

The Education Department's Financial Aid Card Pilot Program Was Envisioned And Managed By Former Card Payments Industry Insiders.

In February 2020, The Department Of Education Implemented A Long Discussed Card Pilot Program For Financial Student Aid That Consumer Advocates Worried Could Leave Students With Restricted Funds While Their Data Was Being Sold.

In October 2018, The Department of Education Announced A Pilot Program To Put Student Loan Funds On Federally Branded Payment Cards.

October 2018: The Department Of Education Announced A Proposal To Issue Payment Cards For The Disbursement Of Student Loan And Pell Grant Funds. "The Trump administration announced today that it will seek proposals from companies that want to develop a new, federally branded financial services product that allows students to receive student loan and Pell Grant funds to pay for things like books and living expenses." [Politico Pro, [10/16/18](#)]

- **"The Department Said It Will Enter Into Agreements With "One Or More" Financial Services Providers To Carry Out The Pilot Program, Which Is Meant To Provide Students With A Fee-Free Option To Receive Their Federal Student Aid Refunds. It Was Also Pitched Last Year As A Way To Better Track How Students Use Their Financial Aid Money."** [Politico Pro, [10/16/18](#)]

In February 2020, The Department Of Education Launched The myFSAPay Pilot Program At Select Universities, With The Program "Implemented Initially" By Fiserv And Metabank.

February 2020: The Department Of Education Announced The Launch Of The myFSAPay Pilot Program At Select Schools, With Students Able To "Choose To Receive Their Financial Aid Refunds—After Expenses Such As Tuition, Fees, And Room And Board Are Paid—On A Prepaid Card With A Linked Online Account Accessible Through The MyStudentAid Mobile App." "Federal Student Aid launched today the [myFSAPay](#) program pilot for students at Jackson State University, Purdue University, the University of California-Riverside, and the University of Georgia. This innovative pilot will allow students at the participating schools to choose to receive their financial aid refunds—after expenses such as tuition, fees, and room and board are paid—on a prepaid card with a linked online account accessible through the myStudentAid mobile app." [Department of Education, [02/28/20](#)]

The Pilot Program, "Implemented Initially" By Fiserv And Metabank, Will Be Available To Students At "Jackson State University, Purdue University, The University Of California-Riverside, And The University Of Georgia." "Federal Student Aid launched today the [myFSAPay](#) program pilot for students at Jackson State University, Purdue University, the University of California-Riverside, and the University of Georgia. [...] The pilot will be implemented initially by Fiserv and Metabank, which were selected based on the quality of their past performance in the campus card market, fit for the program, and technical capabilities." [Department of Education, [02/28/20](#)]

Consumer Advocates Expressed Concern About How A Selected Contractor Could Potentially Handle Student Data And That Spending Restrictions On Funds May Lock Money Away From Students – Fortunately, The Program Eventually Barred The Companies From "Cross-Market[ing] Other Services Or Shar[ing] Students' Information With Outside Parties."

Lauren Saunders Of The National Consumer Law Center Was Concerned The Original Proposal Would Enable A Contractor To Sell Student Data While Marketing "Other Financial Products To Students."

"Lauren Saunders, associate director of the National Consumer Law Center, said she was troubled though by the prospect of a contractor that is selected to handle the prepaid card selling student data or using the prepaid card relationship to market other financial products to students. Under the instructions laid out in the solicitation document, students could receive those offers only if they gave permission. 'It could be that there are companies that would find this attractive, not so much for the card itself but for the opportunity to pitch other products or try to develop brand loyalty from customers,' Saunders said." [Inside Higher Ed, [01/25/18](#)]

The Center For American Progress' Associate Director For Postsecondary Education, Colleen Campbell, Criticized The Proposal As "'Incredibly Paternalistic'" As "Spending Restrictions Issued By The Department Or A Student's College May Not Account For All Of The Costs Associated With Attending College."

"Colleen Campbell, associate director for postsecondary education at the Center for American Progress, called the notion that students should be told where to spend their aid funds 'incredibly paternalistic.' She said spending restrictions issued by the department or a student's college may not account for all of the costs associated with attending college that have nothing to do with tuition or room and board -- anything from food and rent to transportation or the purchase of a computer to do schoolwork." [Inside Higher Ed, [01/25/18](#)]

In Announcing The Launch Of The Card Pilot Program, ED Noted That While The Contractors Will Be Sharing "Aggregated Data" With The Department, The Companies Are "Permitted To Cross-Market Other Services Or Share Students' Information With Outside Parties."

