Announcer:

Welcome to PayTalk, the podcast for payroll professionals, with your host Nina Talley. In the podcast, we explore the human side of payroll by speaking with global industry leaders who provide their unique insights to help listeners better understand the issues important to them and their careers.

Nina Talley:

Hey everyone, thanks for joining us for PayTalk, The podcast that brings you payroll's human side. I'm your host, Nina Talley, and today we're joined by Bill Sullivan, senior director and group manager of government and industry relations for NACHA, and Bill Dunn, CPP, director of government relations for the American Payroll Association. I've had the pleasure of chatting with both of these gentlemen leading up to this conversation, and I'm really excited for the specific type of insight you can both offer to our listeners. To kick things off, Bill Sullivan. Please tell us a little bit about who you are and about your work with NACHA and how it intersects with the ACH.

William Sullivan:

Absolutely, Nina. And first of all, I wanted to thank you for having me today, and the American Payroll Association and their members for allowing me this opportunity to speak to you today on this podcast. I oversee the government and industry relations at NACHA, and NACHA used to stand for the National Automated Clearing House Association.

William Sullivan:

And we are really direct deposit and direct payment, so electronic payments, and we are the steward or the guardian, as you may say, of the ACH Network. So we write the rules and enforce the rules of any of the participants that use the ACH Network, which is 100% of the banks in the country, and the majority of business in one way, shape or form, either by paying their employees through direct deposit or paying and receiving their invoices using the ACH Network. Just a little bit more on the network. NACHA is really the virtual network, and by virtual network, what I mean is we write the rules, we enforce the rules, but we don't have the pipes per se, that the ACH transactions flow through. The ACH transactions are handled by two operators. The private sector operator, the Electronic Payments Network, or EPN is owned by some of the largest banks in the country.

William Sullivan:

And it runs in parallel with the Federal Reserve, which banks the remaining bank customers using their network. The great thing is the two ACH Networks are really pretty much identical. And if something were to ever happen to one, they can seamlessly offload to the other. So even though EPN and the Federal Reserve are competitors, they also have many things worked in their system so one can offset to the other and they can trade files seamlessly overnight, so ACH payments do not ever stop flowing through the network.

Nina Talley:

Wow, Bill, that is incredibly complicated, and I am personally very thankful to have somebody like you figuring all of that out for the rest of us. Bill Dunn, can you tell our listeners a little bit about your place in the APA, and how your work intersects with folks like Bill Sullivan?

William Dunn:

Yeah, sure. Thanks, Nina. In government relations, we are advocates for payroll professionals. We track state and federal laws regarding how employers must pay workers and everything that flows from that, which includes withholding and remitting taxes, benefits, garnishments, and the like, and the whole reporting aspect of that. How the wages are reported on a pay stub and how taxes are reported on a W2, and how they're reported to the IRS. So our primary focus is working with government so that regulators understand the impact that their laws and regulations will have on businesses. Often, laws and regulations have unintended consequences. And when those consequences affect payroll, we try to communicate that and offer suggestions that will enable employers to comply with the law, while alleviating some of the administrative burden on business or on the payroll functions specifically. Now in general, payroll has a preference for electronic funds transfers, whether that's for paying employees or for making tax deposits. Most electronic payments and payroll go through the ACH Network. So APA has a natural partnership with NACHA in promoting electronic payments.

Nina Talley:

I find it so interesting that there's this entire layer of sort of guardianship between the legislation and our everyday paychecks that go out to almost every one of us in America. And that's something that I think our listeners are going to find a lot of value in, because it is sort of this hidden veil, the communication between the payroll professionals and the government legislators. And I'm really excited to crack that mystery a little bit with you both. So let's just go ahead and jump right into the meat of today's episode, and let's talk about the legislation at the heart of last spring's economic impact payments. That's what we all want to know about. And you guys know the most. Bill Sullivan, give us a little bit of that background on it.

William Sullivan:

Absolutely. And one of the things too, with any piece of legislation or policy coming from Washington, DC, really the goal of NACHA and my goal is to never have the ACH Network legislated or regulated. We are a private-sector rulemaking body of over 40 years, and we're pretty proud of the record that we have as running one of the, if not the safest, payment network in the country, and really only having two rules that didn't pass. And remember when a NACHA rule has to pass, it has to satisfy the needs of the smallest financial institution in the country, as well as the largest financial institution in the country. So we really are very deliberate in the way we go about rulemaking. So whenever payments becomes a centerpiece of legislation, we grow concerned, naturally, just payments aren't generally included in legislation, because we've done a pretty good job, through our efforts, regulating our own network.

