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DEPARTMENT OF THE TREASURY

Internal Revenue Service

26 CFR Part 1

[TD 10056]

RIN 1545-BS27

Trump Accounts

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Temporary regulations.

SUMMARY: This document contains temporary regulations regarding general requirements for Trump accounts, the establishment of an initial Trump account (including automatic enrollment by the Secretary of the Treasury), and qualified general contributions (including qualified stock contributions), which are a special type of contribution made to Trump accounts. These temporary regulations affect trustees of Trump accounts, account beneficiaries of Trump accounts, responsible parties of Trump accounts, and eligible donors who fund qualified general contributions.

DATES: *Effective date:* These temporary regulations are effective on **[INSERT DATE OF PUBLICATION IN THE FEDERAL REGISTER]**.

Applicability date: For applicability and expiration dates, *see* §§ 1.530A-1T(g) and 1.530A-7T(f).

FOR FURTHER INFORMATION CONTACT: Concerning these temporary regulations, Isaac Stein at the Office of Associate Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes) at (202) 317-6320 (not a toll-free number).

SUPPLEMENTARY INFORMATION:

Authority

This document contains temporary amendments to the Income Tax Regulations (26 CFR part 1) to implement section 530A of the Internal Revenue Code (the Code). Section 530A(a) authorizes the Secretary of the Treasury or the Secretary’s delegate (Secretary) to prescribe exceptions to the general rule that a Trump account shall be treated for purposes of the Code in the same manner as an individual retirement account (IRA) under section 408(a) . Section 530A(b)(1)(A)(i) provides that an individual's first Trump account (initial Trump account) is to be created or organized by the Secretary. Section 530A(b)(1)(B) provides that a Trump account must be designated (in such manner as the Secretary shall prescribe) at the time of the establishment of the account as a Trump account. Section 530A(b)(2)(C)(i) authorizes the Secretary to make an election to establish an initial Trump account for an eligible individual. Section 530A(b)(2)(C)(ii) authorizes the Secretary to prescribe rules regarding the time and manner for a person other than the Secretary to make an election to establish an initial Trump account for an eligible individual. Section 530A(f)(1)(A) defines a qualified general contribution as a contribution made by the Secretary pursuant to a general funding contribution. Section 530A(f)(3)(B) provides that a ‘qualified geographic area’ is any geographic area in which not less than 5,000 account beneficiaries reside and which is designated by the Secretary as a qualified geographic area. Section 530A(i)(1) provides, in relevant part, that the trustee of a Trump account will make reports to the Secretary and to the beneficiary, at such time and in such manner as may be required by the Secretary, with respect to such matters as the Secretary may require. Section 408(a)(2) authorizes the Secretary to approve as a nonbank trustee for an IRA a person who demonstrates to the satisfaction of the Secretary that the manner in which such other person will administer the trust will be consistent with the requirements of section 408. Section 7805(a) authorizes the Secretary to prescribe all needful rules and regulations for the enforcement of the Code, including all rules and regulations as may be necessary by reason of any alteration of law in relation to internal revenue.

Background

I. *Overview*

Section 70204 of Public Law 119-21, 139 Stat. 72 (July 4, 2025), commonly referred to as the One, Big, Beautiful Bill Act (OBBBA), added new sections 530A, 128, 139J, and 6434 to the Code. Section 530A provides for the establishment of a Trump account for an eligible individual and rules regarding Trump accounts.

In accordance with section 7805(e)(1), concurrent with the publication of this Treasury Decision, the Department of the Treasury (Treasury Department) and the IRS are publishing in the Proposed Rules section of this issue of the **Federal Register** a notice of proposed rulemaking (CC-00226466-26) containing proposed regulations under section 530A at proposed §§ 1.530A-1 and 1.530A-7 (the proposed regulations), the text of which, except for the applicability provisions, is the same as the text of §§ 1.530A-1T and 1.530A-7T of the temporary regulations.

Interested persons are directed to the **ADDRESSES** and Comments and Requests for a Public Hearing sections of the preamble to CC-00226466-26 for information on submitting public comments or requesting a public hearing on the proposed regulations.

II. *Trump Accounts - General Requirements and Election to Establish an Initial Trump Account*

A Trump account is a type of traditional IRA established under section 530A for the exclusive benefit of an eligible individual or such eligible individual’s beneficiaries. An eligible individual is any individual (i) who has not attained age 18 before the close of the calendar year in which an election to establish an initial Trump account is made, (ii) for whom a social security number (within the meaning of section 24(h)(7)) has been issued before the date on which the election is made, and (iii) for whom an election is made either by the Secretary or, if the Secretary has not made an election, by a person other than the Secretary at the time and in the manner prescribed by the Secretary.

After an election is made, an initial Trump account is created or organized by the Secretary for the eligible individual. After an initial Trump account has been established, a subsequent Trump account (rollover Trump account) may be established for the account beneficiary during the period that begins when such initial Trump account is established and ends on December 31 of the calendar year in which the account beneficiary[1] of the initial Trump account attains age 17 (growth period). A rollover Trump account must be funded by a qualified rollover contribution, which is a trustee-to-trustee transfer of the entire account balance from the account beneficiary's existing Trump account.[2]

Section 530A(a) generally treats Trump accounts in the same manner as traditional IRAs under section 408(a), except as otherwise provided in section 530A or under regulations or guidance provided by the Secretary. Special rules contained in section 530A that do not apply to other traditional IRAs include rules regarding contributions, investments, distributions, and reporting. After the growth period, most of the special rules no longer apply and the rules under section 408 governing traditional IRAs generally apply.

III. *Qualified General Contributions*

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[1] After an initial Trump account has been established for an eligible individual, the individual is referred to as the account beneficiary pursuant to section 530A(b)(4).

[2] A qualified rollover contribution for a Trump account under section 530A(e) may be made only during the growth period and is different from and unrelated to a qualified rollover contribution for a Roth IRA under section 408A(e).

One type of contribution permitted during the growth period is a qualified general contribution, which is a contribution made by the Secretary and funded by a general funding contribution from a State (or political subdivision thereof), the United States, the District of Columbia, an Indian Tribal government, or a section 501(c)(3) tax-exempt organization. The contribution is distributed to the Trump accounts of account beneficiaries who are members of a qualified class. Under section 530A(f), a qualified general contribution must be made pursuant to a general funding contribution, must be made to each account beneficiary in the qualified class, and must be made in an equal amount for each account beneficiary in that class. The statute provides broad, objective criteria to describe the qualified classes of account beneficiaries whose Trump accounts can receive the qualified general contribution.

Section 139J provides that qualified general contributions to a Trump account are not includible in the gross income of the account beneficiary when made.

IV. *Prior Guidance*

On December 2, 2025, the Treasury Department and the IRS issued Notice 2025-68, 2025-52 IRB 856, which informed taxpayers that the Treasury Department and the IRS intend to propose regulations under section 530A and related provisions. The notice addressed initial questions regarding Trump accounts, including elections to establish initial Trump accounts, anticipated annual reporting, qualified rollover contribution reporting, trustee-to-trustee information, and account beneficiary disclosures. The notice also requested comments.

On March 9, 2026, the Treasury Department and the IRS published a notice of proposed rulemaking (NPRM) (REG-117270-25) in the **Federal Register** (91 FR 11194) containing proposed regulations (§§ 1.530A-1 through 1.530A-6) that would provide guidance on making an election to establish a Trump account and reserve additional sections for further guidance on Trump accounts (prior § 1.530A-1 NPRM).

The NPRM published in the Proposed Rules section of this issue of the **Federal Register** withdraws the prior § 1.530A-1 NPRM.

On March 9, 2026, the Treasury Department and the IRS also published a notice of proposed rulemaking (REG-117002-25) in the **Federal Register** (91 FR 11203) containing a proposed regulation (§ 301.6434-1) that would provide guidance on the Trump accounts contribution pilot program under section 6434 under which the Trump accounts of eligible children can receive $1,000 pilot program contributions.

On July 13, 2026, the Treasury Department and the IRS published Rev. Proc. 2026-25, 2026-29 IRB 45, which provides a transfer tax safe harbor for certain individual donors who make one or more contributions to Trump accounts established under section 530A.

On August 11, 2026, the Treasury Department and the IRS published a notice of proposed rulemaking (REG-101355-26) in the **Federal Register** (91 FR 51611) containing proposed regulations (§§ 1.128-1 through 1.128-3, 1.129-1 and 1.129-2) that would provide guidance on employer contributions to Trump accounts under section 128, including applicable nondiscrimination rules, and the nondiscrimination rules for dependent care assistance programs under section 129.

On August 21, 2026, the Treasury Department and the IRS published a notice of proposed rulemaking (CC-00349938-26) in the **Federal Register** (91 FR 54280) containing a proposed regulation (§ 1.530A-3) that would provide guidance on eligible investments, which are the only assets in which Trump account funds may be invested during the growth period.

Explanation of Provisions

These temporary regulations provide rules regarding the establishment of an initial Trump account and qualified general contributions. Section 1.530A-1T provides general requirements for Trump accounts and rules for the establishment of an initial

Trump account, including automatic enrollment by the Secretary, and for the administration and claiming of auto accounts. The prior § 1.530A-1 NPRM, which is being withdrawn, did not provide for broad automatic enrollment by the Secretary. After considering public comments and further addressing the legal and operational issues associated with automatic enrollment, the Treasury Department and the IRS have identified an administrable structure that permits broad automatic enrollment while protecting return information. *See* Section I.D.2 of this Explanation of Provisions. Section 1.530A-7T provides rules regarding qualified general contributions, including qualified general contributions that consist of qualified stock or that use an approved class.

I. *Section 1.530A-1T -- Trump Accounts; General Requirements; Establishment of an Initial Trump Account; Auto Enrollment and Auto Accounts*

A. *Overview*

Section 1.530A-1T provides definitions related to Trump accounts, general requirements for Trump accounts, rules for establishment of an initial Trump account, including auto enrollment by the Secretary, and rules for auto accounts and claiming an auto account.

