

June 30, 2025

Mr. Tyler Curtis  
Director  
Office of Consumer Policy  
United States Department of Treasury

Subj: Request for Information on Executive Order 14247

Transmitted electronically via regulations.gov

Dear Mr. Curtis:

On behalf of WERC (formerly known as Worldwide ERC, Inc.), thank you for the opportunity to provide comments on Executive Order 14247, "Modernizing Payments to and From America's Bank Account" published in the Federal Register on May 30, 2025.

WERC is the professional association representing the global talent mobility industry with over 2,750 enterprises and more than 10,000 individuals as members. Our membership is comprised of the many human resource and operations professionals representing the world's largest corporations as well as mid-sized U.S. businesses, who employ and routinely relocate over 450,000 workers throughout the U.S. and around the world annually via a company-sponsored mobility program. We also represent the essential service providers who enable the movement of talent, including relocation management companies, movers, real estate brokerages, tax and immigration experts, temporary housing providers, destination service providers, and more.

While modernization of the U.S. financial system will provide sought-after efficiencies and cost savings, there are specific situations, particularly in employment-related cases where a third party is involved and/or foreign workers, that require unique considerations to ensure facilitation of payment to or from the taxpayer. We commend the Administration's desire to transition to efficient and secure electronic financial transactions. However, the volume, importance and varied nature of these transactions within the context of moving a company's workforce talent, particularly when involving foreign nationals, necessitates adequate implementation time and limited, but important exceptions, to ensure a smooth transition.

Below please find our comments to the Request for Information (RFI) published on May 30, 2025.

A (1) What are some of the factors causing individuals and organizations to continue to use paper checks to receive or make payment to the Federal Government?

- The vast majority of U.S. companies with formal programs to move their employees for employment-purposes leverage third party partners, such as a relocation management company (RMC) and/or tax service providers, to administer various operational and compliance components of the move. In many cases, this includes a third-party making

U.S. federal tax payments via check on behalf of individuals whose moves they are supporting. This is done to ensure timely payment, streamline the process given what are often complex internal corporate processes, and provide documentation tracking and receipt capabilities via mail certification.

A transition to electronic payments can be achieved, while meeting the same internal and document needs, by the U.S. Treasury providing an avenue where a third party can remit an electronic payment on behalf of a tax payor via a method that allows the submission of a batch file for application to individual accounts. The IRS's existing process for completing a same-day U.S. wire of federal tax payment provides a starting point for this solution. But the existing framework is a complicated process for individuals, the third-party entity, and their financial institutions that can only be done on an individual per case basis. RMCs and other third-party entities must coordinate tens of thousands of tax remittance transactions for their clients annually, so any payment process would require a platform that allows for bulk payment submission for multiple individuals via a batch process with full capabilities for tracking documentation and validation of funds application.

Additionally, to facilitate smooth operations, RMCs, corporations and tax firm clients sometimes have U.S. Federal tax refund checks directed to the individual's employing corporation as part of their client's overall tax equalization process. This ensures all payments are made in a timely manner and the assignment of tax refunds to the company facilitates a more seamless process for the employee whose move is being facilitated and for the company.

## 2. What barriers exist for transitioning individuals and organizations to electronic funds transfer (EFT) options?

In most circumstances, foreign workers cannot obtain a bank account in the United States without a Social Security Number (SSN) or an Individual Tax Identification Number (ITIN). While many foreign nationals working in the U.S. possess a nonimmigrant visa from a category that will enable them to be eligible for and to apply for a SSN or ITIN and open a U.S. bank account, this is not always the case, particularly with short-term business travel. Without this ability, the individual would not be able to make or receive tax-related payments directly via an EFT from a U.S. account. And while the IRS does permit payment from a foreign bank account via an international wire transfer, the existing procedures are complex and result in significant transaction fees that would result in an unintended financial burden and would not address the issue of receiving payments.

We would recommend that the Administration consider implementing additional avenues to pay/receive tax payments that would not require Social Security Numbers or a U.S. bank account. These could include:

- Secure digital wallets that work globally;
- prepaid debit cards;

- credit card payments without fees; and
- streamlined international wire transfers for tax payments or refunds. While international transfers are currently available the system is cumbersome. We recommend Treasury streamline this process to reduce administrative complexity, minimize fees and provide multilingual guidance to facilitate access.

These would need to have sufficient compliance and security mechanisms to ensure funds are not misappropriated or misused but that have the ability to address the unique circumstances of both foreign national taxpayers and U.S. taxpayers that may not have a bank account.

Lastly, we recommend Treasury consider developing bulk payment/refund portals for organizations such as relocation management companies, corporations or tax service providers that manage payments for multiple individuals. This would facilitate a secure efficient move away from paper checks, when an authorized third party is involved, by allowing the authorized third party to submit or receive payments on behalf of multiple individuals using a batch file format, with built-in tracking and reconciliation tools.

Unless third party entities can make or receive payments for the individuals as outlined above, we recommend these individuals be considered an exception as stated in Section 4(i) of Executive Order 14247.

Effective Date for Transition. The RFI stated that, effective September 30, 2025, the Federal Government will cease issuing paper checks for, “all Federal disbursements inclusive of intragovernmental payments, benefits payments, vendor payments, and tax refunds, except as specified in the E.O.” While transitioning to an electronic payments system has benefits, the third-party entities that support individuals moving for employment purposes, including Relocation Management Companies and Corporations, need more time than a calendar quarter to put systems in place and work with affected individuals and entities to make the transition to electronic transmission. Particularly with tax refunds and quarterly payments, a transition at the beginning of the calendar year would enable businesses to effectively make the change and facilitate the transition and compliance alignment concurrent with an individual tax filing year.

We look forward to working with you to ensure the smooth transition in modernizing federal payments. If you have any questions or would like additional information, please contact me via the email or phone number listed below.

Sincerely,



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