



June 30, 2025

The Honorable Scott Bessent
Secretary of the Treasury
U.S. Department of the Treasury
1500 Pennsylvania Ave., NW
Washington, DC 20220

**FTA Comment on Request for Information Related to E.O. 14247 –
Modernizing Payments To and From America's Bank Account
(Docket No. TREAS-DO-2025-0004)**

The Financial Technology Association (FTA) appreciates the opportunity to comment on the Department of the Treasury’s Request for Information (RFI) regarding Executive Order 14247 on “*Modernizing Payments To and From America’s Bank Account.*” We commend Treasury for initiating this important review of how the federal government can reduce reliance on paper checks, increase electronic payment options, and enhance the financial well-being of the individuals and families it serves. Indeed, by incorporating digital payment solutions into government disbursement systems, the government can immediately advance financial inclusion, empower often overlooked segments of the population by onboarding them into the digital economy, and enhance overall system resilience and performance. Additionally, by providing digital payment providers direct access to core payments systems, the government can ensure the ongoing modernization and preeminence of our national payments infrastructure.

FTA is a nonprofit trade organization representing leading technology-centered financial services (fintech) companies. Our members are committed to advancing the responsible use of technology, which significantly improves the industry’s ability to offer innovative financial products, including payment solutions, while maintaining robust compliance with regulatory standards.

We appreciate the opportunity to share our perspective on how digital payments and supporting infrastructure can serve the dual goals of modernizing government disbursement systems and improving outcomes for recipients—Americans deserve no less. We support Treasury’s efforts under EO 14247 and offer the following recommendations to accelerate modernization and ensure Americans—including the underserved—benefit from access to secure, digital-first payment tools:

- Treasury should explicitly recognize the key and current role that digital payment providers and technologies play in modernizing payments, reducing cost, improving speed, enhancing transparency, and reducing fraud;

- Treasury should incorporate digital payment solutions into government disbursement systems in order to immediately broaden access for unbanked and underbanked consumers and small businesses;
- Treasury should advance the modernization of underlying payments infrastructure in the U.S. by granting digital payment providers direct access to core payments systems in order to improve the reliability and inclusivity of funds delivery; and
- Treasury should launch a comprehensive financial education and digital literacy program to help consumers identify payment solutions and combat fraud.

I. Treasury Should Explicitly Use this RFI as an Opportunity to Recognize the Critical Role of Digital Payments Providers and Technologies in Improving Payments Systems and Outcomes

Digital payment technologies have transformed how individuals and businesses send and receive money. These digital financial tools offer faster settlement times, enhanced transparency, lower transaction costs, and greater security, all of which contribute to more effective and inclusive financial systems.¹ For government payments, digital options can similarly significantly reduce administrative costs, combat fraud, and ensure that funds reach recipients efficiently. Treasury’s efforts with respect to this RFI help underscore this reality, and we encourage Treasury to specifically highlight the key role that digital payment providers and technologies play in modernizing solutions.

To this end, the COVID-19 pandemic highlighted both the promise and shortcomings of legacy payment systems. Millions of Americans waited weeks for paper checks, while those with access to digital accounts or prepaid cards received funds quickly and safely. What’s more, leading fintech companies were able to provide critical government funding to small businesses that struggled to access traditional banking services.² This underscores the importance of digital and fintech solutions to consumers and small businesses alike.

In fact, nearly 92% of Americans made at least one digital payment (e.g., online purchases, in-app or in-store digital wallet use) in 2023—a testament to the mainstream adoption of safe, consumer-centric technologies that fill long-standing gaps in access, affordability, and choice.³ Digital

¹ Financial Technology Association (2023a) *Fintech Regulation, Explained*. Available at: <https://www.ftassociation.org/fintech-regulation-explained>.