B. *Definitions*

Section 1.530A-1T(b) includes definitions of the terms *account beneficiary*, *eligible individual*, *qualified ABLE rollover contribution*, *qualified general contribution*, *qualified rollover contribution*, *Trump account,* and *Secretary* that are consistent with sections 530A(b)(4), 530A(b)(2), 530A(d)(4)(B), 530A(f), 530A(e), 530A(b)(1), and 7701(a)(11)(B), respectively.

Section 1.530A-1T(b)(3) defines the term *growth period* as the period that begins when the account beneficiary’s initial Trump account described in § 1.530A-1T(b)(5)(i) or (ii) is established and ends on December 31 of the calendar year in which the account beneficiary attains age 17. This definition is provided for ease of reference and reflects the statutory concept of the period before the first day of the calendar year in which the account beneficiary attains age 18.

Section 1.530A-1T(b)(4) defines the term *IRA* as an individual retirement account under section 408(a), including a custodial account treated as a trust under section 408(h) but, consistently with section 530A(b)(1), does not include an individual retirement annuity under section 408(b).

Section 1.530A-1T(b)(5) defines the terms *initial Trump account*, *auto account*, and *claimed initial Trump account*. An initial Trump account is a Trump account created or organized by the Secretary pursuant to section 530A(b)(1)(A)(i) and maintained by a trustee selected by the Secretary pursuant to section 530A(g). The definition of *initial Trump account* covers three types of initial Trump accounts. The first type of initial Trump account is any Trump account that is established when a person other than the Secretary makes an election (using Form 4547, *Trump Account Election(s)*, or successor form, or through an electronic application or webpage) and activates the account before auto enrollment by the Secretary. The second type of initial Trump account is an auto account, which is an initial Trump account created or organized pursuant to an election made by the Secretary under § 1.530A-1T(d)(2). The third type of initial Trump account is a claimed initial Trump account, which is an initial Trump account created or organized by the Secretary to receive a qualified rollover contribution from an auto account. These definitions identify the different ways in which a taxpayer can establish a Trump account created or organized by the Secretary, and also distinguish an initial Trump account from a rollover Trump account established under section 530A(b)(1)(A)(ii).

Section 1.530A-1T(b)(6) defines the term *master group trust* as a trust established by the Secretary for the exclusive benefit of account beneficiaries of auto accounts for the purpose of holding investments of auto accounts that meets the applicable requirements of Rev. Rul. 81-100, 1981-1 C.B. 326, as modified, and is exempt from taxation under section 408(e).[3]

Section 1.530A-1T(b)(10) provides that the term *qualified stock contribution*, which is a type of qualified general contribution, is defined in § 1.530A-7T(b)(9).

Section 1.530A-1T(b)(11) defines the term *responsible party* as the person who is authorized under the terms of the written governing instrument for a Trump account to act on behalf of the account beneficiary. A person's status as a responsible party under the written governing instrument does not, by itself, establish that the person is entitled under section 6103 to inspect or receive the account beneficiary's returns or return information.

Section 1.530A-1T(b)(12) defines the term *rollover Trump account* as a Trump account that is not an initial Trump account and that is created or organized in the United States and established for the account beneficiary during his or her growth period pursuant to section 530A(b)(1)(A)(ii). A rollover Trump account must first be funded by a qualified rollover contribution from the account beneficiary's existing Trump account before receiving any other contribution. Because a qualified rollover contribution is a direct trustee-to-trustee transfer of the entire Trump account balance, an account beneficiary may have only one funded Trump account at a time.

Section 1.530A-1T(b)(14) defines the term *traditional IRA* as an IRA that is not a Roth IRA under section 408A.

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[3] Although these regulations do not address State or local tax treatment, the Treasury Department and the IRS anticipate that, in a jurisdiction that conforms to section 408(e) and applies corresponding treatment to a group trust described in Rev. Rul. 81-100, a Trump account and the portion of the master group trust equitably attributable to that account generally would receive corresponding treatment for State income tax purposes. However, treatment under any particular State or local law depends on that law and is not determined by these regulations.

C. *General Requirements for a Trump Account*

Section 1.530A-1T(c)(1) provides that a Trump account is a type of traditional IRA described in section 530A(b)(1) for the exclusive benefit of an eligible individual and, after the death of the individual, his or her beneficiaries. A Trump account can be either an initial Trump account or a rollover Trump account.

Section 1.530A-1T(c)(2) provides rules for the written governing instrument of a Trump account. Except as otherwise provided, the written governing instrument must satisfy the requirements of section 408(a)(1) through (6), which apply to other IRAs, and the requirements of section 530A(b)(1)(C)(i) through (iii), which apply only to Trump accounts. The written governing instrument must reflect both the rules that apply during the growth period and the rules that apply after the growth period.

Section 1.530A-1T(c)(2)(ii) also requires the written governing instrument to clearly designate the account as a Trump account at the time of its establishment. Accordingly, an existing account, such as an IRA that is not a Trump account, may not be amended to become a Trump account. In addition, the account must be titled to clearly identify the account as a Trump account for the benefit of the account beneficiary.

With respect to the growth period, the written governing instrument generally must restrict the timing and annual amount of contributions in accordance with section 530A(b)(1)(C)(i) and prohibit contributions under a Simplified Employee Pension (SEP) arrangement under section 408(k) or a Savings Incentive Match Plan for Employees (SIMPLE) IRA plan under section 408(p) in accordance with section 530A(h)(1). Additionally, the written governing instrument must prohibit distributions in accordance with section 530A(b)(1)(C)(ii), and require the funds in the account to be invested only in eligible investments in accordance with section 530A(b)(1)(C)(iii), as applied under § 1.530A-7T(d). A Trump account satisfies the cash contribution requirement in section 408(a)(1) if, except in the case of a qualified rollover contribution, the written governing instrument provides that no contribution will be accepted unless it is in cash or is qualified stock received in a qualified stock contribution described in § 1.530A-7T(d).

With respect to the period after the growth period, the written governing instrument must satisfy the requirements of section 408(a)(1) through (6) and the prohibition in section 530A(h)(1) against receiving contributions under a SEP arrangement under section 408(k) or a SIMPLE IRA plan under section 408(p), which continues to apply after the growth period.[4]

Section 1.530A-1T(c)(3) provides, under the authority of section 408(a)(2), that any person approved by the IRS as of December 31, 2025, to be a nonbank trustee of an IRA is automatically approved to be a nonbank trustee of a Trump account.

Section 1.530A-1T(c)(4) provides that a Trump account is subject to special rules that differ from the rules for other traditional IRAs, including rules relating to contributions, investments, distributions, and reporting. After the growth period, the rules under section 408 that apply to other traditional IRAs generally apply to Trump accounts, except as provided in section 530A(h).

For the avoidance of doubt, § 1.530A-1T(c)(5) provides that for purposes of section 530A, an individual attains an age on the individual's birthday, and not the day before the individual's birthday. For example, a child born on January 1, 2009, attains age 18 on January 1, 2027.

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[4] Notice 2025-68, Q&A A-10 addresses a contractual (not tax law requirement) provision in a written governing instrument for an automatic transfer of the account to a traditional IRA immediately after the growth period. In such instance, the written governing instrument does not need to reflect rules that would apply after the growth period because the Trump account would not remain open after the growth period. However, if the account remains a Trump account for any period of time after the growth period, including if there is a provision in the written governing instrument for an automatic transfer of the account to a traditional IRA when the account beneficiary turns 18 rather than at the end of the growth period, the written governing instrument must reflect the post-growth period requirements applicable to Trump accounts.

Section 1.530A-1T(c)(6) provides that a funded Trump account may not be closed during the growth period unless all assets have first been distributed in a distribution permissible under section 530A(b)(1)(C)(ii). The distribution restrictions of section 530A(b)(1)(C)(ii) do not apply after the growth period and therefore those restrictions do not prevent closing a Trump account after the growth period, whether funded or unfunded. It also provides that an unfunded Trump account that is not an auto account may be closed by the trustee after the growth period if provided by the terms of the written governing instrument.

D. *Establishment of Initial Trump Accounts*

1. *Methods to establish an initial Trump account*

Section 1.530A-1T(d)(1) explains the three methods by which an initial Trump account may be established. Under the first method provided in § 1.530A-1T(d)(1)(i), an auto account is established pursuant to an election by the Secretary to establish an auto account in accordance with section 530A(b)(2)(C)(i).

Under the second method provided in § 1.530A-1T(d)(1)(ii), an initial Trump account is established pursuant to an irrevocable election by a person other than the Secretary (such as by using Form 4547 or the electronic application or webpage made available by the Secretary) in accordance with section 530A(b)(2)(C)(ii). It is anticipated that elections under the first method will generally eliminate the need for any election by a person other than the Secretary; however, this second method is available for any rare exceptions. Section 1.530A-1T(d)(1)(iii) includes a deemed election to address situations where an election was made to establish an initial Trump account and the account was activated, but the election was not made by a person authorized to make the election under the applicable instructions. Under this provision, the Secretary is deemed to have made the election to establish the initial Trump account. Thus, the account does not cease to be a Trump account solely because the individual who submitted the election was not authorized to do so. Such an account is not an auto account.

Under the third method provided in § 1.530A-1T(d)(1)(iv), claiming an auto account pursuant to § 1.530A-1T(f) can result in the establishment of a claimed initial Trump account to receive the funds from the auto account. *See* section I.F. of this Explanation of Provisions regarding other methods to claim an auto account. The claimed initial Trump account is an entirely different account from the auto account. For example, an auto account can only receive qualified general contributions and the $1,000 pilot program contribution (if a pilot program election has been made by a pilot program-electing individual pursuant to section 6434) while a claimed initial Trump account can receive any contribution that is permitted to be made to a Trump account (such as a contribution from the family of the account beneficiary or from an employer).

2. *Auto Enrollment*

Under the prior § 1.530A-1 NPRM (91 FR at 11196), elections to establish an initial Trump account generally would be made by persons other than the Secretary pursuant to section 530A(b)(2)(C)(ii). Although the prior § 1.530A-1 NPRM acknowledged that section 530A(b)(2)(C)(i) authorizes the Secretary to make an election to establish an initial Trump account, those proposed regulations contemplated that the Secretary's exercise of that authority would be limited to instances in which the Secretary is deemed to have made an election when an election was submitted by a person who was not authorized to make the election (91 FR at 11197). That proposed approach reflected the need to issue the proposed regulations promptly in order to implement Trump accounts by the July 4, 2026, date on which contributions could first be made. Given the limited time available, the Treasury Department and the IRS were unable to fully resolve the legal and administrative issues associated with implementing broad automatic enrollment, including the need to prevent the unauthorized disclosure of return information.