William Sullivan:

So in this case, when the coronavirus had hit the United States, and it was clear that this was going to have some significant economic impacts on people's lives and businesses and employers, and Congress started to look at ways they get help in the short term, remedy the problem, I immediately started reminding all the folks inside the Beltway, the policy players, of the fact that the government is the largest user of the ACH Network, that Treasury sends out over 99% of all their benefit payments using the ACH Network and direct deposit. The majority of tax returns are sent out using direct deposit. So I had some great conversations with the National Economic Council, which is located in the White House, as well as some of the senior folks at Treasury, the IRS, the Bureau of Fiscal Services. And for those who may not know, Fiscal Services is actually the accounts payable and accounts receivable arm for the US government, and many Congressional members that sit on the House Financial Services Committee and the Senate Banking Committee, because I knew that they would have oversight and would really be responsible for this piece of legislation.

William Sullivan:

I was very happy to see that just about everybody I talked to said, "Absolutely. We know the significance of the ACH. We need to get these payments out quickly, efficiently, and safely. And ACH is the way to go." And even though they didn't specifically legislate that the language of the bill basically left it up to Treasury and Treasury is like, "We have to do this quickly. This is a no brainer. We're using ACH." So that's a little bit of background on the direct deposit side of things. And the CARES Act was quickly debated and negotiated amongst Congress, and really the White House was heavily involved, and was signed into law in late March, and we started flowing payments in April.

Nina Talley:

That is such rapid delivery when it was really, really needed. I'm glad that people like you are there to streamline things. And I know that paper checks can be such a headache, and now more than ever, because it requires actual physical contact to hand out a paper check. Bill Dunn, I would love to hear from you on your thoughts on the actual issues that are being addressed by going paperless.

William Dunn:

Going paperless has a lot of parallels with what employers are doing to pay employees. And it's really interesting. The IRS in early June, they announced some figures that about 160 million payments had been issued, and about three-quarters of those were made by direct deposit. But that left another quarter of all those payments, about 40 million, that were going to go out by check, and very late in the process, they added debit cards to that. But in early June they announced that they had issued 35 million checks, and the US Treasury has an impressive ability to produce checks, but 35 million as a whole lot of checks to write. And they tried to cut that number by setting up a way, the IRS, tried to cut that number by setting up a way on their website for taxpayers to provide their account information.

William Dunn:

And you see the parallel with payroll, because you can't provide a payment by direct deposit if you don't have the account information. And so that deadline was by mid-May, because as Bill Sullivan said, there was a rush to get those checks out, or to get the payments out. So they had a deadline, and the people that didn't meet that deadline, they received checks. And it was about a week or two after that deadline, the IRS announced that they would partner with the Money Network to issue four million payments on debit cards. And that sounds like a small number in comparison, four compared to 35 or 120, but four million is a lot of cards to issue.

Nina Talley:

Yeah, it is. It's truly, actually, difficult to wrap your mind around the physical number. It's very easy to say four million, but that's a lot of contact. At the bare minimum, it's a lot of contact between people that has to happen. So that's a very good point. So Bill Sullivan, you were there as the CARES Act was being written and implemented. And I know that I personally would have loved to have been a fly on the wall during that meeting when it was finalized, but you have a lot of insight that we can't get anywhere else. Can you tell us a little bit about why direct deposits were so important for NACHA to implement into this and really dive in, get a little granular for us.

William Sullivan:

Sure. Very selfishly, because it is the payment network that we operate and run, we always feel the ACH Network is the way to go, but really a little bit more reality driven would be, we were told as the legislation was being written, that again, the Bureau of Fiscal Services, which is ultimately responsible for taking the IRS files and sending them out to our citizens, had a capacity of no more than $5 million of checks being cut per week. That was the maximum amount the federal government could do to cut a check each week.

William Sullivan:

So if you talk about the 160 million payments that Bill Dunn referenced, if you divide that by five million, that would mean that still the majority of the country would not have been paid yet if those payments went out by check. Ultimately, now, the footnote on the story is Fiscal Service was very quickly increased their capacity and they could cut seven million checks a week, and they were cutting checks daily and releasing them daily, where the ACH payments were being released once a week for certain dates on availability. And I'll get to that a little bit later in our call today. So we really felt that if they needed to do this fast, and we needed to help Americans, the fastest way to do it was using electronic payment methods, such as direct deposit. We also saw that direct deposit, I think it was around the first week these payments were made, which was several days, right after Easter, there were 80 million direct deposits sent out to Americans. So half of the folks were paid in the first week using direct deposit, and then checks started flowing the week after.

