

# Earned Wage Access and Direct-to-Consumer Advance Usage Trends

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## Executive Summary

Persistent lack of liquidity is among the many financial health challenges faced by consumers in the United States. Over the past decade, new financial products have emerged to assist consumers in meeting these liquidity challenges. Earned Wage Access (EWA) and Direct-to-Consumer (D2C) Advance products are designed to help close the gap between a consumer earning wages and accessing their paycheck. Broadly speaking, EWA providers partner with an employer or payroll system to gain insight into earned wage or projected earned wage information, and provide a means for consumers to access those wages before payday or the day funds are accessible. D2C providers work directly with consumers and connect to their bank accounts to observe inflows and outflows, providing a certain amount of liquidity, upon request. There is a spectrum of EWA and D2C Advance models. As this space has grown, various models have emerged and there are variations on how these products are offered.

Thus far, there has been little insight into how consumers use these products. As a step forward in understanding how consumers use EWA and D2C Advance products, and the impact these products have on financial health, the Financial Health Network partnered with a handful of EWA and D2C providers who provided individual and anonymized usage data. These data include transactional details, such as when advances were taken and recouped, the amounts users advanced, if companies were able to recoup the advances, and the costs users paid to use the advance.

Based on its analysis of this data, the Financial Health Network made the following observations:

- Most consumers used EWA and D2C Advance products consecutively over varying periods of time.
- Advances were recouped successfully at least 97% of the time.
- The cost to use an advance was typically less than 5% of the advance amount, but the cost over time can vary based on the company's fee model and individual usage patterns.

While these findings cover datasets from just a handful of companies, and additional research is certainly needed to draw firmer conclusions, this research does shed light on key aspects of EWA and D2C Advance usage. Further research is needed to explore the implications of consumers' consecutive use of such products in order to better understand whether EWA and D2C Advance products help consumers build resilience and pursue opportunities. Additionally, this research highlights the imperative for providers to price responsibly and design recoupment in a way that is not burdensome to consumer financial health. Accordingly, additional research partnerships, with an emphasis on financial health measurement between nonprofits, fintechs, and employers, will be integral for better mapping and understanding the opportunities that EWA and D2C Advance present.

## Background on Earned Wage Access and Direct-to-Consumer Advance

### *User Demand*

For many U.S. workers, the time between earning and being able to access their wages can create financial distress. Only one-third of private-sector employers pay their workers on a weekly basis, while over 60% are paid on a biweekly or semi-monthly basis, and 5% are paid even less frequently.<sup>1</sup> Some workers have a cash buffer in their checking account or liquid savings to help tide them over if their pay schedule does not line up with their expense payments (e.g., a bill due date). However, one in five families has less than two weeks of liquid

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<sup>1</sup> “[Length of pay periods in the Current Employment Statistics survey](#),” U.S. Bureau of Labor Statistics, 2019.

savings.<sup>2</sup> Bills and expenses can be due prior to payday, or unexpected expenses can come up that require immediate payment. This leads many consumers to seek out financial products that will provide them immediate liquidity for short-term needs, overdraw their accounts, defer payments, and risk incurring late fees.

Many of the options available to consumers to deal with liquidity crunches come at a steep cost. Consumers have used some of the following products to provide some form of small dollar liquidity when they're in a cash crunch:

- **Overdraft:** Many financial institutions will cover a transaction made by a consumer that exceeds the available funds in their account and then charge an overdraft fee. Given that the median overdraft is triggered by a transaction of \$50, but usually costs around \$35 per transaction, and that more than half of all overdrafts are repaid in three days, this could be viewed as a very high-cost form of credit.<sup>3,4</sup> Consumers spent an estimated \$12.4 billion on overdraft fees in 2020.<sup>5</sup>
- **Payday and Single Payment Vehicle Title Loans:** These are high-cost loans for amounts ranging from \$100 to \$1,000 that typically require a single balloon payment at the end of a two-week or one-month term. They typically cost \$15 per \$100 borrowed for two-week payday loans and \$25 per \$100 borrowed for one-month vehicle title loans. Given the extremely short payback period, four in five payday loans are either rolled over or renewed within 14 days, which often results in prolonged cycles of debt.<sup>6</sup> Vehicle title borrowers have similar outcomes.<sup>7</sup> Consumers spent an estimated \$4.6 billion on payday loans in 2018.<sup>8</sup>
- **Pawn Loans:** These are non-recourse loans securitized by a pledged good, which the lender returns once the loan is repaid. Loan terms are typically 30 days. Loan sizes are a percentage of the assessed value of the good and typically range from \$75 to \$100. Interest rates vary by state and are between 2% and 25% per month.<sup>9</sup>

<sup>2</sup> “[Insights from the Making Ends Meet Survey](#),” Consumer Financial Protection Bureau, 2020.

