

# HEALTH SAVINGS ACCOUNT (HSA)

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People’s United Bank Section 125 Cafeteria Plan (the “Cafeteria Plan”) permits eligible employees to choose to pay for certain benefits on a pre-tax basis, including funding of a Health Savings Account (“HSA”). This summary describes the HSA and applicable rules.

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## Overview of the Health Savings Account (HSA) Benefit

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A Health Savings Account (“HSA”) is not an employer-sponsored employee benefit plan. It is an individually-owned savings account that is established and maintained by a trustee/custodian outside the Plan to be used primarily for reimbursement of “eligible health care expenses”. People’s United Bank has no authority or control over the funds deposited in an HSA. The HSA is not considered to be sponsored or maintained by People’s United and is not intended to be subject to the federal statute known as the Employee Retirement Income Security Act of 1974 (“ERISA”).

### Health Savings Account Defined

A health savings account is a tax-advantaged trust or custodial account used to pay for certain health care expenses. The HSA Benefit allows you to make pre-tax contributions that People’s United will forward to your HSA trustee/custodian for deposit in your account. Your HSA belongs to you, is completely portable and it goes with you if you change jobs or terminate employment. You (not People’s United or your HSA trustee/custodian) are responsible for:

- Meeting any IRS requirements or limitations to assure favorable tax treatment;
- Reporting to the IRS any contributions to your HSA (whether made through the Plan or otherwise);
- Reporting to the IRS any distributions from your HSA;
- Determining whether HSA distributions are for eligible health care expenses;
- Maintaining documentation sufficient to prove that distributions you did not report as taxable were made for eligible health care expenses;
- Payment of income and penalty taxes on distributions which were not for eligible health care expenses.

You can use amounts in your HSA and the earnings on those amounts to pay for eligible health care expenses on a tax-free basis. With certain exceptions for death, disability or attainment of age 65, you must pay a 10% penalty as well as regular income tax on amounts distributed from your HSA that are not used to pay eligible health care expenses.

### HSA Administrator and Trustee/Custodian

For administrative convenience, People’s United has selected ConnectYourCare as the administrator, with Bank of New York Mellon (“BNY Mellon”) as the trustee/custodian, for amounts contributed to HSA accounts through the Plan. You will be provided links to the forms necessary to establish an HSA with ConnectYourCare. You will be responsible for managing your HSA and for complying with the rules established by ConnectYourCare and the IRS. Once your pre-tax contributions are deposited into your HSA, you are free to request a distribution of the funds or to transfer them to another HSA trustee or custodian.

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## Eligibility

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Only eligible employees enrolled in the Medical Plan’s HealthSavings Option, a HSA-eligible High Deductible Health Plan, may be eligible to establish and make pre-tax contributions to an HSA.

You are not eligible for an HSA if you:

- Are enrolled in Medicare.
- Are covered by another health care plan that is not a HDHP.
- Can be claimed as a dependent on someone else’s tax return.
- Are covered by veterans’ benefits and have used Veteran Affairs medical services within the previous three months.
- Are enrolled or covered by a general purpose Flexible Spending Account (FSA) or full purpose Health Reimbursement Arrangement (HRA), including one offered through a spouse’s employer. See additional details in *FSA/HRA Restriction* section.

HSA eligibility (the rules around whether someone has a qualified HDHP and nothing else that would disqualify them) is determined monthly and would take into account retroactive changes. HSA eligibility is used to determine how much a person can contribute to the HSA each year.

HSA establishment is different. An HSA is established once it has been opened and funded. HSA establishment is used in determining which distributions can be tax-free. Distributions must be for healthcare related expenses incurred by the account owner, his or her spouse and tax dependents and incurred on or after the HSA was established.

HSAs are individually owned. They can't be transferred to another owner. There is a limited exception in the case of the account owner's death. If the beneficiary is the spouse, it can be transferred to an HSA in the spouse's name.

