


# Clearinghouse REVIEW

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**END  
HOUSING  
BARRIERS  
BASED ON  
CRIMINAL  
RECORDS**



**APPLY  
DISPARATE  
IMPACT THEORY**

Ensure Fair Wages for Workers with Disabilities  
Reform H-2B Guest Worker Program  
Consider Lump-Sum Settlements and Public Benefit Eligibility  
Target Underlying Causes of Poverty  
Protect Users of Electronic Benefit Cards  
Offer Opportunities with Housing Choice Vouchers



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Over the past twenty years electronic benefit transfers (EBTs) have replaced paper checks for the delivery of public assistance benefits. Since the first demonstration project in Reading, Pennsylvania, in 1984 the delivery of public assistance benefits via EBT systems has become widespread. By the end of 1998 more than forty states operated EBT systems to deliver food stamp benefits.<sup>1</sup> Since then states have extended EBT systems to other types of public benefit payments as well (e.g., TANF (Temporary Assistance for Needy Families), child support, and WIC (Special Supplemental Nutrition Program for Women, Infants, and Children) nutrition assistance). Most recently there has been a move away from EBT systems in favor of electronic payment card (EPC) systems that use commercial brand (Visa or MasterCard) prepaid debit cards to send public benefits to recipients.

As the electronic age continues to shape the delivery of public benefit payments, we need to recognize and examine the implications of these delivery systems, especially the differences between EBT and EPC systems, and the potential impact, both positive and negative, these systems can have on low-income communities.

### EBT Versus EPC

In general EBT systems allow recipients of government benefits to use a plastic card to access their benefits. The passage of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 expanded EBT use by requiring states to implement EBT systems for food stamp benefits by October 1, 2002.<sup>2</sup> Before this legislation only about a dozen states operated some form of EBT delivery system; two years after the Act passed a majority of states used EBT systems for at least one type of benefit payment.<sup>3</sup>

Since then the electronic banking industry has continued to grow and various other forms of electronic payment mechanisms have emerged. In particular EPC seems poised to replace EBT as the preferred method. EPC systems issue personalized

<sup>1</sup>U.S. Department of Agriculture, Food Stamp Electronic Benefit Transfer Systems: A Report to Congress 17 (Oct. 2003), <http://1.usa.gov/eevQPX>.

<sup>2</sup>7 U.S.C. § 2016(i)(1).

<sup>3</sup>Barbara Leyser, *Recipient Concerns with the Use of Electronic Benefit Transfer Systems for the Delivery of State and Federal Benefits*, 32 CLEARINGHOUSE REVIEW 215 (Sept.–Oct. 1998).

branded cards (Visa or MasterCard), which are funded with the individual's benefits and can be used wherever Visa or MasterCard is accepted. Eleven states have switched to EPC systems for one or more public benefit programs, and other states, among them Texas, are doing so.<sup>4</sup>

On the federal level, the U.S. Department of the Treasury and other agencies are also turning to EPC systems; a 2008 report found that thirty-four of forty-two programs used one or more electronic payment methods.<sup>5</sup> In fact, earlier in 2011 the Treasury Department finalized a new rule that requires all federal public benefit payments to be delivered via direct deposit or Direct Express Debit MasterCard, a form of EPC.<sup>6</sup> The Treasury launched an EPC pilot program, the MyAccountCard Visa Prepaid Debit Card program, to deliver federal tax refunds electronically onto prepaid VISA cards.<sup>7</sup> Given this push on both the federal and state levels toward the use of EPC, we must consider the impact of this delivery system on low-income communities—especially the differences between EBT and EPC systems, their advantages and disadvantages, and how to overcome problems that may arise.