<sup>3</sup> “[Data Point: Checking account overdraft](#),” Consumer Financial Protection Bureau, 2014.

<sup>4</sup> Requirements for overdraft services can be found here:

<https://www.consumerfinance.gov/rules-policy/regulations/1005/17/>.

<sup>5</sup> “[The FinHealth Spend Report 2021](#),” Financial Health Network, to be released April 2021.

<sup>6</sup> “[CFPB Data Point: Payday Lending](#),” Consumer Financial Protection Bureau, 2014.

<sup>7</sup> “[Single-Payment Vehicle Title Lending](#),” Consumer Financial Protection Bureau, 2016.

<sup>8</sup> “[Payday, Vehicle Title, and Certain High-Cost Installment Loans Final Rule](#),” Consumer Financial Protection Bureau, 2020.

<sup>9</sup> Cartner & Skiba, “[Pawnshops, Behavioral Economics, and Self-Regulation](#),” Vanderbilt University Law School, 2012.

## Market Evolution

Generally speaking, EWA providers allow consumers to access a certain amount of their earned wages prior to a payday and recoup that amount by deducting it from a consumer's subsequent paycheck. D2C providers typically observe inflow and outflow patterns in a consumer's bank account and provide a certain advance amount based on those patterns, upon the consumer's request.<sup>10</sup> The provider will then recoup that amount from the consumer's subsequent account inflow, or on a scheduled date. EWA and D2C providers disburse advances via direct deposit or onto a debit card or digital wallet through a partner financial institution.

Providers earn revenue in a number of ways. Some EWA providers offer their service at no charge to the consumer, earning revenue instead through other sources, including fees paid by the employer and interchange on debit cards through which advances are delivered. Other EWA providers charge the consumer a periodic fee or a periodic fee only during periods in which a consumer uses the service. Some EWA providers charge a transaction fee for each advance. In some cases, both the employer and the consumer will share the cost, or the employer will subsidize some or all of the consumer's fee. D2C providers will charge a periodic fee, a fee-per-use, or invite the consumer to pay a voluntary fee. Some charge both a periodic fee and transaction fee and/or invite the consumer to pay a voluntary fee.

While these models have only emerged within the last 10 years, EWA and D2C Advance platforms have quickly gained widespread attention and the landscape of providers has grown tremendously. While initially the companies entering the space were early-stage startups, the types of providers offering EWA and D2C Advance products have become increasingly diverse, and now include HR platforms and established financial services incumbents.

One industry analyst estimates that nearly 55.8 million EWA totaling \$9.5 billion were facilitated in 2020. This compares with 37.2 million EWA totaling \$6.3 billion in 2019, and 18.6 million EWA totaling \$3.2 billion in 2018.<sup>11, 12</sup> As more EWA providers enter the market, employer benefits providers, financial wellness platforms, and payroll platforms have begun to incorporate EWA products as a feature.

EWA and D2C companies operate in a variety of models, and there is a wide variation in how companies offer products within those models. We have developed two broad categories of providers:

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<sup>10</sup> Some D2C providers will request a pay stub or wage information and use a risk algorithm to predict earnings.

<sup>11</sup> ["Making Ends Meet: On-Demand Pay and Employer-Based Loans,"](#) Aite Group, 2021.

<sup>12</sup> Financial Health Network was unable to acquire market sizing data for D2C providers.

1. **Employer and Payroll-Integrated EWA Providers:** Providers partner with an employer or payroll processor to integrate with, or otherwise receive information from, the employer's payroll system, to allow "early access" to wages a consumer has already earned.

The portion of earned wages that can be accessed is determined by the employer or provider. When a consumer requests an advance, the money is disbursed to the consumer, subject to whatever maximum the employer or provider has established. This advance is repaid through the consumer's next paycheck, which is reduced by the advance amount. The fees for this service are sometimes covered by the employer, the employee, or a mix of the two. Based on current players in this space that charge the consumers a fee, monthly employee subscription fees range from \$5 - \$10/month and individual transaction fees range from \$1 - \$5.<sup>13</sup> Some employers subsidize some or all employee fees.

The amount of the transaction fee may vary depending on the method of disbursement selected by the employee. Some providers partner with a card network (such as Mastercard or Visa) to direct deposit consumers' earned wages onto a debit card. In this case, the provider may not charge the employer or the consumer any fees, but earn revenue from the interchange fees. Some HR and payroll platforms that work with employers to provide products such as time tracking, benefits information, employee portals, pay stubs, and other personnel resources, also offer EWA as an additional product. The cost of the EWA is typically folded into the cost of using the HR or payroll platform.