"In its evaluation of the effectiveness of the pilot, the Department will receive aggregated data from Fiserv and Metabank, such as the percentage of students receiving financial aid refunds that sign up for and activate the card; data will not be provided until a substantial number of students are enrolled in order to protect their privacy. Additionally, the pilot implementers are not permitted to cross-market other services or share students' information with outside parties." [Department of Education, [02/28/20](#)]

A. Wayne Johnson, The Former Head Of The Education Department's Office Of Strategy And Transformation, Led The Charge For Using Payment Cards... After A Career Working In The Card Payment Space.

A. Wayne Johnson, One of the Leading Advocates For Payment Cards At The Education Department, Founded A Company That Operates In The Payment Card Market...

In January 2018, A. Wayne Johnson Was Asked "To Lead The Office Of Strategy And Transformation" At ED. "As work continues to improve customer service and overall operations of the Office of Federal Student Aid (FSA), Secretary of Education Betsy DeVos announced the formation of a Strategy and Transformation unit to improve the delivery of financial aid to millions of students and their families. Secretary DeVos asked A.

Wayne Johnson to lead the Office of Strategy and Transformation. James Manning will lead FSA as Acting Chief Operating Officer.” [Press Release, [01/25/18](#)]

- **In His New Role, Johnson Played A Critical Role In Developing The Prepaid Card Proposal.** “The prepaid card is one of several new initiatives pushed by A. Wayne Johnson, who became FSA's chief last fall. Johnson has promised that the card, which is essentially a debit card for student aid funds, would allow the Education Department to add better customer service and help students understand the implications of their spending and how it affects their student loan debt. Combined with a new mobile app the department is developing, students would get proactive reminders about spending and account balances.” [Inside Higher Ed, [01/25/18](#)]

Before His Time At ED, Johnson, “Launched A Credit And Debit Card Security App” Via His Company First Performance Global. “Johnson is a co-owner of Middle Georgia independent living communities that include The Cottages on Wesleyan and The Gables at Wolf Creek in Macon. He's launched a credit and debit card security app through his technology start-up, First Performance Global, which is part of Georgia Tech's Advanced Technology Development Center.” [The Macon Telegraph, [06/23/17](#)]

- **First Performance Counts Several Large Financial Services Companies As Its Investors, including: Mastercard, Regions Financial Corp, RRE Ventures, and Synchrony Financial.** [First Performance Global, accessed [10/17/18](#)]

...After Previously Working For A Variety Of Companies In The Card Payment Space.

A. Wayne Johnson Has Served As A Senior Executive For TSYS, Visa, And First Data Corporation. “Dr. Johnson is the Founder, Chairman and former CEO of First Performance Corporation, a global payment card technology platform company. Dr. Johnson's business experience includes working as a senior executive with TSYS, First Data, VISA, Deloitte and as Chief Executive Officer for companies in both the banking and information processing sectors.” [Press Release, [06/20/17](#)]

- “Total System Services, Inc. provides payment processing, merchant, and related payment services to financial and nonfinancial institutions worldwide. [...] The company also provides third party processing and related services for credit card issuers, merchant acquirers, independent sales organizations, and financial institutions; and issuer processing services, as well as operates as a prepaid program manager.” [Bloomberg, accessed [10/10/18](#)]
- “Visa Inc. operates as a payments technology company worldwide. The company facilitates commerce through the transfer of value and information among consumers, merchants, financial institutions, businesses, strategic partners, and government entities” [Bloomberg, accessed [10/10/18](#)]
- “First Data Corporation provides electronic commerce solutions for merchants, financial institutions, and card issuers worldwide.” [Bloomberg, accessed [10/10/18](#)]

In October 2019, A. Wayne Johnson Resigned From The Education Department To Run For The US Senate Seat Vacated By Sen. Johnny Isakson (R-GA), While Also Proposing The Cancellation Of Approximately \$925 Billion In Federal Student Loan Debt.