² See Paypal (2021) *Resilience and Growth During the COVID-19 Pandemic: A Study of Digital Small Businesses*. Available at: https://s205.q4cdn.com/210152132/files/doc_downloads/additional_resources/C19_and_Digital_SMBs_PayPal.pdf; See also Battisto, J. et al (2021) *Who Received PPP Loans by Fintech Lenders?* Liberty Street Economics, Federal Reserve Bank of New York. Available at: <https://libtystreeteconomics.newyorkfed.org/2021/05/who-received-ppp-loans-by-fintech-lenders/>.

³ Varadarajan, R. et al. (2024) *State of consumer digital payments in 2024*, McKinsey & Company. Available at: <https://www.mckinsey.com/industries/financial-services/our-insights/banking-matters/state-of-consumer-digital-payments-in-2024>



payments also generate measurable economic benefits. FTA member products help consumers—particularly those earning under \$100,000 annually—save an average of \$360 per year in interest and bank fees.⁴

Fintech is designed to serve a broad spectrum of individuals, particularly those who have been underserved or excluded by the traditional financial system. Fintech providers focus on developing solutions that help mitigate financial inequities by improving access to essential banking services and money management tools. These tools support better outcomes in spending, saving, borrowing, and investing.

To this end, leading fintech firms have successfully helped to address the needs of people often left out of mainstream financial services, such as the unbanked, the underbanked, and those seeking alternative approaches to financial health. This includes independent earners—who typically do not have W-2 income and therefore require more flexible and accessible financial options—as well as others relying on a range of income sources.

By prioritizing accessibility and consumer needs, many fintech providers operate without charging minimum account opening fees, monthly maintenance fees, and overdraft fees, all of which have traditionally caused friction and undermined trust with respect to legacy solutions. They also use modern technology to give users quicker, safer access to their funds, bypassing the delays and higher costs that are common with legacy financial transfers. Many fintechs facilitate access to a range of fee-free core banking services. This can include FDIC-insured checking accounts, free in-network ATM withdrawals, free in-network paper money deposits, free overdraft coverage, enhanced saving yields, and other customer support services. Treasury can accordingly help facilitate the significant growth of healthy financial foundations for many who currently rely on physical checks by helping direct individuals into better-suited digital solutions.

More specifically, benefits of digital payments include faster delivery, cost-efficiency, reduced fraud risk, and increased access by reducing gaps and inequities in the legacy financial system.⁵ Digital payments offer meaningful improvements in transparency and oversight compared to legacy solutions, including cash or check-based methods. Digital transactions are traceable, often allowing near real-time visibility into fund flows.⁶ These features enable faster payment

⁴ Plaid (2020) *Fintech Effect 2020*. Available at: <https://plaid.com/blog/the-fintech-effect-consumer-impact-and-a-fairer-financial-system>.

⁵ Warden, S. (2020) “Fintech’s Roadmap to Financial Inclusion,” Milken Institute Review, July. Available at: <https://www.milkenreview.org/articles/fintechs-roadmap-to-financial-inclusion>. See also Goldstein, I., Jiang, W., and Karolyi, G. A. (2019) “To FinTech and Beyond,” *The Review of Financial Studies*, 32(5), pp. 1647–1661. doi: 10.1093/rfs/hhz025.

⁶ See Association for Financial Professionals (2024) *Making the Switch: Moving from Checks to Digital Payments*. Available at: <https://www.afponline.org/training-resources/resources/articles/Details/making-the-switch-moving-from-checks-to-digital-payments>



reconciliation, reduce the likelihood of manual error, and facilitate more effective monitoring and compliance.⁷

Digital payments also allow for real-time validation of recipient account status, a feature that significantly reduces payment failures. Additionally, electronic funds transfers (EFT) are substantially less prone to fraud compared to paper checks—highlighting the security imperative of digital disbursement. In contrast, digital platforms—including prepaid and fintech-enabled accounts—enable funds to be blocked or reversed if suspicious activity is detected. When errors or anomalies are identified, digital systems can act quickly to prevent fraud on the back end, unlike the slower response associated with paper-based methods.⁸

