

April 6, 2026

Tanya McInnis, Deputy Director
Office of Consumer Policy
U.S. Department of Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Dear Ms. McInnis,

The [Cities for Financial Empowerment Fund](#) (CFE Fund) appreciates the opportunity to inform the interagency Financial Literacy and Education Commission (FLEC)'s statutorily required annual review of the U.S. National Strategy for Financial Literacy. FLEC provides a unique opportunity to implement effective financial capability strategies including increasing access to mainstream banking opportunities. The timing of this review coincides with the recent Executive Order 14247 (EO14247) calling for the elimination of paper check disbursement from the federal government. As agencies work to implement EO14247, we believe FLEC has a corresponding opportunity to build an interagency strategy to support access to safe mainstream banking.

Across federal programs, there are recurring points at which individuals receive income or engage with public systems—such as tax refunds, benefit payments, or workforce-related earnings. These are “bankable moments”: times when individuals are making immediate decisions about how to receive and manage their money. In many cases, these interactions occur without a connection to safe, affordable banking. For example, approximately 3.4 million people receive federal payments via Direct Express prepaid card, and nearly 70% report being otherwise unbanked.¹ At the same time, there is an established national infrastructure of safe, low-cost Bank On-certified accounts, offered by hundreds of financial institutions and supported by federal regulators.

Through our work supporting governments across the country to develop and implement strategies to improve financial capability and security, we have seen how access to safe and affordable banking accounts can serve as a critical foundation. Evidence from our network of [Financial Empowerment Center](#) (FEC) municipal partners reveals that even when working repeatedly with a professional financial counselor, people without a mainstream bank or credit union account were only *half as likely* to be able to save money, and only *one-third as likely* to be able to improve their credit score, compared to those with accounts; moreover, those counseling clients who newly opened a mainstream account then became *eight times more likely* to improve their finances than those who did not. Access to safe and affordable bank accounts matter.

Aligning Federal Payment Systems with Banking Access Works

Our experience leading the national Bank On movement shows that banking access strategies, when integrated into a government payment and service streams, are uniquely successful not

¹ <https://directexpress.info/2025/02/26/cardholder-survey-shows-slight-increase-in-feature-awareness/>

only in connecting individuals to accounts but in serving as a platform to solve key access barriers such as identification, address, language, and fees.

As one example, during the height of the COVID-19 pandemic, the CFE Fund worked with federal partners in the Trump administration to harness the banking access opportunities represented by the Economic Impact (stimulus) and Child Tax Credit payments. The CFE Fund, Bank On coalitions, FEC partners, and other local leaders deployed messaging around how direct deposit could help consumers receive funds faster, safer, and more affordably, and directed consumers to Bank On certified accounts. According to the Internal Revenue Service (IRS), more than 10 million households entered new or modified banking account information for the first series of stimulus payments. The Federal Deposit Insurance Corporation's (FDIC's) unbanked survey found that almost half (44.8%) of recently banked households who received a government benefit payment cited the payment as contributing to their decision to open an account.

As such, we believe FLEC is well-positioned to identify programs and payment moments that can be made "bankable moments," resulting in large-scale adoption of safe and affordable banking accounts. With the federal government issuing billions of dollars in payments each year, the financial value of insuring that recipients have access to accounts that are federally insured, low-cost, and fully transactional is clear.

The CFE Fund

The CFE Fund is a national nonprofit organization that has worked with over 100 cities and counties to help them implement large-scale, systemic financial empowerment initiatives for their residents, including access to safe and affordable banking accounts, one-on-one financial counseling, asset building, and consumer financial protection.

Bank On

The CFE Fund's national Bank On initiative is a multi-sector partnership to create pathways for un- and underbanked individuals to enter, or re-enter, the financial mainstream. At the core of the initiative are the [Bank On National Account Standards](#) for basic banking accounts that are designed to address critical pain points for consumers and limit risk for financial institutions. Certification under the Standards prohibits overdraft or insufficient fund fees and requires low monthly fees, a low opening deposit, and bill pay functionality. The 15 required core features in the Standards address the issues identified by the FDIC as primary reasons that individuals are unbanked. The CFE Fund also supports more than 100 local Bank On coalitions across the country to expand banking access and connect consumers to these Bank On certified accounts, both by encouraging more financial institutions to offer certified accounts and by developing programmatic integration opportunities to connect people to those accounts at scale.

Bank On certified accounts are widely available to people receiving federal payments. There are more than 500 banks and credit unions with a certified account; certified accounts are available at over 60% of bank branches across the country. Banks offering a certified account represent more than 66% of the national deposit market share.