## **FSA /HRA Restriction**

An employee who chooses to make or receive HSA contributions may also have the option to enroll in a Flexible Spending Account (FSA) or Health Reimbursement Arrangement (HRA). However, the HRA and FSA coverage must be limited to "permitted coverage" or "permitted insurance."

If you have a year-end balance in a general-purpose health FSA, you are ineligible for HSA contributions until the first calendar month after the health FSA grace period ends. The same is true if your spouse's general-purpose health FSA has a year-end balance as your medical expenses are eligible for reimbursement from that general-purpose health FSA.

However, per the IRS, if you have a \$0 balance at plan year end under a general-purpose health FSA with a grace period (such as the 2018 People's United General-Purpose Health Care FSA) you can disregard that FSA coverage and begin HSA contributions during the grace period. This rule requires that the \$0 balance be determined on a cash basis, meaning the balance as of the December 31, 2018 must be \$0 without taking into account expenses that have not been reimbursed as of that date. Thus, pending claims, claims submitted, claims received, or claims under review that have not been paid as of a date are not taken into account.

## **Customer Identification Process (CIP)**

ConnectYourCare and BNY Mellon utilize industry leading partners for compliance under a customer identification program (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 PATRIOT Act and other regulations.

ConnectYourCare collects the following information at the time of enrollment: first name, last name, residential address, date of birth, Social Security Number and home phone number. This information is used to verify the employee's identity. The employee will pass the CIP process when a certain combination of the information matches.

If you fail CIP, BNY Mellon will reach out to you and request two valid forms of identification. An initial letter will be sent within 15 days of the failure. A second letter will be mailed 45 days after the failure with a third mailed 75 days after.

Employees must submit two legible copies of valid forms of identification to BNY Mellon within 90 days of notification. Social Security Card is required and one additional form of identification from the list below:

- Current Valid Driver's License or State Non-Driver Identification Card – U.S. Only
- Current Valid Passport
- Current Valid Passport Card – U.S. Only
- Resident Alien Card
- Permanent Resident Card
- Alien Registration Receipt Card
- Green Card/Temporary Residence Card or Non-Resident Alien Card
- Employment Authorization Card Form I-766
- Immigrant or Non-Immigrant Visa
- US Military ID

Valid forms of identification can be faxed to 508-599-4080, Attn: CIP Team, or forwarded to one of the addresses listed below. For questions regarding CIP failure notification, call 800-367-9519 (Mon-Fri 8 AM - 5 PM EST).

#### Regular Mail:

Health Savings Account Services  
Attn: CIP Team  
P.O. Box 9820  
Providence, RI 02940-8020

#### Overnight Courier:

Health Savings Account Services  
Attn: Regulatory Operations CIP Team  
4400 Computer Drive  
Westborough, MA 01581

During the process of attempting to resolve the CIP failure and open the account, ConnectYourCare will accept but hold contributions to the HSA account –these contributions will not be sent to BNY Mellon.

Once the account opens, contributions held by ConnectYourCare will be applied to the account and funding requested from the employer. If you do not respond, do not provide the requested documentation, or are otherwise unable to resolve a CIP failure after the 90 days, the account will be closed.

If an employee has made direct post-tax contributions to the HSA during the CIP failure resolution period, BNY Mellon will accept the funds but will not allow distributions. Any funds in the account at the time of account closure will be returned to the employee via check 5 days after account closure.

### **Transfer of Assets**

If you have another HSA, you may transfer that HSA balance into your new HSA account. A Transfer of Assets form, provided by BNY Mellon, must be completed and provided to the bank as instructed on the form.

### **HSA Accounts Opened in Error**

If you establish an HSA, but later determine that you were never an eligible individual, then no HSA should have ever existed and the account will be nullified and closed. You must contact [HR.Benefits@peoples.com](mailto:HR.Benefits@peoples.com) as soon as you determine ineligibility. Your contributions will be returned to you. There will be no account closure fee charged since the account was closed due to ineligibility.