2. **D2C Providers:** Providers connect to the consumer's bank account to monitor cash flow and paydays, or will offer a digital bank account through a partner financial institution. Some providers will use a third-party service to view transaction data.

A consumer can request an advance (advance amounts vary by company practices and consumer-provided wage information). If the request is approved, the advance is disbursed to the consumer's bank account. The advance amount is repaid through an electronic debit from the consumer's bank account upon their next deposit, or on a scheduled date. In addition, some companies offer an overdraft avoidance advance. If a consumer appears likely to overdraft, or if their bank account balance drops below a certain amount, the provider may prompt the consumer to request an advance if a consumer has opted in for that product feature. Advance amount restrictions vary by company, and some are determined by a consumer's deposit data.

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<sup>13</sup> See Appendix for a table of existing providers and costs.

Consumers pay for this product through a monthly subscription fee, a fee per transaction, a voluntary fee amount, or a hybrid of a subscription fee plus a per-transaction or voluntary fee. For companies that charge a subscription fee – which in some cases is folded into a broader suite of products – these fees can range from \$1 - \$9.99 per month. Companies that charge a transaction fee typically charge \$1 - \$5.<sup>14</sup> The size of the transaction fee can vary depending upon the means of disbursement chosen by the consumer.

Some providers also offer a suite of products that includes EWA or D2C Advance, and fees for advances are included in a membership fee. Some offer other products on a non-fee basis. Products that are offered additionally or on a non-fee basis can include financial counseling, financial planning, credit-building tools, and savings tools. Some of these companies have noted that the financial health impacts of EWA and D2C Advance cannot be assessed as a standalone product and should be viewed in the context of the other products they offer.

### Modern-Day Payroll Systems

One of the main drivers of EWA and D2C Advance demand is that consumers do not receive their wages in real time or experience a delay between payday and being able to access pay. With innovations in payroll and accounting technology, such as direct deposit and the marked shift from cash to electronic transactions, many are considering why it is still the case that a majority of employers continue to pay in intervals rather than in real time, especially for those in financially vulnerable positions.

Some advocates maintain that the modern U.S. payroll system allows employers to essentially receive labor and services from employees for free for up to two weeks to one month, while employees wait on receivables owed.<sup>15</sup> They argue that employers are effectively taking out zero-interest loans from employees who are lending their labor until they are paid.

Alternatively, many employers choose to pay their employees at regular intervals because of the administrative costs and burdens, such as payroll processing, ensuring accuracy, managing cash flow, and varying state tax requirements. Converting to a system that would pay employees in real time would require significant time, planning, and investment in technology and resources. Additionally, some Human Resources critics of EWA and D2C

<sup>14</sup> *Ibid.*

<sup>15</sup> “[You’re Giving Your Boss a Loan](#),” NPR, 2019.

Advance have argued that receiving pay on-demand could hurt consumers financially because they may not learn to budget and plan for long-term purchases.<sup>16</sup> Receiving pay in regular intervals could help consumers track expenses and budget for short- and long-term expenses.

A different view entirely is that this is a product of cultural inertia – i.e., employers have been taught how to structure their business a certain way and have maintained their business models as such.

## Research Initiative

While EWA and D2C Advance programs have gained increasing public attention, relatively little is known about how these products are actually used by consumers. To address this information gap, we worked with a sample of EWA and D2C companies that shared datasets with details on usage that we could analyze. For this study, four companies provided usage data to the Financial Health Network.

This small sample of companies is not intended to be representative of all companies that offer EWA and D2C Advances. Nevertheless, this initiative aims to provide a profile or usage patterns across a number of companies that can help inform understanding of these products.

### *Methodology*

Two EWA and two D2C Advance companies provided the Financial Health Network with datasets of de-identified records covering a period of at least 12 months. The data linked all activity for any given de-identified individual during that period. Each of the companies has a unique model in terms of how they structure their product (advance amount limits, repayment period, and limits on frequency of uses), cost and pricing schemes, and the additional products they offer.

The sample companies' datasets also varied in the number of users, advance transactions, and the time range covered. In total, the Financial Health Network analyzed 7,405,557 individual D2C Advances taken by 286,883 users and 453,945 EWA Advances from 56,516 users.<sup>17</sup> Each company provided data on all advances taken within at least one year and covered advances taken until January 2020. Some companies provided datasets longer than one year, but all datasets overlapped in the year 2019. The longest time range provided was four years

<sup>16</sup> “[Why on-demand pay is in demand](#),” Human Resource Executive, 2019.