### Cost Benefit Analysis of Moving from EBT to EPC Systems

Although EBTs and EPCs are similar in that they distribute public benefits efficiently and economically, the systems

have different advantages and disadvantages. EBT systems are preferable to mailed checks because benefits can be received more timely, theft and fraud are reduced, and the need to pay check-cashing fees is eliminated. However, EBT systems do not mitigate the stigma associated with public benefits and may even increase it. Once cashed, the proceeds of paper checks can no longer be identified as public benefit payments, whereas EBT cards are usually clearly marked and easily identifiable when used at a grocery checkout line. EPCs, by contrast, look just like a Visa or MasterCard, thereby reducing stigma while offering increased access to the mainstream financial industry (see below).

A major flaw in EBT systems is that not every retailer or automated teller machine (ATM) network accepts their use. Under most states' current EBT systems, cards may be used only at ATM networks and retailers that have agreed to participate in the state's public benefits program. Nationally most EBT systems use the Quest Network, a quasi-electronic funds transfer point-of-service network restricted to EBT transactions, and beneficiaries may use an EBT card only where the Quest logo is displayed.<sup>8</sup> With an EPC system, however, beneficiaries may use their cards virtually anywhere that a MasterCard or a Visa logo is displayed. Such expanded access is a significant program improvement, but it comes with its own problems. For example, several states,

<sup>4</sup>The eleven states are Arizona, California, Georgia, Indiana, Iowa, Mississippi, Nebraska, New York, North Carolina, Ohio, and Oklahoma. Regarding Texas see Council on Competitive Government, Electronic Payment Card (EPC) Services Overview (Jan. 30, 2009), <http://bit.ly/i1gD7C>. See also Maureen Pirog et al., The Expanding Role and Efficacy of E-Government Innovations in U.S. Social Services, Appendix A: State Social Services Summary (April 2007) (manuscript prepared for VIII International Scientific Conference, Modernization of Economics and Social Development, Moscow, Russia), <http://bit.ly/jVhcyj>.

<sup>5</sup>U.S. GOVERNMENT ACCOUNTABILITY OFFICE, GAO-08-645, ELECTRONIC PAYMENTS: MANY PROGRAMS ELECTRONICALLY DISBURSE FEDERAL BENEFITS, AND MORE OUTREACH COULD INCREASE USE 8 (June 2008).

<sup>6</sup>Management of Federal Agency Disbursements, 75 Fed. Reg. 80315 (Dec. 22, 2010), amending 31 C.F.R. pt. 208 (see Section 208.3 for actual language). The Direct Express debit card, which is geared toward social security and Supplemental Security Income recipients who do not have bank accounts, allows beneficiaries to receive cash back with purchases and cash from bank tellers, make one automated teller machine (ATM) withdrawal per month and ATM balance inquiries, and receive notice of low balance and receive one card replacement per year, all for free.

<sup>7</sup>Press Release, U.S. Department of the Treasury, Treasury Launches Pilot Program of Prepaid Debit and Payroll Cards for Fast, Safe and Convenient Tax Refunds (Jan. 13, 2011), <http://1.usa.gov/eYrZHK>. Enabling card holders to limit the cost of card use, MyAccountCard offers free point-of-sale transactions, free online bill payment, free cash withdrawals at more than 15,000 ATM machines nationwide, and free cash back at participating retail stores. Bonneville Bank, as the Treasury's financial agent, will issue these cards through Green Dot Corporation (*id.*).

<sup>8</sup>Chaddsford Planning Associates, From EBT to EPC, Converting from Electronic Benefits Transfer to Network-Branded Debit Cards for Government Disbursements (n.d.), <http://bit.ly/hncexn>.

notably California and Maine, have had situations in which public benefit recipients used their state-issued benefit cards to withdraw cash from ATMs in casinos, massage parlors, liquor stores, and other locations.<sup>9</sup> Without considering whether recipients used these ATMs because they were conveniently located or for some other legitimate reason, Gov. Arnold Schwarzenegger ordered California's EBT vendor to block card usage at casino ATMs.<sup>10</sup>

