



PayrollOrg Participates in D.C. Earned Wage Access Discussion

In May, PayrollOrg attended a stakeholder meeting hosted by the District of Columbia Department of Insurance, Securities, and Banking (DISB) regarding earned wage access (EWA) products and potential regulatory frameworks for EWA use.

EWA programs allow employees to access wages they have already earned before a scheduled payday. Supporters of EWA products have emphasized the role these programs can play in helping employees manage unexpected expenses and avoid higher-cost financial alternatives. On the other hand, regulators and consumer advocates continue to raise concerns about transparency, fee disclosures, and repayment practices.

D.C. discussion

The meeting follows a late 2025 request when the agency formally requested public comments on issues relating to EWA including disclosure standards, fee structures, licensing requirements, consumer protections, employer involvement, and whether EWA services should be regulated as credit products or as a distinct financial service. The discussion included participation from financial technology providers, consumer advocates, employers, and other stakeholders interested in wage payment innovation and consumer protection issues.

The meeting focused on how EWA products operate, including employer-integrated models, direct-to-consumer services, fee structures, disclosures, and consumer safeguards. The discussion was a first step as DISB gathers stakeholder feedback to evaluate whether EWA products should be regulated as a form of credit or through a separate regulatory structure specific to wage access services.

Potential regulations

During the meeting, participants discussed broader employer concerns surrounding EWA products and the ongoing debate over whether EWA should be classified as a loan. Discussions focused on how different regulatory approaches could affect employer participation in EWA programs, potential liability concerns, consumer disclosure requirements, and the impact varying regulations could have on employers offering EWA benefits to employees.

PayrollOrg participated in the discussion to provide insight into payroll administration and the practical considerations employers and payroll professionals face when implementing or coordinating with EWA providers. This follows earlier engagement by PayrollOrg's [Government Relations Task Force](#), which submitted a comment [letter](#) to DISB outlining PayrollOrg's position on employer-integrated EWA (see "[Inside Washington](#)" for May 2026). PayrollOrg emphasized the importance of clear regulatory guidance that recognizes employer-integrated models as non-credit services. PayrollOrg acknowledged ongoing litigation between the District's Attorney General Brian Schwab and direct-to-consumer EWA service providers but did not offer comments as these models do not impact payroll management.

The DC DISB is expected to continue the discussion on EWA regulation at the conclusion of the fiscal year 2027 budget process this fall.