



STATE OF INDIANA

DEPARTMENT OF FINANCIAL INSTITUTIONS

30 SOUTH MERIDIAN ST.
SUITE 200
INDIANAPOLIS, INDIANA
46204-2759
(317) 232-3955
(800) 382-4880
WWW.IN.GOV/DFI

Guidance on Licensure under the new Indiana Earned Wage Access Act

On May 6, 2025, Governor Braun signed HB 1125, the Indiana Earned Wage Access Act (“EWAA”), into law. The EWAA goes into effect in Indiana **on January 1, 2026**. This guidance is provided to assist entities in determining whether they need a license under Indiana’s EWAA, and to encourage early application for the license for those who will need it.

Do I need an Indiana Earned Wage Access License?

The EWAA, [IC 28-8-6](#), defines Earned Wage Access (“EWA”) Services as one of the following:

- (A) Consumer directed wage access services.
 - This means the business by a provider of delivering to a consumer access to earned but unpaid income, based on the consumer’s representations of, and the provider’s reasonable determination of, the consumer’s earned but unpaid income.
- (B) Employer integrated wage access services.
 - This means the business by a provider of delivering to a consumer access to earned but unpaid income, on the basis of employment, income, or attendance data obtained directly or indirectly from an employer.

The term does not include the provision of Small Loans (see [I.C. 24-4.5-7](#)) or Payroll Processing services. In addition, there are several statutory exceptions to licensure listed at [IC 28-8-6-301](#). If you have questions about whether you fit into an exception, please see the statute. Entities are encouraged to review the EWAA to determine whether they need a license.

Activities authorized by the EWA license are not authorized under another Indiana license, such as the Small Loan license or Money Transmitter license. Entities that currently have one of these licenses must apply for a new license in order to engage in EWA activities after December 31, 2025.

EWA License Application Process

Licensure under the EWAA is required for EWA activities beginning on **January 1, 2026**. The application process will be available via the [Nationwide Multistate Licensing System](#) beginning on **October 1, 2025**.

Entities should determine the need for licensure immediately, and then submit an application on October 1. We encourage entities to apply well in advance of the January 1, 2026, effective date, so that the application can be reviewed and a licensing decision issued promptly after January 1. Applicants working toward licensure and compliance will have until April 30, 2026, to confirm submission of a **complete** application with the Department. While the Department will work diligently with applicants during the four-month grace period, applications submitted after April 30, 2026, will be considered delinquent.

Contact us if you have questions or need assistance.

Department Contact Information

Licensing Staff: DFILicensing@dfi.in.gov

Legal Staff: Legal@dfi.in.gov