

SESSION OF 2024

SUPPLEMENTAL NOTE ON HOUSE BILL NO. 2105

As Amended by Senate Committee on Financial
Institutions and Insurance

Brief*

HB 2105, as amended, would create the Kansas Earned Wage Access Services Act (Act) and authorize the Office of the State Bank Commissioner (OSBC) to regulate earned wage access services providers. The bill would establish registration criteria, including annual reporting and business records requirements, as well as assign powers and duties to the State Bank Commissioner (Commissioner), including examination and enforcement, to ensure compliance with the Act. [Note: “Earned Wage Access” is often abbreviated as “EWA.”]

Designation, Applicability, and Definitions (Sections 1-2)

The bill would designate the sections of the bill as the Kansas Earned Wage Access Services Act. The bill would further specify the Act would not apply to a bank holding company regulated by the Federal Reserve, a depository institution regulated by a federal banking agency, or a subsidiary of either the holding company or depository institution that directly owns 25 percent of the common stock.

Definitions

The bill would create several definitions for terminology used in the Act. Among the definitions established in the bill:

*Supplemental notes are prepared by the Legislative Research Department and do not express legislative intent. The supplemental note and fiscal note for this bill may be accessed on the Internet at <http://www.kslegislature.org>

- “Consumer” would mean an individual who is a resident of the state. (Under the bill, a provider may use the mailing address provided by a consumer to determine a consumer’s residency.);
- “Earned wage access services” would mean the business of providing consumer-directed wage access services or employer-integrated wage access services, or both;
- “Consumer directed wage access services” would mean offering or providing earned wage access services directly to consumers based on the consumer’s representations and the provider’s reasonable determination of the consumer’s earned but unpaid income;
- “Employer-integrated wage access services” would mean the business of delivering to consumers access to earned but unpaid income that is based on employment, income, and attendance data obtained directly or indirectly from the employer;
- “Fee” would mean a fee imposed by a provider for delivery or expedited delivery of proceeds to a consumer or a subscription or a membership fee imposed by a provider for a *bona fide* group of services that include EWA services;
 - A voluntary tip, gratuity, or donation would not be deemed a fee;
- “Obligor” would mean an employer or other person who employs a consumer or any other person who is contractually obligated to pay a consumer earned but unpaid income in exchange for a consumer’s provision of services to the employer or on behalf of the employer on an hourly, project-based, piecework, or other basis, and including where the consumer is acting as an independent contractor;

- “Person” would mean any individual, corporation, partnership, association, or other commercial entity; and
- “Provider” would mean a person who is in the business of offering earned wage access services to consumers.

The bill would also create definitions for the terms act, commissioner, director, earned but unpaid income, member, Nationwide Multistate Licensing System and Registry (NMLS), nonrecourse, officer, outstanding proceeds, owner, partner, principal, proceeds, and registrant.

Registration for Persons Engaging in Earned Wage Access Services Business (Section 3)

The bill would require persons engaging in or willing to engage in any EWA services business with a consumer to register with the Commissioner. Such persons would be required to submit a registration application on forms prescribed and provided by the Commissioner. The application would be required to include:

- The applicant’s name, business address, telephone number, and if any, website address;
- The name and address of each owner, officer, director, member, partner, or principal of the applicant;
- A description of the ownership interest of any officer, director, member, agent, or employee of the applicant in any affiliate or subsidiary of the applicant or any entity that provides any service to the applicant or any consumer relating to the applicant’s EWA services business; and

- Any other information the Commissioner may deem necessary to evaluate the financial responsibility, financial condition, character, qualifications, and fitness of the applicant.

Application for, Approval, and Issuance of Registration

The bill would also require the Commissioner to approve an application and issue a nontransferable and nonassignable registration to the applicant once the Commissioner receives the complete application and application fee and determines the financial responsibility, financial condition, character, qualifications, and fitness warrants a belief that the applicant's business will be conducted competently, honestly, fairly, and in accordance with applicable state and federal laws.

Registration Expiration; Renewal; Failure to Issue

The bill would provide the earned wage access services registration would expire on December 31 each year. A registration would be renewed if the person files a complete renewal application with the Commissioner at least 30 calendar days prior to the registration's expiration. The renewal application would be required to contain all information the Commissioner requires to determine the existence and effect of any material change from the information contained in the applicant's original application, annual reports, or prior renewal applications. A nonrefundable renewal fee would also be charged.

