



***2026 ERO Program Compliance
Training
REFUND TRANSFER***

SECTION ONE: 2026 Product Suite

Our portfolio of financial services and our commitment to customer service will help you grow your business. Here is a summary of the 2026 Tax Season Product Suite:

Refund Transfer Program

Refund Transfer

The Refund Transfer (RT) is a convenient way for your taxpayer to pay the fees associated with their tax preparation from their refund amounts. Once the IRS deposits the taxpayer's refund into an account setup by SBTPG, fees are deducted from the refunds, and the balance is disbursed via the taxpayer's selected disbursement method. According to the IRS website, most refunds are disbursed in less than 21 days, but funding times may vary depending on IRS processing procedures.*

**According to the IRS website, most refunds are disbursed in less than 21 days, when filed electronically. If a paper tax return is filed, the refund should be issued in about six to eight weeks from the date IRS receives the tax return. If a taxpayer chooses direct deposit, it may take additional time after the disbursement of the tax return for their financial institution to post the funds to their account. Refunds may be delayed longer for other reasons. If this happens, the taxpayer should contact the IRS directly by calling the IRS Taxpayer Assistance Line (800-829-1040).*

State Refund Transfer

Your taxpayer can request the state taxing authority to deposit their state refunds to their federal RT account. Upon receipt of state fundings, the state refund amounts are made available to your taxpayer by the same disbursement method chosen for the federal product. Funding times vary from state to state.

An RT Processing Fee is charged to process your taxpayer's federal or state tax refunds. The RT Processing Fee will be increased to \$14.95 for each subsequent refund received, federal or state, for your taxpayer.

Your taxpayers can utilize the "Where's My Refund" tool at the IRS to check on the status of their refund <https://www.irs.gov/refunds>. They may also log into their SBTPG account at www.sbtpg.com to get up-to-date information about their Refund Transfer filing. Additional information is available through our help center and automated phone center located on our website.



Disbursement Methods Available

Please refer to the SBTPG website at www.sbtpg.com for additional details related to disbursement options. Summary information is provided below. There are three disbursement methods available to taxpayers using a Refund Transfer or a State Refund Transfer as follows:

Direct Deposit – RT proceeds may be direct deposited into your taxpayer’s checking or savings account. Funds are disbursed upon IRS or state funding. The funds will reach your taxpayer’s bank account 1 – 2 business days after we have disbursed funds.

Important Note: Please verify the taxpayer’s banking information for the deposit of their refunds. For direct deposit, the taxpayer’s name must be on the account. For a joint tax return, some banks require both names on the account. Please ensure the account information provided by the taxpayer includes an active, open deposit account. If the bank is unable to deposit refunds due to incorrect information provided, there is a \$30.00 reprocessing fee to convert the refunds to a check and mail it to the address on the account. Please ensure that the address provided by the taxpayer is current.

Fast Forward by sbtpg – Taxpayers, if eligible, can request Fast Forward by sbtpg when they select the RT with direct deposit. When the IRS funds their federal tax refund, they can get their federal tax refund direct deposit up to 5 days early for a \$25.00 fee. Fast Forward is integrated into your tax software. The availability of Fast Forward is subject to the taxpayer’s bank’s participation in the Real-Time Payments (RTP) system and the taxpayer’s federal tax refund is less than \$10,000. If Fast Forward is selected and, based on the above-mentioned criteria, they are not eligible or Fast Forward is not available to them, they will not be charged the \$25.00 fee.

Cashier’s Check – SBTPG will make check print authorizations available to you upon receipt of IRS or state fundings. Check printing can be performed directly from your computer through your software provider or through the SBTPG website (you will be notified if this feature is available to you).

Card – The Card is issued by Green Dot Bank, Member FDIC. Funds are loaded to the card within minutes of funding, without requiring the taxpayer to return to your office. Please remind your taxpayer to review their Cardholder Agreement containing the terms and conditions applicable to the Card, including the fees and charges that apply to the Card.

Important Note: Each card provider has different maximum daily deposit amounts. If the taxpayer’s refunds are over that amount, the deposits will be returned to SBTPG, and the disbursement method



will be changed to checks. If a taxpayer is using a card to deposit their RT, the taxpayer should call their card provider for the routing number, account information and the maximum daily deposit. Advise the taxpayer of their expected refund amounts. If it is over the maximum daily deposit amount, have the taxpayer ask if the limit can be adjusted to accept the refunds.