Nina Talley:

That, again, I have a very hard time wrapping my head around the actual implementation of all of that. And I think that we all know that there were a lot of concerns going into actually getting these stimulus checks out to Americans. Can you tell me a little bit about what those concerns were on? We understand that it was a big deal to cut this amount of money, but what were the actual logistical concerns?

William Sullivan:

That's a great question, Nina. And honestly, I learned quite a few of these kind of along the way. And some of that was by working with the other financial institution trade associations. And I'll pause for a second, just to give a tip of the cap to those trade associations, because they helped lead the charge and reinforcing what NACHA was telling the federal government by saying, "Our bank members absolutely need these to be sent out electronically." Because if you think about it, the message from the government at the time was, "Try to limit your travel away from home. Try to limit human interaction," and the elderly needed to stay as confined as possible. If you were sending checks out, you would have potentially had overrun bank lobbies. You would have had overrun ATM or bank teller lines through the drive-thru, and people would have been potentially risking their lives to do something with this paper check that was being sent.

William Sullivan:

So even if the government could have produced 80 million in the first week, like they did with ACH, that would have been 80 million people going into a lobby. And quite honestly, the financial institutions were looking out for the health and safety of their employees as well. You can't have that many people going through touching a piece of paper through a bank lobby. And at the time banks were actually shutting their lobbies down, and they were really trying to encourage all electronic payments or just using an ATM machine, or something that didn't actually need human contact.

William Sullivan:

Another thing that probably is not widely known, and I don't understand all the nuances of it, but according to our member banks, and the other financial institution trades, treasury checks are one of the most fraudulent-created check in the country today. So a lot of banks had a policy in place before the CARES Act that they wouldn't take a photo, when you do a remote capture with your telephone and deposit your check that way, you couldn't do that with government checks. And some of them would not allow a government check to be deposited through an ATM machine. So even folks that thought they were technologically savvy couldn't go in and just, in some cases, snap a picture of that check and have it remotely captured at their bank and have access to those funds. So between health and safety and potential fraud, it was very important that these payments get moved through the system electronically.

Nina Talley:

That is such a good point, that there were so many layers of safety and protection, and how simple it is to just cut the paper check out of the equation, and it solves so many problems. But that being said, getting this sort of legislation implemented across jurisdictions, I can't even imagine the work that went behind that. And I would love to hear how you managed to coordinate different jurisdictions and get them to agree and compromise together so that we could get these payments out.

William Sullivan:

Yeah. And on jurisdictions, I'm going to kind of take that in a little different route on that and just, the coordination really came amongst the White House and Treasury. And Treasury oversees the IRS and the Bureau of Fiscal Services, but they often operate almost independently of one another. So it was making sure that the players that were responsible for the payments all understood that one, NACHA was there to help and assist whenever possible, that our members were there to help and assist whenever possible, but also to make sure that they were following our operating rules so all these payments would be made just like any other ACH payment. And at times, it was just pointing out things on how they could format a file to maybe be a little bit more efficient for going through the ACH operators, the Federal Reserve and the Electronic Payments Network, and onto banks, which ultimately then pass them on to their customers.

William Sullivan:

I think the other part of that area that you used jurisdiction in would be coordinating with the financial institution trades. And that would be having meetings twice a week, where all the trades participated, to share concerns, success stories, potential problems, and things that we in turn then relayed to the federal government, whether it be the IRS that was pulling the files to send to Americans, or whether it was Fiscal Services and the way they were formatting those files, or in terms of banks, on how they were handling those files and making sure that they all were following the NACHA operating rules.

Nina Talley:

Well, that sounds like quite the juggling act. And I am incredibly proud of you for managing to do it. I know that my family was definitely helped out by these stimulus payments, and knowing that there are people behind the scenes making sure that we're okay, it means a lot, especially given how difficult these legislative matters can be, and how hard it can be to get them pushed through so quickly.

Nina Talley:

The American Payroll Association's 2020 edition of the Guide to Successful Electronic Payments provides payroll professionals information they need to successfully implement or improve the electronic pay process at their companies. As you were hearing during this podcast, the nature of electronic payments is changing rapidly, but the APA's Guide to Successful electronic Payments has been updated with the latest information on international payments, on-demand pay, the upcoming edition of new same day ACH processing window later in the day, and the guide also provides all you need to know about direct deposit, third-party payments and pay cards. What's the price for this valuable resource? It's free for APA members, thanks to the sponsorship of rapid! PayCard.