<sup>17</sup> Note that not all users took the same amount of advances.

and the shortest was one year. Analysis was conducted on all of the data that each company provided. Additionally, the datasets reflected all of the states in which the companies operated.

The Financial Health Network examined the following variables for each advance:

- **Customer ID (anonymized):** Each individual advance was attached to a customer ID, which belonged to the user that took the advance. The customer IDs were unique to each company and user.
- **Advance amount:** The dollar amount of each individual advance taken.
- **Date disbursed:** The date that the company made the advance available to the user.
- **Recoupment date:** The date the company debited the advance amount from a user's bank account or the date the company deducted the advance from the user's paycheck.
- **Cost/Fee:** The amount a consumer paid to use the service. This could be in the form of a monthly (or periodic) subscription fee, transaction fee, or voluntary tip amount for each advance or some combination of these.

### *Caveats & Limitations of Data*

We conducted analysis to make findings on usage, but were limited by certain factors:

- The datasets only included information with respect to users. We did not have information regarding nonusers and could not compare across the two groups.
- The datasets did not include payroll information, so we had no insight into how often users were paid or if pay-periods were consistent. In place of this, we divided the observations into semi-monthly calendar months to examine frequency of usage and consecutive use. All companies indicated that some of their users are not paid at a typical bi-weekly pay schedule, and some may be gig-economy workers who are not paid at a regular cadence. This added a layer of complexity when assessing frequency and consecutive use. Additionally, we were unable to see earnings during periods in which an advance was taken from an EWA company, or cash inflows preceding a period in which an advance was taken from a D2C company. As a result, we were unable to analyze how the size of advances compared with the amount that could have been advanced or to income inflows generally.

- The datasets did not include eligibility information, so we did not know when users became eligible to use the product or if they became ineligible at some point. As a result, we were unable to determine whether any period during which a user did not receive an advance reflected either a choice by the consumer not to seek an advance or a lack of eligibility.
- We did not have insight into how the workplace promoted the product or restrictions employers put in place on usage.
- The companies offered EWA or D2C Advance as part of a suite of other products. This report only looks at the EWA and D2C Advance product usage.

Some of the companies that participated may have since changed their product offerings or policies after the time range in which the data was provided. Some of the companies may also have changed their pricing models or lowered their pricing since the time of our study. The observations are only reflective of advances taken in the time range provided.

