

2013 Survey of
Unemployment Prepaid Cards:
States Save Workers Millions in Fees;
Thumbs Down on Restricting Choice

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ABOUT THE NATIONAL CONSUMER LAW CENTER

Since 1969, the nonprofit National Consumer Law Center® (NCLC®) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, including older adults, in the United States. NCLC's expertise includes policy analysis and advocacy; consumer law and energy publications; litigation; expert witness services, and training and advice for advocates. NCLC works with nonprofit and legal services organizations, private attorneys, policymakers, and federal and state government and courts across the nation to stop exploitive practices, to help financially stressed families build and retain wealth, and advance economic fairness.

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EXECUTIVE SUMMARY

AT A GLANCE...

- **A chart and detailed table comparing direct deposit rates are on pages 8 and 26, respectively.**
- **A national overview of prepaid card fees is in Table 1 on page 15.**
- **State-by-state fee summaries and ratings begin on page 28.**

The National Consumer Law Center's 2011 report, [*Unemployment Prepaid Cards: How States Can Deal Workers a Winning Hand By Discarding Junk Fees*](#),¹ highlighted the many junk fees and restrictions that created traps for unemployed workers and undermined the potential benefits of delivery of unemployment compensation benefits via prepaid cards. Two years later, NCLC's new survey shows that overdraft fees are gone and other fees have come down considerably, saving workers millions of dollars a year, though not in every state. But workers in five states incur prepaid card fees unnecessarily as those states violate federal law and require use of the prepaid card, without

offering the choice of direct deposit to the worker's own account. Other states impose hurdles to signing up for direct deposit. This report details changes in fee schedules since the 2011 report and includes a new survey of direct deposit rates.

Most workers choose direct deposit to their own account when offered the choice. But states vary in how easy they make it to sign up for direct deposit:

- Among the 36 jurisdictions that use prepaid cards but also offer direct deposit, Minnesota has the highest direct deposit rate of 82%. Arizona's is the lowest at 16%, and the median rate is 57%. Some states encourage direct deposit as the first choice. Others automatically enroll workers in the prepaid card, requiring them to go to extra effort to disenroll to select direct deposit.
- Five states (California, Indiana, Kansas, Maryland, and Nevada) violate federal law by requiring workers to receive benefits on the state vendor's prepaid card. In California, Kansas and Maryland, workers can set up automatic transfers to their bank account, but only 21% to 24% do so, which can result in a delay of one to four days in receiving payment.
- Indiana is the only state to fail to offer direct deposit, checks, or even an automatic transfer from the prepaid card to the worker's own account. Workers must use the prepaid card or do a manual transfer to their bank account after each deposit. Nevada is similar, though the state is looking at adding automatic transfer capability.

Many states have lowered fees on their UC prepaid cards:

- Overdraft fees are gone. U.S. Bank, the only bank that had overdraft fees in our last survey, has eliminated them. All nine of the bank's unemployment cards now receive a positive rating.
- In Pennsylvania, the state projects that workers will save \$5.2 million through several improvements to the card program.
- Point-of-service fees are nearly gone and ATM fees are easier to avoid.
- We now rate 18 cards as "thumbs up" and only 3 as "thumbs down" (out of 42 cards). In 2011, 8 cards merited a positive rating and 16 were negative (out of 40 cards).²

Even well-designed prepaid cards impose costs on workers, though the price is likely lower than the cost of cashing paper checks. In California, which continues to have the best card in our survey, workers paid nearly \$1.8 million in fees in the past year, not including ATM surcharges. Thus, offering workers the choice of direct deposit remains important even for prepaid cards with the fewest fees.

Recommendations for improving UC prepaid card programs include:

- Prominently offer direct deposit to the worker's own account first, at time of application, and make sign-up easy.
- Offer a minimum of one free ATM and teller withdrawal for each deposit and preferably more.
- Eliminate fees for balance inquiries, customer service and denied transactions.
- Monitor fees and involve workers and advocates to address excessive costs.
- Publicize methods of fee-free cash access and card use and improve information about the location of free ATMs.
- Offer prominent, complete and accurate fee information on the state website.

States have made many improvements in their UC prepaid cards, but work remains. For families struggling with unemployment, every dollar counts.

I. Background

As states have worked to deliver unemployment benefits more efficiently and to speed receipt of funds to workers, most have eliminated paper checks. Instead, most states offer direct deposit to the worker's bank account, and use prepaid cards to deliver benefits to workers who do not have bank accounts or do not sign up for direct deposit.

In 2011, the National Consumer Law Center (NCLC) issued a [report](#) reviewing the prepaid card programs used by 40 states to pay unemployment compensation (UC). The report found that the cards varied considerably, with some having few fees and others a minefield. Overall, the report gave 8 cards one or two "thumbs up" and 16 cards a negative rating, with others in between.³

States also varied in the options they gave unemployed workers. Most states offered the choice of direct deposit to the consumer's own account. But five states required workers to be paid through a prepaid card.

Since our report was issued, two new cards, in the District of Columbia and Georgia, have come on the market. Nine states still do not have prepaid cards and pay their workers through direct deposit or paper checks.

II. Choice: UC Prepaid Cards Offer Important Benefits, but Workers Must Always Have the First Choice of Direct Deposit to Their Own Accounts

A. The Pros and Cons of Prepaid Cards

For workers without bank accounts, prepaid cards can be a considerable improvement over paper checks. Prepaid cards deliver funds faster, in a more secure and convenient fashion. They enable workers to avoid check cashing fees and the security risks of carrying cash.

Every UC card in the 2011 survey provided multiple ways for a careful worker to use the card for free and to withdraw funds at a cost below cashing a paper check. That remains true today. For unbanked consumers, prepaid cards open up access to internet and telephone purchases and other conveniences offered by Visa- or MasterCard-branded debit cards.

On the other hand, prepaid cards typically come with many more fees for ordinary functions than do bank accounts. Prepaid cards are rarely the best choice for a consumer who already has her own account. Prepaid cards can have fees to withdraw cash at an ATM, check the card balance, attempt a transaction with insufficient funds, call customer service, and withdraw cash from a teller

window, among other fees. With careful use, a worker can avoid most of these fees, but they will catch many workers.

Even a well-designed prepaid card imposes fees on consumers. For example, in NCLC's 2011 survey, we gave California's UC card, issued by Bank of America, our top ranking. The only fees that most workers will incur on the California card are ATM fees, and then only if the worker makes more than four withdrawals per month at out-of-network ATMs. Nonetheless, California workers are paying approximately \$1.8 million/year in prepaid card fees, not counting additional ATM surcharges. About \$1 million of that is for domestic ATM fees, and the remainder is for international ATMs, emergency cash fees and expedited replacement cards.⁴

Even in California, which has the top prepaid card, workers pay an annual \$1.8 million in fees, not counting additional ATM surcharges.

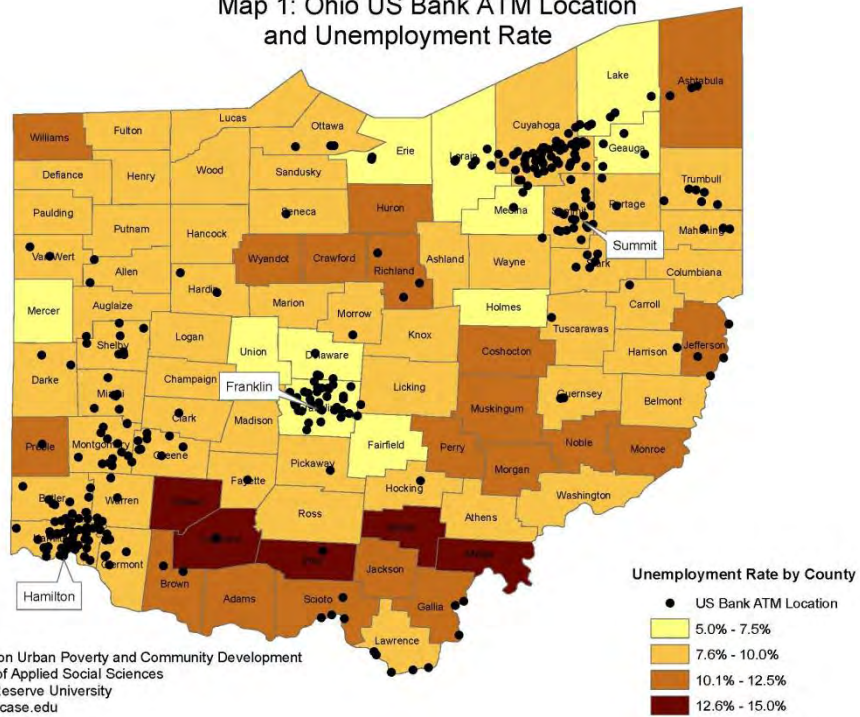
Moreover, as with any prepaid or debit card, consumers may incur ATM surcharges if they use a UC card at an ATM outside of the card's network. That is, even if the prepaid card charges no fee at all for any ATM withdrawal, the out-of-network ATM will impose a surcharge. The average ATM surcharge is presently \$2.50.⁵

ATM surcharges are not unique to prepaid cards. Banked consumers incur ATM surcharges as well if they use an ATM other than one at their bank. However, consumers have a choice of where to bank, and can choose a bank or credit union that offers free ATMs that are convenient to their home or work. When the state delivers benefits through a prepaid card, the worker does not get to choose among cards with different fees or a different ATM network.

When designing a UC prepaid card, states seek a contractor that will provide an expansive free ATM network throughout the state. The network may augment bank branches with additional network ATMs, often in locations such as convenience stores and drug stores.

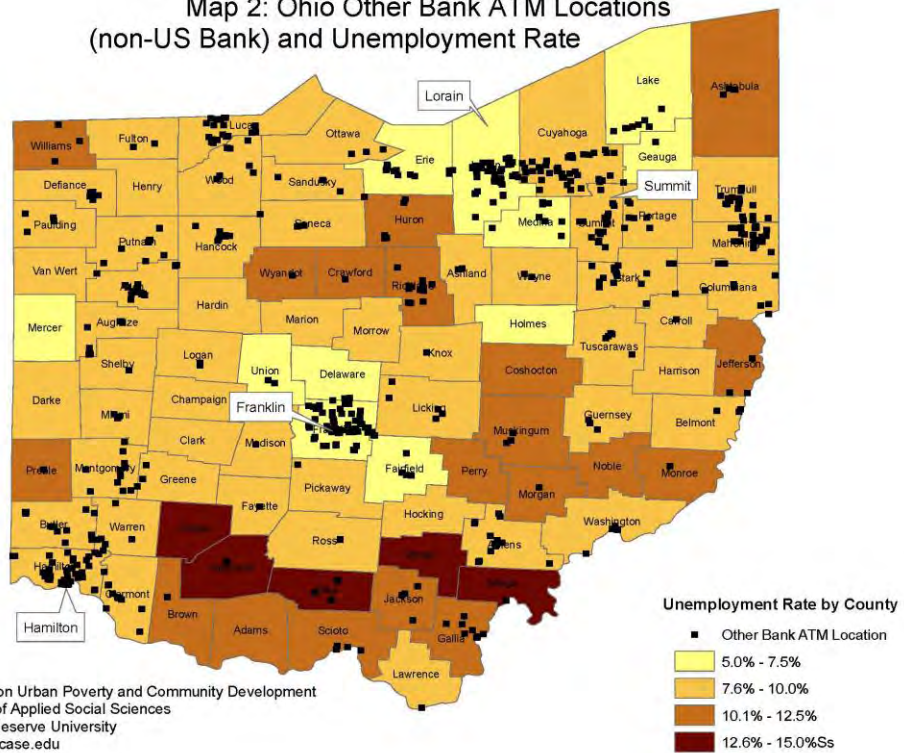
But even then, there can be spots with few convenient free ATMs, especially in rural areas. In Ohio, for example, ATM withdrawals are free at the 750 U.S. Bank or Visa/Plus ATMs in the state. But a survey by Ohio Policy Matters found that 33 of Ohio's counties have no U.S. Bank locations and 16 counties have no Visa/PLUS ATM locations.⁶ Some counties, including Vinton and Clinton with unemployment rates over 12%, have neither. Even for counties that do have a network ATM, many of the non-urban counties have few locations, often one free location every 20 miles (see Map 1 and Map 2).