Both Products (Refund Transfer and State Refund Transfer) require documentation which is to be reviewed and accepted by the taxpayer. The following forms are required to be signed by the taxpayer and retained in your office for future reference:

- (1) Tax Return
- (2) Refund Transfer Application and Agreement
- (3) Refund Transfer Fee Disclosure Form
- (4) 7216 Consent forms
- (5) Refund Transfer State Disclosure Form, when applicable

All of these forms print directly from your software. When a tax return is completed, it is essential to educate taxpayers about the available filing and payment options, including the IRS direct file options and the tax product option.

Offer Tax Products Fairly

Explain the timing and costs associated with the tax products in comparison to the IRS options. It is your responsibility to ensure that the taxpayer understands the IRS disbursement options, in which taxpayers can have their refunds deposited directly into their personal bank accounts or as checks mailed to their homes for **FREE** with paid tax preparation. Explain that taxpayers generally choose a tax product so they can have their taxes professionally prepared and pay tax preparation fees with their refund money. Additionally, a tax product allows unbanked taxpayers the benefit of having their refund direct deposited rather than receiving a check in the mail from the IRS in 21 to 28 days.

Please remember to explain all fees clearly and ensure that the taxpayer understands each fee that will be deducted from the proceeds of their refunds (including deposit product fees, tax preparation, and other fees, as applicable).



The chart below provides a summary of product options, disbursement methods, associated fees, and availability of funds.

Filing Method	Tax product	Disbursement	Estimated Availability of Funds*	Deposit Product Fee
Paper Return	None	IRS Direct Deposit or IRS Issued Check	5 to 7 weeks	None
E-File	None	IRS Direct Deposit	Less than 21 days	None
E-File	None	IRS Issued Check	21 to 28 days	None
E-File	Refund Transfer (RT) or State Refund Transfer (SRT)	Cashier’s Check, Card, or Direct Deposit	Less than 21 days	Yes
E-File	Refund Transfer (RT) or State Refund Transfer (SRT)	Direct Deposit with Fast Forward by sbtpg**	Up to 5 days early before IRS release date	Yes

*The PATH Act (Protecting Americans from Tax Hikes) legislation may create funding delays of up to six weeks or more for taxpayers filing at the beginning of the tax season. We encourage you to read about possible payment delays in more detail by viewing the IRS website at <https://www.irs.gov/individuals/refund-timing>. Your taxpayers can utilize the “Where’s My Refund” tool at the IRS to check on the status of their refund - <https://www.irs.gov/refunds>.

**If taxpayers request the Fast Forward service, if eligible, it will enable them to receive their federal tax refund up to five (5) days early for an additional fee of \$25.00. They are eligible if they select Refund Transfer and either direct deposit or a Green Dot Card as the disbursement method for their federal Refund Proceeds. The availability of Fast Forward is subject to: (a) their bank’s participation in the Real-Time Payments (RTP) system, (b) availability of funds for this program at the time they receive their refund, and (c) their federal tax refund is not greater than \$10,000. If Fast Forward is selected and, based on the above-mentioned criteria, they are not eligible or Fast Forward is not available to them, they will not be charged the \$25 fee. The \$25 fee shall not apply if depositing refund onto a new Green Dot Card that is issued in the tax office. Fast Forward is subject to the IRS submitting refund information to sbtpg before the release date in which the IRS will release the funds to the Deposit Account. The IRS may not submit refund information early. Fast Forward may change or discontinue at any time.



BE FAIR AND CLEAR. Please remember to explain all options available to the taxpayer.

1. **Do not** pressure the taxpayer(s) into choosing a particular tax product.
2. **Do not** ask the taxpayer(s) what option they want before explaining all of the options available to them.
3. **Do not** pick any option or options for the taxpayer(s).
4. **Do not** encourage or discourage a taxpayer from applying for a tax product – only present the information and allow the taxpayer to make their own decisions.

Do not use misleading slogans or campaigns to entice a taxpayer to use a tax product

Our team of experts has worked hard to create marketing campaigns that comply with consumer protection laws. You can count on us to provide you approved marketing materials. SBTPG has marketing materials available for your office, so please ensure your materials are up to date. Please visit the supplies page of our website to view the materials that are available. Many items are free, and a small shipping and handling fee may apply for some items.

MAKE SURE WE CAN CONTACT YOU. From time to time, SBTPG personnel may need to reach you regarding new products available to you, compliance-related matters, or other business reasons. Please ensure that your contact information is up to date, including phone number and email address, so that if we need to reach you, we can.

Question 1: Which of the following statements are true?

- a) A taxpayer will get refunds faster by using a tax product. Using a tax product is faster than using the IRS free e-file option.
- b) A taxpayer will get refunds in the same amount of time regardless of whether a tax product is used or an IRS e-file is selected. However, if direct deposit with Fast Forward is selected, the taxpayer may receive their refund up to 5 days early.