In addition, many digital payment providers leverage artificial intelligence and machine learning to identify patterns, detect anomalies, and mitigate financial crime risks. AI-enhanced fraud detection systems can flag suspicious transactions in real time, reducing the occurrence of invoice fraud, duplicate payments, and other irregularities that might otherwise go undetected in manual review processes.⁹ As demonstrated recently by an FTA member, digital payment providers are taking critical steps to help detect, prevent, and mitigate scams in the peer-to-peer (P2P) payment space, including through education and awareness campaigns and the use of leading-edge anti-fraud tools.¹⁰

Recent research and stakeholder feedback further underscore the role of digital payments in enhancing economic resilience, enabling better budget management, and reducing reliance on costly alternative financial services. By expanding access to lower-cost and transparent digital tools, fintech enables underserved populations to build wealth, reduce fees, and access the financial mainstream.¹¹ Treasury can lead by example in modernizing disbursement systems and modeling best practices for other institutions. Treasury should also explore novel digital identification systems that can protect privacy, while helping senders of physical checks determine whether the recipient has existing access to digital payments solutions—the ability to determine if an intended recipient is capable of receiving a digital payment could speed adoption and expedite a move away from physical checks.

⁷ Payments Journal (2025) *Beyond Checks: Why Prepaid Cards and Digital Payments Are the Smarter Choice*. Available at: <https://www.paymentsjournal.com/beyond-checks-why-prepaid-cards-and-digital-payments-are-the-smarter-choice/>

⁸ Payments Journal, 2025

⁹ Financial Technology Association (2024a) *FTA Response to Treasury RFI on Financial Inclusion*. Available at: [FTA-Response-to-Treasury-Financial-Inclusion-RFI.pdf](https://www.fta.org/FTA-Response-to-Treasury-Financial-Inclusion-RFI.pdf)

¹⁰ Block (2024) How Cash App is Fighting Scams. Available at: <https://block.xyz/documents/how-cash-app-is-fighting-scams.pdf>

¹¹ Financial Technology Association (2023b) *Just the Facts: Expanding Investment Access and Opportunity*. Available at: <https://www.ftaassociation.org/just-the-facts-expanding-investment-access-and-opportunity>.



To realize the full benefits of this transition, the federal government must support the upgrading of digital payment infrastructure, including by broadening the range of firms allowed to participate. By investing in modern infrastructure, the government not only improves its own disbursement capabilities but also amplifies the benefits to consumers and small businesses whose payment solutions rely on these upgraded systems. To this end, Treasury would be better positioned to further promote and incorporate the use of secure, consumer-friendly channels for disbursement, including digital wallets, fintech-enabled bank accounts, and prepaid digital products. As detailed in the sections below, immediately adopting digital payment solutions, expanding payments system access, and modernizing underlying infrastructure are critical to achieving the goals of Executive Order 14247.

II. Treasury Should Embrace and Immediately Incorporate Digital Payment Methods and Solutions That Broaden Access and Benefit End-Users

The success of modernized federal disbursement efforts depends on ensuring that recipients—especially those who are unbanked or underbanked—can access their funds easily, safely, and affordably. Many unbanked and underbanked individuals already use digital wallets, prepaid accounts, and fintech-enabled FDIC-insured bank accounts. This preference often stems from negative experiences with traditional banking—including costly overdraft and NSF fees¹²—and is reinforced by the increased adoption of modern fintech services, which frequently eliminate harmful fees, accelerate access to wages and payments, and offer tools to help manage cash flow and improve credit.¹³ Treasury should build on this momentum by supporting and incorporating regulated, consumer-friendly payment options that meet people where they are.¹⁴ At the same time, Treasury should ensure that legacy providers do not engage in anti-competitive practices intended to undermine competition, consumer choice, and modern payment solutions.

To reach more recipients, Treasury should accordingly ensure federal payments can be received via numerous digital methods and incorporate such solutions into disbursement systems.