Many commenters expressed strong support for auto enrollment of initial Trump accounts. Commenters urged the Secretary to make an election for each individual who satisfies the statutory age and social security number requirements, using information available from tax returns, Social Security Administration records, and other authorized sources. Commenters stated that requiring an affirmative election by a person other than the Secretary would reduce participation, particularly among nonfilers, families unfamiliar with tax procedures, and families with limited time or resources to complete a separate enrollment process. Commenters also stated that an eligible individual should not lose the opportunity to receive contributions or investment growth merely because no adult completed an election.

Following the publication of the prior § 1.530A-1 NPRM, and after considering the public comments supporting automatic enrollment, the Treasury Department and the IRS further considered how to address the legal and operational issues identified in that NPRM. In coordination with the Treasury Department's financial agent and other governmental agencies, the Treasury Department and the IRS have identified an administrable structure under which the Secretary can make elections for eligible individuals while preserving separate IRA ownership and protecting return information from disclosure. This change in approach therefore reflects the development of a different administrative structure, rather than a change in the Treasury Department and the IRS's interpretation of the authority conferred by section 530A(b)(2)(C)(i).

Under this structure, a separate initial Trump account is established for each eligible individual pursuant to a separate written governing instrument, and separate account-level records are maintained for each account, which are referred to as auto accounts. Contributions are received and recorded by the individual auto account, and the assets attributable to auto accounts are invested collectively through a master group trust that is intended to satisfy the applicable requirements of Rev. Rul. 81-100, as modified. Each auto account holds an undivided proportionate beneficial interest in the investments held through the master group trust that are attributable to contributions allocated to qualified classes of which the account beneficiary was a member and any $1,000 pilot program contribution (if a pilot program election has been made by a pilot program-electing individual pursuant to section 6434) made to that account, and records maintained for the Trump accounts program identify the assets attributable to each auto account. The structure thus combines separate account ownership and account-level recordkeeping with collective investment and administration.

The master group trust addresses the concerns reflected in the prior § 1.530A-1 NPRM about disclosure of return information because investments are held and administered at the master-group-trust level.[5] Thus, the trustee of the master group trust can execute transactions for the trust without receiving or disclosing account-identifying return information for each account beneficiary in connection with each transaction. Return information used to identify eligible individuals and establish auto accounts is retained in a safeguarded environment by the Secretary and his financial agent authorized to receive that information on the Secretary's behalf.

In addition, a person seeking to claim an auto account must independently submit the information required by the Secretary, authenticate the person's identity, establish the person's legal authority to act with respect to the account and to receive the account beneficiary's return information, and execute any consent required for disclosures necessary to process the claim and transfer the account balance. This process permits an authorized person to claim and control the account without

[5] In connection with its establishment of auto accounts and the master group trust, Treasury has determined the eligible investment(s) and other assets to be held by the master group trust; at Treasury's direction, the trustee of the master group trust effects any transactions by the master group trust.

disclosing protected account information before the person's legal authority to that information has been established.

Accordingly, after considering the comments and developing this new administrable structure, § 1.530A-1T(d)(2)(i) provides for auto enrollment through the Secretary making the election to establish an initial Trump account. Section 1.530A-1T(d)(2)(ii) provides that any account established after auto enrollment has begun pursuant to an election under § 1.530A-1T(d)(1)(i) through (iii) will be an auto account. To effectuate auto enrollment, on or about October 1, 2026, the Secretary will make an election to establish an auto account for each individual who the Secretary has determined satisfies the age and social security number requirements and for whom no prior election has been made by a person other than the Secretary. An auto account shall be established for each such individual. Thereafter, the Secretary will make subsequent periodic elections to establish auto accounts for individuals who the Secretary determines satisfy those requirements and for whom no prior election has been made by a person other than the Secretary, and will establish auto accounts for eligible individuals for whom a Trump account has not been established. It is anticipated that such periodic elections will be frequent enough to generally eliminate the need for any election by a person other than the Secretary.

3. *Account Activation Is Required to Establish the Initial Trump Account*

Section 1.530A-1T(d)(3) clarifies that an election under § 1.530A-1T(d)(1)(ii) (for example, using Form 4547) does not by itself establish an initial Trump account (and contributions cannot be made until the account is established). In order to establish an initial Trump account that is not an auto account, the account must be activated by the person making the election or claim pursuant to instructions from the trustee after the election is made. Account activation (which includes signing the account agreement for the initial Trump account) is generally the last step in the establishment of an initial Trump account.

The Secretary, as the responsible party, is deemed to have activated each auto account with the trustee selected by the Secretary pursuant to section 530A(g), and no separate action by anyone is required for the auto account to be established.

Making a claim with respect to an auto account pursuant to § 1.530A-1T(f) (for example, using the electronic app) does not by itself establish a claimed initial Trump account. The qualified rollover contribution from the auto account or other contributions to the account cannot be made until the account is established. In order to establish a claimed initial Trump account, the account must be activated pursuant to instructions from the trustee after the claim is made. *See* section I.F. of this Explanation of Provisions regarding making a claim with respect to an auto account.

E. *Administration of Auto Accounts*

Section 1.530A-1T(e) provides rules regarding the administration of auto accounts.

During the growth period, an auto account may accept only qualified general contributions under section 530A(f), including qualified stock contributions, and a $1,000 pilot program contribution (if a pilot program election has been made by a pilot program-electing individual pursuant to section 6434). While the Secretary cannot make a pilot program election for the $1,000 pilot program contribution under section 6434, in limited circumstances where a pilot program election has been made by a pilot program-electing individual pursuant to section 6434, but an account was not activated, the auto account will be able to receive the $1,000 pilot program contribution. After the growth period, an auto account generally may not accept contributions. This limitation permits auto accounts to receive Treasury-administered contributions while the Secretary remains the responsible party and while account-identifying information is maintained in a safeguarded environment. It also avoids requiring disclosure of account information to a person seeking to act for the account beneficiary before that person's identity, legal authority to act for the beneficiary, and entitlement under section 6103 to receive the beneficiary's return information have been established.

Section 1.530A-1T(e)(3) provides that an auto account's sole investment is its equitable interest in the master group trust, and the written governing instrument for the auto account must provide that the auto account adopts the provisions of the master group trust.[6] The master group trust may hold only eligible investments described in section 530A(b)(3), cash to the extent permitted under section 530A(b)(1)(C)(iii), and qualified stock contributed pursuant to a qualified stock contribution described in § 1.530A-7T(d), including successor qualified stock. *See* section II.D. of this Explanation of Provisions regarding qualified stock contributions. With respect to the eligible investment requirement in section 530A(b)(1)(C)(iii), each auto account's interest in the master group trust consists of its undivided proportionate beneficial interest in those investments of the master group trust that are attributable to contributions allocated to qualified classes of which the account beneficiary was a member and any $1,000 pilot program contribution (if a pilot program election has been made by a pilot program-electing individual pursuant to section 6434) made to that account.

It is anticipated neither the trustee of the master group trust nor the Secretary, acting in the Secretary's capacity as responsible party, has discretion with respect to voting or other corporate actions involving those assets. This approach permits those matters to be administered on a uniform basis for all affected auto accounts without requiring individualized directions with respect to each account. The treatment of stock,

[6] Rev. Rul. 81-100 permits IRAs (including Trump accounts) and other eligible retirement arrangements to pool assets in a group trust if specific requirements are satisfied. If those requirements are satisfied, the Federal tax status of the group trust is derived from the tax status of the participating entities to the extent of their equitable interests in the group trust. Thus, the master group trust would be exempt from taxation under section 408(e) with respect to funds that equitably belong to auto accounts.

cash, or other property received by reason of owning qualified stock is governed by § 1.530A-7T(d). *See* section II.D. of this Explanation of Provisions.

Section 1.530A-1T(e)(3)(ii) requires the trustee of the master group trust to sell qualified stock within a reasonable period after the end of the applicable minimum holding period described in § 1.530A-7T(d)(3) and promptly invest the proceeds in an eligible investment described in section 530A(b)(3). Providing a reasonable period for the sale, rather than requiring a sale on a specified date, permits the trustee to conduct an orderly disposition and reduces the potential market effects of predictable, concentrated sales. Investment of the proceeds is treated as prompt if it occurs within 30 calendar days after the sale.

Section 1.530A-1T(e)(4) provides rules for closing an unfunded auto account after its growth period or once the auto account has been claimed and funds have been transferred out (as in a trustee-to-trustee transfer). *See* § 1.530A-1T(c)(6) for rules regarding closing a Trump account that is not an auto account.

Section 1.530A-1T(e)(5) also provides that, if an account beneficiary dies during the growth period before the account beneficiary's funded auto account has been claimed, the account will cease to be a Trump account on the day that the account beneficiary dies but will remain an IRA, which still may be claimed pursuant to § 1.530A-1T(f). The fact that the account remains an IRA even after the account ceases to be a Trump account is a special rule limited to the situation in which an account beneficiary of a funded auto account dies during the growth period. The estate of the account beneficiary will be the beneficiary of the auto account. However, if the auto account is unfunded when the account beneficiary dies, the account will be closed pursuant to § 1.530A-1T(e)(4).

The Treasury Department and the IRS anticipate that reporting rules for Trump accounts, including reporting rules relevant to auto accounts, will be addressed in future guidance.

F. *Claiming an Auto Account*

1. *In General*

Section 1.530A-1T(f) provides rules for claiming an auto account. A guardian or legal custodian having authority under applicable law to manage the account beneficiary's property or financial affairs, or an account beneficiary with legal capacity (for example, having attained the age of majority, or become emancipated, under applicable State law), may claim an auto account through an electronic application or web page made available by the Secretary, in accordance with applicable instructions.