Nina Talley:

APA members receive the 2020 ebook version of the publication as part of their membership benefits. If you're not already an APA member, go to the APA's website at www.americanpayroll.org to join. To get your copy of the guide to successful electronic payments, be sure to choose the membership tab and click on "free eBooks" from the pull down menu of the American Payroll Association's website. Don't get left behind in understanding electronic payments.

Nina Talley:

Now, obviously, there were headaches along the way. What were some of the biggest issues that you encountered as you were writing up the legislation and as you were implementing it?

William Sullivan:

Yeah. And just a quick correction on that. NACHA did not write the legislation. It was written in Congress through close consultation with industry, which we clearly helped consult, but also very close consultation with the White House and the Department of Treasury to ensure that anything contained in the legislation was actually feasible for the IRS and Treasury to do. And they did an amazing job. I mean, I think that's one of the things that sometimes we lose sight on right now, because there's still a handful of payments that have yet to be made. And there were a couple of concerns around pay cards that we'll probably get to later. They got out a lot of payments, over 140 million in a very short period of time. And the last time the federal government had to send any form of economic impact payment was in the early to mid 2000s.

William Sullivan:

And they sent them all by check, and it took over eight weeks to get them all out by check. So they did an amazing job, but yes, there were headaches. And there were lots of headaches. The first, a little story to go along with the first one was when the legislation was being kicked around and everybody assured me that, "Hey, Congress, isn't going to prescribe how the payments are going to be made. They're going to leave that up to Treasury. Don't worry. We're obviously going to use direct deposit." One potential roadblock, and again, this has never been confirmed, but one potential roadblock was that President Trump saw it as an opportunity, if checks were mailed out, to put his signature on those checks and include a letter how the administration was helping America through this time of crisis. And ultimately, the White House acquiesced and the president's signature is only on a handful or 25% of the total checks that were sent out of all the payments with his signature on it.

William Sullivan:

But it was something that we had to remind them, one, about the five million at the time, now seven million, checks that could be cut per week. And the president's signature could potentially be on a check that's arriving to somebody 12 weeks after the legislation was enacted, and that wouldn't look good for him or the administration. And we also reminded them that about five weeks before coronavirus became a household name, I just happened to ask the Bureau of Fiscal Services, "Hey, how much does it cost to actually cut a check, to have that filed, to produce it, to cut and mail a check?" And they said the cost per check was about $1.50 per check. So if you're sending out 160 million stimulus payments times $1.50, that's quite a hit to the United States budget. So really it ended up being a no brainer to use ACH and direct deposit.

William Sullivan:

But we did have a nervous couple of days when we were hearing that they were talking about sending all checks so the president could put his signature on it, but ultimately, the White House acquiesced on that. Now, a couple of other headaches that probably your members and listeners would be able to relate to, because they're all part of a really valuable, really engaged trade association like American Payroll Association, is the communications. The communications that we had with our members and the communications that we had to have with all those areas of government that I mentioned before, the IRS, Congress, Treasury, Fiscal Services, to make sure that any information being disseminated was being disseminated not only accurately, but across the board. Keep in mind, we were in the middle of COVID-19 and NACHA being located just outside of Washington, DC, had made the decision that all but essential workers would be working from home.

William Sullivan:

And quite honestly, we're a 70-person trade association. The essential workers were like four, and everybody else would be working from home. So even though we had great technological capabilities to work from home, we were getting overrun with phone calls and emails and any type of communication you could think of by members that had millions of questions on, "Okay, when am I going to see these payments? What is the file look like? How many checks are going to be cut, because we need to make sure that our branches are going to have money in the branches if everybody comes in and cashes out a check on the same day. Are they going to be sent out by region? Are they going to be sent out by need? What about this operating rule? What about that?" And we really had to go almost all hands on deck with being able to answer questions of our members, but also to government entities and members of Congress that had any kind of concerns or constituent questions along the way.

William Sullivan:

So that was probably the biggest headache for us. A couple others would be still kind of under the communications realm, because the IRS propped this up so quickly, they made the decision that they would use, they would pay anybody who qualified, who had gotten a tax return over the last two years, they would use their account information and routing information to send those payments out. And that's how they got the 80 million the first week out the door so quickly on that. But what we ran into was the communications folks didn't quite understand that process, and kind of pulling back the curtains or a little inside baseball for the listeners today would be when you receive a tax refund, the tax refund's availability is always on a Wednesday. Now some banks, because I'll see them coming in and electronically, they usually come into the bank on a Monday or Tuesday, will make that money available.