October 2019: A. Wayne Johnson Resigned From The Education Department In Order To Launch A

"Long-Shot Bid" For The US Senate Seat Vacated By Sen. Jonny Isakson (R-GA). "A senior student-loan official in the Trump administration said he would resign Thursday and endorse canceling most of the nation's outstanding student debt, calling the student-loan system 'fundamentally broken.' A. Wayne Johnson was appointed in 2017 by Education Secretary Betsy DeVos as chief operating officer of the Office of Federal Student Aid, overseeing the \$1.5 trillion student-loan portfolio. After seven months, he moved into a different role as chief strategy and transformation officer, leading a revamp of how the agency deals with borrowers and the companies that service the debt. [...] "Mr. Johnson plans a long-shot bid for the Senate seat being vacated by Sen. Johnny Isakson (R., Ga.), who has announced he will retire Dec. 31 for health reasons." [Wall Street Journal, [10/24/19](#)]

In Announcing His Future Plans, Johnson Proposed Forgiving The Federal Student Loan Debt Of "Nearly 37 Million Borrowers" Totaling "About \$925 Billion." "Mr. Johnson, who has never run for elected office, has voted in Republican and Democratic primaries, records show, and describes himself as a moderate Republican. He said he intends to run as a Republican. Mr. Johnson proposes forgiving up to \$50,000 for anyone with federal student-loan debt, about \$925 billion, he said. Nearly 37 million borrowers would have their entire student-loan balances canceled under the plan, he said." [Wall Street Journal, [10/24/19](#)]

Former ED General Counsel Carlos Muñiz Was Supposed To Manage The Ethics Program At ED, Yet He Consulted For A Deceptive Prepaid Card Company That Could Have Reaped Benefits From ED's Payment Card Program.

In his Role As General Counsel at ED, Carlos Muñiz Managed The Department's Ethics Program.

As ED's General Counsel, Carlos Muñiz Manages The Department's Ethics Programs And Clears Its Regulatory Documents. In an October 3, 2017 letter to Carlos Muñiz, Senator Elizabeth Warren said, "If confirmed as General Counsel, you will also be responsible for managing the Department's ethics programs and clearance of its regulatory documents." [[Letter from Sen. Elizabeth Warren to Carlos Muñiz](#), 10/03/17]

In The Year Prior To His Appointment, Carlos Muñiz Consulted For A Prepaid Card Company That Inspired The CFPB's Prepaid Card Rule With Its Widespread Consumer Abuses.

Carlos Muñiz Consulted For A Prepaid Card Company That Has Been Hit By A \$53 Million FTC Settlement After It Deceived Consumers. Carlos Muñiz consulted for NetSpend in the year prior to his appointment at the Department of Education. [[Carlos Genaro Muniz](#), OGE Form 278e, 07/10/18]

- **NetSpend "Deceived Customers" About The Balances They Held On Their Prepaid Cards, "Depleted Account Balances By Charging Inactivity Fees," And "Delayed Resolving" Complaints.** "NetSpend Corporation has reached a settlement with the U.S. FTC about the FTC's claims that NetSpend's advertisements deceived consumers about the availability of funds deposited on general purpose reloadable prepaid cards (GPR Cards). [...] According to the FTC's November 2016 complaint, NetSpend's advertising promises 'guaranteed approval' and 'immediate access' to funds that are 'always available.' Instead, the complaint alleges, cardholders experienced delayed or denied access to funds on their GPR Cards and NetSpend depleted account balances by charging inactivity fees and often delayed resolving and providing provisional credit for account errors." [National Law Review, [04/21/17](#)]
- **NetSpend Had To Pay \$53 Million As A Result Of The Settlement.** "Under the terms of the settlement, NetSpend agreed to pay \$53 million, \$40 million of which will be refunded directly to

consumers. The settlement also requires NetSpend to remediate the deceptive advertising about its GPR Cards." [National Law Review, [04/21/17](#)]

NetSpend's Consumer Violations Spurred The CFPB's Prepaid Card Rule, Which The Company "Heavily" Lobbied Against. "Egregious consumer violations by NetSpend led the Consumer Financial Protection Bureau to issue a rule requiring disclosures of various fees of prepaid cards in October 2016. TSYS and NetSpend heavily funded the lobbying effort to invalidate this rule [...]" [[Letter from Rep. Mark Takano et. al to Mr. Carlos G. Muñoz](#), 05/17/18]

FSA Portfolio Manager Patrick J. Fox May Oversee The Payment Card Program... After A Previous Stint Working For A Large Prepaid Card Company.

