

June 30, 2025

U.S. Department of the Treasury  
1500 Pennsylvania Ave. NW  
Washington, DC 20220

**Re: Comments in response to RFI on the implementation of the President's Executive Order (E.O.) 14247 on "Modernizing Payments To and From America's Bank Account" issued on March 25, 2025**

The National Association of Enrolled Agents (NAEA) appreciates the opportunity to comment on the Department of the Treasury's request for information (RFI) to inform its implementation of Executive Order (E.O.) 14247 on "Modernizing Payments To and From America's Bank Account," issued March 25, 2025.

NAEA represents the interests of nearly 65,000 enrolled agents (EAs) worldwide. We are the leading community for EAs – from aspiring practitioners to experts with decades of experience – serving millions of taxpayers annually. Our organization is uniquely positioned to offer a practical perspective on tax administration. NAEA has long advocated for creating an efficient, customer-centered tax administration system that is taxpayer-friendly and provides robust digital tools for both tax professionals and taxpayers.

The E.O. directs the Secretary of the Treasury to cease issuing paper checks and transition to the use of electronic payments for all Federal disbursements where feasible. Under this E.O., the Treasury would cease issuing paper checks for all Federal disbursements, including intragovernmental payments, benefits payments, vendor payments, and tax refunds. The E.O. orders that, as soon as practicable, all payments made to the Federal Government should also be processed electronically. It also requires the transition to electronic payments for Federal receipts.

NAEA supports the executive order and its goal of promoting electronic modernization by digitizing payments.

The COVID-19 pandemic made things that we already knew quite clear: paper checks are inefficient, susceptible to fraud, and can lead to delays for both taxpayers and the government. Taxpayers' access to funds when receiving checks can be slowed down by mail service and the bank clearing process, and cashing checks can be costly.

While NAEA supports this executive order and the enhancements to technology modernization it provides to the agency, we do have concerns about the accessibility of electronic payments for some populations. There are EAs across the United States with clients who, at times, might lack access to digital services and technology. Many do not have bank accounts. Many people

do not own computers or smartphones and would be left to use public access computers, which pose a risk of identity theft. Examples can include certain geriatric populations and residents of Native American reservations. For those taxpayers, NAEA believes that flexibilities and considerations should be given as the federal government transitions to requiring electronic payments.

NAEA supports the implementation of an improved electronic system that provides a faster, more efficient method of payment for taxpayers and tax collection. However, we urge the Treasury Department to consider those who may not have access to technology when carrying out this executive order. We appreciate your consideration of these comments and welcome the opportunity to discuss these issues further.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer MacMillan EA". The signature is fluid and cursive, with the initials "EA" clearly visible at the end.

Jennifer MacMillan, EA  
President  
NAEA