William Sullivan:

But really the true availability date of that payment is Wednesday. So they use the exact same descriptor, which is the description in the file for the bank to understand what type of payment it is, and the exact same availability data as they do for tax payments. So one of the problems would be if money was garnished or you didn't quite make that threshold to get the 1200, you maybe made a little bit more money. So again, it was a sliding scale downward. The more money you made, the less money you got in stimulus. You may not recognize that payment. When it came in as the stimulus payment. You may mistake it for a tax refund because the ACH coding said T-A-X-R-E-F for tax refund. And again, it was only because IRS wasn't given enough lead time to make the necessary technical changes in their systems.

William Sullivan:

But also those systems are used to having availability in the file. It says the availability is on a Wednesday. So the Saturday night before Easter, IRS communications went super heavy on social media, saying, "80 million Americans have been paid. They have been paid." But really, what had transpired that Friday and Saturday were the IRS generated those first 80 million ACH files and sent them to Fiscal Services, which again has the pipeline through the ACH to the operators and ultimately the banks. So really those payments hadn't even left the US government yet, but the IRS communications people just didn't know the process. So on a Saturday night before Easter, what you were seeing was bank call centers were overrun with people saying, "Where are my payments? I'm logging on. I don't see my money. Where's my money?" And nobody was ready for it, because everything we had been told was those files would be delivered, but we knew the availability date was on a Wednesday.

William Sullivan:

And luckily, and again, to the credit of the hardworking folks in DC that were responsible for this, I really didn't have that much trouble getting ahold of people within Treasury and people at the IRS to remove all the social media listings after they had been posted. Unfortunately, though, there were tens of thousands of retweets, or sharing on Facebook, sharing on LinkedIn. So the cat was kind of out of the bag, and another kind of inside baseball thing was banks got so many calls and so many hits to webpages that Monday morning after Easter that a lot of them at first thought they were under some sort of denial of service attack or a cyber attack, and their IT people, again, not knowing what was going on, actually temporarily took down those webpages. So if anybody was listening to the podcast, it was like, "Yeah, I tried to go on, I couldn't even get into my bank."

William Sullivan:

That was why, because the numbers were so disproportionately high, banks thought it was an attack on them.

Nina Talley:

Wow.

William Sullivan:

And they shut their systems down out of an abundance of caution.

Nina Talley:

Wow.

William Sullivan:

So those were some of the kinds of headaches that we ran into. There were other more one-off headaches, and this is not a political statement, but often in the world today, if you have a high-ranking official, in this case, the Secretary of Treasury and the President that are in a press conference and having a lot go through their minds, there's a lot of things that they're trying to convey to the country to calm anxiety, to calm the fears, but also to let them know that, "Hey, we're responsible for these payments going out." In one occasion in particular, somebody had asked about what happens if somebody receives a payment for a deceased member of their family, and both Secretary Mnuchin and President Trump said, "Well, they need to return that money."

William Sullivan:

What they didn't realize, though, was all the trade associations, and in communicating to our banks had asked that question weeks before, and we had a legal opinion from Treasury that said, "These are all being vetted by the IRS. No one is to return a payment. If these payments were made, you qualify for these payments."

William Sullivan:

So the President and the Secretary had said that they had to be returned, but didn't offer, as you would expect, any guidance on how to go about returning them. And that set off just a chain of chaos for about 10 days on what do we do with these payments? At the moment, what the federal government is saying, if a deceased member of your family receives a payment, or if you are the surviving spouse and you get, say, the two payments, the $2,400, 1,200 for each, they do want you to mail, I believe via check, money back to the IRS. It is my, and only my opinion, not NACHA's, not a legal opinion, that this is going to be extremely hard to enforce, but I understand why they're saying that, because they can't come back and contradict what the Secretary of Treasury and the President of the United States had said in very public remarks. I believe both were within press conferences, and possibly even reiterated at a cabinet meeting that was recorded and broadcast over whitehouse.gov.

Nina Talley:

Yeah. That's very interesting to hear about how the different gears are moving, and when so many gears are moving so quickly, you just have to go with it and respond, and especially hearing from you about how difficult it is to send out paper checks, I can't imagine that receiving paper checks back is going to be a very easy task. And I appreciate you so much for pulling back the curtain a little bit and sharing that with us. I had no idea, and gosh, that's so interesting. One thing that I heard you touch on just briefly, and I would like to dive in a little bit more, because I heard a lot about it in the news, personally, is garnishments of those checks, and particularly I know that child support payments were an issue, but I would love to hear your thoughts on what garnishments did come out, and then where we see garnishments heading in the future of this type of legislation.

