



Member Identification Program Policy

Original Policy Date: March 23, 2007

Last Reviewed: December 2020

Current Reviewed: December 13, 2021

General Policy Statement: (AS REQUIRED BY THE USA PATRIOT ACT)

Buckeye State Credit Union requires anyone opening a new account relationship, whether online or in person, to provide at a minimum, the following information in order to form a "reasonable belief" that the true identity of a member is obtained. Included in this list is the information required for all new account relationships for individuals, business accountholders and other non-natural person accountholders.

1. Buckeye State Credit Union will normally require one (1) primary form of government-issued identification to verify this information and one (1) secondary form of identification. An additional primary form of identification can substitute for a secondary form, but an additional secondary form **CANNOT** substitute for a primary form.
2. Members who are minors are required to provide two secondary forms of ID (which may include social security card and birth certificate).
3. Information Required for Individual Account Owners (this information is required for ALL account owners):
 1. Name;
 2. Date of birth;
 3. Local U.S. residential street address; (Home country address is also needed if individual is a non-US citizen)
 4. If the individual is a U.S. person: a Taxpayer Identification Number (e.g. Social Security Number or Individual Taxpayer Identification Number). If the individual is a non-U.S. person, all of the following that the individual possesses (Minimum of two): a U.S. taxpayer Identification Number; a valid Passport bearing photograph, number and country of issuance and Alien Identification Card number; Matricula Consular card; number and country of issuance of any other government-issued document evidencing nationality or residence and bearing photograph or similar safeguard.

Examples of Accepted Identification for United States Citizens:

Primary Form of Identification

Valid state issued driver's license
Valid state issued conceal & carry permit
Valid state issued photo identification
Valid state issued driving learner's permit

Secondary Form of Identification

Medicaid/care Card (seniors 65+)
Major credit card (Non-Expired)
Student identification
Work identification (with picture)



Valid United States Passport
Valid military identification

Social Security Card (minor only)
Original or certified copy of Birth Certificate
Debit Card (Visa/Mastercard)
Employment Verification

- Pay stub, W-2, Tax Return

Address Verification

- Auto title or registration
- Utility Bill
- Auto Insurance Card
- Bank Statement
- Cable/Dish Bill
- Phone Bill

NOT Acceptable Forms of Identification

Expired Government Issued ID's
Ohio EBT Cards
ATM Cards
HAS Cards
Work ID without Picture
Social Security Card (Adult)

Examples of Accepted Identification for non-United States Citizens:

Primary Form of Identification

Valid foreign passport
Valid Permanent Resident Card aka Green Card
Valid US non-immigrant visa and border crossing card
Matricula Consular Card

Secondary Form of Identification

Valid foreign or US driver's license
Valid US issued state identification
Valid US issued work identification
Valid US issued student identification
Major credit card (non-expired)

4. Information Required for Businesses and other Non-natural person Accounts:

1. Business name;
2. Date of formation;
3. Local US business street address;
4. Taxpayer Identification Number (e.g. Social Security Number or Employer Identification Number)
5. Proof of Registration with the Ohio Secretary of State
6. Business Documentation that supports the business structure (e.g. Articles of Organization or Operating Agreement for LLCs, Articles of Incorporation for Corporations)



5. Special MIP Requirements for Beneficial Owners of a Business Account

The person responsible for opening the business account must comply with all items in the above procedures and they must complete the Beneficial Owner Certification Form. This form requires the person opening the account to provide their name and title, as well as the name, address, date of birth and identification number for the “beneficial owners” of the entity.

A Beneficial Owner is defined as each individual who directly or indirectly owns 25% or more of the equity interests of the legal entity and a single individual with significant responsibility for managing the legal entity, such as an executive officer, senior manager or other individual who regularly performs similar functions.

Legal entities include:

- corporations,
- limited liability companies,
- other entities that are created by filing a public document with a Secretary of State or similar office, and
- general partnerships or any similar business entities formed in the United States or a foreign country.

Though we do not require the beneficial owners to be present to open the account, we must review documentation to identify each beneficial owner before opening the account. A copy of a Primary form of identification from the list above may be used to identify the beneficial owner rather than the original ID. The certification form will act as a secondary form of identification.

6. Buckeye State Credit Union will also use non-documentary methods of identification to confirm member identity in addition to the documentary ID requirements listed above. The non-documentary identification methods we utilize include ChexSystems, BizChex and Credit Reports. We also utilize Idology’s ID Check out of wallet questions for accounts opened online.

7. Buckeye State Credit Union will not open an account for someone that has applied for, but not yet received, a TIN.

8. Accounts opened for non-US citizens must be completed in person.

9. If we are unable to obtain accepted identification as defined in this policy and the identity of the member or business cannot be determined, we will refuse to open the account. If the identity of the member or business can be determined but we are unable to obtain it through the accepted identification methods listed above, the CEO, COO, CRO or Compliance Risk Analyst would need to approve the ID/ documentation being accepted before the account could be opened.