- **Digital Wallets Enable Instant, Secure Access to Federal Payments:** Digital wallets are a powerful potential tool for federal disbursement modernization. In 2023, 62% of businesses received digital wallet payments¹⁵—while global consumer use is projected to

¹² CFPB Offices of Consumer Populations and Markets (2023) *Data Spotlight: Overdraft/NSF Revenue Down Nearly 50% Versus Pre-Pandemic Levels*, Consumer Financial Protection Bureau. Available at: <https://www.consumerfinance.gov/data-research/research-reports/data-spotlight-overdraft-nsf-revenue-in-q4-2022-down-nearly-50-versus-pre-pandemic-levels/full-report/>

¹³ See Financial Technology Association (2024b); See also Acting Comptroller of the Currency Michael J. Hsu (2023) “Remarks at the NCRC’s 2023 Just Economy Conference ‘Elevating Fairness’”.

¹⁴ Financial Technology Association, 2023b

¹⁵ Walk-Morris, T. (2024) *Businesses boost use of digital wallets: Fed, Payments Dive*. Available at: <https://www.paymentsdive.com/news/businesses-boost-use-of-digital-wallets-fed/717094/>

exceed 5.3 billion users by 2026.¹⁶ Treasury has an opportunity to harness this momentum to deliver faster, more secure payments to recipients nationwide. These platforms enable instant, secure, mobile-first receipt of government funds, backed by intuitive interfaces and biometric protections. They eliminate the delays and fees associated with paper checks and reduce dependence on cash-based services like check-cashers or payday lenders, delivering a cost-effective, inclusive option—especially for unbanked and underbanked populations.¹⁷

- **Digital Prepaid Accounts Provide Immediate, Low-Cost Access:** Prepaid solutions facilitate immediate, low-cost receipt of payments without requiring a traditional bank account or credit check. They support fast online bill pay and peer-to-peer transfers—offering essential flexibility to individuals who otherwise rely on paper-based methods.
- **Fintech-Facilitated Bank Accounts Expand Access to the Financial Mainstream:** Fintechs that partner with banks are already expanding access to safe, affordable financial services for millions of Americans. By helping consumers open FDIC-insured accounts at partner banks—often with no minimum balance requirements or monthly fees—fintech platforms lower barriers that have historically excluded younger, lower-income, and racially diverse populations.¹⁸ In 2023, the FDIC found that nearly 47% of unbanked households cited insufficient funds to meet minimum balances, and 31% cited high fees as key reasons for remaining unbanked.¹⁹ Fintech models directly address these concerns through low-cost, mobile-first solutions. They also expand access to a wide range of other consumer financial products and services beyond just a bank account, including payments solutions. We believe that these solutions have already played a large role in reducing the number of unbanked and underbanked households.
- **Fintech APIs and Tools Streamline Access to Disbursements:** Fintech payment infrastructure—such as Application Programming Interfaces (APIs) which easily facilitate the connection tools and integrated solutions that provide individuals with one single point of access—can streamline the distribution of government funds by enabling direct, instant transfers to recipients’ digital wallets or linked accounts. Because many fintech platforms serve mobile-first users, this infrastructure is particularly well-suited to reach unbanked, underbanked, and low-income populations, as well as future generations of financial

¹⁶ Capital One (2025) *Digital Wallet Statistics*. Available at: <https://capitaloneshopping.com/research/digital-wallet-statistics>

¹⁷ Financial Technology Association, 2023a

¹⁸ Brophy, M. (2025) Chime Financial and the Neobanking Market | An AlphaSense Primer. Available at: <https://www.alpha-sense.com/blog/primer/chime-financial-neobanking-market/>;

¹⁹ FDIC (2023) *FDIC National Survey of Unbanked and Underbanked Households*. Available at: <https://www.fdic.gov/household-survey/2023-fdic-national-survey-unbanked-and-underbanked-households-report>

services customers. By leveraging modern solutions such as APIs, Treasury could improve the speed, efficiency, and inclusivity of public disbursements.