Map 1: Ohio US Bank ATM Location and Unemployment Rate



Source: Center on Urban Poverty and Community Development
Mandel School of Applied Social Sciences
Case Western Reserve University
<http://neocando.case.edu>

Map 2: Ohio Other Bank ATM Locations (non-US Bank) and Unemployment Rate



Source: Center on Urban Poverty and Community Development
Mandel School of Applied Social Sciences
Case Western Reserve University
<http://neocando.case.edu>

Moreover, many workers will prefer to manage all of their money in a single account. A worker with both a prepaid card and bank account may be forced to take cumbersome steps to move the money to the bank account where the worker can access checks and the bank's bill payment features, already customized with the worker's bills. Some prepaid cards have bill payment features, but the worker would have to create a new set of payees on an account that will be temporary.

Consequently, it is essential that workers be given the option of direct deposit to an account of their choice. For most unbanked recipients, a well-designed prepaid card will be better than a paper check, but it will rarely be better than direct deposit for workers who have a bank account that they use for their everyday expenses.

B. Federal Law Requires the Choice of Direct Deposit First

Giving workers the choice of direct deposit to their own account before enrolling them in the prepaid card is not only good policy; it is also the law. The federal Electronic Funds Transfer Act (EFTA) states:

No person [including a state] may ... require a consumer to establish an account for receipt of electronic fund transfers with a particular financial institution as a condition of employment or receipt of a government benefit.⁷

That is, states may not require a consumer to have an account with the institution that holds the state prepaid card contract as a condition of receipt of UC benefits. The consumer must have the choice of another payment method, either direct deposit or a paper check. Giving consumers the choice of payment method enables them to receive funds in the most convenient, least costly manner.

In addition to cost and convenience factors, some consumers also object to being required to have any type of account at a particular bank. For example, one couple objected to a prepaid card for state disability benefits:

First, they don't like Bank of America, and swore off using their products for life. But now the state of New Jersey is opening a Bank of America account in their name without their consent...The dad-to-be's sister also signed up for the program and accidentally threw her debit card away because it came in a Bank of America envelope. She assumed it was junk mail.⁸

In 2009, the U.S. Department of Labor (DOL) recommended "payment of benefits by direct deposit rather than debit cards for individuals with bank accounts."⁹ DOL urged states to "offer the opportunity to elect direct deposit as soon as possible during the claims process."¹⁰ Nearly four years later, there is no excuse for any state not to be offering direct deposit as the first choice for payment of unemployment benefits.

C. Automatic Transfers Are Not the Same as Direct Deposit

Some states that do not permit direct deposit offer the option of setting up an automatic transfer of funds from the prepaid card to the worker's bank account. These states claim that automatic transfers are the same as direct deposit. They are not.

With an automatic transfer, the worker is still required to have an account with the financial institution that issues the prepaid card, and the funds must pass through that account before being transferred off. The worker suffers a delay of at least one day, and as many as four or more (depending whether a weekend or holiday intervenes), in receiving funds while that transfer takes place. The worker is also exposed to unauthorized charges on the prepaid card account just as with any Visa- or MasterCard-branded card.

For states that did not yet offer direct deposit in 2009, DOL indicated that states "should, *as an interim measure*, offer a way for UC benefits to be automatically transferred from the debit card to the individual's bank account."¹¹ Notably, automatic transfers were to be an interim measure. States were expected to set up direct deposit capability.

States that do not offer true direct deposit and require workers to have a prepaid card are violating the EFTA. The fact that automatic transfers may be available does not change that fact.

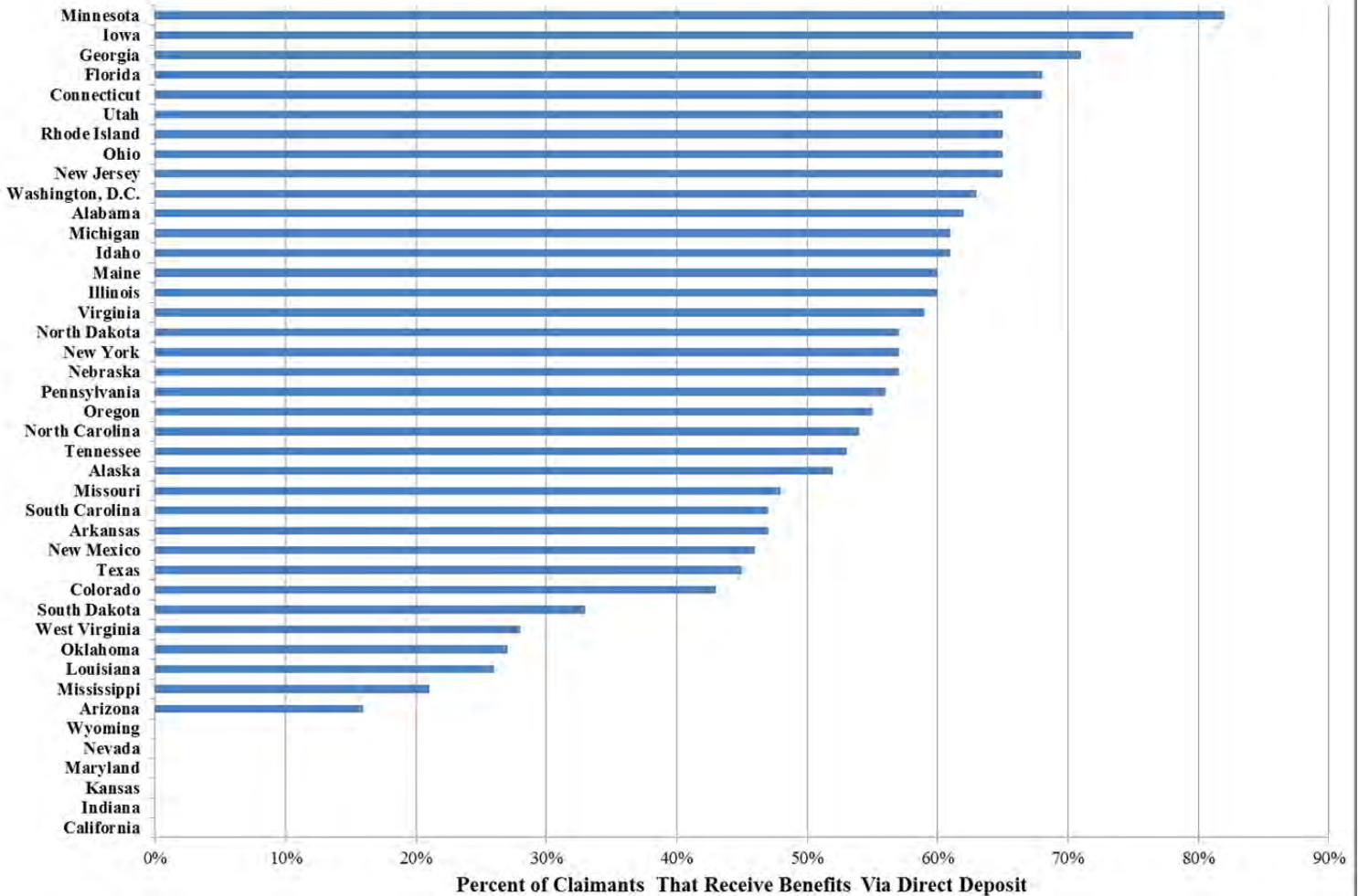
D. How the States Rate on Direct Deposit

1. States Offering Direct Deposit

Of the 42 jurisdictions that use prepaid cards for unemployment benefits, 36 offer the option of direct deposit. Most states encourage workers to sign up for direct deposit when they apply for unemployment, and the majority of workers choose direct deposit when offered the choice. However, states vary in how easy they make it to sign up, and their direct deposit rates differ accordingly.

Enrollment in direct deposit ranges from a high of 82% to a low of 16%. The median direct deposit rate is 57%. Chart 1 (see page 8) displays direct deposit rates, and a detailed table showing the rate of direct deposit, prepaid card and check payments is in Appendix A.

**CHART 1: RATE OF DIRECT DEPOSIT ENROLLMENT
FOR RECEIPT OF UNEMPLOYMENT BY STATE**



California, Indiana, Kansas, Maryland, Nevada, and Wyoming do not offer direct deposit as an option. Rates are based on states self-reporting and are rounded to the nearest whole number. States that do not have prepaid cards were not surveyed.

The state that has been most successful in enrolling workers in direct deposit is Minnesota, where 82% of workers receive their unemployment benefits directly into their own bank accounts. Other states with high direct deposit rates include Iowa (75%), Georgia (71%), Connecticut (68%) and Florida (68%), with several other states not far behind.

In only six states are fewer than 40% of workers enrolled in direct deposit: Arizona (16%), Mississippi (21%), Louisiana (26%), Oklahoma (27%), West Virginia (28%) and South Dakota (33%). However, West Virginia just added direct deposit as an option in 2011, and the state is actively urging workers to sign up for direct deposit, so its rates should increase.

In the other states with low direct deposit rates, the issue is not primarily lack of bank accounts. Though most of these states do have higher rates of unbanked residents than the national average, so do other states that still have significant direct deposit rates, including Alabama (62% direct deposit), Arkansas (47%) and Texas (45%).¹² South Dakota has no excuse: it has one of the lowest unbanked rates (and one of the highest fully banked rates) in the country.¹³

Moreover, the rate of bank accounts among unemployed workers is likely to be higher than the state average. Those workers all received regular income and many had direct deposit of their wages before losing their jobs.

The differences in direct deposit rates among states seem primarily to be due to how hard or easy the state makes it for workers to choose direct deposit.

Rather, the differences in direct deposit rates among states seem primarily to be due to how hard or easy the state makes it for workers to choose direct deposit.

