Overview

Are there any specific actions a customer needs to take with this move?

Depending upon customer activities with the HSA including enrollment, contributions, and reporting, there may be customer impact. Customers should consider:

1. There is a spending account system outage that will prevent customers from accessing the spending account components of the administrative portal between Monday, November 6 and Tuesday, November 14.
2. There is an HSA contribution outage beginning Friday, November 3 at 1:30 PM through Tuesday, November 14. Any contributions planned for this period needs to be moved to before or after the outage. This outage affects both contributions scheduled in the system and file-based contributions.
3. There is a change in company ID for standard ACH debit pulls. Any customer using the ACH debit pull for contributions, needs to provide its bank with the new company ID number that will become effective on November 15 – 2900234962. Otherwise, the bank may reject the ACH debit request. There is a change in bank for ACH push and wire customers as well.
4. There is an HSA account opening delay, beginning October 16. From this date, any new enrollments into a qualified high-deductible health plan will not have HSAs opened at Bank of America. These individuals will be sent directly to Acclaris on the evening of Wednesday, November 15 and the account opening process will begin at that point.

Spending Account System Outage

What does the system outage mean for a customer?

During the system outage, all access to the HSA both for account holders and employers will be turned off. Customers will not be able to run HSA reports or make HSA contributions. Other areas of the administrative portal will continue to be available.

Contribution Outage

When is the HSA contribution outage?

The contribution outage begins on Friday, November 3 at 1:30 pm. Any contribution not loaded by this time will have to loaded on or after Wednesday, November 15.

Changes in Contribution Process

What is changing with the HSA contribution process.

The HSA contribution process is not changing. However, ACH pull customers who have an ACH filter set up will need to provide their bank with the new Company ID number: 2900234962. The new ID should be provided to the bank between Monday, November 6, 2017, and Tuesday, November 14, 2017 to allow contributions to resume on November 15. This new Company ID will be applicable going forward with Acclaris. The customer should also advise that the old Bank of America Company ID number: 1521523496 should be blocked for purposes of HSA contributions as of Monday, November 6.

What if a scheduled contribution is set to run during the contribution outage?

If a contribution schedule date is during the outage, it will not happen and the customer will need to do a manual one-time schedule before or after the outage to load the funds. Schedules will resume as usual after the outage. The customer must provide its bank with the new Company ID number (2900234962) to insure the ACH pull is not blocked.
What about file-based contributions?
Any file that is scheduled to be loaded during the outage will need to be loaded before or after the outage. The customer must provide its bank with the new Company ID number (2900234962) to insure the ACH pull is not blocked.

What about customers using ACH push or wire payments?
Customers using non-standard contribution methods such as ACH push customers and wire must send contributions to a new PNC bank account. We will provide this information separately.

Will customers need to update their bank account information in Acclaris?
No. Customers will not need to re-enter bank account information on the administrative portal, unless they wish to change the source bank for HSA funding with the standard ACH debit pull method. The customer must provide its bank with the new Company ID number (2900234962) to insure the ACH pull is not blocked.

What will happen to contributions already in process at the beginning of the outage?
Contributions that are already in process at the beginning of the outage will complete processing as usual. However, these funds will not be available to the member until Wednesday, November 15.

Is there a change to when employer-submitted HSA funds become available to account holders?
No. There is no change. Funds become available to members on day 4. However, contributions will post on the same day and appear as pending contributions. The available balance will not include the pending contributions.

Where should a customer go if they have questions about contributions?
Customers should call the HSA Employer Contribution Help Desk (1-877-959-4161) between the hours of 9 am and 4 pm for contribution support. If the call goes to voicemail, the customer can provide contact information and preferred times for outreach.

New HSA Openings
What date will be used to initiate account holder mailings?
We will be sending a letter to account holders about the change in HSA custodian in October based upon a mailing list generated around September 13. This means there is a possibility the letter will not reach newly hired employees. We will be asking customers to assist by forwarding finalized member communications to any new hires added between Thursday, August 31, 2017, and Monday, October 16, 2017, to ensure that they receive these important updates.

What about employees hired after October 16, but prior to Monday, November 6, 2017:
To minimize confusion around multiple accounts and debit cards, a new HSA membership received on or after Monday, October 16, 2017, will set up directly with the new custodian, Acclaris, Inc. starting on Wednesday, November 15, 2017.

Can a customer continue to send medical enrollments attached to an HSA during the outage? What is the impact to timing?
A customer can continue to send enrollment information via EDI, or enter new enrollments into the customer portal. However, during the account opening outage, any HSA account opening requests will be held and sent to the spending accounts on the night of Wednesday, November 15.

Customer Identification Process
Will the account holder go through the customer identification process (CIP)?
Yes. Acclaris, Inc. is under legal obligation to complete CIP verification on all transitioned accounts. The CIP verification will occur after the account is transitioned and will not impact the members’ ability to use the account.
Will an account that is in pending CIP verification prior to the change be transitioned to Acclaris?
Any account that is in pending status will transition to Acclaris, Inc. and remain in pending status. Acclaris, Inc. will reinitiate CIP verification. Pended account holders will receive notification and should respond with appropriate documentation as required.

Notifications
How will customers be notified of the change in HSA custodian?
Customers will be notified by AmeriHealth New Jersey through direct mail. Account teams will facilitate communication where appropriate.

How will account holders be notified?
Account holders will be notified through several mailings and through information posted on the member portal. Details are provided in the account-holder FAQ.

Is the customer responsible for notifying account holders of the change in HSA custodian?
No. Existing account holders will receive direct communications. However, we are asking customers to help communicate the upcoming transition to any employee newly enrolled in the HSA in September and October due to the timing gap between the compilation of the mailing list and the transition.

Change in Custodian
Why is there a change in HSA custodian?
Bank of America is discontinuing participation as a third party bank custodian for HSA’s at the end of 2017, and we are moving all HSAs to Acclaris, Inc.

Acclaris, Inc., a Willis Towers Watson Company, has provided platform, web, and print services to us since AmeriHealth New Jersey moved to the Bank of America HSA in 2015. In 2017, Acclaris, Inc. received regulatory approval to become a non-bank HSA custodian. A non-bank custodian is approved by the IRS to perform as HSA custodian by meeting fiduciary requirements and is regulated by the IRS, not by the FDIC. In conjunction with Acclaris, Inc. providing custodial services, PNC Bank, an FDIC insured bank, will act as the bank depository for HSA’s.

Can a customer opt out of the change to Acclaris, Inc. as HSA custodian?
If a customer wishes to continue to provide integrated HSA services it must be with Acclaris. A customer always has the option of moving to another non-integrated HSA custodian. However, any movement of existing HSAs to another custodian will require the account owners to complete a trustee-to-trustee transfer or rollover.