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## **Contributions**

Contributions to your HSA may consist of both pre-tax contributions made by you through the Cafeteria Plan and non-elective Employer base funding and/or incentive contributions (if any) made through the Cafeteria Plan. You may elect to contribute any amount to the HSA up to the annual contribution limit established under Internal Revenue Code (the "Maximum Annual Contribution Amount"). However, no contributions will be withheld until you have agreed to the terms and conditions of the HSA as established by BNY Mellon, thereby establishing the HSA.

### **Maximum Annual Contribution Amount**

The following are general rules about the Maximum Annual Contribution Amount. You should consult with your tax advisor, ConnectYourCare, or BNY Mellon for additional details.

1. The maximum annual contribution to an HSA is determined on a yearly basis. The limits for 2019 are as follows:  
Self-only HDHP coverage .....\$3,500  
Family HDHP Coverage .....\$7,000  
An employee who is 55 or older before the end of the year may make an additional contribution of \$1,000 for 2019.
2. Contributions are limited based on each month of eligibility. Generally, if you are eligible for and participating in an HSA for less than 12 months, you must prorate the maximum contribution to account for the months in which you were not eligible or were not participating in the HSA (divide the annual maximum by 12 to determine the maximum contribution per month and then multiply that amount by the number of months you were eligible for and were participating in the HSA). If, however, you are eligible to contribute to an HSA on December 1 of a year, you can contribute the maximum contribution (no proration is required) for that year, provided you remain covered by an

HSA-eligible High Deductible Health Plan and otherwise eligible for the entire next year (a 13-month period). If you do not remain an eligible individual during the trailing 13-month period, you will be required to pay income tax and a 10% penalty tax on the amounts that you contributed for months during which you were not eligible to contribute to an HSA.

3. An employee cannot make any contribution for any month in which he or she is enrolled in Medicare benefits, including Part A and/or Part B.

Certain contributions will be returned to you as taxable compensation. These include any pre-tax contributions that: (i) cannot be made to the HSA because it is determined that you are not an Eligible Individual, (ii) are held by ConnectYourCare because you have failed to establish an HSA with the Designated Custodian by December 31, and (iii) exceed the Maximum Annual Contribution Amount .

In the event excess contributions are made to the HSA (i.e. the HSA has received contributions in excess of the Maximum Annual Contribution Amount), it will be your sole responsibility to work with ConnectYourCare to remove the excess contribution (plus earnings on such contributions) prior to the due date of the your tax return for that tax year and to report the contributions (and earnings) as income on your income tax return for the year.

## HSA Contribution Reversals

There are only 2 scenarios for which an employer can request the return of employer contributions from an employee's HSA. They are:

1. If the employee was never an eligible individual, then no HSA ever existed and People's United may request the return of Employer Contributions. If not discovered until after W-2s have been distributed, People's United will send an amended W-2.
2. If People's United contributes amounts to an employee's HSA that exceed the Maximum Annual Contribution Amount, People's United may request that ConnectYourCare return the excess amounts to People's United. If, however, amounts contributed are less than or equal to the Maximum Annual Contribution Amount, People's United may not recoup any amount from the employee's HSA.

Employers generally cannot recoup amounts from an HSA other than as discussed above.

**Note:** For the reasons stated above, People's United cannot reverse HSA contributions through Payroll and is not able to retroactively cancel HSA elections.

## Election Changes during the Year

You may increase or decrease contributions to an HSA at any time as long as the change is effective prospectively. Change requests must be submitted on **my-peoples**.

## Additional HSA Contributions

The Contribution Center section of the Participant Portal (see the *Accessing Account Information* section) allows you to make additional contributions online directly from your personal bank account. You complete the information requested (e.g., bank account number, routing number) and elect either a one-time contribution or recurring contributions. If making a contribution between January and April 15, you will be prompted to select current or prior tax year. These contributions are funded by Electronic Funds Transfer (EFT). Contributions are then deposited to the HSA.

If you wish to make a contribution via check or money order, you may complete BNY Mellon's HSA Contribution Form on the Participant Portal and mail it directly to BNY Mellon. The form is also available by calling the ConnectYourCare Customer Service Center at 877-292-4040.