States that actively encourage enrollment in direct deposit upon application have high direct deposit rates. States that put hurdles in front of workers have lower rates.

For example, Arizona's rock bottom direct deposit rate is clearly due to the fact that the state does not give

workers the initial choice of direct deposit. Workers are automatically enrolled in the prepaid card whether they want it or not.¹⁴ After they receive their card, they must take the initiative to find and fill out a form to set up direct deposit. The form must be sent in by mail; it cannot be completed online or over the phone.

Though better than not offering direct deposit at all, this process likely violates the federal law that prohibits states from requiring workers to have an account at a particular institution as a condition of unemployment benefits.¹⁵ Workers are initially required to have a prepaid card account with the state's vendor, and must take additional steps to disenroll from that account.

Other states' low direct deposit rates also are explained by obstacles to enrollment. In Oklahoma, for example, workers who wish to enroll in direct deposit must call to request that a direct deposit form be mailed to them, which they then must mail back. Workers who do not complete the form soon enough are enrolled in the prepaid card.¹⁶ In Mississippi, workers who apply online may elect direct deposit, but workers who do so by phone are automatically enrolled in the prepaid card and must elect direct deposit later in writing or on the internet.

In Minnesota, by contrast, which has the highest direct deposit rate, the state makes it easy for workers to sign up for direct deposit initially and to change payment method. When workers apply, they choose how they want to receive their payments: by direct deposit or prepaid card.¹⁷ Workers can also change their payment method by logging into their account online or by phone.

Direct deposit to the worker's own account should always be the first choice for payment of unemployment benefits. States should encourage that choice and make it easy to select.

2. States that Do Not Offer Direct Deposit

Six states that have UC prepaid cards do not offer direct deposit:

- California, Indiana, Kansas, Maryland, and Nevada require workers to receive benefits through the prepaid card, violating federal law that prohibits requiring consumers to have an account at a particular institution to receive public benefits.¹⁸
- Wyoming does not have direct deposit, but 52% of workers receive paper checks. In the other states that use prepaid cards, only a small number receive paper checks for special reasons.
- Indiana and Nevada are the only states that do not offer direct deposit, paper checks (except in rare cases in Nevada), or even the ability to set up an automatic transfer of funds from the prepaid card to the worker's own account, though Nevada is looking into adding that capability.

California, Indiana, Kansas, Maryland, and Nevada require workers to receive benefits through the prepaid card, *violating federal law*.

In California, Kansas, and Maryland, recipients can set up free automatic transfers to their bank accounts. But, as discussed, doing so results in a delay of one to four days in receiving payment, which is problematic for someone who is struggling with severely reduced income. Recipients also need to figure out how to arrange the transfer and take the steps to do so.

Indiana has an even more cumbersome process. A worker who does not want to use the prepaid card must call after each deposit to transfer the money to his own account. Again, the transfer can take one to four days. Each call will also use up one of the worker's six free calls to the automated customer service line, leaving only two free "interactive voice response" (IVR) calls each month to check the card balance.¹⁹ Nevada does not even offer manual transfers, though the state plans to add the capacity to do manual or automatic transfers.

In California, 24% of workers set up automatic transfers from the prepaid card to their bank account. In Maryland, the rate is 21%. Kansas refused to respond to requests for its automatic transfer rate.

These automatic transfer rates are considerably below the direct deposit rates in states that give workers that option. Only two states, Arizona (16%) and Mississippi (21%), have a direct deposit rate lower than or equal to the automatic transfer rates in California and Maryland. Arizona automatically enrolls all workers in the prepaid card and requires them to take extra steps to disenroll and set up direct deposit. Mississippi also does not permit enrollment in direct deposit at time of application, unless the worker applies online, and state also has a higher unbanked rate than any other state. The California and Maryland automatic transfer rates are well below the direct deposit rates in every other state. Thus, requiring workers to set up automatic transfers after receiving the prepaid card clearly inhibits them from managing the funds in their own account.

Workers should have the choice of direct deposit up front, at the time of application.

Workers who would have set up direct deposit but instead are forced to use the prepaid card risk incurring fees that they could have otherwise avoided. They also face the inconvenience of managing funds outside of their bank account. States should not create barriers for workers to direct their benefits to a bank account of their choice.

3. Paper Check Options

Though either direct deposit or a prepaid card will be the best choice for most workers, for various reasons a paper check may be the preferred option for some workers. Some will find a prepaid card hard to use, especially if they have mental or other disabilities. More remote areas of the country may lack the infrastructure to permit free or easy use of the prepaid card. Other workers feel that it is a violation of their privacy to give their bank account number to the state for direct deposit, or will have other reasons to prefer a paper check.

Arizona explained why a check works better for some recipients:

Some claimants ... prefer to receive a check as they may live in a location which does not have easy access to a bank and some claimants are in the process of separation from a spouse and do not wish to have direct deposit or a debit card account. Claimants may receive checks on a case-by-case basis.²⁰

Of the states that offer prepaid cards, Wyoming has the highest proportion of recipients receiving paper checks (52%), but the state does not offer direct deposit. California also uses checks for 10% of its recipients, but the prepaid card was just introduced in 2011 and checks are being phased out. Similarly, in West Virginia, 8% receive paper checks but the state only recently added directly deposit.

A number of other states mail paper checks to a small percent of their recipients, generally 2% to 4% or less. In some of these states, recipients may be able to ask for a check (though the option is not publicized). In other states, checks may be available only for special reasons, including the first check before direct deposit is set up, interstate claims, payments sent to bankruptcy trustees, or fraud on the prepaid card.

Workers should have the option of a paper check. Few recipients will choose it if the state offers a solid prepaid card and direct deposit, but those choices do not work for everyone.

III. Goodbye Overdraft Fees

In our 2011 survey, five UC prepaid cards, all issued by U.S. Bank, imposed overdraft fees of \$10 to \$20 if workers opted in to overdraft coverage. Those cards were available in Arkansas, Idaho, Nebraska, Ohio, and Oregon.

Although fees were charged only if workers “opted in” to overdraft coverage, prepaid cards should *never* have overdraft fees. Fee-based overdraft loans are a dangerous form of credit: they are easy to trigger inadvertently, fees pile up quickly, and the cost is exorbitantly expensive with no relationship to the amount of credit or the time it is borrowed.²¹ Consumers also often do not understand that overdraft “protection” really just means overdraft fees for transactions they would prefer to have denied.

Overdraft fees have since been completely eliminated from all of the U.S. Bank prepaid cards. Not a single UC prepaid card now exposes workers to the potential of hefty overdraft fees.

U.S. Bank reports that fewer than 2% of its cardholders, about 6,000, had opted in to overdraft coverage.²² Nonetheless, for those who did, multiple fees of \$10 to \$20, depending on the state, could be racked up each day, draining scarce funds that an unemployed worker needed for necessities.

The elimination of overdraft fees is the result of the interchange fee provision (the “Durbin Amendment”) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. That law caps the interchange fees that merchants must pay when they accept debit cards, but exempts prepaid cards from that cap on certain conditions. The absence of overdraft fees is one of the conditions.²³

With overdraft fees gone, all of the U.S. Bank cards move from a “thumbs down” to a “thumbs up” in our ratings. The rating changes are discussed in section IV.C.

IV. Other Fees Are Coming Down

A. Caveat: Fee Information Is Still Difficult to Find, Inaccurate, or Misleading

In our 2011 report, we criticized many states for not putting clear information about the fee schedules for their prepaid cards on their websites. The problem persists today. Even when fee schedules are available, they are often inaccurate, out of date or misleading. This is all the more surprising given that most fee schedules have improved, and states are therefore scaring workers about fees that may no longer be charged.

Some states do not seem to even know their own fee schedules. Even when we contacted states directly, on some occasions they provided us a different (inaccurate) fee schedule than the one the bank provided us. We also learned that some of the fee schedules that states provided us in 2011 omitted some fees.

We have listed links to fee schedules, where available, in Appendix C, and have noted inaccuracies of which we are aware. That appendix also includes fee schedules that we obtained directly from states or card issuers. But even our information may be imperfect, and the information in this report is subject to the caveat that we did our best but it may still contain errors.

A few states seem to be going out of the way to mislead workers about fee information. Some states include frequently asked questions (FAQs) about fees but then hide the answer to the question, touting free services without mentioning other fees.

Some states include frequently asked questions (FAQs) about fees but then hide the answer to the question, touting free services without mentioning other fees.

For example, the Alaska website has this Q&A:

Are there fees associated with my debit card?

You can make up to two free cash withdrawals per month from any JPMorgan Chase or Allpoint ATM's. There will be a surcharge fee on other ATM's. The amount will depend on the bank that owns the ATM. The ATM will notify you of the surcharge fee and allow you to cancel the transaction prior to being charged the fee.²⁴

This answer misleads workers into thinking that the only fee is the surcharge at out-of-network ATMs, a fee that will be displayed on the screen. In fact, workers will incur a \$1.50 fee even if they use a network ATM after making more than two withdrawals per month, and the ATM will not notify the worker about that fee. The Alaska card also charges \$0.40 for all balance inquiries, \$5.00 for all teller withdrawals, \$0.50 for all denied transactions, and \$0.35 for customer service calls or

use of the automated telephone menu, after four calls each month. Yet the website says nothing about these fees and provides no link to a fee schedule. Providing such deceptive and incomplete information is inexcusable.

Similarly, the Arizona website includes a clear tab for “Fees,” but the pop-up reads: “There are no fees if you use your EPC at point-of-sale retailers, JPMorgan Chase or Allpoint ATMs.”²⁵ The website does not describe the fees that the card does charge or provide a link to a fee schedule. Though the Arizona card has relatively low fees, workers still need to know what they are. Workers will pay \$0.25 per call if they use the automated menu to check their balance or talk to customer service more than eight times a month, \$0.75 if they check their balance at an out-of-network ATM, and \$1.50 per withdrawal if they use out-of-network ATMs more than four times per month.

Even when fee schedules are available, they are often buried on the state website, or only found on the bank’s website. We had to dig to find the links in Appendix C. Moreover, we later found that many of these fee schedules were inaccurate.

States have an obligation to provide clear, complete, accurate, and easily accessible information about the fees that workers will charge for accessing their unemployment benefits through a prepaid card. Doing so is a simple matter, and the many states that fail to do so have no excuse.

B. National Fee Trends

For workers who receive their unemployment benefits on prepaid cards, the news is largely good: fees are coming down. Since 2011, many states and their card vendors have made improvements to their prepaid cards, eliminating some of the most problematic fees. Table 1 (see page 15) provides a national overview of the fees on unemployment prepaid cards. Appendix B provides state-by-state details on the most common fees and our assessment of the cards. Links to complete state fee schedules are in Appendix C.

Many cards have moved up in our ratings. In the 2011 report, only 8 cards received one or two “thumbs up.” This year, we have awarded that rating to 18 cards, including three—California, New Jersey, and now Pennsylvania—that receive two “thumbs up.” In addition, 8 cards improved to a neutral rating from “thumbs down.”