Federal Government "Bankable Moments"

We have identified several federal government initiatives within which payment or programmatic moments can become “bankable moments.” With the EO14247 calling for the elimination of paper checks for reimbursements and payments, the key next steps are to identify programmatic touch points and/or policy changes that support simplified access to safe banking to receive funds. In practice, this would involve:

1. Providing clear, direct pathways to open safe accounts at the point of payment or enrollment;
2. Integrating account access into existing application, onboarding, and communication processes; and
3. Leveraging the array of Bank On-certified accounts that are already available nationwide.

Potential examples of these bankable moments include:

(1) Internal Revenue Service Annual Tax Filing and Refunds

Each year, the Internal Revenue Service (IRS) processes over 30 million tax refunds to low- and moderate income filers that claim the Earned Income Tax Credit and Child Tax Credit. Of those, at least 2 million filers are likely to be unbanked. The IRS could replicate the approach used to deliver the 2021 Economic Impact Payments by providing filers with information about opening a banking account and re-establish the portal that allows filers to set up direct deposit. They should also go a step further and easily allow people to open checking accounts during the filing process. Additionally, nearly 3 million low-income or elderly tax filers receiving assistance through the Volunteer Income Tax Assistance (VITA) Program or other IRS associated programs should incorporate training on checking accounts into their annual certification.

(2) Social Security Administration (SSA)

Each month, Treasury’s Bureau of Fiscal Services (BFS) issues nearly 7.4 million Old Age, Survivors, and Disability Insurance (OASDI) and Supplement Social Security Income payments; approximately 3.4 million beneficiaries utilize the Direct Express debit card. Like the tax refund moment, this payment to debit card users represents significant banking access integration potential to provide recipients with information about opening a banking account and opportunity to set up and share new account details.

(3) Federal Emergency Management Agency (FEMA)

Following disaster declarations, FEMA provides payments averaging \$3,000 to affected households. Many of the households receiving FEMA assistance will need to relocate and will not be at an address on record to receive a paper check or debit card in the mail. Having a safe and affordable banking account already established to receive payments by direct deposit, rather than a paper check, is more than a banking access opportunity – it is critical for efficient and effective program implementation.

(4) Department of Veterans Affairs (VA)

The VA reports that more than 250,000 veterans receive their benefits through prepaid debit cards or paper check. As one example of the power of an explicit banking access strategy, the [Veterans Benefit Banking Program](#) encourages veterans to use a mainstream account for benefits receipt. Since its launch, thousands of veterans have moved from paper checks to safe and affordable banking, a 58% decrease in paper check usage since 2018.

(5) Federal Bureau of Prisons Release Preparation Program

The Federal Bureau of Prisons could incorporate financial education and banking access into its Release Preparation Program and specifically ensure that all prisoners are able to have commissary account balances or other funds directly deposited in a mainstream account opened in advance of their release.

(6) Health and Human Services' Office of Refugee Resettlement (ORR)

Treasury could encourage ORR to leverage its guidance, grants, and contracting authority with resettlement agency partners to ensure that financial education and banking access is a critical element of its economic and social stability pillar. Specifically, ORR's Refugee Cash Assistance and Voluntary Agencies Matching Grants are key moments when an integrated banking access initiative could support and enhance these programs' goals of meeting basic needs and easing the pathway to stable housing and employment through connection to a safe and affordable account.

(7) Administration of Children and Families (ACF) Children's Bureau

ACF could leverage Title IV-E and Chafee Transition to Adulthood funds to encourage state child welfare agencies to integrate banking access opportunities for youth receiving cash assistance upon aging out of foster care systems. Programs for system-involved youth in Allegheny County (PA) and Milwaukee (WI) saw success in similar efforts [connecting cash assistance with banking access](#).

(8) Department of Labor - Employment and Training Administration (ETA)

ETA could leverage its leadership and guidance to integrate banking access into Workforce Innovation and Opportunity Act (WIOA) job preparedness programs such as JobCorps, American Job Centers, and Youth Programs. Additionally, ETA can support and guide state-based unemployment insurance agencies to integrate banking access into their insurance claim and payment processes. Two recent [steps forward on this opportunity](#) include Illinois and Maryland, two states that successfully connected their unemployment payments to banking accounts instead of paper checks and debit cards.

(9) Department of Housing and Urban Development (HUD)

HUD could leverage its public housing and Housing Choice Vouchers initiatives as an opportunity to integrate banking access. Additionally, HUD's programs that support public housing residents' broader economic goals, such as the Family Self Sufficiency program, are well-aligned platforms for integrating banking access.

Conclusion

The CFE Fund greatly appreciates the opportunity to share our input on Treasury's review of the National Strategy for Financial Literacy. Our experience in the financial empowerment field highlights both the critical importance of access to a safe and affordable banking account and the success of large-scale banking integration approaches. FLEC has a unique opportunity to help leverage existing moments where Federal agency programs intersect with individuals and ensure that they offer seamless banking access opportunities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Mintz', with a stylized flourish at the end.

Jonathan Mintz
President and Chief Executive Officer
Cities for Financial Empowerment Fund