Beyond supporting and incorporating these digital payment methods, Treasury should work with the federal banking agencies (FBAs) to ensure that legacy providers do not engage in anti-competitive behaviors that create barriers to consumer choice and payment solutions. More specifically, some providers rely on tokenized account numbers (TANs) in lieu of non-tokenized account and routing numbers, purportedly to reduce fraud risks. While TANs may be used by some providers to mitigate certain risks, they also often serve as a barrier to consumers accessing basic account information and to other providers working to counter fraud and other forms of financial crime.

Account and routing information are critical forms of identifying information, and their obfuscation may undermine many common anti-fraud practices. Information security is better protected through sound API-security standards, rather than through standardless tokenization.

Without clear standards, the use of TANs may give legacy providers disproportionate control over downstream applications, enabling anti-competitive behavior and restricting permissioned data sharing. This can also chill consumer-centric innovation, including novel payments use-cases, such as account-to-account payment methods. Treasury should work with relevant stakeholders and agencies to support the development of structured, standards-based approaches to TAN governance.²⁰

III. Treasury Should Advance the Modernization of Underlying Payments Infrastructure by Ensuring Providers have Direct Access to Core Payments Systems, Promoting Real-Time Systems, and Facilitating Bank-Fintech Partnerships

Despite meaningful advances in private-sector payments, the government continues to rely on legacy infrastructure that limits participation by the most advanced digital payments providers and technologies in the market. This outdated approach and infrastructure not only results in higher administrative costs and reduced system efficiency, but also reduced access for the unbanked and underbanked. In addition to adopting digital payments solutions, the government would benefit from modernizing its underlying infrastructure, which includes both allowing broader access to payments firms, as well as adoption of leading-edge technologies. Accordingly, to fulfill the goals of Executive Order 14247, Treasury should support the following paths to modernizing infrastructure and improving service offerings:

²⁰ Financial Technology Association (2023c) *FTA Comment Letter to CFPB, Proposed Rule under Dodd-Frank Section 1033: Personal Financial Data Rights*. Available at: <https://www.ftassociation.org/wp-content/uploads/2023/12/FTA-1033-NPRM-Response-vF.pdf>

- 1. Grant Payments Firms Direct Access to Core Payments Systems to Advance Competition and Resilience:** Fintech payment providers that meet appropriate standards and regulatory oversight should be granted direct access to core public and private payments systems—including participation in core settlement infrastructure, real-time payment systems (discussed below), and card networks. Payment firms are already subject to robust regulatory oversight and provide critical services to consumers and small businesses.²¹ Enabling broader access would foster competition, lower costs, and strengthen system resilience by reducing single points of failure.

To this end, Treasury should support policies that enable responsible access to Federal Reserve master accounts and payments infrastructure for qualified firms, including an optional federal payments charter and increased approvals for so-called Tier 3 banks. This would allow properly regulated payments-focused firms to participate directly in the payments system, reducing their reliance on costly or opaque intermediaries.

Congress should also create an optional federal payments charter to provide a clear national framework for nonbank payment providers and enable direct access to critical payment rails.²² It could complement, not replace, existing state money transmitter laws and offer tailored oversight based on the risk profile of payment activities rather than traditional deposit-taking.²³ These steps would enhance regulatory clarity, streamline compliance, and expand access to real-time payments capabilities.

Other countries—including the U.K., EU, and Canada—have already modernized their payments ecosystems by extending access to well-regulated nonbank firms, resulting in increased competition and lower costs for consumers.²⁴ The U.S. risks falling behind if it does not make similar upgrades to its own infrastructure and regulatory model.²⁵

- 2. Promote Broader Participation in FedNow in Order to Benefit Treasury’s Disbursement Systems:** Treasury should leverage FedNow for its disbursements and promote the use of real-time payments across government. FedNow offers clear operational advantages, such as faster delivery, enhanced accuracy, and better transaction visibility. Real-time capabilities offer faster delivery, reduced errors, and better tracking.

