Outgoing Transfer / Rollover	\$25.00
Paper Statement*	\$2.00
Expedited Debit Card**	\$50.00
Monthly Inactive Account fee (No Transactions for 12 months)	\$3.00

^{*}Paper statement fee charged monthly – Please note you may opt-in to receive free electronic statements online by choosing HSA statements and setting your preference.

Below are the fees currently listed in Avidia Bank's Agreements and Disclosures.

Levy Fee (per levy)	\$50.00	
Research Fee (per hour-\$15.00 minimum)	\$25.00	
Stop Payments (all items)	\$25.00	
Wire transfers (incoming)	\$10.00	
Wire transfers (outgoing)	\$20.00	
Wire transfers (outgoing) international	\$40.00	
Non-Sufficient Funds (NSF). An insufficient funds item may be created by check, in-person	\$30.00	
withdrawal, ATM withdrawal or other electronic means.		
Return items, deposited	\$5.50	
Unavailable funds fee	\$30.00	
The following fees and charges may be assessed against your account if you are sixty-five years of age or		
older, or eighteen years of age or younger:		
Non-Sufficient Funds (NSF). An insufficient funds item may be created by check, in-person	\$5.00	
withdrawal, ATM withdrawal or other electronic means.		

^{**}This fee applies to Avidia Bank issued debit cards only. Any cards issued by FBA do not apply to this charge.