Patrick J. Fox May Have Helped Oversee The Implementation Of FSA's Prepaid Card Program, Including The Selection Of Vendors...

Patrick J. Fox Serves As Portfolio Manager for Federal Student Aid at the Department of Education. [[LinkedIn Profile for Patrick Fox](#), accessed 11/30/20]

Patrick J. Fox, Who Has Worked For Citibank, Bank of America, And Bank One, Was Expected To Play A Role In Selecting Vendors For The FSA's Prepaid Card Program. On May 17, 2018 Representatives Takano, Bonamici, DeSaulnier, And Grijalva wrote to the Department of Education's General Council about Patrick J. Fox's potential conflicts of interest. "Mr. Patrick J. Fox currently works at FSA on portfolio management and may be involved in vendor selection or oversight in this pilot [prepaid card] program. Like Dr. Johnson, Mr. Fox also has an extensive history of working for companies that are potential vendors in the payment card pilot, including Citibank, Bank One, and Bank of America." [[Letter from Rep. Mark Takano et. al to Mr. Carlos G. Muñoz](#), 05/17/18]

...But He Previously Worked For A Financial Technology Corporation Whose Subsidiary's Excessive Fees Inspired The CFPB's Prepaid Card Rule.

Fox Also Worked For TSYS, A Company Whose Subsidiary's Excessive Card Fees Helped To Spur The CFPB To Issue Its Prepaid Card Rule. "Furthermore, in October 2017, NetSpend Corporation ('NetSpend'), a TSYS subsidiary, agreed to pay \$53 million refunds and to settle charges from the Federal Trade Commission, which found that their customers were charged excessive overdraft fees when accessing the company's prepaid debit cards. Egregious consumer violations by NetSpend led the Consumer Financial Protection Bureau to issue a rule requiring disclosures of various fees of prepaid cards in October 2016. TSYS and NetSpend heavily funded the lobbying efforts to invalidate this rule, creating significant questions about whether their former employees, Dr. Johnson and Mr. Fox, may have participated in corporate decisions to lobby against federal consumer protection law." [[Letter from Rep. Mark Takano et. al to Mr. Carlos G. Muñoz](#), 05/17/18]

- **There Are Concerns That Fox's Previous Work At The Firm - Possibly Alongside A. Wayne Johnson - Poses A Conflict Of Interest With His Role In The Prepaid Card Program.** "Mr. Fox also worked as Senior Director at the same Company as Dr. Johnson, TSYS, from September 2009 through some point in 2017, when he was then hired by FSA. He also appeared to overlap with Dr. Johnson at TSYS from 2009 through 2011, and their current relationship, professional or financial, is unclear. However, TSYS presents several ethical considerations. The company provides 'turnkey card programs' for regional and community financial institutions — yet another specific financial technology requested in FSA's payment card solicitation." [[Letter from Rep. Mark Takano et. al to Mr. Carlos G. Muñoz](#), 05/17/18]

The Trump Treasury Department Contracted MetaBank To Disburse As Many As 4 Million Economic Impact Payments (EIPs) By Prepaid Debit Card After It And Its Industry Group Spent Nearly \$227,000 Lobbying Congress And Treasury On The CARES Act And Stimulus Payments.

MetaBank, The Financial Agent For The Trump Treasury Department's U.S. Debit Card Program, Mailed Out "Nearly 4 Million Economic Impact Payments (EIPs) By Prepaid Debit Card."

May 18, 2020: The Trump Treasury Department Announced That Its Financial Agent, MetaBank, Would Begin Mailing Out "Nearly 4 Million Economic Impact Payments (EIPs) By Prepaid Debit Card." "This week, Treasury and the IRS are starting to send nearly 4 million Economic Impact Payments (EIPs) by prepaid debit card, instead of by paper check. [...] Treasury's financial agent, MetaBank, will mail EIP Cards to eligible recipients beginning this week." [Press Release, [05/18/20](#)]

- **MetaBank Was Selected As The Treasury Department's Financial Agent For Its U.S Debit Card Program In 2016.** "The [Economic Impact Payments] Card is part of Treasury's U.S. Debit Card program, which provides prepaid debit card services to federal agencies for the electronic delivery of non-benefit payments. MetaBank was selected as Treasury's financial agent for the U.S. Debit Card program in 2016, following a competitive selection process conducted by the Treasury's Bureau of the Fiscal Service." [Press Release, [05/18/20](#)]

MetaBank And Its Industry Group Spent Nearly \$227,000 Lobbying Congress And The Trump Treasury Department On Issues Related To The CARES Act And Stimulus Payments.

