

June 30, 2025

RE: Comments on Executive Order “Modernizing Payments To and From America’s Bank Account”

Docket ID: TREAS-DO-2025-0004

Dear U.S. Department of the Treasury,

I thank you for the opportunity to submit these comments. As someone who has spent my career at the intersection of public finance, digital infrastructure and public-sector innovation, I appreciate the direction of this Executive Order and the broader agenda it reflects.

I write today as the founder and principal of Treasury Solutions Info Tech LLC - a small but dedicated effort to support modernization of government financial systems. While this is a new chapter for me professionally, my experience spans years at the U.S. Department of the Treasury where I led programs to digitize revenue collection, strengthen oversight of Federal Reserve operations, and modernize cash management across federal agencies and state governments. Over the years, my work has aimed to improve how governments, non-profits and international financial institutions move money - not only faster and more securely, but also with more accountability and equity.

Background

This Executive Order is timely. Our national payments infrastructure is long overdue for transformation. Aging infrastructure like the Treasury Web Application Infrastructure (TWA) are outdated, expensive to maintain and limit the government’s ability to serve the public efficiently.

Meanwhile, the U.S. faces a moment of opportunity. Blockchain technology, decentralized digital IDs, and programmable payments are reshaping what’s possible in both private and public finance. Treasury is well positioned to lead - not just catch up - in setting standards for the rapidly evolving new crypto-based global financial ecosystem.

Also, importantly, we have a unique chance to align innovation with inclusion. FDIC data continues to show that American Indian and Alaska Native (Native American), Black, Hispanic, and rural communities remain disproportionately largely disconnected from the financial system.¹ Any payment modernization effort must underscore the need to make financial inclusion and access its primary building block.

If you’ve ever been to parts of Native American territories in the southwest, you’ll know that some communities there face economic conditions not unlike those in the Global South and unemployment rates can run as high as 80%.² The Trump administration’s America First economic agenda provides the

¹ FDIC. *How America Banks: Household Use of Banking and Financial Services*. Federal Deposit Insurance Corporation, 2023. <https://www.fdic.gov/household-survey>

² Ballard Brief. *Financial Inclusion: Increasing Access to Financial Services*. Brigham Young University, 2023. <https://scholarsarchive.byu.edu/cgi/viewcontent.cgi?article=1128&context=ballardbrief>

framework to not only safeguard taxpayer dollars but ensure that federal government payments modernization efforts prioritize the inclusion of ALL Americans in our financial system. The goal is not only to establish access to financial services for all communities, but to provide pathways for small business lending and local capital formation in these areas. It is at the state and local level where much of the investment and innovation in payments modernization needs to take place.

Analysis and Rationale for Suggested Approach

The danger now is piecemeal reform - one agency here, one system there - without the architecture to support **integration** across federal agencies and state governments. This tendency in the government for siloed modernization efforts by individual agencies or offices risks past repeated mistakes: proprietary systems, vendor lock-in, and fragmented data that hamper fraud and improper payment detection, and lead to waste of taxpayer dollars.

Blockchain technology is uniquely suited to address these longstanding challenges. It enables multiple government entities – federal, state and local – to access and verify transactions on a **shared ledger** in real time, reducing duplication and allowing real-time reconciliations. For federal grant payments to states, **smart contracts** can automate compliance checks embedded in grant agreements, accelerating fund releases to states and localities while enforcing rules or pre-conditions, and cutting administrative costs. A **decentralized digital ID** system, issued by trusted state entities under common federal standards and stored in user-controlled wallets, is essential to securely verify identities, reduce fraud, and maintain privacy.

Most critically, **modernizing federal government “payments” must come first**. Payments are the heartbeat of public finance—everything else, including data sharing, fraud prevention, and disaster response, flows from there. By prioritizing payments modernization, Treasury ensures the disbursement infrastructure is strengthened first, directly reducing fraud, accelerating disaster relief, and advancing financial inclusion. Only then should broader financial data applications be layered in. This is the essential first step for a once-in-a-generation overhaul of the federal payment system to drive efficiency and protect taxpayer dollars.

Recommendations

I respectfully submit the following recommendations:

1. **Treasury should lead blockchain** payment modernization across the federal government. As steward of the General Fund and overseer of federal payments, this is Treasury’s domain - not the Department of Commerce’s.
2. **As matter of priority, establish new blockchain-based “payment” rails** that will ultimately complement or compete with ACH and Fedwire, using a government-wide approach under Treasury’s and OMB’s leadership and directives to ensure integration across agencies and states.

3. **Mandate business process reengineering (BPR)** across federal agencies to map current federal-to-state fund flows - particularly as outlined in federal agency grant agreements with states – to drive meaningful efficiency.
4. **Use OMB and Treasury governance protocols to document savings and ROI from new IT investments**, reinforcing government efficiencies gained and taxpayer dollars saved.
5. **Implement a hybrid digital ID strategy**, with decentralized wallet storage, state-level issuance, and federal blockchain-based verification standards.
6. **Ensure the political will is there at the highest-levels of government** to ensure follow-through with implementation, particularly at the Bureau and federal-employee level.
7. **Invest in “in-house” technical training** on digital assets, blockchain and decentralized finance (DeFi) across the federal government and including state governments - avoiding over-reliance on costly external contractors unfamiliar with government operations.
8. **Require open technical standards and modular design** to avoid vendor lock-in and proprietary silos - safeguarding innovation, long-term flexibility and competition.
9. **Ensure transparency and equal access to public-private consultations** through, for example, the regulatory review process, town halls or workgroups with as many industry associations as possible.
10. **Create sandbox environments for piloting blockchain-based payment systems**, starting with targeted programs like FEMA disaster aid and Social Security disbursements, with clear evaluation criteria and upfront plans for either decommissioning or scaling projects once the sandbox pilot stage has come to an end.
11. **Ensure Treasury participation in FEMA’s Council** and its contribution to the Council’s published recommendations due in November, recognizing that many disaster relief challenges are fundamentally payment-related.
12. **Tie payments modernization grants to matching funds at the state and local level**, empowering state governments to better engage unbanked populations and ensure modernization reaches those most disconnected from the system.
13. **Provide incentives and funding** for modular blockchain infrastructure, digital ID adoption, and community-based financial literacy.
14. **Particularly provide funding** for state and local literacy initiatives focused on reaching unbanked populations, especially in underserved areas.

Conclusion

This is a rare window to rebuild how public finance works in America. With the right strategy, we can cut waste, prevent fraud, and better serve all Americans - especially those who have long been excluded. By leading with blockchain payments and decentralized ID, Treasury can deliver a future-ready system that advances the Administration's goals, safeguards taxpayer dollars, and promotes innovation. For further information on my recommendations, **please see the attached White Papers.**

I appreciate your time and consideration. I would be happy to contribute further or support implementation efforts in any way.

Sincerely,

Tricia Gallagher
Founder and Principal
Treasury Solutions Info Tech LLC

Attachments:

Please read here: "[Partnering for the Future: How a New U.S. Government Blockchain Payment System Can Drive Private-Sector Growth](#)"

Please read here: "[Cybersecurity by Design: Reimagining Digital ID for American Resilience](#)"