Claiming an auto account is the process by which a person establishes legal authority under applicable law to act with respect to an auto account and, before receiving protected account information, establishes authority under section 6103 to receive the account beneficiary's return information. The information required to establish authority under section 6103 is more extensive than what is required by Form 4547. Because the existence of an auto account and account-identifying information maintained by the Secretary or an authorized agent in connection with administration of the account constitutes return information protected by section 6103, a person claiming an auto account must independently provide the information required by the Secretary, authenticate the person's identity, establish the required legal authority under section 6103, and separately execute any consent required under section 6103(c) for disclosure of specified return information needed to process the claim and transfer the account balance to the receiving trustee.

During the growth period, claiming an auto account results in the entire balance of the auto account being transferred in a qualified rollover contribution to either a claimed initial Trump account of the account beneficiary (which is maintained by a trustee selected by the Secretary pursuant to section 530A(g)) or a rollover Trump account of the account beneficiary (which is maintained by a trustee other than the trustee(s) selected by the Secretary). After the growth period, claiming an auto account results in the entire balance of the auto account being transferred to an IRA of the account beneficiary.

As explained in section I.D.3. of this Explanation of Provisions, making a claim with respect to an auto account pursuant to § 1.530A-1T(f) does not by itself establish a claimed initial Trump account, and a qualified rollover contribution from the auto account or other contributions cannot be made until the account is established. In order to establish a claimed initial Trump account, the account must be activated (pursuant to instructions from the trustee to the person making the claim) after the claim is made.

If a claim is made under § 1.530A-1T(f)(1) but a receiving account is not yet established in accordance with applicable instructions (for example, if the claimed initial Trump account is not established because the account is not activated (that is, the account agreement is not signed pursuant to the trustee's instructions)), the auto account balance will remain in the auto account until a receiving account is established and the transfer can be completed. Until a receiving account is established, another claim may be made under § 1.530A-1T(f)(1). In that case, the transfer will be made pursuant to the claim for which a receiving account is first established and ready to receive the transfer.

Section 1.530A-1T(f)(2) provides that, until there has been a transfer of funds from the auto account into a receiving account, another claim may be filed. If multiple claims are filed with respect to an auto account, the responsible party for the claimed initial Trump account will be the first person who activates the account.

Section 1.530A-1T(f)(3) provides a special rule for unfunded auto accounts that permits the claiming process to establish a claimed initial Trump account or rollover Trump account even if no contribution has yet been made to the auto account.

Section 1.530A-1T(f)(4) provides that, if a guardian or legal custodian having authority under applicable law to manage the account beneficiary's property or financial affairs makes a claim for the auto account, that person generally will be the initial responsible party of the receiving Trump account when that account is established. To the extent provided under the written governing instrument and applicable law, the responsible party will have authority, while the account beneficiary does not have legal capacity, to select among eligible investments if more than one eligible investment is offered, direct a transfer for a qualified rollover contribution, direct a transfer for a qualified ABLE[7] rollover contribution under section 530A(d)(4), and select a successor responsible party for the account.

Section 1.530A-1T(f)(5) provides that, if the account beneficiary dies before the auto account has been claimed, a person authorized under applicable law to act with respect to the account beneficiary's estate or property may claim the funds through an electronic application or web page made available by the Secretary, in accordance with applicable instructions, provided that the person also establishes entitlement under section 6103(e)(3) and (7), or other applicable authority, to receive the decedent's return information.

[7] Section 529A was enacted by the Stephen Beck, Jr., Achieving a Better Life Experience Act of 2014, which was enacted as part of the Tax Increase Prevention Act of 2014, Public Law 113-295 (128 Stat. 4010).

II. *Section 1.530A-7T -- Qualified General Contributions and Qualified Stock Contributions*

A. *Overview*

Section 1.530A-7T provides definitions related to qualified general contributions, rules for qualified general contributions (including qualified general contributions that use an approved class or that consist of qualified stock), and rules for determining whether a general funding contribution furthers an exempt purpose.

B. *Definitions*

Section 1.530A-7T(b)(1) defines the term *approved class* as a class consisting of not less than 5,000 account beneficiaries that includes all account beneficiaries who are still in their growth period when the contribution is made, reside in one or more States or other qualified geographic areas specified by the terms of and on the record date(s) provided in the Treasury acceptance agreement, and were born in one or more calendar years specified in the Treasury acceptance agreement.

Section 1.530A-7T(b)(2) defines the term *eligible donor* consistently with section 530A(f)(2)(A) as an entity described in section 170(c)(1) (other than a possession of the United States or a political subdivision of a possession), an Indian Tribal government, or an organization described in section 501(c)(3) and exempt from tax under section 501(a).

Section 1.530A-7T(b)(3) defines the term *general funding contribution* consistently with section 530A(f)(2), and treats an approved class as a qualified class for purposes of this definition. *See* section II.C. of this Explanation of Provisions regarding treatment of an approved class as a qualified class.

Section 1.530A-7T(b)(4) provides that the term *minimum holding period requirement* is the period of time described in § 1.530A-7T(d)(3) during which the qualified stock may not be sold or otherwise disposed of.

Section 1.530A-7T(b)(5) defines the term *qualified class* consistently with section 530A(f)(3), clarifying that a contribution is made when it is made to the Trump account. A contribution is made to the Trump account when it is received by the Trump account, and not when the contribution is announced by the eligible donor or when the general funding contribution is received by the Treasury Department.

Section 1.530A-7T(b)(6) defines the term *qualified general contribution* consistently with section 530A(f)(1) and § 1.530A-7T(c). In accordance with § 1.530A-7T(c)(3)(ii) and (iii) and (c)(4)(ii), it provides that a qualified general contribution includes an *approved class contribution*, which is a qualified general contribution that uses an approved class, and that a qualified general contribution includes a qualified stock contribution.

Section 1.530A-7T(b)(7) defines the term *qualified geographic area* as provided in section 530A(f)(3)(B).

Section 1.530A-7T(b)(8) defines the term *qualified stock* as stock that is publicly traded, issued by a domestic corporation, and not subject to any pre-existing transfer restrictions, such as being a restricted security as defined in 17 CFR 230.144(a)(3), in each case as determined when it is contributed to the Treasury Department as part of a general funding contribution.

Section 1.530A-7T(b)(9) defines the term *qualified stock contribution* as a qualified general contribution of qualified stock that satisfies the requirements of § 1.530A-7T(c) and (d).

Section 1.530A-7T(b)(10) defines the term *record date* as one or more dates specified in a Treasury acceptance agreement as of which the Secretary determines the account beneficiaries whose Trump accounts are eligible to receive a qualified general contribution.

Section 1.530A-7T(b)(11) defines the term *Treasury acceptance agreement* as the written agreement or other documentation pursuant to which the Secretary accepts a general funding contribution.

C. *Qualified General Contributions*

Section 1.530A-7T(c)(1) provides that a contribution is a qualified general contribution only if it satisfies the requirements in § 1.530A-7T(c)(2) through (4). These requirements track the requirements of section 530A(f)(1)(A) through (C) that the contribution be made by the Secretary pursuant to a general funding contribution, be made to the Trump accounts of account beneficiaries in a qualified class, and be made in an equal amount for each account beneficiary in that class.

In accordance with section 530A(f)(1)(A), § 1.530A-7T(c)(2) provides rules for the Secretary's acceptance of a general funding contribution and the Secretary's subsequent making of qualified general contributions to Trump accounts. First, an eligible donor seeking to make a general funding contribution submits a request on the form prescribed by the Secretary or through an electronic application or web page made available by the Secretary. Second, the Secretary reviews the request and may, in the Secretary's sole discretion, approve the request after determining that the request satisfies the requirements of § 1.530A-7T and considering objective criteria, including the cost of implementation, the operational feasibility of the contribution, and the potential impact of other Federal laws (such as securities laws). Third, if the Secretary approves the request, the Secretary and the donor will enter into a Treasury acceptance agreement that contains information required by the Secretary, including the aggregate amount of funding, the qualified class, the record date, and, if applicable, information about the qualified stock.

Because the eligible donor makes a general funding contribution to the Secretary, and the Secretary then makes a qualified general contribution only to certain

Trump accounts, there must be a clear process for acceptance, allocation, transfer, and overall administration. Section 1.530A-7T(c)(2) provides clear and administrable rules to implement these aspects of the two-step contribution structure contemplated by section 530A(f). These rules provide eligible donors and the Treasury Department with certainty and ensure consistent treatment of all members of the qualified class. The Treasury Department anticipates releasing more information about the request form.

In accordance with section 530A(f)(1)(B), § 1.530A-7T(c)(3)(i) provides that qualified general contributions can only be made to Trump accounts of account beneficiaries in a qualified class. The section clarifies that the qualified class must be the qualified class that is set forth in the Treasury acceptance agreement, even if the donor request form identified a different group of account beneficiaries.

Section 1.530A-7T(c)(3)(ii) and (c)(4)(ii) provides that, for purposes of section 530A(f)(1)(B) and (C), respectively, an approved class is treated as a qualified class. Section 530A(f) is designed to permit broad-based contributions to Trump accounts rather than contributions selected on an account-by-account basis. The approved-class rule implements that design by permitting only classes that are defined using a combination of objective criteria consisting of the qualified class-based criteria used in section 530A(f)(3): the account beneficiary must be in the growth period, must reside in one or more States or other qualified geographic areas specified in the Treasury acceptance agreement, and must have been born in one or more specified calendar years. The rule also requires the class to consist of not less than 5,000 account beneficiaries in order to be consistent with the same minimum class size requirement reflected in the qualified geographic area requirement of section 530A(f)(3)(B).

The Treasury Department and the IRS have determined that treating an approved class as a qualified class is consistent with section 530A(f) because the rule furthers the statutory objective of broad, equal-per-beneficiary funding while allowing contributions to be administered using objective criteria that can be verified from Treasury Department records. For example, a contribution for all account beneficiaries born in specified years and residing in a specified State or qualified geographic area may serve a broad class of account beneficiaries while permitting the eligible donor and the Secretary to define the class with enough specificity for administrable funding and allocation.

