



American Fintech Council Testimony

TO: Minnesota House Committee on Commerce Finance and Policy
FROM: Ashley Urisman, Director-State Government Affairs, American Fintech Council (AFC)
DATE: March 24, 2026
SUBJECT: House File 2874

Position: Support with Amendments

Testimony:

Thank you Co-Chair O'Driscoll, Co-Chair Koegel, Co-Vice Chair Elkins, Co-Vice Chair Perryman, and members of the House Commerce Finance and Policy Committee for the opportunity to submit written comments regarding House File 2874 (HF 2874). We are grateful for your work on this important issue and support the intent and much of the substance of this bill. However, we respectfully request a few minor amendments to ensure that consumers can access this important innovative financial tool without compromising on the protection they deserve.

AFC is a standards-based trade association representing the leading financial technology (fintech) companies, including the largest number of Earned Wage Access (EWA) providers. AFC's mission is to promote a transparent, inclusive, and customer-centric financial system. A core part of our mission is supporting responsible innovation and sound public policy in Financial Services.

EWA is an emerging fintech product that allows workers to access the money they have already earned in a given pay period before their employer's scheduled pay day. With EWA, employees are no longer beholden to arbitrary pay periods and can access their own money on their own terms. EWA providers utilize several different business models: some integrate directly with employers, while some offer EWA as a standalone product directly to consumers, while others offer comprehensive subscriptions that include a suite of other financial wellness products in addition to their EWA service. Because the latter business model includes services that are beyond EWA, AFC asks that the bill be amended to ensure that caps on subscriptions fees paid for and bona-fide non-EWA services be excluded from this bill.

To ensure that EWA providers safely and effectively serve consumers, AFC has established clear standards on what constitutes a responsible EWA product to ensure users remain protected. Our standards require that

- A voluntary no-cost option be made available for all users;
- All potential fees are represented to users clearly and transparently;
- All EWA transactions are “credit invisible,” and do not include credit checks or reporting to consumer credit agencies;
- All EWA transactions are “non-recourse,” and users can cancel their EWA service at any time, meaning it does not have to be repaid
- Users who cancel their EWA service may not be sent to collections, charged interest or late fees, and will not see their credit impacted. Users will simply be locked out of an EWA provider’s services until they repay the outstanding balance.

At this time, EWA remains unregulated in Minnesota. The guardrails set forth in HF 2874 explicitly codify the aforementioned AFC standards and create a licensing framework administered by the Minnesota Commerce Department. This framework ensures that workers in the North Star State can use EWA services with peace of mind. The bill creates an opportunity for both Minnesotans and EWA providers to build a stronger economy in the state.

Thank you again for the opportunity to offer our comments regarding HF 2874.

Sincerely,



Ashley Urisman
Director of State Government Affairs
American Fintech Council