Overall, 18 states reduced fees, offered more free transactions, or eliminated problematic junk fees.²⁶ Only 2 states (Alabama and Illinois) introduced new fees or raised existing fees, but also reduced or lowered fees in other areas.

Only 3 out of 42 cards (Alaska, Indiana, and Iowa) now have negative ratings, compared to 16 in our 2011 survey. Though a vigilant worker can avoid fees even on these cards, compared to other states, these cards offer tricks for the unwary.

Table 1: National Overview of Fees on Unemployment Prepaid Cards

Payment Methods	<ul style="list-style-type: none"> • 41 states and Washington, DC use prepaid cards. • 6 states with prepaid cards (CA, IN, KS, MD, NV, WY) do not offer direct deposit, but Wyoming still pays by check.
Point-of-Sale Transactions	<ul style="list-style-type: none"> • 1 state (ME) charges \$0.25 for purchases using PIN entry, but is considering eliminating the fee.
Automated Teller Machine (ATM) Withdrawals	<ul style="list-style-type: none"> • 24 states offer unlimited free in-network ATM withdrawals. • 18 jurisdictions grant 2 to 5 free in-network withdrawals/month. • 18 states allow one or more out-of-network ATM withdrawals each month before fees apply. • In all states, out-of-network ATMs can always assess a surcharge.
Teller-Assisted Withdrawals	<ul style="list-style-type: none"> • 27 card programs offer unlimited free over-the-counter teller withdrawals. • 11 states grant one or more free withdrawals per deposit. • 2 states (IL, VA) provide some free withdrawals but not enough for one withdrawal per deposit. • 2 states (AK, \$5.00; MO, \$1.25) charge every time a cardholder uses a teller-assisted withdrawal.
Account Information	<ul style="list-style-type: none"> • At least 25 states will mail monthly statements for free or a small fee. • 22 states charge \$0.25 to \$1.50 for some ATM balance inquiries.
Customer Service	<ul style="list-style-type: none"> • 23 card programs offer free, unlimited customer service calls. • Others charge \$0.25 to \$3.00 per call with one or more free calls/month. • 16 states have IVR fees for calls to automated customer service (i.e., to check the card balance) after free calls are exhausted.
Denied Transaction Fees	<ul style="list-style-type: none"> • 21 states charge \$0.20 to \$1.00 if a transaction is denied due to insufficient funds, although 14 waive some fees.
Inactivity Charges	<ul style="list-style-type: none"> • At least 28 states charge \$1.25 to \$4.00 per month on accounts that have been inactive after a time period ranging from 6 to 14 months.

Source: NCLC 2012 Survey of State Unemployment Offices

In addition to the elimination of overdraft fees, three positive trends are particularly apparent:

- *POS fees are nearly gone.* In our 2011 survey, four states charged a fee at the point-of-service (POS) if a worker pushed “debit” and entered a PIN when making a purchase, and Colorado charged even if the worker pressed “credit” and signed. The Maine card is now the only one with a POS fee, and the state is considering an offer from JPMorgan Chase to eliminate the fee.
- *ATM fees are easier to avoid.* Most states now offer either unlimited free in-network ATM withdrawals (24 states) or at least one free withdrawal per week or per deposit (16 jurisdictions). Only two states that pay benefits weekly offer only two (Tennessee) or three (Mississippi) free ATM withdrawals per month, not enough to cash each deposit.
- *Fewer workers now face the Catch-22 of paying a balance inquiry fee or taking a chance on a denied transaction fee.* Alaska is now the only state that charges for every balance inquiry and every denied transaction. Iowa is nearly as bad, though denied transaction fees are charged only at ATMs, not at merchants. Though too many cards have either denied transaction fees or balance inquiry fees or both, most waive some of those fees or charge the balance inquiry fees only at out-of-network ATMs.

Despite these positive changes, there has not been enough movement in some areas.

Two states, Alaska and Missouri, still fail to offer one free teller withdrawal per deposit, and two others, Mississippi and Tennessee, do not provide one free ATM withdrawal per deposit. In 2009, the U.S. Department of Labor stated:

[T]he Department interprets Federal law to require that all beneficiaries have reasonable access to the entire amount of each UC payment without cost to the individual. At a minimum, reasonable access means at least one opportunity for the individual to withdraw the entirety of each UC payment at no cost. Applied to debit cards, the state must allow the individual at least one opportunity to cash-out each UC payment, whether by ATM, over-the-counter teller transaction, or point-of-sale (POS) purchase, without incurring any fee.²⁷

A teller withdrawal is the only way to withdraw the entirety of a UC payment. ATMs usually dispense in \$20 increments and may have daily withdrawal limits. Yet Alaska charges \$5 for every teller withdrawal, and Missouri charges \$1.25. Free ATM withdrawals are also important, as most people do not want to wait in teller lines and take up teller time. Tennessee offers free teller withdrawals but provides only two free ATM withdrawals per month (and then charges \$0.40), though benefits are paid weekly. Mississippi also pays weekly but provides only three free ATM withdrawals per month (and then charges \$1.75).

Other areas in which states can still improve include:

- ***Too many balance inquiry fees:*** Cards in 22 states still charge ATM balance inquiry fees in some circumstances, though 16 offer some free inquiries and 11 cards charge only at out-of-network ATMs. Six states – Alaska, Connecticut, Indiana, Iowa, Kansas, and Oklahoma – charge a fee for every balance inquiry at a network ATM. Workers should never have to pay to find out their balance.
- ***Denied transaction fees persist:*** Cards in 21 states charge \$0.20 to \$1.00 if the worker attempts an ATM withdrawal or purchase for more than the card holds, though 14 states will waive the first couple of fees each month. Seven states (Alabama, Alaska, Iowa, Maine, New York, North Carolina and Texas) charge fees for every denied transaction. Though the fees are small, they can add up and workers may not even realize that they are incurring the fees. These fees should be eliminated.

Nonetheless, the overall the movement is in the right direction. More states are reducing the fees on their UC prepaid cards and saving their unemployed workers precious dollars.

C. Specific Fee Improvements and Savings

Many states have dropped or minimized fees on their UC prepaid cards. As a result, 16 states moved up in our rankings. Five of these are U.S. Bank cards that dropped overdraft fees, and the others made a number of improvements.

Pennsylvania switched vendors to JPMorgan Chase, and the new card has several improvements that the state projects will save workers about \$5.2 million a year in fees (see text box on next page). Workers will no longer pay any fees at network ATMs; the size of the network has increased (see Map 3); and the \$1.25 fee for out-of-network ATMs is waived for two withdrawals per month. The new card no longer has any balance inquiry, denied transaction, or customer service fees.

Two Thumbs Up: The New Pennsylvania UC Prepaid Card

After reviewing NCLC's 2011 report, the Pennsylvania Treasury Department set out to incorporate many of the recommendations and other best practices. The new card program with JPMorgan Chase for unemployment and workers' compensation payments will save recipients \$5.2 million each year. These savings are on top of another \$2 million from fee schedule changes in July 2011 that Pennsylvania had already negotiated with the original card issuer.

The state saved workers about \$3 million per year by eliminating all fees for network ATMs (previously \$1.75, with three free per deposit) and by adding 25% more ATMs on six networks: JPMorgan Chase Bank, Allpoint, MoneyPass, Sovereign Bank, Susquehanna Bank, and First National Bank of Pennsylvania. Workers will find it easier to locate network ATMs—the program will ultimately include an integrated ATM locator website combining the data of six ATM networks (see Map 3 on next page). The Pennsylvania program will also include a first-of-its-kind app for iPhones and Android-based mobile phones that will allow cardholders to search for—and obtain directions to—in-network ATMs.

The new card includes unlimited free customer service calls, estimated to save cardholders over \$1 million per year. Although the previous card permitted 7 free calls per month, the \$0.45 fee still added up. ATM balance inquiries are also now completely free, saving workers about \$300,000 a year over the previous card, which charged \$0.40 at out-of-network ATMs.

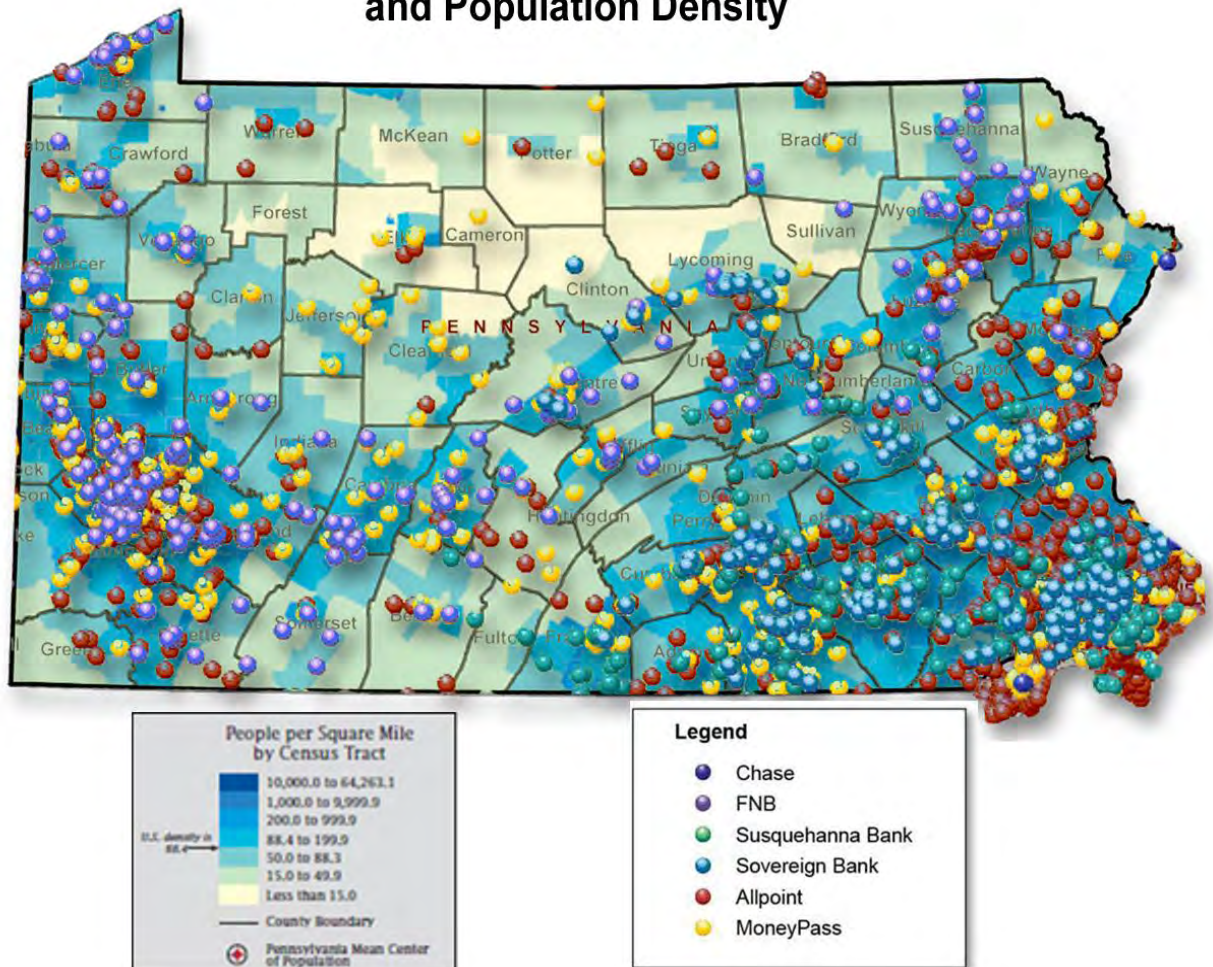
Services to non-English speakers are also enhanced. JPMorgan Chase will develop automated telephone menus in up to fifteen languages for the most commonly used services (e.g. activate a card, card balance, most recent transactions). Speakers of approximately 190 additional languages will have access to a language line.