²¹ Financial Technology Association, 2023a

²² Financial Technology Association, 2024a

²³ Lee, P. (2025) *Modernizing America's Payments System to Lower Costs and Increase Competition*, *Open Banker*. Available at: https://openbanker.beehiiv.com/p/modernizingamericaspayments?utm_campaign=modernizing-america-s-payments-system-to-lower-costs-and-increase-competition&utm_medium=newsletter&utm_source=openbanker.beehiiv.com

²⁴ Financial Technology Association, 2024a

²⁵ Giancarlo, J.C.; Gorfine, D.; and Peters, B. (2025) *The Case for Payments Modernization*, *Milken Institute Review*. Available at: <https://www.milkenreview.org/articles/the-case-for-payments-modernization>

As FTA emphasized when FedNow launched, instant payments can help consumers avoid overdraft fees and payday lenders while allowing businesses to manage expenses more efficiently and reduce payment errors.²⁶ Small businesses benefit as well, gaining the ability to better manage working capital, reduce costly payment errors, and optimize cash flow.

In order to increase use and adoption of FedNow, participation should include nonbank payment providers; this will significantly accelerate adoption and enhance outcomes.²⁷ Inclusion of leading payments companies will further maximize the utility of FedNow and ensure it meets the needs of all users. Treasury's commitment to real-time disbursements, and its inclusion of regulated nonbank providers, can help unlock these benefits at scale.

3. **Support Bank–Fintech Partnerships To Expand Reach:** Responsible partnerships between fintechs and banks have shown clear benefits in expanding access, improving customer experience, and reducing disbursement delays. These partnerships have long served as a vital distribution channel for lending, payments, and deposit products—especially to underserved communities. They reduce friction, improve speed, help consumers avoid harmful fees, empower small and community banks to offer competitive digital products and secure stable, low cost deposits,²⁸ and provide broader reach through user-friendly fintech interfaces.²⁹

A Federal Reserve Bank of Philadelphia study also found that such bank-fintech partnerships expand financial inclusion by reaching individuals underserved by traditional channels.³⁰ During the pandemic, fintech lenders—often partnering with banks—played a critical role in delivering small business relief, including to minority-owned businesses that were overlooked by traditional providers.³¹ It is often the digital distribution channels of fintechs that results in this expanded inclusivity.

Treasury should accordingly play an active role in promoting responsible bank-fintech partnerships by coordinating with the FBAs to clarify expectations and remove regulatory

²⁶ Financial Technology Association (2023d) FTA Statement on FedNow Launch. Available at: <https://www.ftassociation.org/fta-statement-on-fednow-launch/>

²⁷ Frost, J. et al. (2024) “Fast payments: design and adoption,” *BIS Quarterly Review*. Available at: https://www.bis.org/publ/qtrpdf/r_qt2403c.htm

²⁸ Financial Technology Association, 2023a

²⁹ Financial Technology Association (2024c) *FTA Comment Letter re: Request for Information on Bank-Fintech Arrangements Involving Banking Products and Services Distributed to Consumers and Businesses*. Available at: <https://www.ftassociation.org/wp-content/uploads/2024/10/FTA-Letter-on-Fintech-Bank-Arrangements-RFI.pdf>

³⁰ Chernoff, A. and Jagtiani, J. (2023) “The Role of Bank-Fintech Partnerships in Creating a More Inclusive Banking System,” *Federal Reserve Bank of Philadelphia*, WP 23-21. Available at: <https://www.philadelphiafed.org/-/media/frbp/assets/working-papers/2023/wp23-21.pdf>.

³¹ Battisto, J. et al. (2021), “Who Received PPP Loans by Fintech Lenders?,” *Federal Reserve Bank of New York*.

uncertainty. These models are subject to extensive supervision, including consumer protection, AML, privacy, and fair lending laws. However, inconsistent treatment and undue scrutiny under the prior administration created significant regulatory ambiguity. Treasury can help restore confidence in these partnerships by reinforcing their value, encouraging uniform supervisory treatment, and promoting best practices across agencies. Doing so will strengthen the broader financial ecosystem by supporting digital delivery models that combine the safety of regulated bank infrastructure with the accessibility and innovation of fintech platforms.