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## HSA Investments

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The first \$1,500 of contributions will be directed towards the cash portion of the HSA. Once your HSA balance reaches \$1,500, you will have the option of investing in a suite of mutual funds.

You do not have to “open” a separate brokerage account. The list of available mutual funds was included in the HSA terms and conditions you received during enrollment. There are no trading or brokerage fees. None of the mutual funds have a minimum investment requirement. In other words, if your HSA balance is \$1,501, \$1,500 will remain in cash and the \$1 can be invested in mutual funds.

There are two ways to invest:

1. Reallocate an existing balance – you can transfer existing balances from the cash portion of the HSA into mutual funds as long as \$1,500 remains in cash.
2. Automatically invest future contributions – once your balance reaches \$ 1,500, you can allocate 100% of future contributions among one or more mutual funds or you can specify a percentage of future contributions to go to the cash account and the rest allocated to mutual fund(s).

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## Eligible Health Savings Account Expenses

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There are hundreds of eligible expenses that may be paid with your HSA funds, including prescriptions, some over-the-counter items, health insurance deductibles, and coinsurance. HSA funds may even be used for eligible expenses for your spouse and tax dependents.

An eligible expense is defined as certain expenses paid for health care for you, your spouse, or a dependent. To be eligible, the expense must not be covered by insurance. Below are two lists which may help determine whether an expense is eligible. For more detailed information, please refer to IRS Publication 502 titled, “Medical and Dental Expenses,” If tax advice is required, you should seek the services of a competent professional.

### Examples of Eligible Expenses

Examples of eligible expenses include:

- Acupuncture
- Alcoholism treatment
- Ambulance
- Artificial limb
- Automobile modifications for a physically handicapped person
- Birth control pills
- Blood pressure monitoring device
- Braille books & magazines (above the cost of regular printed material)
- Chiropractic care
- Christian Science practitioner
- COBRA premiums
- Contact lenses & related materials
- Crutches
- Dental treatment
- Dentures
- Diagnostic services
- Drug addiction treatment
- Eye examination
- Eye glasses & related materials
- Fertility treatment
- Flu shot

- Guide dog or other animal aide
- Hearing aids
- Hospital services
- Immunization
- Insulin
- Laboratory fees
- Laser eye surgery
- Long-term care premiums or expenses (post tax)
- Medical testing device
- Nursing services
- Obstetrical expenses
- Organ transplant
- Orthodontia (not for cosmetic reasons)
- Oxygen
- Over the Counter Items without a Prescription, Letter of Medical Necessity, or Doctor's Directive:
  - Bandages
  - Braces & supports
  - Catheters
  - Contact lens supplies & solutions
  - Denture adhesives
  - Diagnostic tests & monitors
  - Family planning items
  - First aid supplies
  - Insulin & diabetic supplies
  - Ostomy products
  - Reading glasses
  - Sunscreen & sun block (SPF 15+, broad spectrum)
  - Wheelchairs, walkers, canes
- Over the Counter Items with a Prescription
  - Acid controllers
  - Allergy & sinus medicine
  - Antibiotics
  - Anti-diarrheas
  - Anti-gas products
  - Anti-itch & insect bite
  - Anti-parasitic treatments
  - Baby rash ointments/creams
  - Cold sore remedies
  - Cough, cold & flu treatments
  - Digestive aids
  - Feminine anti-fungal/anti-itch
  - Hemorrhoidal preps
  - Laxatives
  - Motion sickness
  - Pain relievers
  - Respiratory treatments
  - Sleep aids & sedatives
  - Stomach remedies
- Physical exam
- Physical therapy
- Prescription drugs



- Psychiatric care
- Retiree medical insurance premiums
- Smoking cessation program
- Surgery
- Weight loss program necessary to treat obesity
- Wheelchair

## Ineligible HSA Expense Examples

These items are never eligible for tax-free purchase with HSA funds.