The bill would further provide, if the Commissioner fails to issue a registration within 60 calendar days after a filed application is deemed complete, the applicant is permitted to make written request for a hearing. Upon receipt of this request, the Commissioner would be required to conduct a hearing in accordance with the Kansas Administrative Procedure Act (KAPA).

Registration, Processing of; Exceptions to

The bill would also require the Commissioner, no later than January 1, 2025, to prescribe the form and content of an application for registration to provide EWA.

The bill would allow a person who, as of January 1, 2024, was engaged in the business of providing EWA services to continue to engage in this business until the Commissioner has processed the person's application if such person has submitted an application within three months after the Commissioner has prescribed the application's form and content and the person has complied with the Act.

The bill would also provide that the Act's registration requirements would not apply to individuals acting as employees or independent contractors of business entities required to register.

Surety Requirement on Applicants and Registrants (Section 4)

The bill would require each applicant or registrant to file with the Commissioner a surety bond in a form acceptable to the Commissioner. The surety bond would be required to be issued by a surety or insurance company authorized to conduct business in this state, securing the applicant's or registrant's faithful performance of all duties and obligations. The surety bond would be required to:

- Be payable to the OSBC;
- Provide that the bond may not be terminated without 30 calendar days' prior written notice to the Commissioner, that such termination will not affect the surety's liability for violations of the Act occurring prior to the effective date of cancellation, and principal and surety must be and remain liable for a period of two years from the date of any

action or inaction of principal that gives rise to a claim under the bond;

- Provide that the bond shall not expire for two years after the date of surrender, revocation, or expiration of the applicant's or registrant's registration, whichever occurs first;
- Be available for the recovery of expenses, fines, and fees levied by the Commissioner and payment of losses or damages that are determined by the Commissioner to have been incurred by any consumer as a result of the applicant's or registrant's failure to comply with requirements of the Act; and
- Be in the amount of \$100,000.

***Registration Requirements of Registered Providers
(Section 5)***

The bill would subject providers registered in the state ("registrants") to the following requirements:

- A registrant must provide all proceeds on a non-recourse basis and all fees would be treated as non-recourse payment obligations;
- A registrant must develop and implement policies and procedures to respond to questions raised by consumers and address consumer complaints in an expedient manner;
- Before providing a consumer with EWA services, the registrant would be required to inform the consumer of their rights under the agreement, fully and clearly disclose all fees associated with EWA services, and fully and clearly describe how the consumer may obtain proceeds at no cost to such consumer;

- A registrant must inform the consumer of any material changes to the terms and conditions of the EWA services before implementing any changes;
- The registrant must provide proceeds to a consumer via any means mutually agreed upon;
- The registrant must allow a consumer to cancel the use of the provider's EWA services at any time, without incurring a cancellation fee or penalty imposed by the provider;
- The registrant is required to comply with all applicable federal, state, and local privacy and information security laws;
- If a registrant solicits, charges, or receives a tip, gratuity, or other donation from a consumer, the registrant must disclose:
 - To the consumer immediately prior to each transaction that a tip, gratuity, or other donation amount may be zero and is voluntary; and
 - In its agreement with the consumer that tips, gratuities, or other donations are voluntary and that the offering of EWA services is not contingent on whether the consumer pays any, nor the size of, tips, gratuities, or other donations; and
- If a registrant seeks repayment of outstanding proceeds or payment of fees or other amounts owed, in connection with EWA services from a consumer's depository institution, including by means of electronic funds transfer, the registrant must:
 - Inform the consumer when the provider will make each attempt;

- Comply with applicable provisions of the federal Electronic Fund Transfer Act (EFTA) [15 USC 1693 *et seq.*] and any adopted EFTA regulations; and
- Reimburse the consumer for the full amount of any overdraft or nonsufficient funds fees imposed on a consumer by the consumer's depository institution that were caused by the provider attempting to seek payment of any outstanding proceeds, fees, or other payments in connection with EWA services on date before, or in an incorrect amount from, the date or amount disclosed to the consumer (a provider would not be subject to this reimbursement requirement with respect to payments incurred by a consumer through fraudulent or other unlawful means).