Section 1.530A-7T(c)(3)(iii) provides that a qualified general contribution generally must be made in cash to a Trump account. An exception applies for qualified stock contributed as part of a qualified stock contribution that satisfies § 1.530A-7T(d).

Section 1.530A-7T(c)(4) provides that a qualified general contribution must be made in an equal amount to the Trump account of each account beneficiary in the qualified class. Details regarding the form and amount of the qualified general contributions will be addressed in the Treasury acceptance agreement. The equal-amount requirement applies to all account beneficiaries in the qualified class as of the applicable record date and, if multiple record dates are used, across all applicable record dates. The account beneficiaries included in the qualified class are determined based on information obtained during the election process under § 1.530A-1T(d)(1)(i) and (ii), as updated by information reported to the Secretary under section 530A(i).

D. *Qualified Stock Contributions*

1. *In General*

To facilitate certain stock donations from eligible donors, the temporary regulations provide rules for qualified stock contributions. A qualified stock contribution is a contribution of qualified stock. Qualified stock is publicly traded stock that is issued by a domestic corporation and meets the other requirements set forth in § 1.530A-7T(b)(8).

Section 530A(b)(1)(C)(iii) provides that, during the growth period, the funds in a Trump account may be invested only in eligible investments described in section 530A(b)(3). Holding qualified stock received pursuant to a qualified stock contribution does not violate this restriction because no funds in the account are used to acquire the contributed stock. Rather, the stock is contributed directly into the individual Trump accounts for the beneficiaries in the designated qualified class.

Pursuant to the regulatory authority conferred in section 530A(a) to provide exceptions to the rules of section 408(a), the temporary regulations also provide an exception from the section 408(a)(1) requirement that non-rollover contributions to an IRA must be in cash for a qualified stock contribution. The Treasury Department and the IRS have determined that these limited exceptions for qualified stock contributions will facilitate more donations from eligible donors, and will help create a practical pathway for large-scale private giving to support the Trump account program and the account beneficiaries with Trump accounts.

Qualified stock that is contributed to a Trump account is subject to a minimum holding period requirement in § 1.530A-7T(d)(3). Pursuant to the minimum holding period requirement, the stock may not be sold before the earlier of (i) the date that is 5 years after the qualified stock contribution to the account, and (ii) the end of the growth period for the account beneficiary of that account. If the qualified stock is disposed of in violation of the minimum holding period requirement, the trustee must repurchase the same number of shares of the same class of qualified stock that were sold or otherwise disposed of as soon as practicable. However, the qualified stock may be disposed of during the required minimum holding period to effectuate a qualified ABLE rollover contribution, to effectuate a qualified rollover contribution when fractional shares cannot be transferred in kind (for example, if fractional shares cannot be transferred as part of a qualified rollover contribution, the transferring trustee may sell the fractional shares and transfer cash as part of the qualified rollover contribution instead), to accept a tender offer for the qualified stock at the direction of the responsible party, or if the issuer of the qualified stock is acquired for cash (by merger, purchase, or otherwise). *See* § 1.530A-7T(d)(3)(iv).

Section 1.530A-7T(d)(4) provides qualified stock treatment for certain stock received by the Trump account by reason of owning qualified stock (successor qualified stock).

Section 1.530A-7T(d)(5) and (d)(6) provides specific rules on the consequences of the qualified stock being delisted from a national securities exchange and the receipt of property from corporate distributions on the qualified stock, generally requiring that the trustee must promptly sell or dispose of the qualified stock or the property that was distributed, invest the net proceeds and any distributed cash in eligible investments described in section 530A(b)(3), and disclose how the proceeds were invested to the account beneficiary.

Section 1.530A-7T(d)(7) provides that an auto account's equitable interest in qualified stock in the master group trust is treated as qualified stock.

E. *Tax Implications of Contributions*

A general funding contribution, by definition, is made to the Secretary for distribution to a broad class that is defined by objective criteria pursuant to the terms of a Treasury acceptance agreement meant to advance the Trump account program. Thus, § 1.530A-7T(e)(1) provides that with regard to a person making a contribution to an eligible donor that is an organization described in section 501(c)(3) and exempt from tax under section 501(a) to fund a general funding contribution satisfying the requirements of § 1.530A-7T, that person's contribution is deductible under section 170, subject to the other requirements of that section. Similarly, § 1.530A-7T(e)(1) provides that, with regard to individuals making a gift to any organization qualifying as an eligible donor for purposes of section 530A, whether or not that eligible donor subsequently makes a general funding contribution, the gift is to an organization described in section 2522.

Section 1.530A-7T(e)(2)(i) provides that an organization described in section 501(c)(3) and exempt from tax under section 501(a) furthers one or more of its purposes described in section 501(c)(3) by providing a general funding contribution. These rules apply whether the organization provides the amount directly or provides the amount through a distribution from a donor advised fund. These rules provide certainty for eligible donors that funding contributions distributed to the qualified class or approved class outlined in the Treasury acceptance agreement will not affect that charity's exempt purpose. The use of a qualified class or an approved class furthers this purpose because the class is broad, is defined using objective statutory criteria, and includes every account beneficiary satisfying those objective criteria.

Section 1.530A-7T(e)(2)(ii) provides that an eligible donor making a general funding contribution is making an expenditure for a purpose specified in section 170(c)(2)(B). Section 1.530A-7T(e)(2)(ii) also provides that a general funding contribution is neither a grant to an individual for purposes of section 4945 nor a distribution to a natural person for purposes of section 4966. Section 4945(d)(4) generally requires a private foundation to exercise expenditure responsibility with respect to certain grants. Similarly, section 4966(c)(1)(B)(ii) generally requires a sponsoring organization to exercise expenditure responsibility with respect to certain distributions from a donor advised fund. To provide certainty to eligible donors, § 1.530A-7T(e)(2)(ii) also provides that, to the extent that an obligation to exercise expenditure responsibility arises under sections 4945 or 4966, an eligible donor that makes a general funding contribution that satisfies the requirements of that section is treated, for purposes of sections 4945 and 4966, as exercising expenditure responsibility in accordance with section 4945(h). This treatment is based on the safeguards applicable to general funding contributions, including the requirements governing the Treasury acceptance agreement; the requirement that the contribution be made exclusively for one or more purposes specified in section 170(c)(2)(B) and further one or more exempt purposes described in section 501(c)(3); and the reporting requirements under sections 530A(i) and 4945(h)(3). These rules apply whether the donor makes the contribution directly or through a donor advised fund.

Applicability Dates

The temporary regulations under §§ 1.530A-1T and 1.530A-7T apply to taxable years beginning on or after January 1, 2026, and expire on **[INSERT DATE 3 YEARS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]**.

Special Analyses

I. *Good Cause*

Section 553(b)(3)(B) of the Administrative Procedure Act (APA) (5 U.S.C. 553(b)(3)(B)) provides that advance notice and the opportunity for public comment are not required with respect to a rulemaking when an “agency for good cause finds (and incorporates the finding and a brief statement of reasons therefor in the rules issued) that notice and public procedure thereon are impracticable, unnecessary, or contrary to the public interest.” The Treasury Department and the IRS find that good cause exists for issuing these temporary regulations without prior notice-and-comment because following notice-and-comment procedures before these regulations take effect would be impracticable and contrary to the public interest.

OBBBA added section 530A to the Code. Section 70204 of OBBBA generally applies to taxable years beginning after December 31, 2025. Although contributions to Trump accounts were prohibited before July 4, 2026, contributions may now be made to Trump accounts.

OBBBA created a new statutory account structure for eligible individuals. The rules in § 1.530A-1T are necessary to implement that structure immediately.

Section 530A provides that an initial Trump account must be created or organized by the Secretary and designated as a Trump account, and permits the Secretary to make the election to establish an initial Trump account. Section 1.530A-1T provides the procedures needed for the Secretary to exercise that authority, for trustees to identify whether an account is an initial Trump account or a rollover Trump account, for auto accounts to be established and administered, and for a guardian or legal custodian having authority under applicable law to manage the account beneficiary's property or financial affairs, or an account beneficiary, if the account beneficiary has legal capacity, to claim an auto account and direct a permitted transfer. Without immediately effective rules, there would be no uniform framework for determining when an initial Trump account has been established, which account is the account beneficiary's initial Trump account, how auto enrollment by the Secretary would work, how a responsible party is identified, or how an auto account may be claimed and transferred. Those issues must be resolved before trustees and the Secretary can administer Trump accounts as required by section 530A and before contributions can be accepted and properly directed.

Immediate effectiveness is particularly important for the auto account rules in § 1.530A-1T. After publication of the prior § 1.530A-1 NPRM, commenters urged the Treasury Department and the IRS to provide for broader auto enrollment of initial Trump accounts. Following the publication of the prior § 1.530A-1 NPRM, and after considering the public comments supporting automatic enrollment, the Treasury Department and the IRS identified an administrable structure under which the Secretary can make elections for eligible individuals while preserving separate IRA ownership and protecting return information from disclosure.

Under this structure, a separate initial Trump account is established for each eligible individual pursuant to a separate written governing instrument, and separate account-level records are maintained for each account, which are referred to as auto accounts. Contributions are received and recorded by the individual auto account, and the assets attributable to auto accounts are invested collectively through a master group trust that is intended to satisfy the applicable requirements of Rev. Rul. 81-100, as modified. Each auto account holds an undivided proportionate beneficial interest in the investments held through the master group trust that are attributable to contributions allocated to qualified classes of which the account beneficiary was a member and any $1,000 pilot program contribution (if a pilot program election has been made by a pilot program-electing individual pursuant to section 6434) made to that account, and records maintained for the Trump accounts program identify the assets attributable to each auto account. The structure thus combines separate account ownership and account-level recordkeeping with collective investment and administration.

The ability to use that structure depends on having a regulatory regime in effect governing Secretary elections, account establishment, trustee administration, the master group trust, responsible-party authority, claiming procedures, and transition rules for accounts and elections that predate auto enrollment. If the effective date of the regulations was delayed until after notice-and-comment procedures were completed, the Secretary would be unable to begin administering auto elections and auto accounts on a uniform basis, and eligible individuals may not have an account in which to receive qualified general contributions or a $1,000 pilot program contribution (if a pilot program election has been made by a pilot program-electing individual pursuant to section 6434). That result would be contrary to the public interest because it would delay making the accounts available for eligible individuals at the earliest practicable time, which in turn would shorten the growth period of such accounts.