William Sullivan:

Yeah, no, and that's a great question. And it was a hot-button topic, and really it was hot button because the legislation, the CARES Act, didn't specifically address garnishments, but it was clear in the act, and clear of the intent of the act, that it was not a federal benefit payment. This isn't, or wasn't treated like social security payments or any type of benefit payment that the government would be sending out.

William Sullivan:

So those are not subject to garnishment, but a tax refund is. And remember I said that these were treated exactly like tax refunds by the IRS and again, correctly so. This was not a policy mistake, but because of that, they were subject to garnishment. And there were a couple of concerns with that. One, there was concern that the money that it was intended to go to and the people it was intended to help may not see the full value or the full dollar amount of that money if they were garnished.

William Sullivan:

And originally, this was called to my attention from a prominent consumer group speaking on behalf of other consumer groups. And remember, my job as the industry relations guy also means that I do a lot of interacting with consumer groups. And I listened to her concern and got her in touch with all the financial institution trades. And quite honestly, and again, this is kind of pulling back the curtain a little bit, I really wasn't sure how the other trades would react to this, because consumer groups and banking trades don't often share policy issues together and things of that nature. So I was very pleasantly surprised when the financial institution trades said, "We absolutely want to help." And they wanted to help for a couple of reasons. One, it was the right thing to do. Two, because they were telling me, and something, again, I never would have thought of, their call centers were getting overrun with people saying, "Why didn't I get my full amount? Where's my $1,200. How come this is isn't full?"

William Sullivan:

And the call center people can't get into garnishment issues. "Well do you have child support that's in arrears? Do you have this or do you have that?" So it was causing a headache for the financial institution or credit union to explain to their customers why the government sent them the amount of money they did. And then to further compound the issue were a couple of states that were really on the ball with trying to help during the coronavirus payments, or the economic impact payments, they passed their own kind of laws, or the attorney general said, "We will not enforce garnishments. We don't want you to garnish this money. This money should be sent in full to the person it's intended to." So then you had a disparity between states, you had a disparity between laws, and it was a real headache.

William Sullivan:

So I'm happy to say that this prominent consumer group with a couple of very large banking trade associations, so trade associations that do a lot more than say NACHA, which is also a trade association, but we really just focus on electronic payments and the ACH Network. These are more of your larger national trade associations that deal with every facet of banking. We got them, and I'm really proud, because I'm the one who did all the introductions, to team up and to create draft legislative language, run it by Senate and House legal counsel for the House Financial Services Committee and the Senate Banking Committee, run it by the IRS to make sure that everybody could live with this legislative language, and already actually had had it included in a bill in Congress that says, "Going forward, if any of these payments are made in the future, they are to not be subject to garnishment."

William Sullivan:

Now, ultimately, that piece of legislation probably won't go anywhere, but they'll take that piece of legislation, so just imagine just a small piece of the pie, and they'll insert it into a much larger piece of the pie if there is a second round of stimulus payments. So I am pretty confident, given the fact that it's a bipartisan issue, even though Treasury is going to have to do some programming changes with the IRS. We were told yesterday, actually, in kind of a debriefing or a lessons-learned call we had with senior Treasury folks and all the players involved from IRS and Fiscal Services, that it could be done, that those files will be coded in a way they won't be subject to garnishment. And since it was bipartisan, and the consumer groups have signed off on it, and the banks have signed off on it, I can't imagine if legislation moves forward that it would not be included in the legislation and, ultimately, perhaps another law that provides for more economic impact payments.

Nina Talley:

Again, my brain is constantly trying to wrap around the number of institutions that have to work together and agree on things to make these things happen. And thank you for facilitating that. It made my life easier and better. So, we're doing something a little different this month. Because this conversation featured a lot of detailed information about the CARES Act and future economic impact payments, and in order to maintain the integrity of our conversation, we're going to split this terrific episode into two parts. It's important to note that this legislation is ongoing, and as such, some of the information heard here can be subject to change. Make sure you like and subscribe to us on your preferred podcast streaming service. And remember to send us your payroll nightmares to podcasts@americanpayroll.org, or leave us a comment on the APA's Facebook page. We hope you enjoyed the era of payments as policy part one. Tune in next month for part two.

Announcer:

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