MetaBank Won A Contract To Issue These Prepaid Cards After It And Industry Group NACHA Spent Nearly \$227,000 Lobbying Congress And The Treasury Department.

April 2020: MetaBank And Fiserv Won U.S. Treasury Contracts To Issue These Prepaid Cards After Industry Trade Groups Lobbied The IRS. "MetaBank (CASH.O) and Fiserv (FISV.O) won U.S. Treasury contracts to issue Visa Inc (V.N) pre-paid cards loaded with coronavirus stimulus payments, according to two people familiar with the matter. Industry groups had pushed for Treasury's Internal Revenue Service to allow this pre-paid form of stimulus payments, which is designed to help millions of Americans struggling due to coronavirus lockdowns, Reuters reported last week." [Reuters, [04/29/20](#)]

First Quarter Of 2020: MetaBank Spent \$220,000 Lobbying Congress On H.R. 748, The Coronavirus Aid, Relief, And Economic Security (CARES) Act, Among Other Issues. [MetaBank Lobbying Report, [04/20/20](#)]

First Quarter Of 2020: NACHA, Previously Known As The National Automated Clearing House Association, Spent \$6,900 Lobbying Congress And The Treasury Department On "Faster Payments, ACH Network, Federal Reserve Role In Faster Payments, Direct Deposit, [And] Stimulus Payments." [NACHA Lobbying Report, [04/15/20](#)]

- **NACHA Is The Organizing Body Tasked With "Development Of Rules, Standards, Governance, Education, [And] Advocacy" For The Electronic Payments Industry.** "Nacha is a nonprofit organization that convenes hundreds of diverse organizations to enhance and enable electronic payments and financial data exchange within the U.S. and across geographies. Through development of rules, standards,

governance, education, advocacy, and in support of innovation, Nacha's efforts benefit the providers and users of those systems." [NACHA LinkedIn, accessed [05/28/20](#)]

- **“Previously Known As The National Automated Clearinghouse Association, Nacha Is A Non-Profit Association That Is Funded By The Financial Institutions That Use Its Network.”** [Investopedia, accessed [05/28/20](#)]

MetaBank N.A. Is A NACHA Direct Member. [NACHA, [accessed 05/28/20](#)]

Metabank Stood To Make Millions Off Of Banking Fees From Prepaid Debit Cards.

While The Trump Treasury Department Claims EIP Cards Aren't Subject To Many Fees, The Fine Print Shows Fees For Out-Of-Network Withdrawals, For Checking Account Balances On ATMs, And Fees For Multiple Replacement Cards.

The Trump Treasury Department's EIP Card Announcement Proudly Claims The Cards Aren't Subject To Many Fees, But...

The Trump Treasury Department Has Claimed That EIP Card Recipients Won't Incur Fees For Purchases, In-Network ATM Withdrawals, Fund Transfers, Or Checking Their Balances. “This week, Treasury and the IRS are starting to send nearly 4 million Economic Impact Payments (EIPs) by prepaid debit card, instead of by paper check. EIP Card recipients can make purchases, get cash from in-network ATMs, and transfer funds to their personal bank account without incurring any fees. They can also check their card balance online, by mobile app, or by phone without incurring fees.” [Treasury Department Press Release, [05/18/20](#)]

...EIP Cardholders Can Receive One Free Replacement Card, But Subsequent Replacements Cost \$7.50, With A \$17 Charge For Priority Shipment...

SERVICE OR TRANSACTION	FEE AMOUNT
Lost or Stolen Card Reissuance	\$0.00 for first reissued card and then \$7.50 per subsequent reissued card
Additional Charge for Priority Shipment of Reissued Cards	\$17.00

[EIP Cardholder Agreement, accessed [05/27/20](#)]

...After Their First Withdrawal, EIP Cardholders Must Pay \$2 For Every Domestic ATM Withdrawal Outside The “AllPoint” Network And \$0.25 For Any Domestic ATM Balance Inquiry...