IV. Treasury Should Launch a Comprehensive Financial Education and Digital Literacy Program to Highlight Payment Solutions and Combat Fraud

To ensure that digital payment modernization efforts succeed, Treasury must pair infrastructure updates with clear, accessible, and inclusive national education and outreach initiatives. FTA strongly supports the Executive Order’s directive to launch a comprehensive public awareness campaign. As Treasury implements this directive, two priorities should guide the effort: educating consumers and small businesses about available digital payment options and protecting them from fraud.

First, many of the individuals most likely to benefit from faster, safer digital disbursements—such as unbanked, underbanked, or digitally inexperienced users—may also be unaware of their full range of options or unsure how to access them. Treasury should ensure that its public education efforts clearly highlight and promote all available regulated, user-friendly digital payment solutions—including digital wallets, prepaid products, and fintech-facilitated bank accounts—to maximize uptake, reduce delays, and strengthen user confidence.

This outreach should be designed for broad reach and trust, leveraging community organizations and distributing content through accessible, multilingual formats and multiple channels (e.g., SMS, email, and in-app messaging).³² Treasury should also prioritize simplicity in messaging, given that many traditional financial products are intentionally complex. Government communication should cut through that complexity with clear, actionable guidance that leaves recipients feeling informed and empowered.

One especially valuable opportunity where financial education can be improved is to enhance the consumer-facing information provided by the FBAs. Treasury should work with the FBAs to ensure that public materials inform consumers about the availability of fintech providers and solutions that offer regulated access to essential financial tools, including FDIC-insured accounts. For example, the FDIC’s [“Get Banked”](#) campaign currently promotes legacy banking institutions

³² Financial Technology Association, 2023b



but does not reflect the important role of well-regulated bank-fintech partnerships and fintech-facilitated offerings.³³ Updating these materials would improve transparency and strengthen inclusion.

Second, Treasury should prioritize consumer protection by embedding a strong fraud prevention component into its public education efforts. Many fraud schemes disproportionately target those unfamiliar with digital tools or who may be experiencing financial stress. Treasury can strengthen its outreach by partnering with expert-led, public- and private-sector initiatives aimed at helping consumers recognize and avoid scams. These efforts could include collaborations with trusted nonprofits and community organizations,³⁴ as well as building on existing industry-led campaigns, such as FTA’s own *Smarter Than Scams* campaign³⁵—which equips consumers with the tools to recognize and avoid scams. FTA would welcome the opportunity to meet with Treasury to explore ways to collaborate on these and other efforts.

FTA supports Treasury’s leadership in building a stronger, more resilient, and more inclusive payment system. A thoughtful education campaign will ensure that all Americans—not just the digitally fluent—can benefit from these improvements.

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FTA applauds Treasury’s commitment to modernizing the federal payments system in a way that benefits consumers, enhances efficiency, and reduces fraud. We welcome the opportunity to collaborate further and offer continued input as the agency moves forward with implementation of E.O. 14247.

Sincerely,

A handwritten signature in black ink, appearing to read 'Penny Lee', is positioned above the typed name.

Penny Lee
President and Chief Executive Officer
Financial Technology Association

³³ See FDIC (no date) *Get Banked!* Available at: <https://www.fdic.gov/getbanked>

³⁴ For example, initiatives like the Aspen Institute’s Fraud and Scam Reduction Task Force have sought to raise awareness through multi-stakeholder collaboration on consumer education and scam prevention. See Aspen Institute Financial Security Program (Aspen FSP) (2024) *Aspen Institute Financial Security Program Launches National Task Force for Fraud & Scam Prevention*. Available at: <https://www.aspeninstitute.org/news/task-force-on-fraud-and-scams/>

³⁵ Financial Technology Association (no date) *Smarter Than Scams*. Available at: <https://www.ftassociation.org/smarter-than-scams/>