Another benefit of switching from an EBT system to an EPC system is administrative cost savings. EPC systems cost states little or nothing compared to the cost per month per client that EBT vendors charge. For example, in 1999 Illinois's cost per month per client for food stamp EBT transfers was over \$2 million for about 450,000 people.<sup>11</sup> Under EPC systems card issuers offer their cards to states for no or reduced fees. The card issuers assume that they will recoup their costs through the interchange or "swipe" fees charged to retailers of 1 percent to 2 percent of the transaction amount. Card issuers charged an estimated \$48 billion in swipe fees in 2008. By issuing cards to public benefit recipients and thus expanding the pool of people using them, issuers ultimately increase their interchange revenues.

The recently enacted Dodd-Frank Wall Street Reform and Consumer Protection Act gave the Federal Reserve authority to regulate the amount of swipe fees to ensure that they are "reasonable and proportional" to card issuers' costs.<sup>12</sup> Under the Federal Reserve's proposed regulations either (1) a card issuer may charge

an interchange fee equal to allowable costs but not greater than twelve cents per transaction or set its interchange fee at seven cents per transaction, which would be deemed reasonable and proportional, or (2) a cap of twelve cents per transaction would apply to all card issuers.<sup>13</sup> Which, if either, alternative will be adopted is unclear. Legislation recently proposed would delay the implementation of these rules and study the interchange fee industry further.<sup>14</sup> TCF Financial Corporation moved to stop the implementation of the proposed regulations.<sup>15</sup> As proposed, the regulations would exempt government-administered payment programs and reloadable prepaid cards from interchange fee limits for one year. After this exemption expires, card issuers' profits will decrease. This will eliminate their incentive for offering prepaid cards at minimum cost and require states to pay more for the card services.

Cost savings to beneficiaries is said to be another advantage of EPC systems. ACS, the company that handles EPC programs for sixteen states, claims that the average Georgia recipient of child support benefits in the form of a paper check would spend \$9 in check-cashing fees per month if paper checks were used, whereas EPC systems would save individuals a monthly average of \$1.66 in ATM fees and from \$4 to \$13 in money order fees.<sup>16</sup> However, the amount of savings from abandoning checks and money orders may not be as great as previously reported. Prepaid cards may charge activation fees, monthly fees, point-of-sale transaction fees, ATM cash-withdrawal fees, balance inquiry and statement fees,

<sup>9</sup>Mal Leary, *Maine Lawmakers Seek Control over Welfare Cards*, BANGOR DAILY NEWS (July 18, 2010), <http://bit.ly/gv9gVT>.

<sup>10</sup>California Office of the Governor, Executive Order S-09-10 (June 24, 2010), <http://1.usa.gov/gG5ZLn>.

<sup>11</sup>JULIA DIB ET AL., CONSUMERS UNION, ELECTRONIC BENEFIT TRANSFER (EBT) PROGRAMS: BEST PRACTICES TO SERVE RECIPIENTS (2000) (Appendix X: Results from Written Survey), <http://bit.ly/ivOotV>.

<sup>12</sup>Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203, 124 Stat. 1376 (2010); 12 U.S.C. §§ 5301 et seq., § 1075.

<sup>13</sup>Debit Card Interchange Fees and Routing, 75 Fed. Reg. 81722 (proposed Dec. 28, 2010).

<sup>14</sup>Consumers Payment System Protection Act, H.R. 1081, 112th Cong. (2011); Debit Interchange Fee Study Act of 2011, S. 575, 112th Cong. (2011).

<sup>15</sup>*TCF National Bank v. Bernanke*, No. 10-cv-04149 (D.S.D. filed Oct. 12, 2010).