The rules in § 1.530A-7T are also needed immediately. Section 530A(f) permits eligible donors to make general funding contributions for qualified classes of account beneficiaries, and section 530A contemplates that contributions may be made during the growth period. Section 1.530A-7T provides the procedures and standards needed for the Secretary to accept a general funding contribution, enter into a Treasury acceptance agreement, identify account beneficiaries, and determine the amount payable to each account. Until those rules are effective, eligible donors, trustees, and the Treasury Department would lack the operative framework for determining whether a proposed broad-based contribution qualifies under section 530A(f), which account beneficiaries are included, and the amount to be contributed to each account. Delaying these rules would prevent or significantly delay broad-based contributions, require donors and trustees to defer implementation or proceed under uncertain and potentially inconsistent terms, and could deprive account beneficiaries of contributions and associated investment returns during the first period in which Trump accounts are being established and funded.

The qualified stock contribution rules in § 1.530A-7T present an additional need for immediate guidance. Because section 408(a)(1) generally contemplates cash contributions to IRAs and section 530A(b)(1)(C)(iii) restricts investments during the growth period to eligible investments while section 530A(a) allows the Secretary to provide exceptions in guidance for a Trump account from treatment as an IRA, trustees and donors need rules before a stock contribution is accepted to determine whether stock may be transferred, what stock qualifies, how the minimum holding period applies, how corporate actions and successor stock are handled, and when cash proceeds or other property must be invested in eligible investments. Without immediate rules, an eligible donor seeking to make a qualified stock contribution could not reliably complete the contribution, and trustees could not accept and hold the stock without risking inconsistent treatment under the IRA and Trump account rules. Because these issues must be resolved before stock is accepted and allocated to accounts, post-hoc guidance issued only after completion of notice-and-comment procedures would not ensure that stock contributions can be made or that such contributions were treated equally.

The temporary regulations also reduce the risk of inconsistent account treatment and misdirected contributions during the transition to auto enrollment. The regulations specify how accounts established before auto enrollment are treated, how elections made before auto enrollment that have not resulted in established accounts are handled, and how an auto account may be claimed and transferred. Without immediately effective rules addressing the transition, the Secretary and trustees could receive overlapping elections, claims, funding requests, and transfer instructions for the same account beneficiaries without a uniform rule for how to resolve them. That uncertainty would impair orderly administration and could require corrective transfers or duplicative administrative actions.

The Treasury Department and the IRS have taken steps to provide advance information and opportunities for public input. Notice 2025-68 informed taxpayers that guidance would be issued under section 530A and requested comments. The Treasury Department and the IRS also published the prior § 1.530A-1 NPRM regarding elections to establish initial Trump accounts and considered comments on auto enrollment and account administration. In accordance with section 7805(e) of the Code, a cross-referenced notice of proposed rulemaking is being published concurrently with these temporary regulations, and the Treasury Department and the IRS will consider all timely comments before issuing final regulations.

For these reasons, the Treasury Department and the IRS find that delaying the effectiveness of §§ 1.530A-1T and 1.530A-7T to complete notice-and-comment procedures would be impracticable and contrary to the public interest. Accordingly, the Treasury Department and the IRS find good cause under 5 U.S.C. 553(b)(3)(B) to issue these temporary regulations without prior notice and comment.

The Treasury Department and the IRS also find good cause under 5 U.S.C. 553(d)(3) for these temporary regulations to become effective upon publication in the **Federal Register**. A 30-day delayed effective date would create the same problems described above: auto enrollment and auto accounts could not be administered on a uniform basis; claims and transfers could be delayed; and qualified general contributions or qualified stock contributions could be postponed or made under uncertain terms. Immediate effectiveness is therefore necessary to permit the Secretary, trustees, eligible donors, responsible parties, and account beneficiaries to apply the rules as Trump accounts are established, claimed, funded, and transferred.

II. *Regulatory Planning and Review*

Executive Orders 12866 and 13563 direct agencies to assess costs and benefits of available regulatory alternatives and, if regulation is necessary, to select regulatory approaches that maximize net benefits (including potential economic, environmental, public health and safety effects, distributive impacts, and equity).

Executive Order 13563 emphasizes the importance of quantifying both costs and benefits, reducing costs, harmonizing rules, and promoting flexibility.

The temporary regulations have been designated by the Office of Management and Budget's (OMB's) Office of Information and Regulatory Affairs (OIRA) as subject to review under Executive Order 12866 pursuant to the Memorandum of Agreement (MOA, July 4, 2025) between the Treasury Department and the OMB regarding review of tax regulations. OIRA has determined that the rulemaking is economically significant and subject to review under section 3(f)(1) of Executive Order 12866 and section 1(c) of the MOA. Accordingly, the temporary regulations have been reviewed by OMB.

Need for Regulation

The temporary regulations define terms for the purpose of implementing section 530A and clarify how initial accounts will be created and claimed. The temporary regulations define terms and establish rules for general funding contributions and qualified general contributions.

The Statute and the Temporary Regulations

Public Law 119-21, commonly referred to as the One, Big, Beautiful Bill Act, added new sections 530A, 128, and 6434 to the Code. Section 530A describes Trump accounts, section 128 describes certain employer contributions to Trump accounts, and section 6434 describes the Trump accounts contribution pilot program. The temporary regulations implement rules under section 530A concerning account creation and contributions to a qualified class.

Section 530A defines a Trump account as a traditional individual retirement account (IRA) with some special rules. Most special rules that distinguish Trump accounts from other IRAs apply only during the growth period. The first day of the growth period is the day the account is established, and the final day of the growth period is December 31 of the calendar year in which the account beneficiary attains age 17. The rules for traditional IRAs generally apply after the growth period. A Trump account may be established for the benefit of a child prior to the calendar year in which the child attains age 18 if the child has been issued a social security number.

In general, distributions from Trump accounts are not permitted during the growth period. The entire balance of a Trump account may be rolled over in a direct trustee-to-trustee transfer to a new Trump account of the account beneficiary. The entire balance of a Trump account may be rolled over in a direct trustee-to-trustee transfer to an ABLE account of the account beneficiary in the calendar year the account beneficiary attains age 17.

During the growth period, cash in a Trump account must generally be invested in funds that track the returns of a broad index of equities in primarily U.S. companies for which regulated futures contracts are traded, do not use leverage, and do not have annual fees and expenses above 0.1%.

Trump accounts may receive contributions from nonprofits, governments, employers, and individuals. During the growth period, contributions to a Trump account generally are subject to an annual limit of $5,000, adjusted for inflation for taxable years after 2027.

Governments and nonprofits may fund contributions in equal amounts to the Trump accounts of every account beneficiary in a qualified class. A qualified class consists of all account beneficiaries in the growth period or all such account beneficiaries who meet specified geographic or birth year criteria. Contributions to a qualified class funded by governments and nonprofits are facilitated by the Treasury Department. A payment from a government or nonprofit to the Treasury Department for the purpose of funding contributions to a qualified class is defined by section 530A(f)(2) as a general funding contribution. A payment from the Treasury Department to the Trump account of an account beneficiary in a qualified class is defined by section 530A(f)(1) as a qualified general contribution. Contributions to a qualified class facilitated by the Treasury Department and funded by a government or nonprofit do not count towards the $5,000 annual contribution limit.

Section 128 sets rules for certain employer contributions to Trump accounts. Employers may contribute to the Trump account of an employee or an employee's dependent. Section 128 employer contributions to a Trump account are excluded from the employee's income, up to an annual limit of $2,500, adjusted for inflation for taxable years after 2027. Section 128 employer contributions count towards the $5,000 annual contribution limit.

Section 6434 describes the Trump accounts contribution pilot program. In the pilot program, the Secretary of the Treasury (Secretary) will pay $1,000 to the Trump accounts of eligible children. A U.S. citizen born in 2025, 2026, 2027, or 2028 who has been issued a social security number, for whom no request for a pilot program contribution has previously been processed, and for whom the pilot program-electing individual anticipates will be that individual's qualifying child under section 152(c) for the year in which the election is made is eligible for a pilot program contribution. Pilot program contributions do not count towards the $5,000 annual contribution limit.

Other contributions to a Trump account during the growth period (other than qualified rollover contributions), including contributions from friends or family members, contributions from governments and nonprofits that are not facilitated by the Treasury Department, and employer contributions that are not Section 128 employer contributions, are contributions for which no deduction is allowed under section 219 (they create investment in the contract (basis) for purposes of applying section 72) and count towards the $5,000 annual contribution limit.

The temporary regulations (§§ 1.530A-1T and 1.530A-7T) are just one piece of the implementation of section 530A; prior proposed regulations addressed eligible investments (§ 1.530A-3), and future guidance will address other issues (§§ 1.530A-2, 1.530A-4, 1.530A-5, and 1.530A-6).

Under the temporary regulations, the following terms are defined for the purpose of implementing section 530A: IRA, traditional IRA, growth period, responsible party, initial Trump account, auto account, claimed initial Trump account, qualified rollover contribution, rollover Trump account, and master group trust. An IRA is an individual retirement account. A traditional IRA is an individual retirement account that is not a Roth IRA. Growth period is a concise term for the period described repeatedly by the statute as ''the period before the first day of the calendar year in which the account beneficiary attains age 18.'' A responsible party is the person authorized under the written governing instrument to act on behalf of the account beneficiary. An initial Trump account is an account that is created or organized by the Secretary. An auto account is an initial Trump account that is created following an election made by the Secretary. A claimed initial Trump account is an initial Trump account that receives a qualified rollover contribution from an auto account. A qualified rollover contribution is a direct trustee-to-trustee transfer of an account beneficiary's entire Trump account balance to a different Trump account for the same account beneficiary. A rollover Trump account is a Trump account that is not an initial Trump account. A master group trust is a trust established by the Secretary to hold investments for the exclusive benefit of account beneficiaries of auto accounts.