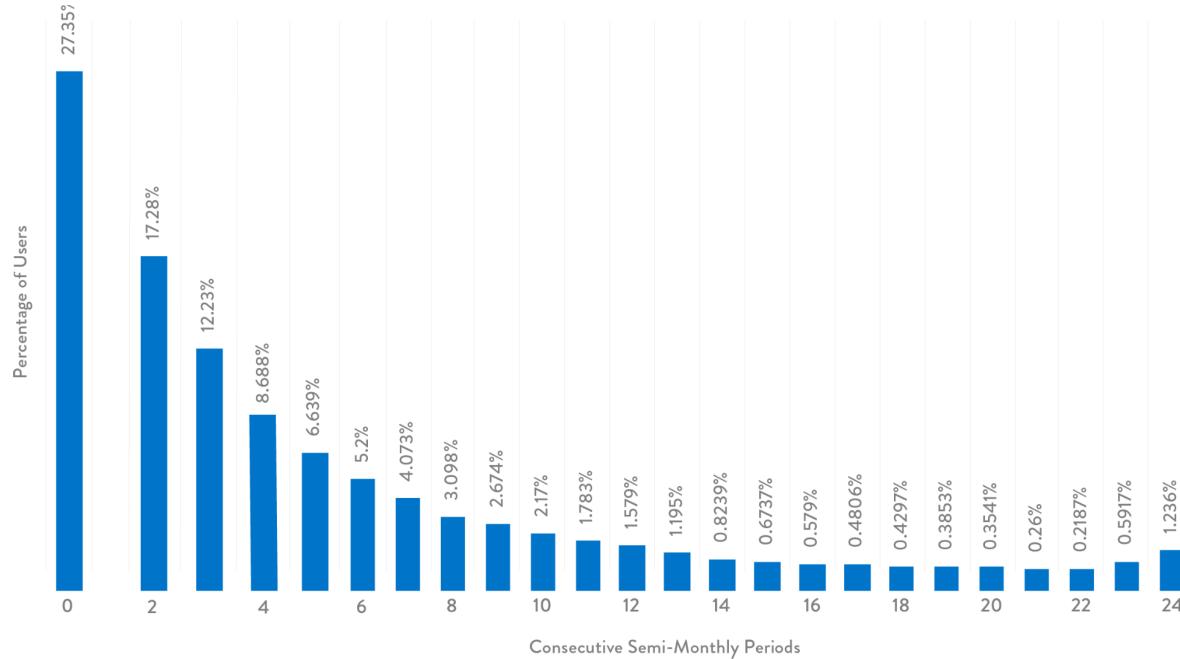
## Findings

### *Advance Usage Patterns*

Our analysis indicates that most users do not take advances on single occasions, but take two or more advances consecutively across several semi-monthly periods and generally over two months. Across all companies, more than 70% of users took advances in consecutive semi-monthly periods in one year of observed time. The lengths of consecutive use differed by company and user. The average length of time users took advances consecutively was just over two months (4.66 semi-monthly periods), and the median was 1.5 months (three semi-monthly periods).

In addition, 10% of users took advances consecutively for at least five months (10 semi-monthly periods) and 1% of users took advances consecutively for a year (24 semi-monthly periods). Over half of customers who took advances consecutively advanced about the same amount each time they advanced.

### Number of Consecutive Semi-Monthly Periods with Advances



Our research showed that 30% of users took advances in every semi-monthly period between their first and last advance during the period covered by the data. On average, these users took advances for three months (6.4 semi-monthly periods). The median length of use by these users was two months. The average and median user took advances consecutively on one occasion. The top 10% of active users took advances consecutively on two separate occasions.

Users of one company took advances consecutively for longer periods of time than the other three companies. Users of this company took advances consecutively for an average of five months, and 10% of the users of this company took advances consecutively for at least 10 months.

**Note:** The number of consecutive advances, the number of consecutive uses between the first and last advance, and the number of discrete usage occasions could be affected by a loss of eligibility, such as loss of employment or a decision by a company not to provide further advances. Similarly, for companies charging a subscription fee, eligibility may have ended as a result of a decision by the user to cease paying the fee. As noted previously, we are not able to observe any of this with the existing data.

## Advance Amounts

The amount users typically advanced varied by company. The EWA companies both permitted employees to advance up to 50% of their earned wages, so differences in advance amounts were determined either by wage amounts or by the amount users chose to advance. The two D2C companies had different policies with respect to the maximum amount a user could advance (one company set a flat amount and the other varied the amount by user) so that differences in advance amounts may be attributable to these policies, to the size of cash inflows into the users' accounts, and/or the choices of the users. Across the companies, the average amount advanced was \$120. For each individual company, average advance amounts ranged from \$78 to \$165 and median advance amounts ranged from \$100 to \$140.<sup>18</sup>

## Recouptment Trends

Advances were successfully recouped at least 97% of the time. Companies recouped advances through their integration with a payroll system or by debiting a user's bank account. Users of all companies had the option to stop or delay the recoupment for any reason. This required proactive action from the user. In some cases, companies were unable to recoup if a user had lost their job, closed their account, or blocked the payment. Across all of the companies, the rate at which a company was "unable to recoup" was 3% or less.

## Costs by Model

Companies employed one of the following fee structures:

- A voluntary fee per individual advance, in which users had the option to pay or not pay a fee, and could choose the amount
- A periodic subscription fee, in which users paid the same periodic fee regardless of whether an advance was taken during the particular time period, though some companies limited the number of advances a user could take to one per pay period
- A set fee users paid during the pay periods in which they took an advance

To calculate the cost to users for these products, we divided the average number of advances and the average amount advanced in a month by the average fee paid in that month. Using this methodology, the average amount a user paid per advance was \$2.59 - \$6.27 across the companies. As a percentage of advance amount, the cost was 2.57% - 4.69%.<sup>19</sup> These costs are significantly less than the costs for some of the alternative products discussed above.

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<sup>18</sup> Amounts reflect individual advances.

<sup>19</sup> One or more of the companies altered their pricing models or lowered their pricing after the time range in which the data was provided, so the current mean fee % of advance amount and mean cost per advance may be lower.

Company	A	B	C	D
Mean fee % of advance amount	3.46%	4.08%	2.57%	4.69%
Mean cost per advance	\$2.59	\$4.42	\$3.00	\$6.27

Depending on factors such as the fee model used, restrictions on the number of advances a user could take, and usage, the total cost over the course of a given period of time could vary. Below are a few possible total costs based on usage. The scenarios assume that the voluntary amount paid is \$4.07 and that companies do not restrict the number of advances users can take.<sup>20</sup>

Voluntary fee	\$10 monthly subscription	\$5 monthly subscription
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*User takes one advance every semi-monthly period*

Cost per advance	\$4.07	\$5	\$2.50
Monthly cost	\$8.14	\$10	\$5
Total cost for six months of usage	\$48.84	\$60	\$30
Total cost for one year of usage	\$97.68	\$120	\$60

*User takes three advances every semi-monthly period*

Cost per advance	\$4.07	\$1.67	\$0.83
Monthly cost	\$24.42	\$10	\$5
Total cost for six months	\$146.52	\$60	\$30
Total cost for one year of usage	\$293.04	\$120	\$60

<sup>20</sup> \$4.07 was selected in this scenario because it is the mean of the “mean cost per advance” for the four companies.