Prohibitions and Restrictions on Registrants (Section 6)

The bill would impose certain restrictions and prohibitions on persons registered under the Act, including:

- Compelling or attempting to compel repayment of outstanding proceeds or payments owed by a consumer through civil suit brought against the consumer, use of a third party to pursue collection, use of outbound telephone calls to attempt collection, or sale of an outstanding amount to a third-party debt collector or debt purchaser;
- Charging a late fee, deferral fee, interest, or any other penalty or charge for failure to repay outstanding proceeds;
- Charging interest or finance charges or charging an unreasonable fee to provide expedited delivery of proceeds to a consumer;

- Misleading or deceiving consumers about the voluntary nature of tips, gratuities, or other donations, or making representation that such contributions will benefit any specific individuals if the registrant solicits, charges, or receives these from a consumer; and
- Reporting a consumer's payment or failed repayment of outstanding proceeds to a consumer credit reporting agency or debt collector.

Applicability of Act with State Law (Section 7)

The bill would provide that EWA services provided by a registrant in accordance with the Act shall not be considered to be:

- A loan or other form of credit nor would the registrant be considered a creditor or lender;
- In violation of or noncompliant with the laws of Kansas governing the sale or assignment of, or an order for, earned but unpaid income; or
- Money transmission, nor would the registrant be considered a money transmitter.

The bill would also provide that fees, voluntary tips, gratuities, or other donations paid to a registrant would not be considered interest or finance charges. The bill would further specify that a registrant that provides proceeds to a consumer in accordance with this act would not be subject to provisions of the Uniform Consumer Credit Code (UCCC) in connection with the registrant's EWA services.

Conflict with Law

For any conflict between provisions of this act and any other state statute, the bill would provide that its provisions control.

Annual Reporting Requirement; Confidential Information; Maintenance of Business Records (Sections 8-9)

The bill would require registrants to file an annual report, on or before April 1 of each year, with the Commissioner relating to earned wage access services provided by the registrant in Kansas during the proceeding year.

Confidential Information; Legislative Review; Written Reports

The bill would provide the information contained in the registrant's annual report is confidential and not subject to the Kansas Open Records Act [KORA] (KSA 45-215 *et seq.*). This provision would expire on July 1, 2029, unless the Legislature reviews and acts to continue such exception under KORA.

The bill would require a written report detailing an event and its expected impact on the registrant's business be made to the Commissioner within 15 days of the occurrence of one of the following events:

- Filing for bankruptcy or reorganization by the registrant;
- Institution of a revocation, suspension, or other proceeding against the registrant by a governmental authority that is related to the registrant's EWA services business in any state;
- Addition or loss of any owner, officer, partner, member, principal, or director of the registrant;

- A felony conviction of the registrant or the registrant's owners, officers, members, principals, directors, or partners;
- A change in the registrant's name or legal entity status; or
- The closing or relocation of the registrant's principal place of business.

Failure to Report

The bill would provide that the failure to make any required report to the Commissioner may subject the registrant to a late penalty of \$100 for each day such report is overdue.

Business Records

The bill would require registrants to maintain and preserve complete and adequate business records, including a general ledger containing all assets, liabilities, capital, income, and expense accounts for a period of three years. Additional recordkeeping requirements would include:

- Maintaining and preserving complete and adequate records of each EWA services contract during the contract's term and for a period of five years from the date on which the registrant last provides proceeds to the consumer; and
- Providing records to the Commissioner within three business days of the Commissioner's request or, at the Commissioner's discretion, pay reasonable and necessary expenses for the Commissioner to examine them at the place where such records are maintained. The bill would also permit records to be submitted electronically in a manner prescribed by the Commissioner.

***Registration Denial, Suspension, or Revocation;
Opportunity for Hearing (Section 10)***

The bill would establish criteria in which the Commissioner may deny, suspend, revoke, or refuse to renew a registration if the Commissioner makes such finding, after notice and opportunity for a hearing in accordance with the provisions of KAPA. Among the criteria, the Commissioner could take action if or when:

- The applicant or registrant has repeatedly or willfully violated any provision, any adopted rules and regulations, or any order lawfully issued by the Commissioner pursuant to the Act;
- The applicant or registrant has failed to file and maintain the required surety;
- The applicant or registrant is insolvent;
- The applicant, registrant, or an employee of the applicant or registrant has been the subject of any disciplinary action by the Commissioner or any other state or federal regulatory agency; or
- Facts or conditions exist that would have justified the denial of the registration or renewal had such facts or conditions existed or been known to exist at the time the application for registration or renewal was made.