- Cosmetic surgery
- Concierge service fees (billed for future services; no treatment actually provided)
- Exercise equipment
- Fitness programs
- Funeral expenses
- Hair transplants
- Household help
- Illegal operations and treatments
- Maternity clothes
- Most insurance premiums (*COBRA, long term care and retiree medical premiums are allowed*)
- Teeth whitening

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## Obtaining Reimbursements/Withdrawals

Amounts paid out of an HSA are called “distributions.” The distribution process is handled by the HSA custodian or trustee. Distributions may be made using the payment card or by an online claim submission. You are responsible for determining whether the distributions from the HSA will be tax-free for expenses incurred for health care for you, your legal spouse or tax dependents. No documentation is required to be submitted for reimbursement. It is a good idea, however, to retain documentation showing that the amount received was for an eligible health care expense in case you are audited by the IRS.

## Payment Card

You will receive a ConnectYourCare payment card that may be used for all eligible health care expenses. The card should only be used to pay for eligible health care expenses, and you should always save your receipts. If enrolled in the HSA and the General Purpose or Limited Purpose Health Care FSA, you will receive one payment card in the initial mailing. Additional or replacement cards will be provided free of charge.

## Card Functionality

Your card has been programmed to work only at approved merchant locations that are designated as health care merchants based on their Merchant Category Code (MCC) or are IIAS compliant. Examples of approved merchants include doctor’s offices, hospitals and many groceries, pharmacies and other stores that are IIAS compliant. Visit [www.connectyourcare.com/stores](http://www.connectyourcare.com/stores) for a list of certified IIAS stores. For purchases at locations that are not approved, you can pay with other means, and then submit a request for reimbursement through your online or mobile account.

Additional functionality to be aware of:

- If your account has insufficient funds, the entire card transaction is declined, unless the merchant has the ability to accept partial authorizations.
- When a payment card is reported as lost or stolen, the account is flagged and the payment card is de-activated. ConnectYourCare will initiate the process for a replacement card to be sent to you within two weeks.
- Only the cash portion of the HSA is available on the card. Balances invested in mutual funds must be transferred to the cash portion of the HSA before it will be available on the card.
- When your employment terminates, the card remains active and funded with your remaining account balance.

## Manual/Online Claim Submission of Eligible Expenses

For manual/online claims submission, you can complete a simple funds distribution request process through the Participant Portal (see the *Accessing Account Information* section). You will enter basic expense information including date of service, provider, recipient name, service type, and amount paid. The request is automatically approved (since no documentation is required for an HSA) and queued up for the next distribution date. Distributions will be released daily.

There is no time limit for submitting requests for distributions from the HSA.

## Taxable Withdrawals

For distributions of HSA funds for non-eligible expenses, you should enter a claim online and may select “HSA Withdrawal- Other” in the drop down list of expenses.

If you use your HSA funds for a non-eligible expense, and self-report the non-eligible distribution on your income tax return, the funds for that expense are taxable since the initial contribution to the HSA was tax-free. If you are under the age of 65, the non-eligible expense distribution amount will be subject to an additional 20% tax penalty.

When entering a claim online, you may choose to pay yourself through direct deposit or check, or you may enter an alternative payee and address where a check will be sent directly to the provider.

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## Changes in HSA Participation Status

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### Termination

If your employment with People’s United terminates, your HSA accounts will remain active and you will still be able to use the Healthcare Payment Card. However, your HSA will be moved out of the employer group account into an individual HSA account. A monthly fee of \$5.50 will be debited directly from the HSA account for as long as you maintain the HSA account.

### Mid-year Cancellation

If you cancel enrollment in the HSA during the year due to a permitted election change event but continue to be actively employed, the account will remain active and you will not be charged any account administration fee.

Note: Reducing your payroll contribution to \$0 is not considered cancellation of the HSA. However, if you switch to the HealthReimbursement Option or cancel Medical Plan coverage through People’s United, your HSA enrollment is considered cancelled.

### Rehire

If you are rehired, your existing Healthcare Payment Card remains active and your HSA is transferred back into the People’s United HSA group account.