Question 2: The Refund Transfer Product provides a convenient way for your taxpayers to receive their tax refunds. This product option can be especially useful for unbanked taxpayers.

According to the financial services agreement, you agree to present all disbursement options, including free options, to the taxpayer upfront. You should also do which of the following when explaining the Refund Transfer product to taxpayers:

- a) Highlight the positive features of the Refund Transfer product, but not explain the fees associated with using this product unless the taxpayer asks.
- b) Explain all fees associated with the product regardless of whether or not the taxpayer asks.

Question 3: As stated in the Financial Services Agreement, you confirm that you will provide the taxpayer with the product disclosure forms associated with using a tax product and will retain signed copies on file in your office for SBTPG review, if requested.

The product forms include the following: Refund Transfer Application and Agreement, and the Fee Disclosure Forms.

Which of the following statements is true?

- a) I am required to explain all product options to the taxpayer before proceeding with the tax product application. This includes a description of free product options. I am also required to retain signed bank documentation, such as the Refund Transfer Application and Fee Disclosure Forms. I will be required to submit this to SBTPG if requested.



- b) I am required to explain all product options to the taxpayer before proceeding with the tax product application. This includes a description of free product options. I am also required to obtain signed bank documentation, such as the Refund Transfer Application and Fee Disclosure forms; however, I do not need to retain this on file.

Question 4: SBTPG experts have created Tax Product Marketing Materials, which are available for your convenience, before the start of each tax season. Experts from our marketing, legal, and compliance teams have worked hard to create materials that comply with all laws and regulations. This helps your business conform to the current regulatory environment.

In reference to the Financial Services Agreement, you agree to which of the following practices:

- a) I agree to use current year SBTPG-approved marketing materials. I will not use tax product marketing materials that I have created without first obtaining consent from the SBTPG Marketing Department.

- b) I agree to use SBTPG-approved marketing materials. If I create my own tax product marketing materials, I agree that I will review them for any related compliance risks.

SECTION TWO: General Best Practices

We are excited to partner with you for the coming tax season, and we have provided a few tips to help your office stay current with general policies and procedures. The following general practices help keep our industry free from fraudulent activity:



The SBTPG User Manual identifies the following Best Practice recommendations to safeguard electronic and physical taxpayer information:

To Protect Electronic Documentation:

- Use strong and unique passwords of 8 or more mixed characters, password protect all wireless devices, use a phrase or words that are easily remembered and change passwords periodically.
- Opt for two-factor authentication when it's offered.
- Create and secure Virtual Private Networks.
- Limit computers storing taxpayer information to authorized users.
- Set up computer screens away from public view.
- If utilizing portable media, use encryption.
- Encrypt all sensitive files/emails and use strong password protections.
- Lock computers when not in use or when not monitored.
- Install anti-malware/anti-virus security software on all devices (laptops, desktops, routers, tablets and phones) and keep software set to automatically update.
- Back up sensitive data to a safe and secure external source not connected fulltime to a network.
- All computers used in the preparation of tax returns must be protected by a hardware or software firewall (e.g., router, Windows Firewall, Zone Alarm).
- All computers used in the preparation of tax returns must store taxpayer data in an encrypted format.
- All computers used in the preparation of tax returns must provide secure file transfer capability (e.g., HTTPS, SFTP, FTPS).
- Wipe clean or destroy old computer hard drives and printers that contain sensitive data.

To Protect Physical Documentation:

- Safeguard physical taxpayer files by utilizing a locked storage cabinet or drawer.
- Do not leave taxpayer information lying in plain sight.
- Monitor visitors while onsite.
- Shred all confidential documentation before trashing.

Whether you're handing over paperwork, a site-printed check, or providing taxpayer information over the phone, it's important to verify you're talking to the actual taxpayer before doing so. Obtain information about the taxpayer before releasing any confidential information. Additionally, before releasing payment, you are required to re-verify the taxpayer through photo identification.



In today's technology-saturated world, it becomes increasingly important to know how to recognize phishing schemes. Phishing is a method fraudsters use to steal information by posing as a legitimate organization, often over the phone or via email. For your protection and the protection of your taxpayers, use the following tips to help ensure you don't become a victim:

- Never give out sensitive information under pressure if the source seems untrustworthy.
- If an email, call, or piece of mail is received that seems suspicious, question its source. When in doubt, contact the correct company directly and confirm if the request was real. The following are qualities that may indicate a phishing attempt:
 - An email or call that seems generic or not personalized, for example failing to reference an account you have;
 - A piece of communication received requests personal passwords; and/or
 - An email is poorly written or contains low quality images of a company's logos.
 - Please note, the IRS never initiates initial email contact with tax pros about tax returns, refunds or requests for sensitive financial or password information.
- Do not click on links or download attachments from unknown or suspicious seeming emails.
- Keep your computer protected with an antivirus to block cyber-attacks.
- Keep up-to-date with the latest industry trends on this topic through the IRS and news sources.