The new program also includes a suite of free services that matches or exceeds traditional banking products, including online bill pay, teller withdrawals, paper statements, and online balance transfers. Like all UC prepaid cards, the card has an inactivity fee, but the contract requires JPMorgan Chase to do outreach to cardholders to encourage them to use their cards in order to avoid the fee. Cardholders whose notifications are returned as undeliverable may not be charged inactivity fees.

Pennsylvania Treasurer Rob McCord noted the critical importance of information about other state programs and NCLC recommendations in developing the new program: "We looked to the National Consumer Law Center's leadership and their easy-to-reference report when it came time to build a better program in Pennsylvania. It was a great resource. It informed us about the practices of other states and identified areas where we could improve. We feel the end result is one of the best debit card programs in the nation. We'll be able to pay benefits on a debit card in a way that does not 'nickel and dime' recipients with high fees and excessive transaction costs." He added, "Workers who have earned benefits – and need those dollars to get through hard times – will have more resources to survive and support their families."

For more information on Pennsylvania's new debit card program, visit www.debitcard.patreasury.gov.

Map 3: Pennsylvania In-Network ATMs and Population Density



Source: JPMorgan Chase and the U.S. Census Bureau

Pennsylvania now joins California and New Jersey in the ranks of the top cards with “two thumbs up.” (The State of California, however, still gets negative marks for requiring the use of the card and not offering direct deposit.) All three cards have very few fees and offer at least two free withdrawals at out-of-network ATMs. The Oregon card is similar, and is a vast improvement, but we have awarded it only one “thumbs up” due to the fairly high \$2.00 out-of-network ATM fee (with two free per month).

All of these cards now offer recipients ample free ways to get cash and information with no junk fees:

- Unlimited free in-network ATM withdrawals;
- Two or four (California) free withdrawals out of network;
- Free bank teller withdrawals;

- Free cash back from a purchase;
- No overdraft or denied transaction fees;
- No ATM fees for balance inquiries, whether in- or out-of-network;
- Unlimited free automated and live customer service calls;
- No fees for point-of-sale transactions.
- The option of monthly statements for free (except in New Jersey).

With the elimination of overdraft fees, the U.S. Bank prepaid cards in Arkansas, Idaho, Nebraska, Ohio, and Oregon also now have excellent cards and improve from a negative rating to a “thumbs up.” The cards offer features similar to the California, New Jersey, and Pennsylvania cards, except that they do not offer any free out-of-network ATM withdrawals (except Nebraska, which offers one per month, and Oregon, which offers two). Idaho and Minnesota also charge \$3.00 per customer service call to a live representative if the worker makes more than one (Minnesota) or three (Idaho) calls per month. That is not as good as the other U.S. Bank cards, which do not charge for customer service, and \$3.00 is too much for a customer service call. But most workers will not incur those fees and (with some reluctance) we have still given Idaho and Minnesota positive ratings.

The two newest cards also receive a “thumbs up.” In Georgia, the only significant fee is \$0.95 for using out-of-network ATMs. The District of Columbia card is similar, but the fee is higher (\$1.75) and workers get only one free withdrawal per week at network ATMs. But in both cases workers can effectively “cash” or use the card for free.

The Tennessee card, which previously had the most junk fees, has eliminated several fees and now receives a neutral rating. The card stopped charging for ATM balance inquiries, eliminated point-of-sale fees, and added two free cash withdrawals per month at network ATMs. Though the card is considerably improved, Tennessee pays benefits weekly and two free ATM withdrawals per month is not enough to enable workers to “cash” each deposit for free.

Rhode Island jumps from a “thumbs down” to “thumbs up” as the card stopped charging for ATM balance inquiries, began offering unlimited withdrawals at in-network ATMs, and eliminated point-of-sale fees. The card also offers the most free out-of-network withdrawals of any state: two per weekly deposit.

Other states also made positive changes:

- Colorado eliminated POS fees, waived one denied transaction fee for each weekly deposit, and increased the amount of cash that could be withdrawn from an ATM up to \$809.
- Louisiana added unlimited free ATM withdrawals and balance inquiries in-network and one free denied transaction per deposit.
- South Carolina now permits unlimited in-network ATM withdrawals and has stopped charging for customer service calls.

- Utah eliminated balance inquiry fees at network ATMs and added one free denied transaction per deposit.
- Connecticut removed its denied transaction fee.

The savings from even modest changes can add up: Colorado estimated that eliminating point-of-service fees alone saved workers \$720,000 per year. Waiving one denied transaction fee per deposit should also save some of the \$14,000/year Colorado workers were paying for those fees.

Although many states improved their cards since NCLC’s 2011 review, a few added or increased fees and removed free transactions. Some states have increased the amount of their fees, but permit more free transactions before the fee kicks in. In general, this is an improvement, because allowing the first transactions to be free may enable many workers to avoid the fees altogether. But in some cases the number of free transactions is still too low.

Colorado estimated that eliminating point-of-service fees alone saved workers \$720,000 per year.

For example, Illinois, which changed vendors from Illinois National Bank to JPMorgan Chase, made several changes. The new contract increases ATM fees from \$0.95 to \$1.40 but adds one free withdrawal per biweekly check; doubles to \$1 the ATM balance inquiry but charges it only out of network and permits one free inquiry per month; and adds a new denied transaction fee but waives three per month. The fee for customer service calls dropped from \$1.25 to \$0.35 and workers now get six free calls per month. Overall, the positive changes on the Illinois card move the state out of the “thumbs down” category into neutral, but workers should never pay for balance inquiries, customer service or denied transactions, and need more than two ATM withdrawals per month.

Similarly, the Alabama card has improved, but changes go in both directions and are not sufficient to rate a “thumbs up.” Under its prior fee structure, Alabama charged for every balance inquiry and every denied transaction at ATMs. The card now allows one free balance inquiry each month, but should not charge those fees at all. Moreover, the card not only retained its denied transaction fee, but increased the amount to \$0.50 (from \$0.40) per denial. The Alabama card also increased the ATM fee from \$1.00 to \$1.50.

As more states reduce and simplify fees on their prepaid cards, hopefully the others will follow suit. All states should find ways to develop a card program that enables workers to use the cards and get the information they need without paying fees to access their own money.

Clearly, the trends are in the right direction. States are saving unemployed workers millions of desperately needed dollars by reducing or eliminating unnecessary prepaid card fees.

V. Recommendations and Conclusion

States and prepaid card vendors have made many improvements in their unemployment cards. For workers who do not have a bank account, and who know how to use the card to avoid fees, every unemployment prepaid card provides a less expensive, more convenient, and safer method of receiving payments than waiting for a paper check and paying to cash it.

Every card program can be improved, however, and helping unemployed workers preserve benefit dollars is essential. The following measures can help workers maximize their unemployment benefits and control their budgets:

- **Prominently offer direct deposit to the worker's own account first, at time of application, and make sign-up easy.** A prepaid card should always be the second choice payment method, available for workers who do not have a bank account or who for, whatever reason, prefer to have a separate prepaid card. A worker who does not sign up at time of application should be able to set up direct deposit by phone or online, with instructions given at sign-up and in a prominent location on the state website.
- **Offer a minimum of one free ATM and teller withdrawal for each deposit and preferably more.** Two free ATM withdrawals per month are insufficient if benefits are paid weekly. Workers are also more likely to keep money on the card and use it if they are not worried about ATM fees if they need more cash.
- **Eliminate fees for balance inquiries and customer service.** Workers should not be charged for finding out information about their accounts, especially through automated methods. The vendor's costs for balance inquiries should be covered either as overhead or bundled with ATM fees in order to simplify fee schedules and promote access to balance information. Consumers should have reasonable free access to customer service if they have a problem or question about the card and should never be charged for automated telephone inquiries.
- **Eliminate denied transaction fees.** The complete elimination of overdraft fees is a welcome development. Denied transaction fees should also be eliminated. Workers do not expect those fees, are likely to be unaware when they incur the fees, and should not be penalized for trying to extract every last dollar from the card or thinking that a deposit has come in.
- **Monitor fees and involve workers and advocates to address excessive costs.** Some states could not tell us how much their workers were paying in fees. This is inexcusable. The card vendors certainly know, and states should insist on receiving this information regularly. Armed with that information, states can work with vendors and can reach out to workers who are incurring excessive fees to make improvements.

- **Publicize alternative methods of fee-free cash access and card use.** Many workers do not know how they can avoid fees by locating network ATMs, asking for cash back from a purchase, using bill payment features when available, and through other methods. States can use more prominent disclosure materials and website information, public service announcements, and outreach to workers who are incurring unnecessary fees.
- **Improve information about the location of free ATMs.** Finding network ATMs is not always easy, especially if the card uses more than one network. State unemployment offices and websites should contain materials listing and mapping the locations of network ATMs and have easy-to-use websites and mobile applications for finding those ATMs. Pennsylvania has done a particularly good job of developing a centralized method of locating all fee-free ATMs within more than one network.
- **Offer prominent, complete and accurate fee information on the state website.** Many states are woefully lacking on the most basic protection: making it simple to find clear, accurate and complete fee information on the state website.

Prepaid cards offer the promise of a win-win: states can save money by avoiding the costs of dealing with paper checks, and card users can skip check cashing fees, receive their money faster, and avoid the risks of carrying cash. But direct deposit to the worker's own account needs to be universally available and promoted everywhere as the first choice. For unemployed workers who receive their benefits on a prepaid card, states have made many improvements, and the trends are in the right direction. But not every state is there yet, and they should look to the states that provide good models to follow. For families struggling with unemployment, every dollar counts.

END NOTES

¹ Available at www.nclc.org/issues/unemployment-compensation-prepaid-cards.html.

² We have corrected some errors in the 2011 ratings, described in Appendix B.

³ Nat'l Consumer Law Ctr., *Unemployment Compensation Prepaid Cards: States Can Deal Workers a Winning Hand By Discarding Junk Fees*, (2011), available at www.nclc.org/issues/unemployment-compensation-prepaid-cards.html.