<sup>16</sup>ACS, *The Check Is Not in the Mail: How Our EPC Solutions Save Government Agencies Money—and Still Get Benefits to Program Recipients Faster* (July 2008).

customer-service call fees, bill-pay fees, reloading funds fees, inactivity fees, account closing fees, overdraft fees, and others.<sup>17</sup> For instance, if a beneficiary uses an ATM that is not owned by the card issuer, a surcharge ranging from \$0.50 to \$4 per transaction will be deducted from the beneficiary's account. Since public aid beneficiaries need their entire benefit amounts for bare subsistence, they cannot afford to pay extraneous fees. Moreover, these fees have been increasing due to the recent credit card and financial reforms and card issuers' desire to find new revenue sources.<sup>18</sup> Thus, in designing an EPC system, states should limit fees.

Another advantage of EPC systems relates to protecting federal benefits from garnishment. Federal law prohibits creditors from attaching, garnishing, or otherwise taking social security funds; similarly protected are veterans', railroad retirement, and federal employee retirement benefits.<sup>19</sup> Nonetheless each year banks illegally freeze the exempt benefits of more than one million recipients of social security and other federal beneficiaries.<sup>20</sup> Citing the complexity in attempting to identify exempt funds in a commingled account, banks seek to avoid releasing funds improperly by freezing the entire account. Once frozen, an account is difficult to unfreeze, and recipients often face protracted legal battles. EPC systems resolve this problem since protected funds are on the EPC card rather than in a beneficiary's account.

A final problem with EPC systems—one that is seldom acknowledged—is how they affect the unbanked. Federal officials estimate that 28 percent of social security

recipients (2.1 million people) and 59 percent of Supplemental Security Income recipients (1.8 million people) do not have bank accounts.<sup>21</sup> Simply providing an EPC—basically a debit card without a bank account linkage—will not help these millions of unbanked Americans enter the mainstream financial sector. Assuming that one purpose of an EPC system is to increase such access, mechanisms must be developed to connect each recipient's EPC with a mainstream financial tool. For instance, linking EPCs to savings accounts could encourage recipients to save some of their benefits in a traditional savings account or certificate of deposit. The Treasury's MyAccount-Card pilot program will give participants access to a linked savings feature with no charge to open or maintain the account, no minimum balance requirement, and an interest rate of 0.25 percent. Fees may apply, however, if the consumer uses the card at an ATM outside the MyAccount-Card network, and only a limited number of withdrawals are permitted each month.

In sum, while an improvement over EBT systems, EPC systems do have limitations and raise new issues and problems which must be resolved. Perhaps the most significant consideration under an EPC system is the lack of consumer protections.

### EPCs and Consumer Protection Laws

As the trend toward EPC systems becomes more pronounced, related consumer protection questions have received little attention. As noted, effective May 1, 2011, absent a waiver, all nontax federal payments, including benefit and retirement payments, must be made by

<sup>17</sup>Michelle Jun, Consumers Union, Prepaid Cards: Second-Tier Bank Account Substitutes, (Sept. 2010), <http://bit.ly/dR5R3W>.

<sup>18</sup>In 2009 ATM surcharges rose 12.6 percent from the previous year to an average of \$2.22 (*id.*).

<sup>19</sup>42 U.S.C. § 407(a) (social security benefits); 38 U.S.C. § 5301(a)(1) (veterans benefits); 45 U.S.C. § 231m (railroad retirement benefits); 5 U.S.C. § 8470 (federal employee retirement benefits). In *Porter v. Aetna Casualty and Surety Company*, 370 U.S. 159 (1962), the U.S. Supreme Court held that federally exempt disability benefits deposited in a bank account remained exempt so long as they were readily traceable and "retain the quality as moneys," that is, they are readily available for the day-to-day needs of the recipient and have not been converted into a "permanent investment" (*id.* at 162). This rationale has been widely applied to other types of exempt benefits.

<sup>20</sup>Protecting Social Security Benefits from Predatory Lending and Other Harmful Financial Institution Practices, Hearing Before the Subcomm. on Social Security of the H. Committee on Ways and Means, 110th Cong. (June 24, 2008) (statement of Margot Saunders, National Consumer Law Center), <http://bit.ly/e5wSK1>.