Under the temporary regulations, these additional terms are defined for the purpose of implementing section 530A: Treasury acceptance agreement, eligible donor, approved class, record date, qualified stock, and qualified stock contribution. A Treasury acceptance agreement is a document that specifies the terms under which the Secretary accepts a general funding contribution. An eligible donor is a government or nonprofit that is eligible to make a general funding contribution. An approved class is a group of at least 5,000 account beneficiaries in the growth period who meet geographic and birth year criteria specified by a Treasury acceptance agreement. A record date is the date (or dates) when membership in a qualified class is determined as specified in a Treasury acceptance agreement. Qualified stock is publicly traded stock of a domestic corporation with no pre-existing transfer restrictions, such as being a restricted security as defined in 17 CFR 230.144(a)(3). A qualified stock contribution is a qualified general contribution of qualified stock.

Under the temporary regulations, the Secretary will create auto accounts for eligible children who do not have Trump accounts on or about October 1, 2026, and periodically thereafter. The Secretary is the responsible party for an auto account. An auto account may receive qualified general contributions and the $1,000 pilot program contribution. A person with legal authority to view the account beneficiary's tax information, including a guardian or legal custodian or the account beneficiary after attaining age 18, may "claim" an auto account. When an auto account is claimed during the growth period, there is a qualified rollover contribution to a claimed initial Trump account or to a rollover account, and the individual claiming the account becomes the responsible party. When an auto account is claimed after the growth period, there is a trustee-to-trustee transfer to a traditional IRA for the benefit of the account beneficiary.

Under the temporary regulations, the terms of a general funding contribution must be specified in a Treasury acceptance agreement. A Treasury acceptance agreement must identify the donor, aggregate funding amount or commitment, geographic criteria of the qualified class (if any), age criteria of the qualified class (if any), record dates, donor-identity reporting, and other required information. An approved class will receive the same tax treatment and Treasury facilitation as a qualified class. The regulations clarify that a 501(c)(3) organization furthers exempt purposes by making a general funding contribution, including through a donor advised fund, and that a general funding contribution is neither a section 4945 grant to an individual nor a section 4966 distribution to a natural person.

Under the temporary regulations, a general funding contribution may consist of qualified stock. For a qualified stock contribution, the Treasury acceptance agreement must include the name and employee identification number (EIN) of the stock issuer, the number of shares, and other required information. Qualified stock that is contributed to a Trump account in a qualified general contribution must generally be held for five years, but there are exceptions to liquidate the stock at the end of the growth period, to initiate a qualified ABLE rollover, to permit cash in lieu of fractional shares that cannot be transferred in kind as part of a qualified rollover contribution, in the case of a tender offer, or if the issuer of the qualified stock is acquired (by merger, purchase, or otherwise). If qualified stock is disposed of improperly without an exception, equivalent stock must be repurchased.

Baseline

The Treasury Department and the IRS have assessed the benefits and costs of the temporary regulations relative to a no-action baseline reflecting anticipated Federal income tax-related behavior in the absence of these temporary regulations.

Affected Entities and Taxpayers

The temporary regulations are expected to affect 73 million children in 44 million families.

Economic Effects of the Temporary Regulations

The temporary regulations make several choices that increase the appeal of making general funding contributions. As a consequence, more eligible donors will make general funding contributions, more children will receive qualified general contributions, and the total value of class contributions will be larger.

The class contribution feature of Trump accounts is unprecedented in the domain of child savings accounts. This will be the first time the federal government facilitates private contributions for the benefit of individual American children. Because class contributions are charting new territory in charitable giving, there is no obvious basis for estimating the incremental impact of the temporary regulations.

One very instructive data point is the pledged contribution from the Michael & Susan Dell Foundation (MSDF). MSDF has been at the forefront of class contributions since Trump accounts were enacted into law. MSDF pledged $6.25 billion to children born between 2016 and 2024 who live in ZIP codes where household median income is below $150,000. Some individuals have announced similar donations with smaller regional footprints, and other individuals have expressed interest in similar donations. It is unclear whether this level of giving can be sustained in the long run or whether it is concentrated as Trump accounts are launching. The choices in the temporary regulations position class contributions to Trump accounts for sustained participation by nonprofits and governments, both large and small.

The temporary regulations are expected to increase the number of children who have Trump accounts in 2026 by more than 60 million. The future impact is more uncertain, but the temporary regulations are estimated to result in approximately two million additional accounts per birth year cohort into the future.

As a result of the temporary regulations, the incremental value of class contributions is expected to be billions of dollars per year, allocated across the Trump accounts of tens of millions of children.

Account creation

The temporary regulations prescribe that the Secretary will create Trump accounts that are able to receive qualified general contributions on behalf of eligible children without any action required from parents or guardians. An alternative would be to require a parent or guardian to take some action to open a Trump account before an eligible child is able to receive a qualified general contribution. The Treasury Department and the IRS decided to create Trump accounts for eligible children because the benefit to Trump account beneficiaries of incremental general funding contributions was expected to exceed the cost to the Treasury Department and the IRS of incremental administrative burdens.

A previous version of these regulations, which was proposed and is being withdrawn, explained that the Treasury Department and IRS believed at the time it was published that it was not possible for the Secretary to create Trump accounts for eligible children due to legal and administrative constraints. The Treasury Department and IRS, in consultation with the financial agent, the initial trustee, and appropriate federal regulators, have found a path to overcome those constraints. A major innovation for overcoming those constraints is using a master group trust. Trump accounts, which are individual accounts, are able to hold eligible investments, indirectly through their interests in the master group trust, without disclosing taxpayer information.

The most informative precedent for estimating the impact of the Secretary creating Trump accounts, relative to requiring action from a parent or guardian, is the Alfond Grant program, which began offering $500 to every newborn in Maine starting in 2013. The Alfond Grant program initially had an opt-in structure where a parent or guardian was required to check a box on their state tax return, and enrollment during that period was around 40% of eligible families. Trump accounts have some advantages over the Alfond Grant program for opt-in enrollment: the initial grant is larger, Trump accounts are capable of accepting other employer, nonprofit and government contributions, and Trump accounts are more salient than the Alfond Grant program. Nevertheless, if the Treasury Department and the IRS had chosen to require a parent or guardian to take some action to open a Trump account, then ongoing enrollment would likely have been close to 50% of eligible families. Administrative data from early Trump account elections so far in 2026 support this inference from the Alfond Grant program. In contrast, when the Secretary begins creating Trump accounts, nearly 100% of eligible children will have Trump accounts.

In addition to the direct impact, which will be the creation of more than 60 million Trump accounts, the choice to have the Secretary create accounts will increase the appeal of funding contributions to classes of Trump account beneficiaries. Stakeholders have expressed that eligible donors prefer that their contributions reach all children, not just children whose parents have the awareness to opt in. Both nonprofits and governments will be more likely to make general funding contributions with the confidence that the Secretary creates Trump accounts for all eligible children.

Table 1 shows the approximate number of electronic Forms 4547 processed prior to July 30, 2026, and the estimated number of eligible children in 2026, by adjusted gross income. Proportionately, children in lower income groups are the biggest beneficiaries of the regulation requiring the Secretary to establish a Trump account for eligible children.

Table 1

Adjusted Gross Income	Electronic Forms 4547 processed prior to July 30 (thousands)	Number of eligible children in 2026 (thousands)
No adjusted gross income or missing	10	8,610
$1 under $15,000	390	4,070
$15,000 under $30,000	710	10,340
$30,000 under $50,000	840	11,070
$50,000 under $75,000	780	8,770
$75,000 under $100,000	620	6,320
$100,000 under $200,000	1,480	14,570
$200,000 under $500,000	660	7,540
$500,000 or more	100	2,070
Total	5,600	73,370

Table 2 shows the approximate number of electronic Forms 4547 processed prior to July 30, 2026, and the estimated number of eligible children in 2026, by state. In most states, the number of processed electronic Forms 4547 was less than 10% of the estimated number of eligible children as of July 30.

Table 2

State	Electronic Forms 4547 processed prior to July 30 (thousands)	Number of eligible children in 2026 (thousands)
Alabama	80	1,000
Alaska	20	150
Arizona	130	1,410
Arkansas	60	630
California	450	7,210
Colorado	110	1,090
Connecticut	50	640
Delaware	20	190
District of Columbia	10	100
Florida	330	4,060

Georgia	180	2,230
Hawaii	20	250
Idaho	50	430
Illinois	180	2,390
Indiana	150	1,440
Iowa	70	660
Kansas	70	620
Kentucky	100	910
Louisiana	70	940
Maine	20	220
Maryland	90	1,200
Massachusetts	90	1,170
Michigan	170	1,870
Minnesota	110	1,180
Mississippi	50	610
Missouri	130	1,230
Montana	30	210
Nebraska	40	440
Nevada	50	610
New Hampshire	30	220
New Jersey	130	1,780
New Mexico	40	400
New York	250	3,510
North Carolina	200	2,100
North Dakota	20	170
Ohio	230	2,310
Oklahoma	90	850
Oregon	70	720
Pennsylvania	220	2,360
Rhode Island	20	180
South Carolina	100	1,050
South Dakota	20	200
Tennessee	160	1,410
Texas	540	6,780
Utah	80	840
Vermont	10	100
Virginia	160	1,680
Washington	160	1,460
West Virginia	40	310
Wisconsin	110	1,110
Wyoming	20	120
Other or missing	10	8,630
Total	5,600	73,370

Approved classes

The temporary regulations allow contributions to approved classes, which are defined by both age and geographic criteria, to receive the same tax treatment and facilitation by the Treasury Department and the IRS as contributions to qualified classes, which are defined by either age or geographic criteria. An alternative would be not to allow contributions to approved classes to receive the same tax treatment and facilitation by the Treasury Department and the IRS as contributions to qualified classes.

Stakeholders have expressed that eligible donors value the flexibility of using both age and geographic criteria. Notably, the eligibility criteria announced by the MSDF included both age and geographic criteria. This choice and several others increase the appeal of funding contributions to classes of Trump account beneficiaries.