As this illustrates, the voluntary payment model can be more or less expensive than the fixed-fee model, depending on the number of advances the user takes, and the size of the voluntary payment relative to the subscription fee. This illustration also assumes that the customer chooses to pay the same amount with each advance – or pay a fee at all.<sup>21</sup> Additionally, if a consumer chooses to take no advances, under the fixed-fee model, the customer would still incur a cost.

## Additional Research Opportunities

The findings of this analysis allow us to make observations about usage patterns, recoulement trends, and the cost of using EWA and D2C Advance. These findings leave open a set of further research questions about the reasons consumers use EWA and D2C Advance, the uses to which they put the money advanced, and the extent to which EWA and D2C Advance contributes to overall financial health. Potential future research and questions to explore include:

### *Understanding Consumer Needs Based on Usage Patterns*

Consumer usage patterns indicate that EWA and D2C Advance have become staples in the financial lives of some of the consumers who use them. Understanding how that regular usage may reflect factors such as income gap issues (expenses exceeding income) or other financial challenges would be informative. Specifically, further research can help understand the extent to which EWA and D2C Advance help consumers and employees bridge short-term challenges or meet their financial goals in a way that is positive for financial health in the medium and long term. Similarly, it would be informative to see the extent to which EWA and D2C Advance reduce the need for consumers to rely on more costly products, especially those which have been shown to lead to a cycle of indebtedness. This may also help understanding of whether consumers use multiple liquidity products simultaneously or are using EWA or D2C Advance to fulfill the obligation of another EWA or D2C Advance.

### *Examining Recoulement Practices*

Across all companies, we saw that advances are almost always successfully recouped. Though companies employ various practices that allow consumers to select recoulement dates or delay or stop recoulement, all companies recoup through access to a consumer's bank account or payroll system. The consumer does not need to take action to ensure recoulement.

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<sup>21</sup> The majority of customers in the dataset opted to pay a voluntary fee.

Future research could explore how recoupment practices impact other payment choices that a consumer makes, such as expenses or obligations. Insight into occurrences of consumers delaying a payment or stopping a payment could be telling of how often consumers make use of these options.

### *Exploring Cost*

The cost to use all four companies' products was typically less than 5% of the individual advance amount. The cost over time is impacted by the model, usage, and how or if companies restrict the number of advances a consumer can take in a pay period or at a time. Future research could also compare wage data to cost, and explore how much wages are ultimately reduced over the course of using EWA and D2C Advance.

## Conclusion

The EWA and D2C Advance space is certainly burgeoning and continuously evolving. We can expect to see more growth in this space as providers see opportunities to fill consumer needs or demands. The analysis we have conducted sheds some light into how consumers are using EWA and D2C Advance.

As described, most consumers tend to use EWA and D2C Advance consecutively at least some of the time, advances are almost always recouped. While the costs can vary based on the provider's business model and the consumer's usage pattern, the individual cost of EWA and D2C Advance are low relative to some of the alternatives available to cover cash shortfalls. These findings point to the potential financial health implications of EWA and D2C Advance, but more research is needed to explore this. We hope to continue working with providers, employers, and consumers to understand how EWA and D2C Advance are used and to uncover opportunities to impact financial health.

## Appendix

EWA Providers				
Product	End User Cost <sup>22</sup>	Structure	Disbursement	Additional Products <sup>23</sup>
<b>AnyDay</b>	No fees	Up to 50% of earned wages	AnyDay Mastercard	Bill pay, cash back rewards, and budgeting and saving tools
<b>Branch</b>	No fees	Up to 50% of earned wages per period	Debit card	Budgeting tools, instant tip and reimbursement payout, no-fee checking and digital wallet, shift scheduling
<b>Ceridian Dayforce Wallet</b>	No fees	Rules vary by employer	Prepaid card in a digital wallet	Human capital management software suite: payroll, benefits, talent and workforce management
<b>Clair</b>	No fees	100% of earned wages	Advances are deposited into a digital account provided by Clair that comes with a Mastercard debit card	Savings account and features for advances, ATM access, debit card
<b>DailyPay</b>	\$2.99 per transaction; employers can subsidize fees	100% of earned wages can be drawn down unlimited times, maximum of 3 transfers/up to \$1,000 per day	Direct deposit, Visa/Mastercard debit card  Charge \$1.99 to receive transfer the next business day	Savings tool and account, pay cycle/disbursement management, FlexTips – ability to access tips and gratuities

<sup>22</sup> End user costs may also include transfer costs, which are not included in this table.