***Administration of the Act; Powers Granted to
Commissioner (Section 11)***

The bill would authorize the Commissioner to administer the provisions of the Act and would authorize the Commissioner to exercise powers as designated, including:

- Adopting, amending, and revoking rules and regulations as necessary to carry out the intent of the Act;
- Investigating and examining the operations, books, and records of an EWA services provider as the Commissioner deems necessary;
- Establishing, charging, and collecting fees from applicants or registrants for reasonable costs of investigation, examination, and administration of the Act, in such amounts as the Commissioner may determine sufficient to meet the agency's budget requirements;
- Exchanging information regarding the administration of this act with any federal agency or any state that regulates the applicant or registrant or to any attorney general or district attorney with jurisdiction to enforce criminal violations of this act; and
- Requiring fingerprinting of any officer, partner, member, owner, principal, or director of an applicant or registrant. Such fingerprints may be submitted to the Kansas Bureau of Investigation (KBI) and the Federal Bureau of Investigation (FBI) for a state and criminal history record check to be submitted to the OSBC.

Records and Information Release

The bill would also specify the KBI must release all records of adult convictions, adjudications, and juvenile adjudications in Kansas and of another state or country to the OSBC. The bill would provide that state and national history record checks would be considered confidential and subject to KORA and its disclosure and legislative review provisions.

The bill would further specify examination reports and correspondence regarding such reports would be considered confidential and not subject to disclosure provisions of KORA. The Commissioner would be permitted to release examination reports and correspondence in connection with a disciplinary proceeding conducted by the Commissioner, a liquidation proceeding, or a criminal investigation of a proceeding. The bill would further specify actions the Commissioner would be permitted to take in order to conduct examinations, investigations, and proceedings under the Act and also provide for confidential information contained in informal agreements.

Nationwide Multistate Licensing System and Registry

The bill would also require using of the NMLS for processing applications, renewals, amendments, surrenders, and any other activity the Commissioner deems appropriate. The bill would permit the Commissioner to establish relationships or contracts with the NMLS, to report violations of the law as well as enforcement actions to the NMLS, and to require any applicant or licensee to file reports to the NMLS in the form prescribed by the Commissioner.

Violations of the Act; Enforcement Actions (Section 12)

The bill would also prescribe enforcement actions the Commissioner could take in the event the Commissioner determines, after notice and opportunity for a hearing pursuant to KAPA, that a person has engaged, is engaging in, or is about to engage in an act or practice constituting a violation of any provision of this act, adopted rules and regulations, or issued order. These actions would include requiring:

- The person cease and desist from the unlawful act or practice;

- The person pay a fine not to exceed \$5,000 per incident for the unlawful act or practice and further, in the instance such violation is committed against elder or disabled persons (as defined in consumer protection law), the Commissioner may impose an additional penalty not to exceed \$5,000 for each violation in addition to any other civil penalty provided by law;
 - The bill would specify that any collected fines and penalties associated with the above violations must be designated for use by the Commissioner for consumer education;
- The person pay restitution for any loss arising from the violation or requiring the person to disgorge any profits arriving from such violation;
- The person take such action as in the judgment of the Commissioner that will carry out the purposes of this act; and
- The person be barred from subsequently applying for registration under this act;
 - The bill would further specify actions that could require issuance of an emergency cease and desist order and notification requirements, including an opportunity for a hearing.

***Failure to Obey a Subpoena; Permissible Actions
(Section 13)***

The bill would also establish requirements for cases of failure or refusal to obey a subpoena and would permit a court to issue an order requiring a person to appear before the Commissioner or the Commissioner's designee. Failure to appear could be punished by the court as contempt of court. The bill would further specify that no person could be excused from attending, testifying, or producing any

document or record before the Commissioner or in obedience to the subpoena or any proceeding initiated by the Commissioner.

***Criminal Penalties; Intentional Violations of the Act;
Actions in District Court (Sections 14-15)***

The bill would state it is unlawful for any person to violate the provisions of, any rules or regulations adopted under, or any order issued under the Act. A conviction for an intentional violation would be a Class A nonperson misdemeanor. A second or subsequent conviction would be a severity level 7 nonperson felony.

The bill would permit the Commissioner, Attorney General, or a county or district attorney to bring an action in a district court to enjoin any violation of this act or rules and regulations adopted thereunder.