SERVICE OR TRANSACTION	FEE AMOUNT
Domestic ATM Withdrawals outside the “AllPoint” Network	\$0.00 for first withdrawal and then \$2.00 per subsequent withdrawal
Domestic ATM Balance Inquiry	\$0.25

[EIP Cardholder Agreement, accessed [05/27/20](#)]

The AllPoint Network Is A “Surcharge-Free ATM Network” With 55,000 ATMs Worldwide. “Allpoint Network is the largest surcharge-free ATM network with more than 55,000 ATMs in leading national and regional merchant locations across the United States, Canada, Mexico, United Kingdom and Australia.” [Allpoint, [07/11/17](#)]

...EIP Cards Have Limits On Account Withdrawals And Transfers, With Withdrawals Being Limited To \$1,000 Per Day From An ATM, \$2,500 For Point-Of-Sale Transactions, Or \$2,500 Withdrawals From Bank Tellers...

TRANSACTION LIMIT	FEE AMOUNT
ATM Withdrawal Limit	\$1,000 per transaction and per day (bank limits may be less)
Point-of-Sale Transactions	\$2,500 per transaction and per day
Money Network Check Limit	\$9,999.99 per check and per day
Bank Teller Over-the-Counter Withdrawal	\$2,500 per transaction and per day (bank limits may be less)
ACH Transfer to Domestic Bank	\$2,500 per transaction, \$2,500 per day, \$5,000 per month

[EIP Cardholder Agreement, accessed [05/27/20](#)]

...EIP Cardholders Must Pay Fees For Certain International Services And Transactions, Including Withdrawals And Balance Inquiries...

INTERNATIONAL USE	FEE AMOUNT
ATM Withdrawals Outside of the U.S	\$3.00
ATM Declined Transactions Outside of the U.S	\$0.00
International ATM Balance Inquiry	\$0.25
Bank Teller Over-the-Counter Withdrawals Outside of the U.S.	\$5.00

[EIP Cardholder Agreement, accessed [05/27/20](#)]

EIP Cardholders Pay No Fees For A Number Of Services And Transactions, Including: All Purchases, Opening The Account, Maintaining The Account, And Overdrafting The Account.

EIP Cards Have No Fees For The Following Services And Transactions:

- Opening of Card Account
- Monthly Maintenance
- All Purchases
- Domestic ATM Withdrawals Within The “AllPoint” Network
- Non-ATM Balance Inquiries Via Mobile App, Online, Or Phone
- Balance Updates
- Transfer Of Funds To A Personal Bank Account
- Negative Card Account Balance
- ATM Declined Transactions
- Monthly Paper Statements By Mail

[EIP Cardholder Agreement, accessed [05/27/20](#)]

QUICK MATH: If All 4 Million Americans Receiving A Prepaid Debit Card From MetaBank Incurred The \$2 Withdrawal Fee, Fees Would Total \$8 Million

HYPOTHETICAL: There are up to 4 million Americans receiving prepaid debit cards from Metabank. If all 4 million Americans received a \$1,200 stimulus check, and they needed to withdraw their cash from an ATM outside of the “AllPoint” network, they would each incur a \$2 fee.

MetaBank Was Reportedly Issuing The Prepaid Debit Cards To Up To 4 Million Americans. “The U.S. Treasury Department and the Internal Revenue Service began sending out Economic Impact Payments as prepaid debit cards last week. So almost 4 million Americans still waiting for their cut of the \$2.2 trillion CARES Act can expect to get their stimulus money in the form of an EIP Card, as opposed to a paper check. Problem is, these Visa VISA, +1.89% cards are being issued by MetaBank (the Treasury’s financial agent) and delivered in plain envelopes from Money Network Cardholder Services.” [Market Watch, [5/28/20](#)]

Potential Fees For Those 4 Million Americans:

TRANSACTION LIMIT	FEE AMOUNT
ATM Withdrawal Limit	\$1,000 per transaction and per day (bank limits may be less)

[EIP Cardholder Agreement, accessed [05/27/20](#)]

SERVICE OR TRANSACTION	FEE AMOUNT
Domestic ATM Withdrawals outside the “AllPoint” Network	\$0.00 for first withdrawal and then \$2.00 per subsequent withdrawal
Domestic ATM Balance Inquiry	\$0.25

[EIP Cardholder Agreement, accessed [05/27/20](#)]