<sup>23</sup> Some of the additional products are included with a periodic membership fee, transaction fee, or at no cost.

### EWA Providers (cont.)

<b>Product</b>	<b>End User Cost<sup>24</sup></b>	<b>Structure</b>	<b>Disbursement</b>	<b>Additional Products<sup>25</sup></b>
<b>EarnedCard</b>	No fees	Unlimited access to earned wages when transfers are made to EarnedCard debit card; a cap of up to \$500/month for direct deposits	Direct deposit, EarnedCard debit card \$2.50 immediate transfer fee; next business day transfers are free	Interest-earning savings account, ATM access, debit card, credit-building
<b>Even</b>	\$8/month; employers can subsidize all or portion of the monthly fee	Up to 50% of earned but unpaid wages	Deposited into bank account linked through direct deposit debit card cash pick-up	Pay tracking, budgeting tools, automated interest-earning savings account, and bill pay to the services offered by Even
<b>FinFit</b>	No fees	One access per pay period for up to 50% of earned wages	Direct deposit	Budgeting tools, employer-based loans, financial coaching & wellness services, health insurance, student loan assistance
<b>FlexWage</b>	Transaction fees vary by employer; typically \$3 - \$5	Up to 100% of net wages Maximum of 2 transfers per pay period and 4 per month	Flexwage Visa Payment card Instant access	Debit card, ATM Access, financial coaching, Sum180 budgeting and savings tools, FlexPay – early access to tips
<b>Gusto Cashout</b>	No fees	Lesser of \$500 or 40% of paycheck, max of 2 cashouts/month	Deposited into bank account linked through direct deposit	Human capital management software suite: payroll, benefits, time tracking, and onboarding

<sup>24</sup> End user costs may also include transfer costs, which are not included in this table.

<sup>25</sup> Some of the additional products are included with a periodic membership fee, transaction fee, or at no cost.

**EWA Providers (cont.)**

<b>Product</b>	<b>End User Cost<sup>26</sup></b>	<b>Structure</b>	<b>Disbursement</b>	<b>Additional Products<sup>27</sup></b>
<b>Immediate</b>	Per pay period, 1st transfer costs \$3, 2nd transfer costs \$2, and the 3rd and onward transfers are free	Up to 50% of earned wages per pay period	Direct deposit, Visa Direct debit card	N/A
<b>Instant Financial</b>	No fees	Up to 50% of earned wages from most recent shift	Loaded onto Instant debit card (prepaid Visa card)	Instant Tips – early payout of tips and gratuities, Instant Mileage – real-time mileage reimbursements, inability to overdraft debit card
<b>InstantWage (OneCom)</b>	Up to \$5 per transaction <sup>28</sup>	Up to 50% of earned wages	Payroll card	N/A
<b>PayActiv</b>	\$1 per day services are accessed (\$5 cap for biweekly pay period), or free if the employee direct deposits their wages onto a PayActiv card	Up to 50% of earned wages or \$500 per pay period	Visa Prepaid Card, or deposited via payroll direct deposit	Budgeting tools, bill pay, Financial Counseling, automated savings tools, integrations with e-commerce platforms, tip and mileage disbursements, payroll card, discounts, awards
<b>Paychex</b>	No fees		Direct deposit, paycards; wages can be delivered in real-time through The Clearing House	Human capital management software suite: payroll, benefits (including partnerships with PayActiv and FinFit), talent and workforce management, business insurance

<sup>26</sup> End user costs may also include transfer costs, which are not included in this table.

<sup>27</sup> Some of the additional products are included with a periodic membership fee, transaction fee, or at no cost.

<sup>28</sup> "Up to" in this context refers to an employers' ability to subsidize cost.