<sup>21</sup>Consumer Federation of America et al., Comments to the Social Security Administration Regarding the Use of Master and Sub Accounts and Other Account Arrangements for the Payment of Benefits 9 (June 20, 2008).

electronic funds transfer.<sup>22</sup> Under this rule, federal benefit recipients who do not have a bank account available for direct deposit will be enrolled in the Direct Express Debit MasterCard program, a prepaid card program with terms and conditions approved by the Treasury. This mandated use of EPCs may, however, pose consumer protection problems for beneficiaries because the cards are not covered by the Electronic Funds Transfer Act and Regulation E.<sup>23</sup>

In the mid-1990s, when most EBT systems were implemented, many states opposed extending Electronic Funds Transfer Act protection to EBT systems on the grounds that the potential liability under Regulation E would make EBT systems more costly to states.<sup>24</sup> Despite intense industry pressure, the Federal Reserve initially included EBT within Regulation E. However, states urged as part of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 that Congress statutorily exempt EBT from Regulation E.<sup>25</sup> Congress agreed to this amendment, and Regulation E was revised to exempt need-based government electronic benefit payments.<sup>26</sup> The term “account” under Regulation E therefore does not include accounts distributing needs-tested benefits in a program established under state or local law or administered by a state or local agency.<sup>27</sup> Since such state-based EPC programs are not governed by Regulation E, they do not receive the same protections as other types of debit and credit cards.

For example, under Regulation E a consumer can be held liable for an unauthorized electronic fund transfer only if the financial institution has given the consumer certain disclosures.<sup>28</sup> This protection is particularly important for public benefit recipients, who can least afford the loss of funds due to fraud or error.

To deal with the lack of sufficient consumer protections of EPCs, Rep. Sander Levin (D-Mich.) and Rep. Jim McDermott (D-Wash.) introduced the Benefit Card Fairness Act of 2010 last year.<sup>29</sup> This bill, which is likely to be reintroduced in the next Congress, would (1) extend Regulation E protections to government-sponsored benefit payment cards and ensure that consumers have a choice in whether to receive government benefits through electronic payments; (2) include any electronic fund transfers, including EBT and EPC systems established by a federal, state, or local government agency within Regulation E’s protections; (3) require financial institutions to offer low-fee “government payment accounts” that include Federal Deposit Insurance Corporation (FDIC) protection; (4) prohibit fees on “government payment accounts” except for certain transaction fees, a nominal fee of up to \$1 for written periodic statements, and other fees for services beyond ordinary use of the account; and (5) require disclosures to consumers as to how to obtain account balances, written account history, fee information, and error resolution.

<sup>22</sup>31 U.S.C. § 3332(f)(1)–(2). Automatic waivers are granted for “(1) payment recipients born prior to May 1, 1921, who are receiving Federal payments by check on March 1, 2013, (2) payments that are not eligible for deposit to a Direct Express prepaid card account . . . , and (3) payment recipients whose Direct Express Card has been suspended or cancelled.” Recipients who may face a hardship due to mental impairment or remote geographic location may also request waivers (Management of Federal Agency Disbursements, 75 Fed. Reg. 80326 (Dec. 22, 2010), to be codified at 31 C.F.R. § 208.4(a)–(b)).

<sup>23</sup>15 U.S.C. §§ 1693 *et seq.*; 12 C.F.R. §§ 205 *et seq.* (2010).

<sup>24</sup>Brian Miller, *Regulation E Threatens Welfare EBT*, GOVERNMENT TECHNOLOGY (Dec. 31, 1994), <http://bit.ly/fug4zH>.

<sup>25</sup>Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. No. 104-193, 110 Stat. 2105 (Aug. 22, 1996), codified at 7 U.S.C. 2016(i)(1).

<sup>26</sup>Electronic Fund Transfers, 61 Fed. Reg. 19662 (May 2, 1996), amended Regulation E but kept the coverage of EBT; Final rule covering EBT, 59 Fed. Reg. 10678 (March 7, 1994). See BankersOnline.com, Regulation E and the EBT Debate (1997), <http://bit.ly/hFNIBD>.