⁴ We have estimated those numbers for a 12-month period based on California's report that, for the ten months from July 2011 through April 2012, workers paid \$917,082 in domestic ATM fees, \$111,897 in foreign ATM fees, \$433,870 in emergency cash fees (fees to wire money when the card is lost), and \$6,350 in fees for express delivery of a replacement card.

⁵ Ann Carrns, "Average ATM Surcharge Reaches New High." *New York Times* (Sept. 26, 2012).

⁶ See Testimony of David Rothstein, Ohio Policy Matters, presented to the Senate Committee on Banking, Housing, Urban Affairs, Subcommittee on Financial Institutions and Consumer Protection, on "Examining Issues in the Prepaid Card Market" (March 14, 2012), available at <http://www.policymattersohio.org/rothstein-testimony-march2012>. Charts comparing the ATM locations and the county unemployment rates are included in Figures 1 and 2 attached to the testimony.

⁷ 15 U.S.C. § 1693k.

⁸ Jen A. Miller, "Isn't This State-Mandated Banking?!" *Bankaholic* (July 16, 2011), available at <http://www.bankaholic.com/isnt-this-state-mandated-banking/>. Although New Jersey does offer the option of direct deposit, in California an unemployed worker has no choice but to have a Bank of America prepaid card account.

⁹ Employment and Training Admin. Advisory System, U.S. Dep't of Labor, Unemployment Insurance Program Letter No. 34-09 on Best Practices for Payment of UC (UC) by Debit Cards, at 1 (Aug. 21, 2009) ("DOL Program Letter"), available at http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2795.

¹⁰ *Id.* at 2.

¹¹ *Id.* at 2 (emphasis added).

¹² In Alabama, Arkansas, and Texas, 58% of the residents are fully banked, compared to 59% in Louisiana, 61% in Mississippi, and 62% in Oklahoma. See Fed. Dep. Ins. Corp., "2011 Nat'l Survey of Unbanked and Underbanked Households—Appendix H, Detailed State Tables." (Sept. 2012), available at http://www.fdic.gov/householdsurvey/2012_unbankedreport_app_h-i.pdf.

¹³ In South Dakota, 72% of residents are fully banked and only 4.4% are completely unbanked, compared to national averages of 69% and 8.2%, respectively. See *id.*

¹⁴ See Arizona Department of Economic Security, "How Will I Receive My Benefit Payments?" (2013), available at <https://www.azdes.gov/main.aspx?menu=317&id=3872> (last visited Jan. 18, 2013).

¹⁵ See 15 U.S.C. § 1693k(2). Courts have interpreted a related provision, 15 U.S.C. § 1693k(1), which bans credit conditioned on electronic repayment, to prohibit creditors from making electronic payment the default payment method even if consumers can cancel it. See *Pinkett v. First Citizens Bank*, 2010 WL 1910520 (N. D. Ill. May 10, 2010); *O'Donovan v. CashCall, Inc.*, 2009 WL 1833990 (N.D. Cal. June 24, 2009).

¹⁶ See Eppicard.com, "Oklahoma: About Your Card." (2013), available at https://www.eppicard.com/okedcuiclient/pdf/OKUI_NotificationLetter.pdf (last visited Jan. 18, 2013).

¹⁷ See Unemployment Insurance Minnesota, "Payment Options." (2011), available at <http://www.uimn.org/uimn/applicants/getpaid/payment-options/> (last visited Jan. 18, 2013).

¹⁸ Nevada pays a small number of workers by paper check but checks are being phased completely out.

¹⁹ The IVR fees are especially unfortunate given that Indiana also charges \$0.40 for ATM balance inquiries.

²⁰ E-mail Communication from Nicole Moon, Public Information Officer, Arizona Department of Economic Security (Oct. 10, 2012).

²¹ For example, studies have shown that consumers who are persuaded to opt in to overdraft coverage often thought that they were protecting themselves from overdraft fees rather than giving permission to charge them. See Center for Responsible Lending, *Banks Collect Overdraft Opt-Ins Through Misleading Marketing*, (April 26, 2011), available at <http://www.responsiblelending.org/overdraft-loans/policy-legislation/regulators/banks-misleading-marketing.html>.

Other studies have shown that the average overdrawn debit card transaction is only \$14.75 and is repaid in a few days. See Eric Halperin, Lisa James, & Peter Smith, Center for Responsible Lending, "Debit Card Danger: Banks offer little warning and few choices as customers pay a high price for debit card overdrafts." (Jan. 25, 2007), available at <http://www.responsiblelending.org/overdraft-loans/research-analysis/Debit-Card-Danger-report.pdf>.

²² Randy Tucker, "Bank nixes fees for jobless." *Dayton Daily News* (July 16, 2012), available at <http://www.daytondailynews.com/news/news/state-regional/bank-nixes-fees-for-jobless/nPwqw/>.

²³ Prepaid cards issued by banks with fewer than \$10 billion assets are not subject to the interchange fee cap and thus can charge high interchange fees even if they have overdraft fees. But U.S. Bank has over \$10 billion in assets and is the only bank that issued a prepaid card that included overdraft fees.

²⁴ See Alaska Department of Labor and Workforce Development, "Unemployment Insurance: FAQ's for Debit Card." (Jan. 2010), available at http://labor.alaska.gov/esd_unemployment_insurance/faq-debit-cards.htm (last visited Jan. 18, 2013)

²⁵ See Arizona Department of Economic Security, "Electronic Payment Card (EPC): Fees." (2013), available at <https://www.azdes.gov/main.aspx?menu=317&id=3880>.

²⁶ The 18 states are Alabama, Arkansas, Colorado, Connecticut, Idaho, Illinois, Indiana, Louisiana, Michigan, Nebraska, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Utah, and West Virginia. Indiana reduced some of the fees but retains its "thumbs down" because it has several fees, including balance inquiry fees with no free inquiries, and because the state forces all workers to use the card and the card does not have an option to automatically transfer funds to a bank account. Louisiana's card is considerably improved but the card still has too many fees to get a "thumbs up."

²⁷ DOL Program Letter, *supra* note 9, at 3.

Appendix A

Payment Methods by State for Distributing Unemployment Benefits*

Jurisdiction	Prepaid Card	Direct Deposit	Check
Alabama	38%	62%	0%
Alaska	44%	52%	4%
Arizona	81%	16%	3%
Arkansas	53%	47%	0%
California	90%	0%	10%
Colorado	57%	43%	0%
Connecticut	32%	68%	0%
Dist. Of Columbia	35%	63%	2%
Florida	29%	68%	3%
Georgia	29%	71%	0%
Idaho	39%	61%	0%
Illinois	40%	60%	0%
Indiana	100%	0%	0%
Iowa	24%	75%	1%
Kansas	100%	0%	0%
Louisiana	72%	26%	2%
Maine	40%	60%	0%
Maryland	100%	0%	0%
Michigan	39%	61%	0%
Minnesota	18%	82%	0%
Mississippi	79%	21%	0%
Missouri	52%	48%	0%
Nebraska	43%	57%	0%
Nevada	96%	0%	4%
New Jersey	35%	65%	0%
New Mexico	52%	46%	2%
New York	43%	57%	0%
North Carolina	46%	54%	0%
North Dakota	43%	57%	0%
Ohio	35%	65%	0%
Oklahoma	73%	27%	0%
Oregon	45%	55%	0%
Pennsylvania	42%	56%	2%
Rhode Island	35%	65%	0%




South Carolina	51%	47%	2%
South Dakota	67%	33%	0%
Tennessee	47%	53%	0%
Texas	55%	45%	0%
Utah	35%	65%	0%
Virginia	41%	59%	0%
West Virginia	64%	28%	8%
Wyoming	48%	0%	52%

*States that do not offer prepaid cards are not included.




Source: NCLC 2012 Survey of State Unemployment Offices

Appendix B

2013 State-by-State Highlights of Unemployment Compensation Prepaid Card Programs











Key:  **Best bet**  **Runner-up**  **Problematic**






ATM: The fee for ATM withdrawals at either in- or out-of-network ATMs.
ATM-out: The fee for withdrawing cash only at out-of-network ATMs.
Bal: The fee to check the balance at an ATM in- or out-of-network.
Bal-out: The fee to check the balance only at an out-of-network ATM.
CS: The fee for calling live customer service.
DT: The fee for denied transactions at an ATM or merchant. DT ATM indicates a fee only for denied ATM transactions.
F: The number of free transactions per month before a fee is imposed.
IVR: The fee for calling customer service and using the Interactive Voice Response (automated) menu, such as to check the account balance. The same fee will also apply to live customer service calls.
PIN: The fee for a point-of-service (POS) transaction using a personal identification number.
Teller: The fee for a withdrawal from the teller window.
 *Free transactions only at network ATMs or the card issuer’s branches.





State (bank)	Ranking	State-by-State Highlights	Notable Fees (not all fees) ¹
Alabama (Comerica)	2013: Neutral	Alabama made some changes to improve the card but still has some unwelcome fees. The card added two more fee-free cash withdrawals at network ATMs and one balance inquiry per month is now free. But the card retained and increased the fees for denied transactions and customer service calls.	\$1.50/4F* \$0.40/1F* Bal \$0.50 DT ATM \$0.35/8F IVR
	2011: 		
Alaska (JPMorgan Chase)	2013: 	Alaska’s card is one of only two states that put workers in a Catch-22: pay a balance inquiry fee or risk a denied transaction fee. Alaska is also one of only three states that do not offer any free teller-assisted withdrawals and the teller fee is the highest of any state. The prepaid card does provide one free ATM withdrawal per deposit at either in- or out-of-network ATMs, but then charges a high \$1.50 fee.	\$1.50/2F ATM \$0.40 Bal \$5.00 Teller \$0.50 DT \$0.35/4F IVR
	2011: ² 		



¹ We have not listed fees for replacement cards, inactivity fees, monthly statements, foreign transactions, bill payment services, or alerts. See Appendix C for links to the complete fee schedules.




² We have corrected Alaska’s 2011 rating to “thumbs down” based on a balance inquiry fee that the state did not disclose to us in 2011. Combined with the other fees, the cumulative effect is a Catch-22 and a lot of fees.