**EWA Providers (cont.)**

<b>Product</b>	<b>End User Cost<sup>29</sup></b>	<b>Structure</b>	<b>Disbursement</b>	<b>Additional Products<sup>30</sup></b>
<b>Rain Instant Pay</b>	\$3.99 per transaction	Access to earned wages	Direct deposit	N/A
<b>Rellevate</b>	\$9.95/month to employee	Up to 50% of earned wages, 4 advances/month	Debit card	Bill pay, money transfer, digital bank account
<b>Square</b>	Free to Cash App, 1% transfer fee if sent to debit card (capped at \$2)	Up to \$200 or up to 50% of earned wages per pay period	Cash App, linked Debit card	Debit card, banking, investing, and payments all through the Cash App
<b>Tapcheck</b>	“Small” flat fee per transaction	Up to \$100 per transaction	Direct deposit, payroll card  Next day transfer, Instant Access costs \$4.95	Cash back rewards, text alert programs, ATM access, paying bills, interest-bearing savings
<b>Wisely by ADP</b>	N/A - currently in pilots	Access to full pay	Loaded onto Wisely payroll card	Bill pay, ATM access, savings feature, and budgeting tools

<sup>29</sup> End user costs may also include transfer costs, which are not included in this table.

<sup>30</sup> Some of the additional products are included with a periodic membership fee, transaction fee, or at no cost.

### Direct-To-Consumer Providers

<b>Product</b>	<b>End User Cost</b>	<b>Structure</b>	<b>Disbursement</b>	<b>Additional Products</b>
<b>Albert</b>	No fees	Up to 3 advances and a \$100 maximum advance total per pay period	Standard delivery occurs within 3 business days  Instant delivery costs \$3.99 for Albert Genius subscribers and \$4.99 for non-subscribers; must connect debit card	Investment tools, budgeting tools, savings features, financial coaching, car/renters/life insurance
<b>Brigit</b>	Included in Brigit Plus offering of \$9.99/month	Between \$80 and \$250, only one advance can be taken out at a time	Standard delivery is within one business day; express delivery within 20 minutes available if a debit card is linked to the account	Budgeting tools, overdraft auto-advance, finding gig work, savings tracking, balance alerts, credit monitoring and \$1 million identity theft protection
<b>Cleo</b>	Included in Cleo Plus premium offering for \$5.99/month	Between \$25 and \$100 based on eligibility	Disbursed through Cleo wallet linked to a bank account or through a connected debit card; Standard advances take up to 4 days, express delivery transfers funds the same day for \$3.99	AI-powered budgeting and savings assistant

### Direct-To-Consumer Providers (cont.)

Product	End User Cost	Structure	Disbursement	Additional Products
Dave	Membership of \$1/month and tips per advance	Up to \$100, can only access one advance at a time and within 11 days of next direct deposit	Standard advances take up to 3 business days and deposited into linked account; express delivery transfers the funds immediately to a linked debit card for \$4.99	Credit-building, checking account, budgeting tools, finding gig work, overdraft auto-advance
Earnin	Tips ranging from \$0 - \$14 per advance	Cash out: Up to \$100/day, up to \$500/paycheck	Standard delivery is 1-2 business days, Lightning Speed facilitates transfer immediately <sup>31</sup>	Account Management, cashback rewards, budgeting tools, Microsavings, medical bill negotiation
		Earnin Express: The lesser of \$1000 or 80% of paycheck per pay period <sup>32</sup>		
Empower	Membership fee of \$8/month	Up to \$250 cash advance		Personalized budgeting, auto-save tools, interest-bearing checking account
FloatMe	Membership fee of \$1.99/month	Up to \$50, can only have one advance out at a time	Regular transfer takes 1- 3 business days; instant transfers go directly to debit card	Savings tools and features, overdraft alerts

<sup>31</sup> This feature is only available if a debit card account that receives at least 50% of one's paycheck is linked.

<sup>32</sup> This feature is only available if direct deposit is routed to the Earnin Express Virtual Account.

### Direct-To-Consumer Providers (cont.)

<b>Product</b>	<b>End User Cost</b>	<b>Structure</b>	<b>Disbursement</b>	<b>Additional Products</b>
<b>Klover</b>	Membership fee of \$1.99/month	Up \$130 per pay period	Standard transfer takes 3 - 5 business days to reach linked checking account, "expedited" transfers reach an account either the same day or the next business day and "immediate debit" takes 2-6 hours to transfer; both cost \$3.99 – \$14.98, depending on platform usage	Earning "points" on the platform by engaging with ads, checking spending, and uploading receipts for transactions; points reduce overall cost of using platform and increase amounts that can be advanced
<b>MoneyLion</b>	Core membership is free  Builder Plus membership is \$19.99/month  Optional tips suggested per transaction	Up to \$250 or 30% of direct deposit amount per pay period	Regular delivery to a MoneyLion account takes 12-48 hours  Regular delivery to an external checking account takes 3-5 business days  Turbo, or instant, delivery to a MoneyLion account costs \$3.99  Turbo delivery to an external debit card costs \$4.99	Investing tools, mobile banking, credit builder loans, debit card rewards