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March 12, 2021

Matt Miller
Acting Commissioner, Bureau of the Fiscal Service
United States Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC, U.S.A.

Dear Acting Commissioner Miller,

I am writing, as president of the Association of Americans Resident Overseas (AARO) and on behalf of its more than 1,000 strong membership made up of American expatriates and dual nationals, to ask for your assistance with a serious glitch that adversely affected the distribution of Economic Impact Payments under last year's CARES Act. Unless fixed, this situation will continue to create problems for overseas Americans. We have not yet heard from our members regarding the distribution of the second round of stimulus payments. We are concerned, however, about the distribution of a third round of payments under the American Rescue Plan Act of 2021. A simple solution appears to be available, but it requires authorization from your bureau.

Many American recipients of stimulus checks not resident in the U.S. do not have U.S. bank accounts. Without a U.S. account, which can be very difficult to open from abroad, the checks are often non-negotiable. Few banks, moneychangers, department stores, or hotels (at least in Europe) will provide cash for a dollar check. Banks' willingness to accept deposits in foreign currency (i.e., dollars) is, at best, variable across banks and even across branches within the same bank. Experience varies across jurisdictions. We have heard reports that many banks in Austria, for example, were willing to accept stimulus checks last year. More recently, however, we have been informed that no bank in the Netherlands will do so. Endorsing the check over to a friend or relative in the United States with a U.S. account is cumbersome, and banks do not like deposits that are not made out to the account holder.

The simple solution is to allow recipients of the checks to exchange them for pre-paid debit cards. The mechanics of this are already in place. Unused checks can be voided and sent to IRS offices in Austin, TX. The explanation accompanying the returned check could include a simple request for replacement by the pre-paid debit card.

Americans Helping Americans Abroad
Association régie par la loi du 1er juillet 1901

The IRS distributed 4 million such pre-paid debit cards as stimulus payments last May. Issuing a few more to non-residents would not add materially to its workload.

Unfortunately, it is not up to the IRS to proceed along these lines since your Bureau determines who receives the debit cards. So far as we are aware, taxpayers have no scope for making this selection and, without your authorization, nothing can be done.

I am requesting that you please call this issue to the attention of the officials responsible for the allocation of the pre-paid debit cards and ask them to offer non-resident recipients a way to exchange any unusable checks they now hold for the pre-paid cards that allow them to access their funds.

Now that the third stimulus package has been signed into law, I would encourage you to offer pre-paid debit cards as an option to all recipients not resident in the U.S.

Thank you in advance for your attention.

Sincerely,



William Jordan
President, Association of Americans Resident
Overseas (AARO)
president@aaro.org

cc: Janet Yellen, Secretary, U.S. Treasury
David Lebryk, Fiscal Assistant Secretary, U.S. Treasury
Timothy E. Gribben, Commissioner, Bureau of the Fiscal Service, U.S. Treasury
Charles P. Rettig, Commissioner, Internal Revenue Service
Danielle Sumner, Legislative Assistant, Rep. Carolyn B. Maloney
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