Arizona (JPMorgan Chase)	2013: 	Arizona should offer the choice of direct deposit earlier in the application process, but has a decent prepaid card with no fees at network ATMs and no penalty fees. It also includes some free out-of-network ATM withdrawals and the option of monthly account statements. However, the state should eliminate the fees for balance inquiries at out-of-network ATMs and provide unlimited free calls to customer service, especially to the automated menu.	\$1.50/4F ATM-out \$0.75 Bal-out \$0.25/8F IVR
	2011: 		
Arkansas (U.S. Bank)	2013: 	Arkansas is one of five states that recently eliminated its overdraft fee. The Arkansas card offers ample access to free account information, including automatic monthly paper statements, and the card has generally good access to cash without fees.	\$1.50 ATM-out
	2011: 		
California (Bank of America)	2013:  	California violates federal law by not offering direct deposit first, but the state has the best overall UC prepaid card. The card offers multiple free ways to access cash, including some out-of-network ATM withdrawals, free account information, an option to sign up for paper statements, and no penalty fees.	\$1.00/4F ATM-out
	2011:  		
Colorado (JPMorgan Chase)	2013: Neutral	Colorado reduced several fees since 2011 and workers who use network ATMs can avoid most fees. But the card would be improved further by eliminating all fees for ATM balance inquiries and denied transactions and by permitting one free teller withdrawal per deposit.	\$1.50/2F ATM-out \$0.50 Bal-out \$4.00/2F Teller \$0.75/2F DT \$0.25/8F IVR
	2011: 		
Connecticut (JPMorgan Chase)	2013: Neutral	Connecticut dropped its denied transaction fee, but should also eliminate the ATM balance inquiry fee. The card offers unlimited teller withdrawals, good access to out-of-network ATMs, and the option to sign up for paper statements for a small monthly fee.	\$1.50/4F ATM \$0.85 Bal \$0.25/5F IVR
	2011: 		
Delaware	No prepaid card yet but one is coming soon.		



District of Columbia (Citibank)	2013: 	The new Washington, D.C. card is almost fee-free, with no penalty or information fees and a free cash withdrawal for each deposit at in-network ATMs, though workers will pay at out-of-network ATMs.	\$1.75/4F* ATM
	2011: No card.		
Florida (Wells Fargo)	2013: Neutral	Florida has several fees, but recipients who live near a network ATM have decent free access to cash and information. But fees at out-of-network ATMs are high.	\$2.25 ATM-out \$0.75 Bal-out \$3.00/2F Teller \$0.50/5F IVR
	2011: Neutral		
Georgia (Comerica)	2013: 	The new Georgia card has almost no fees for ordinary use as long as workers use network ATMs, though there are fees for using the optional bill payment and text message deposit notification features.	\$0.95 ATM-out
	2011: No card.		
Hawaii	No prepaid card yet.		
Idaho (U.S. Bank)	2013: 	Idaho is one of five states that recently eliminated its overdraft fee. The card offers excellent access to free account information, including the option of monthly paper statements, and has generally good access to cash without fees. However, Idaho should eliminate the customer service fee, which is the highest of any state.	\$1.25 ATM-out \$3.00/3F CS
	2011: 		
Illinois (JPMorgan Chase)	2013: Neutral	Illinois made some improvements but also some fee increases. Workers can now withdraw cash for free after each biweekly deposit, but pay a higher fee after that. Balance inquiries are now free at network ATMs but the \$1 fee out of network fee and the new denied transaction fee are unfortunate. The card could also be improved by permitting one free teller withdrawal per deposit and unlimited customer service calls, especially for automated services.	\$1.40/2F ATM \$1.00/1F Bal-out \$5.00/1F Teller \$1.00/3F DT \$0.35/6F IVR
	2011: 		

Indiana (PNC)	2013: 	Indiana violates federal law by not offering direct deposit first, <i>and</i> the card doesn't even offer the option of automatic transfers to a bank account. The card also assesses a fee for all ATM balance inquiries and charges even for automated telephone balance inquiries, after 6 each month, although several of the fees have been reduced slightly since 2011.	\$1.05/4F* ATM \$0.40 Bal \$0.20/4F DT ATM \$0.40/6F IVR \$0.40/6F CS
	2011: 		
Iowa (Wells Fargo)	2013: 	Iowa is one of two states that put consumers in a Catch-22 with a fee for all ATM balance inquiries and all denied transactions if the balance is insufficient. The card also charges for calls to customer service, even to the automated (IVR) menu to check the balance, after six calls each month.	\$1.35/4F* ATM \$0.50 Bal \$0.50 DT ATM \$0.40/6F IVR
	2011: 		
Kansas (Citibank)	2013: Neutral	Kansas violates federal law by not offering direct deposit first. The Kansas prepaid card has unwelcome balance inquiry fees but they are not as steep as on some cards. Otherwise, workers can generally avoid fees.	\$0.75/4F ATM \$0.25 Bal
	2011: Neutral		
Kentucky	No prepaid card yet.		
Louisiana (JPMorgan Chase)	2013: Neutral	Workers in Louisiana who use network ATMs can avoid most fees. The card has several fees but offers a number of free transactions before the fees kick in. The state removed the fee for transactions at in-network ATMs and added a number of free transactions for out-of-network ATM use, denied transactions, and teller withdrawals. The card could be improved by eliminating all fees for balance inquires and customer service, especially for using the automated menu.	\$1.50/4F ATM-out \$0.75/4F Bal-out \$4.00/4F Teller \$0.75/4F DT ATM \$0.25/8F IVR
	2011: Neutral		

Maine (JPMorgan Chase)	2013: Neutral	Maine is the only state to charge for purchases (including cash back) made with a PIN number, and the card also has inappropriate denied transaction fees. Information access is good: ATM balance inquiries and customer service calls are free, paper statements are available for a small fee each month, and a clear and complete fee chart is available on the state's website.	\$1.50/4F* ATM \$0.25 PIN \$1.00 DT
	2011: Neutral		
Maryland (Citibank)	2013: 	Maryland violates federal law by not offering direct deposit, but the state has one of the better UC prepaid cards, with no penalty fees and generally ample access to cash and information without fees. The card could be improved with an option to sign up for paper statements. Recipients can arrange for payments to be automatically transferred but there might be a delay in receiving funds.	\$1.50/4F* ATM
	2011: 		



Massachusetts	No prepaid card yet.		
Michigan (JPMorgan Chase)	2013: Neutral	Michigan made some improvements by lowering the denied transaction fee and waiving two a month and dropping ATM balance inquiry fees in network. Workers can avoid those fees with careful use, but both should be completely eliminated.	\$1.50/4F* ATM \$1.00 Bal-out \$4.00/2F Teller \$1.00/2F DT
	2011: ³ 		
Minnesota (U.S. Bank)	2013: 	The Minnesota card has no penalty fees and generally ample access to cash and information without fees. But the stiff customer service fee, tied for the highest of any state, should be eliminated. The card could also be improved by offering some free out-of-network ATM withdrawals.	\$1.50 ATM-out \$3.00/1F CS
	2011: 		







³ The 2011 “thumbs down” for Michigan, due to the high denied transaction fee and a number of other fees, was inadvertently left off of the original version of the 2011 report.







Mississippi (Comerica)	2013 : Neutral	The Mississippi card permits three free in-network ATM withdrawals per month, but benefits are paid weekly so workers will likely incur some fees. The card could also be improved by eliminating all fees for balance inquiries, denied transactions, and automated customer service calls, as well as the option to sign up for paper statements.	\$1.75/3F* ATM \$0.75/3F* Bal \$0.50/3F* DT ATM \$0.50/5F IVR
	2011: Neutral		
Missouri (Central Trust Bank)	2013: Neutral	Missouri is one of only two states with no free teller withdrawals. Otherwise, Missouri charges no ATM fees in-network and offers a number of free transactions even at out-of-network ATMs. Although fees for automated customer service and denied transactions kick in only after free transactions are used up, those fees should be eliminated altogether.	\$1.75/4F ATM-out \$0.50/4F Bal-out \$1.25 Teller \$0.25/4F DT \$0.50/12F IVR
	2011: ⁴ Neutral		
Montana	No prepaid card yet.		
Nebraska (U.S. Bank)	2013: 	Nebraska is one of five states that recently eliminated its overdraft fee. The card offers excellent access to free account information, including automatic free monthly paper statements, and has generally good access to cash without fees.	\$1.25/1F ATM-out
	2011: ⁵ 		


⁴ We have adjusted Missouri's 2011 rating to neutral instead of "thumbs up" as we mistakenly thought there were some free teller withdrawals.




⁵ The 2011 "thumbs down" for Nebraska, due to the overdraft fee, was inadvertently left off of the 2011 report.

Nevada (Wells Fargo)	2013: Neutral	Nevada violates federal law by not offering direct deposit, and the card does not even permit transfers to a bank account, though that may change. After some free transactions, the card charges fees for denied transactions, ATM balance inquiries and automated (IVR) customer service calls.	\$1.75/4F* ATM \$0.50/1F Bal \$0.50/2F DT ATM \$0.35/5F IVR
	2011: Neutral		
New Hampshire	No prepaid card yet.		
New Jersey (Bank of America)	2013: 	New Jersey has one of the best UC prepaid cards, with multiple free ways to access cash, including some out-of-network ATM withdrawals, free account information, and no penalty fees. The card could be improved with an option to sign up for paper statements and more free-out-of-network ATM withdrawals for those not near a network ATM.	\$1.00/2F ATM-out
	2011: 		
New Mexico (Wells Fargo)	2013: Neutral	The New Mexico card provides generally ample access to cash and information by offering a number of free transactions before fees are charged. The card could be improved by offering some free out-of-network ATM withdrawals and eliminating the denied transaction and customer service fees.	\$1.50/4F* ATM \$10.00/4F Teller \$0.50/4F DT ATM \$0.50/4F IVR \$1.50/2F CS
	2011: Neutral		
New York (JPMorgan Chase)	2013: Neutral	The New York card provides ample access to information and numerous opportunities to withdraw funds for free, including some free out-of-network ATM withdrawals and the option of paper statements. However, the program could be improved by eliminating the denied transaction fee and the fee for out-of-network ATM balance inquiries.	\$1.50/2F ATM-out \$0.50 Bal-out \$0.50 DT ATM
	2011: Neutral		

North Carolina (Wells Fargo)	2013: Neutral	For recipients who can use network ATMs, the North Carolina card offers generally good access to cash and information. But at out-of-network ATMs, cardholders will pay a steep price for balance inquiries and withdrawals. The card also carries a denied transaction fee. The state should offer recipients the option to sign up for paper statements.	\$2.25 ATM-out \$1.00 Bal-out \$2.50/8F Teller \$1.00 DT ATM
	2011: Neutral		
North Dakota (U.S. Bank)	2013: 	North Dakota has one of the better UC prepaid cards with no penalty fees and generally ample access to cash and information without fees. The card could be improved by offering some free out-of-network ATM withdrawals and by adding an option to sign up for paper statements.	\$1.25 ATM-out
	2011: 		
Ohio (U.S. Bank)	2013: 	Ohio is one of five states that recently eliminated its overdraft fee. The card offers excellent access to free account information, including monthly paper statements, and has generally good access to cash without fees. The card could be improved by introducing some free cash withdrawals at out-of-network ATMs.	\$1.50 ATM-out
	2011: 		
Oklahoma (Comerica)	2013: Neutral	The Oklahoma card has adequate cash access but charges for every ATM balance inquiry and even for calls to the automated menu, after 5/month. The state should also eliminate the denied transaction fee.	\$1.50/4F ATM \$2.00 ATM-out \$0.50 Bal \$2.00 Teller-out \$0.50/2F DT ATM \$0.50/5F IVR
	2011: Neutral		
Oregon (U.S. Bank)	2013: 	Oregon vastly improved its card, dropping the overdraft and teller withdrawal fees and adding unlimited network ATM withdrawals. The card also offers free account information, including monthly paper statements.	\$2.00/2F ATM-out
	2011: 		