Notify SBTPG and Affected Taxpayers

If a taxpayer's information becomes compromised in any way, you are required to notify SBTPG immediately and the affected taxpayers.

If you think an unauthorized person has obtained, or is attempting to obtain taxpayer information, it is important to respond quickly. Contact SBTPG immediately. If confidential information was compromised, you need to contact those taxpayers who were affected immediately. In accordance with the Financial Services Agreement, you should implement the procedures and controls described in IRS Publication 4557 "Safeguarding Taxpayer Data: A Guide for Your Business" and Publication 5293 "Data Security Resource Guide for Tax Professionals". Also, review Protect Your Client, Protect Yourself awareness campaigns: Don't Take the Bait and Tax Security 101 available on the IRS website. Additionally, you can review the NIST's "Small Business Information Security – The Fundamentals" which provides an overview of steps to secure data.

Question 7: As referenced in the SBTPG User Manual, you agree that you will take every reasonable precaution to safeguard electronic and physical taxpayer information. This supports the requirements specified in the regulation called the Gramm-Leach Bliley Act of 1999 (GLBA).



Which of the processes below describe and support procedures that could be used to protect taxpayer information?

- a) Lock drawers or cabinets that contain physical taxpayer information.
- b) Monitor visitors while they are onsite.
- c) Encrypt and password protect all devices (e.g., computers, cell phones, or electronic media devices) which store taxpayer information and do not share passwords.
- d) Use regularly updated anti-malware, anti-virus and firewalls for software and hardware storing confidential taxpayer information.
- e) All of the above procedures will help to protect taxpayer information.

Question 8: In the event of a data breach, such as unauthorized access to your computer or lost physical files or media devices, you agree to implement the procedures and controls described in IRS Publication 4557 “Safeguarding Taxpayer Data: A Guide for Your Business”, which is available on the IRS website.

Additionally, you agree to take which of the following actions?

- a) Do not alert anyone until you have proof of fraudulent activity, such as confirmed identity theft.
- b) Immediately contact SBTPG and those taxpayers that were affected.



- c) None of the above procedures are correct.

Question 9: Please confirm the accuracy of the following statements:

Before providing confidential taxpayer information via telephone you are required to validate the caller. Additionally, if the taxpayer comes back to the office to pick up their refund check, you agree to validate the taxpayer’s identity before distributing the refund check.

- a) The Statements are True

- b) The Statements are False

SECTION FOUR: Identify the Taxpayer Before Filing the Tax Return

YOU ARE RESPONSIBLE TO KNOW YOUR TAXPAYER

SBTPG is committed to ensuring that neither we nor you as an ERO participate in the submission of fraudulent tax returns to the IRS. It is essential, therefore, that you undertake reasonable efforts to ensure that the taxpayer whose refunds you will be submitting via SBTPG and its Banks, is, in fact, the correct taxpayer to be submitting the tax return, and that the tax return is accurate, and that you reasonably have identified and verified the identity of the taxpayer using your service.



FRAUD/ANTI-MONEY LAUNDERING CONTROLS

You should not file a tax return if you suspect fraudulent activity.

The number of fraudulent tax returns filed electronically continues to increase each year. Below is a list of possible fraud indicators. This is not intended to imply that every tax return with one or more of the following characteristics is fraudulent. It will be considered good business practice, however, to verify or validate data that might be considered questionable. Taxpayers are disqualified from applying for financial products if the tax preparer cannot obtain or verify the required information.

Possible Taxpayer Fraud Indicators:

- Documents provided for identification appear to have been altered or forged
- Photograph or physical description on the identification is not consistent with the appearance of the taxpayer presenting the identification.
- Other information on the identification is not consistent with information given for tax return preparation.
- Taxpayer cannot be reached at the phone number given
- Taxpayer cannot produce any mail or written documentation with their reported name and address.
- Taxpayer appears to be following a script
- Suspicious person accompanying filer and observed on previous occasions

Possible Social Security Card Fraud Indicators:

- Social Security number that has any of the three groups all zeros
- Social Security number that has the first three numbers above 900
- Social Security number that has the first three numbers of 666

Possible Forms W-2, Forms 1099 and Forms 4852 Fraud Indicators:

- Forms that are typed, with strikeouts, erasures, white outs or type-overs
- Forms that are handwritten or photocopied
- Forms that are incomplete or altered
- Forms that contain errors in income or SSN
- Taxpayer presents employer's copy of W-2
- Employer Identification Number (EIN) is not nine digits or is missing
- Dollar signs used on the W-2s or 1099s
- No cents are indicated (e.g., 5,000 is shown, instead of 5000.00)
- Federal Withholding is greater than 20% of W-2 box 1 wages
- W-2s for a firm in the area differs from other W-2s issued from the same firm



Possible Tax Return Fraud Indicators:

- Maximum EITC is claimed but taxpayer is unable to supply required information on dependent or spouse/other parent
- Claiming dependents other than their own children or grandchildren with no supporting documents
- An unusually high number of dependents born during the year
- A high number of tax returns claiming almost the maximum Earned Income Credit
- An unusually high number of refunds over \$2000
- Many tax returns with identical income, withholding, refunds, or EINs on multiple W-2s

The definition of Money Laundering is:

- The process of converting illegally-obtained funds into clean funds.
- A primary method utilized by money launderers is introducing the illicit funds into the mainstream financial system and moving the funds via a variety of techniques to make them appear clean.

The risk of introducing illegally obtained funds into the banking system can be identified in our program as identity theft and tax return fraud. Below are the steps you must take to properly identify the taxpayer and to prevent fraud.

To protect yourself from processing invalid tax returns, you are responsible to validate the identity of your taxpayer before filing a tax return. Best practice processes to verify your taxpayer's identity can be accomplished through the following procedures:

Collect taxpayer demographic information:

- Name
- Physical address
- Tax Identification Number and
- Date of birth

Verify the information through documentation:

- Unexpired government issued photo identification
- Supporting documents for the Tax Identification Number (i.e., social security cards)
- Tax documentation such as W-2s or 1099s

The identity of each taxpayer and dependent should be verified to a reasonable and practical extent. If you are suspicious of the taxpayer's identity, perform additional due diligence by asking to see additional information. As



part of the financial services agreement, you agree to carefully review the identity of each taxpayer before filing the tax return. Employees and business partners responsible for filing tax returns need to be aware of these due diligence procedures.

You should not file the tax return if you cannot verify the taxpayer's identity.

Question 11: To ensure you are not facilitating possible fraud and/or money laundering, you agree to create and implement the following:

- a) A taxpayer identification program to validate the identity of each taxpayer and dependent. Identity will be validated through documentary and non-documentary methods for each member listed on the tax return.
- b) A taxpayer identification program to validate the identity of each taxpayer and dependent. Identity should be validated by reviewing the taxpayer's (and any dependent's) government issued identification. This identification does not need to include a photograph.
- c) A taxpayer identification program to validate the identity of each taxpayer and dependent. Identity should be validated by reviewing the social security cards for each taxpayer. No other information should be validated.

Question 12: As part of your financial services agreement, you agree that you will collect and validate which of the following pieces of taxpayer information before filing the tax return?

- a) Ask the taxpayer for their name, address, telephone number, and W-2 forms.
- b) Review the taxpayer's (and any dependent's) expired government issued identification to validate their identity.
- c) At a minimum, the taxpayer should provide their name, physical address, tax identification number, and date of birth. The tax professional must validate this information by reviewing at least one form of unexpired government issued photo identification. Additionally, the tax professional must review the social security cards for the primary and secondary filers, as well as all dependent children listed on the tax return.



Question 13: If you are presented fraudulent or suspicious documentation and cannot reasonably confirm the identity of the taxpayer, you agree that you will do which of the following?

- a) Perform additional due diligence by asking for additional verification, such as asking for utility bills, credit cards, or personal references. You should also verify sources of income and validate data that looks questionable.
- b) If you suspect fraud, you should refuse to file the tax return.
- c) All of the above answers are correct.

Question 14: If the taxpayer has multiple income documents which appear to be suspicious and are not easily verifiable, should you complete the tax return?

- a) Yes. I will complete the tax return. It is not my job to help prevent fraud.
- b) No, if I am suspicious of the documentation provided to prove income and I am not able to validate the information, then I will not file the tax return. We are all responsible for preventing fraud.



SECTION FIVE: Certification

In order for enrollment to be activated, please have ALL employees, contractors or others under your EFIN, who will be offering or discussing tax products with taxpayers to successfully complete the online program compliance training.

I CERTIFY THAT I HAVE READ, UNDERSTAND AND AGREE TO ABIDE BY THE TERMS PROVIDED TO ME IN THE PROGRAM COMPLIANCE TRAINING.

- Yes
- No

