July 30, 2026

The Honorable Bryan G. Steil
United States House of Representatives (WI-01)
1526 Longworth House Office Building
Washington, DC 20515

Re: H.R. 9330, the Earned Wage Access Consumer Protection Act

Dear Representative Steil:

PayrollOrg (PAYO) is pleased to provide comments on H.R. 9330, the Earned Wage Access Consumer Protection Act. PAYO is a nonprofit association representing more than 20,000 payroll professionals responsible for ensuring employees are paid accurately and in compliance with federal, state, and local laws. Through our Government Relations Task Force, PAYO provides policymakers with practical insight into payroll administration and the operational impact of employment-related legislation.

PAYO appreciates your continued leadership in establishing a clear federal framework for earned wage access (EWA). EWA has become an increasingly important financial wellness benefit for employees while also serving as a valuable recruitment and retention tool for employers. A consistent federal standard provides greater certainty for employers, payroll service providers, consumers, and EWA providers.

Definitions

PAYO strongly supports the bill's definitions of earned wages, earned wage access services, earned wage access providers, employers, and payroll service vendors. These definitions appropriately distinguish earned wage access from traditional lending by recognizing that the wages have already been earned but not yet paid. This distinction is fundamental to preserving EWA as a financial wellness benefit rather than treating it as a loan.

PAYO also appreciates that the legislation expressly excludes payroll service vendors acting solely in their capacity as facilitators of wage payments from the definition of an earned wage access provider.

Consumer Protections

PAYO supports the consumer protections established throughout the legislation, including clear disclosures, a no-cost option, voluntary tipping disclosures, cancellation rights, dispute resolution procedures, reimbursement for certain overdraft fees, restrictions on debt collection practices, nondiscrimination protections, consumer data protections, and the prohibition on providers sharing fees or tips with employers.

Federal Consistency

PAYO appreciates the bill's approach to preserving appropriate state authority while establishing a consistent federal framework that prevents compliant earned wage access products from being treated as loans or credit and varying from state to state.

Payroll Administration Considerations

PAYO respectfully encourages continued attention to the interaction between earned wage access and federal payroll tax administration, particularly that of constructive receipt under the Internal Revenue Code.

Employer-integrated EWA models vary considerably. In some arrangements, payroll departments share employment, attendance, or wage information with an EWA provider but do not know which employees have utilized EWA or the amounts accessed until the regular payroll cycle is processed. In both circumstances, federal employment tax reporting and deposits occur through the normal payroll process. Any requirement to accelerate federal tax deposits based on individual EWA transactions could impose significant administrative burdens on employers and payroll departments.

PAYO believes H.R. 9330 represents an important step toward establishing a comprehensive federal framework for earned wage access services. We look forward to working with you and your staff as this legislation advances and would welcome the opportunity to provide additional information regarding payroll operations and employer-integrated EWA programs.

Sincerely,

Adam J. Prinzo
Manager, Government Relations
PayrollOrg

For: Government Relations Task Force
Electronic Payments Subcommittee
Cochairs Nancy Fletcher, CPP, Ronald Gilson, CPP, and Kristine Willson, CPP