Pennsylvania (JPMorgan Chase)	2013: 	Pennsylvania changed vendors to JPMorgan Chase and now has one of the best cards, dropping fees for use of network ATMs, balance inquiries, and customer service, increasing the size of their ATM network, and adding some free transactions out of network. The card also offers the option of free monthly paper statements.	\$1.25/2F ATM-out
	2011: Neutral		
Rhode Island (JPMorgan Chase)	2013: 	The Rhode Island card eliminated some of the most problematic fees. The card offers the most free out-of-network ATM withdrawals of any state: two for each deposit. There are also unlimited free calls to customer service. The card could be improved by eliminating the denied transaction fee.	\$1.50/8F ATM-out \$5.00/4F Teller \$0.25/4F DT
	2011: 		
South Carolina (Bank of America)	2013: 	South Carolina dropped the customer service fee and in-network ATM fee. Recipients can avoid most fees if they use network ATMs and check their balance first. Consumers can also elect paper statements. The card could be improved by waiving out-of-network ATM fees for those far from a network ATM and eliminating all fees for denied transactions.	\$1.50 ATM-out \$2.00/4F Teller \$0.50/4F DT ATM
	2011: Neutral		
South Dakota (U.S. Bank)	2013: 	South Dakota has one of the better cards, with no penalty fees and generally ample access to cash and information without fees, including free monthly statements upon request. The card could be improved by offering some free out-of-network ATM withdrawals.	\$1.25 ATM-out
	2011: 		

Tennessee (JPMorgan Chase)	2013: Neutral	The Tennessee card had the most fees of any state in 2011 but has made several improvements. The card provides ample access to information but still does not provide at least one free ATM withdrawal per weekly deposit. The card could also be improved by offering the option to sign up for paper statements.	\$0.40/2F ATM \$0.25/4F IVR
	2011: 		
Texas (JPMorgan Chase)	2013: Neutral	The Texas card offers good access to cash without fees but charges a denied transaction fee and also balance inquiry fees at out-of-network ATMs. On the positive side, recipients can sign up for free monthly paper statements, and free text, e-mail, or telephone alerts when funds are deposited, and customer service calls are free.	\$1.50/2F ATM-out \$0.50 Bal-out \$5.00/2F Teller \$1.00 DT
	2011: Neutral		
Utah (JPMorgan Chase)	2013: Neutral	The Utah card has improved slightly from 2011 by adding some free denied transactions, and workers who are careful can avoid most fees. But unlike the better cards, it does not offer unlimited ATM withdrawals in-network. The balance inquiry and denied transaction fees should also be dropped completely.	\$1.50/4F ATM \$0.50/4F Bal-out \$4.00/4F Teller \$1.00/4F DT
	2011: Neutral		
Vermont	No prepaid card yet.		
Virginia (Comerica)	2013: Neutral	Virginia offers a number of options to withdraw cash without fees but the card charges fees for ATM balance inquiries (one free per month at a network ATM) and denied transactions (waived twice a month). Workers now have the option of signing up for monthly paper statements	\$1.45/5F* ATM \$0.50/1F* Bal \$2.50/2F Teller \$0.50/2F DT ATM
	2011: Neutral		
Washington	No prepaid card yet.		

West Virginia (JPMorgan Chase)	2013: Neutral	The West Virginia card has few fees if you stay away from out-of-network ATMs, but charges a stiff fee if you use them. The card could be improved by eliminating fees for balance inquiries and customer service, as well as adding a paper statement option.	\$2.50 ATM-out \$0.25 Bal-out \$1.25/2F CS
	2011: 		
Wisconsin	No prepaid card yet.		
Wyoming (U.S. Bank)	2013: 	Wyoming has one of the better cards, with no penalty fees and generally ample access to cash and information without fees, including free monthly statements. The card could also be improved by offering some free out-of-network ATM withdrawals. Wyoming is also one of only six states that do not offer direct deposit, though it does offer a paper check option.	\$1.50 ATM-out
	2011: 		

Appendix C

Links to State Unemployment Prepaid Card Fee Schedules

Alabama

[https://www.eppicard.com/aledccclient/pdf/AL DIR Card Carrier.pdf](https://www.eppicard.com/aledccclient/pdf/AL_DIR_Card_Carrier.pdf)

Alaska

Obtained by NCLC from JPMorgan Chase and available at:

<http://www.nclc.org/images/pdf/files/alaska-fee-schedule.pdf>

Alaska has an incomplete fee schedule posted on the state website, which the state also provided to NCLC for our 2011 report. The state website omits the denied transaction fee, ATM balance inquiry fee, and teller fee. JPMorgan Chase provided NCLC with a comprehensive and current fee schedule.

Arizona

Obtained by NCLC from JPMorgan Chase and available at:

<http://www.nclc.org/images/pdf/files/arizona-fee-schedule.pdf>

Arizona has an incomplete fee schedule posted on the state website. The state notes only the transactions cardholders can perform for free, omitting the fees charged for out-of-network ATM cash withdrawals, balance inquiries, and phone calls. JPMorgan Chase provided NCLC with a comprehensive and current fee schedule.

Arkansas

<http://www.arkansas.gov/esd/UI/PDF/UI%20Debit%20Card.pdf>

The fee schedule on the Arkansas website still lists a fee if the card is overdrawn, but the state has confirmed that the fee no longer exists.

California

<https://prepaid.bankofamerica.com/EDDCard/PRC384/CP384-T03-019/docs/terms.htm>

Colorado

<http://www.colorado.gov/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1251819767089&ssbinary=true>

Connecticut

<http://www.ctdol.state.ct.us/DirectBenefits/fees.html>

District of Columbia

Obtained by NCLC from the District and available at: <http://www.nclc.org/images/pdf/files/dc-fee-schedule.pdf>

Florida

https://www.eppicard.com/fledcuiclient/pdf/Florida_Brochure_v_12.pdf

Georgia

http://www.dol.state.ga.us/pdf/ui/georgia_ui_debit_mastercard_brochure.pdf

Idaho

<http://labor.idaho.gov/pdf/ReliacardFeeSchedule.pdf>

The fee schedule on the Idaho website still lists a \$10 charge if the card is overdrawn, but the state has confirmed that the fee no longer exists.

Illinois

<http://www.ides.illinois.gov/Custom/Library/publications/Publications/ChaseMasterCardFeeSchedule.pdf>

Indiana

http://www.in.gov/dwd/files/INClient_Brochure_Product.pdf

Iowa

https://www.eppicard.com/iaedcclient/pdf/IA_Card_Carrier.pdf

Kansas

https://www.getkansasbenefits.com/documents/debit_faqs.asp

Louisiana

Obtained by NCLC from JPMorgan Chase and available at:

<http://www.nclc.org/images/pdf/files/louisiana-fee-schedule.pdf>

Louisiana has not posted a fee schedule on its website. JPMorgan Chase provided NCLC with a comprehensive and current fee schedule.

Maine

<http://www.maine.gov/labor/unemployment/mapcard/fees.html>

Maryland

Obtained by NCLC from Maryland Department of Labor, Licensing, and Regulation and available at: <http://www.nclc.org/images/pdf/files/maryland-fee-schedule.pdf>

Michigan

Obtained by NCLC from JPMorgan Chase and available at:

<http://www.nclc.org/images/pdf/files/michigan-fee-schedule.pdf>

Michigan has an inaccurate fee schedule posted on the state website. The state's version lists a fee for in-network ATM balance inquiries. This fee has been eliminated. The state also posts an incorrect fee amount for denied transactions (\$1.50). The correct fee is \$1.00 and JPMorgan Chase waives a two denied transactions each month, another feature the state schedule omits. JPMorgan Chase provided NCLC with a comprehensive and current fee schedule.

Minnesota

<http://www.uimn.org/uimn/applicants/getpaid/payment-options/electronic-payments/card-costs.jsp>

The fee schedule on the Minnesota website still lists a \$20 charge if the card is overdrawn, but the state has confirmed that the fee no longer exists.

Mississippi

https://www.eppicard.com/msedcclient/pdf/MS_Card_Carrier.pdf

Missouri

<http://www.labor.mo.gov/DES/Forms/4606-ai.pdf>

Nebraska

Obtained by NCLC from the Nebraska Department of Labor and available at:

<http://www.nclc.org/images/pdf/files/nebraska-fee-schedule.pdf>

The fee schedule provided to NCLC still lists an overdraft charge, but the state has confirmed that the fee no longer exists.

Nevada

https://www.eppicard.com/nvedcclient/pdf/NVCard_Card_Carrier.pdf

New Jersey

http://lwd.dol.state.nj.us/labor/ui/content/debit_card_faq.html#3

New Mexico

https://www.eppicard.com/nmedcclient/pdf/NM%20DWS%20Card%20Carrier_WEB.pdf

New York

<http://www.labor.ny.gov/directpaymentcard/fees.shtm>

North Carolina

https://www.eppicard.com/ncedcclient/pdf/ESC_Card_Carrier.pdf

North Dakota

<http://jobsnd.com/sites/default/files/UI-USBank-Relicard-faq.pdf>

Ohio

<http://jfs.ohio.gov/ouc/debitcardFAQ.stm>

Oklahoma

https://www.eppicard.com/okedcuiclient/pdf/OKUI_Carrier.pdf

Oregon

http://www.oregon.gov/EMPLOY/UI/pages/ui_payment_options.aspx

The fee schedule on the Oregon website notes that cardholders will be charged a fee if they perform more than two out-of-network ATM withdrawals each month, but the site does not list the amount of the fee. A state employee confirmed that the Oregon card charges \$2.00 for each subsequent withdrawal.

Pennsylvania

<http://www.debitcard.patresury.gov>

Rhode Island

<http://www.dlt.state.ri.us/ui/epcDisclosure.htm>

South Carolina

<http://dew.sc.gov/documents/DebitCardFeeSchedule.pdf>

South Dakota

<http://dlr.sd.gov/ui/reliacardfaqs.pdf>

Tennessee

http://www.tn.gov/labor-wfd/uidebitcard/fee_information.html

Texas

<http://www.twc.state.tx.us/ui/bnfts/debit-card.html#whereoffees>

Utah

Obtained by NCLC from JPMorgan Chase and available at:

<http://www.nclc.org/images/pdf/files/utah-fee-schedule.pdf>

Utah has not posted a fee schedule on its website. The fee schedule initially provided to NCLC by the state omitted a number of free transactions, including some free out-of-network balance inquiries and denied transactions. JPMorgan Chase provided NCLC with a comprehensive and current fee schedule.

Virginia

https://www.eppicard.com/vaedcclient/pdf/VA_Card_Carrier.pdf

West Virginia

http://www.wvcommerce.org/App_Media/assets/doc/businessandworkforce/workforcewv/unemploymentcompensation/Debit_Card_Fee_Schedule_-_Debit_Card_11-27-12.pdf

Wyoming

<http://wyomingworkforce.org/job-seekers-and-workers/Pages/faq.aspx>

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