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## Additional HSA Information

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### HSA Mailing Address Requirement

You must have a physical mailing address (not a P.O. Box) listed as your primary home address in my-peoples in order for ConnectYourCare to open your HSA. If you have a different mailing address, contact HR Services via phone (877-284-8383) or email ([HR.Services@peoples.com](mailto:HR.Services@peoples.com)) to setup an alternative mailing address.

## US Patriot Act

To help fight money-laundering activities and the funding of terrorism, the USA Patriot Act established requirements for investors as of October 1, 2003. Banks, including those that open HSA's, must obtain, verify and record information that identifies individuals and entities that engage in certain transactions with or through a bank. As a result, account owners may be required to complete some paperwork related to the USA Patriot Act in order to open their account. Identified account owners will receive a request for additional information at their supplied mailing address. Information requested typically includes items such as the following: copy of current driver's license, copy of utility bill or passport. Failure to respond to requests for additional information will result in account closure and return of any funds posted to the account to the participant.

## Electronic HSA Statements

To reduce cost, ensure security and preserve our environment, HSA statements can be viewed on the ConnectYourCare member website. People's United Bank will provide your People's United work email address to ConnectYourCare, which will allow you to receive electronic notification from ConnectYourCare that the statement is available on the ConnectYourCare member website. You may change the email address or opt out of the electronic statements at any time by accessing your personal profile on the ConnectYourCare member website. If you want paper HSA statements, your HSA will be charged a \$1.00 monthly fee.

## HSA Tax Forms

For participants who opt to receive paper statements, tax forms will be distributed by BNY Mellon and mailed to the participant's home mailing address. For participants who opt into e-statements, participants will login to their internet banking account and print tax documents from there. There are two forms distributed:

- Form 1099-SA reports the total distributions from the HSA and is delivered in January. If no distribution was taken, the participant will not receive a 1099-SA.
- Form 5498 reports total contributions to the HSA and is delivered in May. This timing allows for any additional contributions to a prior year account, which is permitted up until April 15 of the new year.

## Important Terms, Conditions and Tax Consequences

For details concerning your rights and responsibilities with respect to your HSA (including information concerning the terms of eligibility, qualifying High Deductible Health Plan, contributions to the HSA, and distributions from the HSA), please refer to your HSA Custodial Agreement and the ConnectYourCare portal.

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## Accessing Account Information

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### Participant Portal

Participants can access the ConnectYourCare website directly at [www.connectyourcare.com](http://www.connectyourcare.com). Participants will need to register and create a distinct username and password the first time they login. The portal is available 24 hours a day, 365 days a year.

All active employee demographic changes (i.e. address, phone number) should be entered via my-peoples, not the ConnectYourCare portal. Email address and preferences may be updated directly in ConnectYourCare website.

Through the ConnectYourCare website portal, you can:

- Receive real-time updates to account balances
- View claims status and the claims reimbursement schedule
- Submit manual requests for reimbursement
- Review Frequently Asked Questions (FAQs), including eligible expenses
- Access a robust suite of health education and wellness tools
- Sign up for direct deposit

- Read messages regarding their account in the Communications Center
- Request additional healthcare payment cards
- Reset a password
- Review year-to-date contributions, account balance and transactions information
- View payment card charges
- View HSA interest payments
- View and submit HSA withdrawal requests (including those for non-medical/health care purposes)
- Make additional HSA contributions
- Access HSA Investments
- Elect e-statements
- Elect mobile alerts

A Mobile Application is available to iPhone and Android device users. Features and capabilities include:

- View account balance, account alerts and transaction history
- Submit a new claim
- View FAQs
- Receive text message alerts
- Click to call customer service
- Upload claim documentation immediately, submitting a photo of the claim receipt

## **24 Hour Participant Call Center**

Representatives are available 24 hours per day, seven days per week at 877-292-4040. You will need to enter your nine digit social security number for all options except speaking with a customer service rep, who will ask for member name and last four digits of SSN.