

Frequently Asked Questions

Primary Depository Transition for ACH Processing

What is changing?

On March 31, 2022, BMO Harris will become the primary depository for your employees' HSAs. In its role as primary depository, BMO Harris will become the new ACH origination provider, handling all money movement to and from participant HSAs, including contributions to and payments from those accounts. We are working with our HSA administration partner to ensure this is a smooth transition.

What is changing as part of this transition?

If you use ACH filters, you can expect the following changes as part of this transition:

- New routing number: Employer contributions using WealthCare Admin (WCA)
- New routing number: Unsolicited ACH, e.g. direct deposit/debit from your employees' accounts.
- Company IDs used for ACH transactions
- ACH filters for payroll contributions
- Wiring Instructions

We will provide an implementation document that includes the new IDs and filters.

What is the difference between a custodian and a depository?

- A **custodian** is responsible for protecting the consumer and managing the account, communications, compliance, tax reporting, the account opening process, funds movement and more. WealthCare Saver* is and will remain the custodian.
- A **depository** is the underlying bank that holds the funds. The depository will become BMO Harris.

What types of money movement are affected?

Money movement impacts include:

- Your contributions via ACH and/or wire transfers will now move through depository accounts established with BMO Harris.
- Individual contributions and provider payments will be done using new BMO Harris account information.
- Contributions made via check will not be impacted by this transition.

Who does this change affect?

This change affects:

- Employers that offer HSAs and contribute either pre-tax employee and/or employer contributions to their employee HSAs via ACH filter
- Employees who make contributions to their HSA via an ACH direct deposit from a personal bank account or provider initiated payments via ACH debit directly from their HSA. For example: member has provided provider with HSA bank account information for payment processing.

What communications will my members receive and when?

We will provide an email template that includes the new IDs and filters for you to send to your employees. The email will be an attachment in the communication sent to you on or around November 15th.

WealthCare Saver will also send an email communication to your employees in February 2022.

How do I know if my bank uses ACH filters?

If you're unsure if your bank uses ACH filters, please check with your finance team.

What is the timeline for these changes?

These changes will take effect March 31, 2022. If you use ACH filters, you will need to add the new ACH filter in advance of the cutover. Failure to complete this action in advance of the cutover date may result in failed contributions after March 31, 2022. ACH filter testing will begin in December 2021 for employers with the ACH pull method. The email communication sent to you on or around November 15th provides additional details.

We encourage you to communicate with any of your employees who may have automated bill payments via ACH direct debit or who may make HSA contributions via ACH direct deposit. These employees will need to change the unsolicited ACH routing number.

We will provide an email template that includes the new IDs and filters for you to send to your employees. The email will be an attachment in the communication sent to you on or around November 15th.

How will I keep informed about this change?

We will communicate with you during the ACH filter testing process, in advance of the official notification to your employees from the custodian, and after the cutover is complete.

What is expected of me as an employer in preparation for this cutover?

The following actions need to be taken based on how you contribute to your members HSA's:

Funding Method:	Definition:	Employer Action:	Testing:	Timing:
ACH Pull	Funds are pulled from employer bank account based on contribution manager submission or invoice	Add new BMO Harris filters	<i>Follow employer communication</i>	Follow testing plan. Filters must be made by 3/30/22
ACH Push	Funds are submitted from the employers account to individuals HSA bank accounts	Add new BMO Harris filters	No testing available	Contributions on or after 3/31/22 must go to BMO Harris.
Wire	Employer receives an invoice for contributions and wires funds accordingly. Note: Wire funding use is limited and based on group size	Add new BMO Harris payee	No testing available	Wires on and after 3/31/22 must go to BMO Harris.

If you use ACH filters, please make the necessary changes to your company IDs and/or ACH filters with your respective banks before the March 31, 2022 cutover date. We will provide an implementation document that includes the new IDs and filters.

If you do not update the ACH filters, attempts to submit contributions could result in an ACH return. Per most contracts, there is a fee incurred for ACH returns.

Note: If you are processing a payroll contribution file before 3/31/22 with an effective date of 3/31/22 or AFTER please use the new BMO Harris banking filters.

How should I notify my employees?

We will provide you with an email template to communicate to your employees about this transition. We encourage you to do so as soon as possible.

What is expected of the employee prior to the change?

If employees make direct deposits to their HSA or have automatic bill pay set up with their medical provider to pull funds from their HSA, they must change the routing number with their banking institutions and/or medical providers. We will provide an email template that includes the new IDs and filters for you to send to your employees.

If employees fail to update the routing number, the direct deposit or debit payment may fail and the funds would be returned to the originating bank account. The employee would still be responsible for making that payment as agreed to with the provider.

Will there be any change to employees' HSA account numbers as part of this transition?

No, employee HSA account numbers are not changing.

How will this depository change impact tax filing for 2022?

There will be no impact to 2022 tax filing as a result of this depository change. Employees will receive a 2021 Tax Form from the WealthCare Saver custodian.

Will members have new terms and conditions/disclosures?

There is no change to terms and conditions as part of this change

Will this impact members investments?

There is no change to investments as part of this change

For divisional funding groups will each division be tested?

Yes, each division will need to test.

* WealthCare Saver, a dba of Alegeus Technologies, LLC, is a licensed Non-Bank Custodian of HSA cash accounts.