Fees Collected by the Commissioner (Section 16)

The bill would provide that all fees collected by the Commissioner would be subject to the provisions requiring 10.0 percent of fees collected be deposited to the credit of the State General Fund (SGF).

Background

The bill was introduced by the House Committee on Financial Institutions and Pensions at the request of a representative of EarnIn.

House Committee on Financial Institutions and Pensions

In the House Committee hearing on January 30, 2023, a representative of EarnIn provided **proponent** testimony, describing its business as an Earned Wage Access (EWA)

provider, which gives customers access to their earnings as they are earned and before they are paid. The conferee stated access to “pay-on-demand” reduces financial anxiety by allowing individuals to spend, transfer, and save their money as they choose. The conferee outlined EarnIn’s presence in Kansas (more than 22,000 unique users) and noted EWA is currently unregulated in the state and its business model does not fit easily into existing regulatory frameworks. The conferee noted the bill provides the framework that protects consumers and gives businesses certainty to invest and grow, regardless of EWA business model.

Representatives of Payactiv, an EWA provider, and Kansans for Payday Loan Reform provided neutral testimony. The Payactiv representative encouraged amendments to the bill to split regulation of the two different EWA models – the employer integrated earned wage access model and the direct-to-consumer advance model, given the differences in how these models operate. Written-only neutral testimony submitted by the Office of the State Bank Commissioner (OSBC) noted concerns with the bill, as introduced, and support for an amendment that was to be offered by the proponent.

Opponent testimony was provided by a representative of DailyPay, Inc., (employer-integrated EWA provider) who noted Kansas would be the first in the country, if the bill is enacted, to have an earned wage access services law. The conferee shared concerns about the need to include the entire industry within the scope of regulation and addressed changes needed in the bill, as introduced, including the licensing criteria, different standards to govern the various EWA models, and clear disclosure requirements for all fees.

On February 8, 2023, the House Committee adopted several amendments incorporating recommendations from the OSBC, in consultation with other parties to the bill. The amendments incorporate the business models associated with the provisions of EWA services. The amendments also:

- Add and clarify existing defined terms;
- Update the registration expiration date;
- Increase the surety requirement from \$25,000 to \$100,000;
- Remove language applicable to finance charges and specific lending act requirements;
- Clarify information required to be contained in a registrant's written report following certain reportable events and reduce the filing requirement timeline from 30 days to 15 days;
- Modify the powers assigned to the Commissioner to clarify an access requirement and add additional requirements regarding information obtained from fingerprinting and criminal history record checks; and
- Increase, from \$2,000 to \$5,000, the per incident fine maximum on persons committing an unlawful act or practice and the fine maximum associated with violations committed against elders or disabled persons (as defined in consumer protection law). Further, any fines collected for either of these violations would be required to be designated for the purpose of consumer education.

On February 23, 2023, the bill, as amended by the House Committee, was withdrawn from the House Calendar and referred to the House Committee on Appropriations. On March 1, 2023, the bill was withdrawn from the House Committee on Appropriations and rereferred to the House Committee on Financial Institutions and Pensions.

On March 13, 2023, the House Committee recommended further amendments to the bill. The amendments clarify the term "commissioner" to mean only

the State Bank Commissioner, add a disclosure requirement on the registrant regarding changes to the terms and conditions of the EWA services, remove language pertaining to compliance with National Automated Clearinghouse Association rules, modify participant cancellation provisions, remove disclosure requirements relating to nonpublic personal information, and remove language regarding applicability to the Uniform Consumer Credit Code.

Senate Committee on Financial Institutions and Insurance

In the Senate Committee hearing on February 8, 2024, representatives of EarnIn and Daily Pay, Inc., provided **proponent** testimony outlining the need for separate and distinct regulation of EWA in Kansas and efforts to work with regulators, EWA providers, and other stakeholders to craft model legislation to fit all EWA business models. Written-only proponent testimony was submitted by representatives of the American Fintech Council and the Chamber of Progress.

In the Senate hearing, a balloon amendment to the bill, as it passed the House, was distributed and discussed.

A representative of the OSBC appeared as an **opponent** to the bill, as it passed the House. The conferee indicated if the balloon amendment was adopted, the agency would take a neutral position on the bill, provided certain provisions in the amendment were retained.