<sup>27</sup>12 C.F.R. § 205.15(b) (2010).

<sup>28</sup>*Id.* § 205.15(d)(3).

<sup>29</sup>H.R. 4552, 111th Cong. (2d Sess. 2010).

Similarly Sen. Robert Menendez (D-N.J.) proposed the Prepaid Card Consumer Protection Act of 2010 to expand Regulation E and require FDIC insurance for prepaid card users.<sup>30</sup> The bill would regulate prepaid debit cards to (1) define “spending card accounts” to encompass nonreloadable prepaid debit cards of less than \$250 and reloadable general purpose prepaid debit cards; (2) require full FDIC insurance; (3) prohibit certain fees, including annual fees, overdraft fees, usage fees at the point of sale, declined transaction fees, inactivity or dormancy fees, and account closing fees; (4) expressly allow certain fees, with some capped or restricted; permitted capped fees would cover replacement cards, expedited card delivery, periodic fees (but no more frequent than monthly), reload fees (so long as an alternative loading method does not require payment of a fee), ATM fees outside the United States and outside the network of the issuer, and activation or enrollment fees; (5) require issuers to disclose fees through a fee table that “can be easily understood by the consumer” and an “estimate of the average monthly cost to a typical consumer for using the spending card account” and, further, give to every account holder a “wallet-sized summary of any fees that may be charged in connection with the spending card account”; and (6) require the Consumer Financial Protection Bureau and the FDIC to issue regulations.

Note that using government-issued cards, such as the Direct Express Card, is different from using a general prepaid card for the direct deposit of public benefits. General prepaid card funds typically are pooled in an account in the name of the card provider, not the consumer.<sup>31</sup> FDIC insurance, however, covers only the account owner, in this case the prepaid card company, and then only up to a maximum of \$250,000. Aggregated general prepaid accounts exceed this maximum, and the protection does not extend to the

consumer unless the issuer complies with the FDIC’s rules regarding “pass-through insurance.”<sup>32</sup> Furthermore, some general prepaid cards offer advances or lines of credit that can have interest rates equal to those of payday loans. Such features can result in disastrous financial situations for low-income consumers.

To cover this situation the Treasury announced, in December 2010, an interim final rule permitting delivery of federal payments to general prepaid cards that offer all of the consumer protections that apply to payroll cards under Regulation E protections, comply with the FDIC’s pass-through insurance requirements, and do not offer lines of credit or loan features that trigger automatic repayment from the prepaid card account.<sup>33</sup> However, these protections do not apply to government-sponsored EPCs. Congress must act through legislation such as the Benefit Card Fairness Act or the Prepaid Card Consumer Protection Act before EPC systems can adequately protect low-income families.



Low-income public benefit recipients are more likely than other consumers to need protection but less likely to receive it. Regular debit and credit cards offer such protection, and even general prepaid cards accepting direct deposit of federal benefits must now comply with the new Federal Reserve regulations requiring Electronic Funds Transfer Act and Regulation E coverage and FDIC insurance and prohibiting payday lending features. To ensure that beneficiaries who are required to use EPC systems are also protected, legislation such as the Benefit Card Fairness Act, which requires these same protections for government-sponsored EPCs, is critical. Only when these measures are accomplished will an EPC system truly benefit the most vulnerable populations.

<sup>30</sup>S. 4041, 111th Cong. (2d Sess. 2010), <http://bit.ly/hgl6l0>.

<sup>31</sup>National Consumer Law Center, Features of a Safe Basic Banking or Prepaid Card Account (Dec. 2010).

<sup>32</sup>12 C.F.R. pt. 330 (2010)

<sup>33</sup>Federal Government Participation in the Automated Clearing House, 75 Fed. Reg. 80335 (Dec. 22, 2010).



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