The Senate Committee adopted several amendments, including technical and clarifying language. The amendments would also:

- Add language to clarify the Act would not apply to certain financial institutions (section 1);
- Modify several definitions of terms including “Commissioner”, “consumer directed wage access

services”, “earned but unpaid income”, “earned wage access services”, “obligor”, “outstanding proceeds”, and “person”; replace the definition of “employer-integrated wage access services”; restore a definition for “nationwide multistate licensing system and registry”; remove definitions (and references to, throughout the bill) for “mandatory payment” and “non-mandatory payment”; and add definitions for “fee”, “member”, and “principal” (section 2);

- Update provisions to include reference to principals; remove language requiring application and renewal fees to be established by rules and regulation and change the expiration date of a license from April 30 to December 31; require the Commissioner to prescribe the application form within six months, provide for registration for persons engaged in EWA services, and exempt from registration requirements individuals acting as employees or independent contractors of business entities required to register (section 3);
- Update provisions from reference of non- and mandatory payments to fees; clarify and reorganize specified criteria for information to be presented to a consumer before providing EWA services; and include new criteria relating to cancellation, compliance, disclosure, and repayment (section 5);
- Replace a prohibition on the imposing of a mandatory payment on a consumer with a prohibition on compelling or attempting to compel repayment and identifying those means of repayment; adding deferral fee to prohibited charges for failure to repay outstanding proceeds; remove three prohibitions pertaining to offering EWA services and insert five prohibitions, including charging interest or an unreasonable fee and misleading or deceiving consumers about the

voluntary nature of tips, gratuities, or other donations (section 6);

- Replace language stating non-mandatory payments paid by a consumer to the registrant would not be considered finance charges with provisions stating EWA services: would not be considered a loan or money transmission, fees would not be considered interest or finance charges, and registrants would not be subject to the UCCC; provide the new Act's provisions control when in conflict with other state law (section 7);
- Add member and principal to one of the events required to be reported by registrants and add member to another reported event, felony conviction (section 8);
- Add clarifying language to reference applicable federal law as it applies to record keeping (section 10) and add language to include the attorney general or district attorney general in provisions applying to enforcement of criminal violation in the administration of this act (section 11);
- Update fingerprinting requirements to include member, owner, and principal and modify background check provisions to require a request be submitted to the Commissioner and replace language pertaining to the Commissioner's authorization and receipt of checks from a private entity with a provision allowing KBI records be released to the OSBC; update legislative review provisions from July 1, 2028, to July 1, 2029 (section 11); and
- Add a requirement for use of the NMLS or registry for processing applications, renewals, amendments, surrenders, and other activity; permit contracts with, reporting violations of the law and

other actions, and requiring filing of reports by applicants and licensees with the NMLS (section 11).

Fiscal Information

According to the fiscal note prepared by the Division of the Budget on the bill, as introduced, the OSBC indicates it would require an additional 1.0 FTE position for an Examiner, at a cost of \$70,200 from the Bank Commissioner Fee Fund for salaries and wages and an additional \$1,200 for information technology licenses and other operating expenses for FY 2024. Any fees collected under the bill would be remitted to the State Treasury with 10.0 percent credited to the SGF, and the remaining balance would be credited to the Bank Commissioner Fee Fund. However, the OSBC cannot estimate the amount of revenues the bill could generate.

The Kansas Sentencing Commission estimates enactment of the bill could have an effect on prison admissions, bed space, and workload; however, it anticipates any fiscal effect to be negligible. The Kansas Department of Corrections indicates the bill would have no fiscal effect. The Office of Attorney General indicates that costs associated with any increase in cases or complaints as a result of the bill's enactment would be absorbed within existing resources. The Kansas Judicial Branch indicates the bill would increase the number of cases filed in district courts because the bill would allow court actions to be filed to enforce the Act and the bill would create a new crime. The bill could result in the collection of additional docket fees, fines, and supervision fees, most of which would be deposited in the SGF.

The Kansas Association of Counties indicates that the fiscal effect of the bill would be negligible unless the number of violations would require additional court and staff time than could be absorbed within counties' current resources.

Any fiscal effect associated with the bill is not reflected in *The FY 2024 Governor's Budget Report*.

Financial services; Kansas Earned Wage Access Services Act; earned wage access services; EWA; State Bank Commissioner; fees; rules and regulations