The Treasury Department and the IRS used historical returns for a broad index of U.S. equities for birth cohorts ranging from 1926 to 2006 to quantify the benefit at age 18 of returns on investments made at various ages.[8] Table 3 shows that while an earlier investment allows for more growth, there are still typically benefits at age 18 from making an investment even at age 17.

Table 3

	Value at age 18 of investment in broad index of U.S. equities		
Investment scenario	**10th percentile**	**50th percentile**	**90th percentile**
$1,000 at birth	2,980	6,180	13,800
$1,000 at age 1	2,860	5,690	11,990
$1,000 at age 2	2,680	4,920	10,040
$1,000 at age 3	2,400	4,750	9,030
$1,000 at age 4	2,150	4,260	8,040
$1,000 at age 5	2,020	3,990	7,110
$1,000 at age 6	1,770	3,620	6,350
$1,000 at age 7	1,660	3,280	5,380
$1,000 at age 8	1,680	3,150	4,670
$1,000 at age 9	1,480	2,740	4,110

[8] Kenneth R. French Data Library. *https://mba.tuck.dartmouth.edu/pages/faculty/ken.french/data_library.html*.

$1,000 at age 10	1,350	2,460	3,560
$1,000 at age 11	1,340	2,350	3,040
$1,000 at age 12	1,180	2,050	2,720
$1,000 at age 13	1,050	1,890	2,390
$1,000 at age 14	1,020	1,630	2,060
$1,000 at age 15	990	1,400	1,810
$1,000 at age 16	970	1,240	1,590
$1,000 at age 17	900	1,160	1,330

Notes: Percentiles at age 18 are calculated based on birth cohorts 1926 through 2006. For a particular birth cohort, the value at age 18 of one dollar invested at birth is calculated as the gross 18-year market return for a broad index of U.S. equities.

Stock contributions

The temporary regulations allow general funding contributions to be made with stock of publicly traded domestic corporations, which will be allocated by the Treasury Department to beneficiaries in the specified class and generally must be retained for at least five years. An alternative would be to require general funding contributions to be made with cash only. The Treasury Department and the IRS have concluded that qualified general contributions of publicly traded stock benefit Trump account beneficiaries because the benefit to Trump account beneficiaries of incremental general funding contributions was expected to exceed the cost to beneficiaries of riskier returns for general funding contributions that would have been received anyway but arrive as stock rather than cash.

For most ordinary investors comparing a diversified portfolio to a concentrated portfolio, the diversified portfolio will generally have the same expected return at lower risk. Reducing risk is generally beneficial for an investor, holding fixed expected returns.

To the extent that general funding contributions would have been made in cash and will instead be made as stock, Trump account beneficiaries will bear some additional risk in the form of increased portfolio concentration.

On the other hand, Trump account beneficiaries are likely to receive more total contributions than they would if stock contributions were prohibited. The Treasury Department and the IRS have been informed that several eligible donors who would not otherwise make cash contributions are prepared to facilitate contributions of appreciated stock similar in magnitude to the general funding contribution of the MSDF. Donors are attracted by the hope that a stock contribution with a five-year holding period may lead recipients and their families to feel that they have a stake in the fate of the corporation to a greater extent than if the child’s holdings of the corporation were only through an index fund. This choice and several others increase the appeal of funding contributions to classes of Trump account beneficiaries.

The Treasury Department and the IRS have reviewed claims that allowing stock contributions is a method of facilitating tax deductions of appreciated stock for individuals funding those contributions. However, an individual who wants to fund a general funding contribution must act through an eligible donor, which would generally be a 501(c)(3) organization. The temporary rules have no impact on the deductibility of contributions of cash or appreciated stock to 501(c)(3) organizations. It might be more efficient for Trump account trustees to manage the orderly liquidation of donated stock after the five-year holding period, but 501(c)(3) organizations are also capable of managing orderly liquidations prior to a general funding contribution made in cash.

Summary

The major areas of discretion in the temporary regulations require the Secretary to create Trump accounts for eligible children, allow contributions to approved classes to receive the same treatment as contributions to qualified classes, and allow general funding contributions to be made with stock of publicly traded domestic corporations. All of these decisions increase the appeal of funding contributions to classes of Trump account beneficiaries and are expected to result in billions of additional dollars per year in general funding contributions, which will be allocated across the Trump accounts of tens of millions of children.

III. *Paperwork Reduction Act*

The Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) generally requires that a Federal agency obtain the approval of the OMB before collecting information from the public, whether such collection of information is mandatory, voluntary, or required to obtain or retain a benefit. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection of information displays a valid control number.

The collections of information in these temporary regulations contain reporting, third-party disclosure and recordkeeping requirements that are necessary for Trump account enrollment. These collections of information generally would be used by the Secretary to automatically enroll beneficiaries into Trump accounts.

The temporary regulations mention reporting requirements for making elections for Trump accounts by a person other than the Secretary, as detailed in 26 CFR 1.530A-1T(d)(1)(ii). This reporting requirement is already approved by the OMB under OMB Control Number 1545-2336 and is not being revised by this temporary regulation.

The temporary regulations mention reporting requirements for filing a general funding contribution request and entering into a Treasury acceptance agreement, as detailed in 26 CFR 1.530A-7T(c)(2). This reporting requirement is already approved by the OMB under OMB Control Number 1505-0285 and is not being revised by this temporary regulation.

The temporary regulations include reporting by account beneficiaries or responsible parties and third-party disclosures and associated recordkeeping requirements from trustees to account beneficiaries or responsible parties. These collections of information are necessary to allow account beneficiaries or responsible parties to claim accounts and to inform account beneficiaries or responsible parties of any required sales and investments related to qualified stock. IRS anticipates that the likely respondents are individuals, responsible parties, businesses, and for-profit organizations (trustees).

Table 1 provides a high-level description of the collection requirements created or changed within this regulation, and the regulatory sections that detail these requirements. Table 2 provides the estimated burden placed on respondents for each collection requirement. These collection requirements and their associated burdens will be approved by the OMB under OMB Control Number 1545-2336 under the emergency procedures in 5 CFR 1320.13 and will be renewed under the PRA procedures in 5 CFR 1320.10.

Table 1: Description of Collections

OMB Control Number	Collection Type	New or Revised Collection	Description	Regulatory Section with Additional Details
1545-2336	Third-party Disclosure and Recordkeeping	New	Claiming an auto account	26 CFR 1.530A-1T(f)
1545-2336	Third-party Disclosure and Recordkeeping	New	Beneficiary disclosure when stock held in a Trump account is either de-listed from a national securities exchange or generates property that is not successor qualified stock	26 CFR 1.530A-7T(d)(5), (d)(6)

Table 2: Estimated Burden				
Collection	**Estimated number of respondents**	**Estimated frequency of responses**	**Estimated average annual burden per response**	**Estimated total annual burden hours**
26 CFR 1.530A-1T(f)	63,360,000	1	6 minutes	6,336,000
26 CFR 1.530A-7T(d)(5), (d)(6)	5	27,717	1 minute	2,310

IV. *Regulatory Flexibility Act*

For applicability of the Regulatory Flexibility Act, please refer to the cross-referenced notice of proposed rulemaking (CC-00226466-26) published elsewhere in this issue of the Federal Register.

V. *Unfunded Mandates Reform Act*

Section 202 of the Unfunded Mandates Reform Act of 1995 (UMRA) requires that agencies assess anticipated costs and benefits and take certain other actions before issuing a final rule that includes any Federal mandate that may result in expenditures in any one year by a State, local, or Tribal government, in the aggregate, or by the private sector, of $100 million in 1995 dollars, updated annually for inflation. These temporary regulations do not include any Federal mandate that may result in expenditures by State, local, or Tribal governments, or by the private sector in excess of that threshold.

VI. *Executive Order 13132: Federalism*

Executive Order 13132 (Federalism) prohibits an agency from publishing any rule that has federalism implications if the rule either imposes substantial, direct compliance costs on State and local governments, and is not required by statute, or preempts State law, unless the agency meets the consultation and funding requirements of section 6 of the Executive order. These temporary regulations do not have federalism implications and do not impose substantial direct compliance costs on State and local governments or preempt State law within the meaning of the Executive order.

VII. *Small Business Administration*

Pursuant to section 7805(f) of the Code, these temporary regulations have been submitted to the Chief Counsel for Advocacy of the Small Business Administration for comment on their impact on small business.

VIII. *Congressional Review Act*

Pursuant to the Congressional Review Act (5 U.S.C. 801 *et seq.*), the Office of Information and Regulatory Affairs designated this rule as a major rule as defined by 5 U.S.C. 804(2). For the reasons stated in the Good Cause section of this preamble, the Treasury Department and the IRS find good cause under 5 U.S.C. 808(2) for these temporary regulations to take effect upon publication, notwithstanding the delayed effective date otherwise applicable to a major rule under 5 U.S.C. 801(a)(3).

Statement of Availability of IRS Documents

Revenue Rulings, Revenue Procedures, Notices, and other guidance cited in this document are published in the Internal Revenue Bulletin (or Cumulative Bulletin) and are available from the Superintendent of Documents, U.S. Government Publishing Office, Washington, DC 20402, or by visiting the IRS website at *https://www.irs.gov*.

Drafting Information

The principal author of these temporary regulations is Isaac Stein of the Office of Associate Chief Counsel (Employee Benefits, Exempt Organizations, and Employment Taxes). Other personnel from the Treasury Department and the IRS participated in their development.

List of Subjects in 26 CFR Part 1

Income taxes and reporting and recordkeeping requirements.

Adoption of Amendments to the Regulations

Accordingly, the Treasury Department and the IRS amend 26 CFR part 1 as follows:

PART 1 – INCOME TAXES

Paragraph 1. The authority citation for part 1 is amended by adding entries for §§ 1.530A-1T and 1.530A-7T in numerical order to read, in part, as follows:

Authority: 26 U.S.C. 7805 * * *

* * * *

Section 1.530A-1T is also issued under 26 U.S.C. 408(a)(2), 530A(a), (b)(1)(A)(i), (b)(1)(B), (b)(2)(C)(i), (b)(2)(C)(ii), and (i)(1).

Section 1.530A-7T is also issued under 26 U.S.C. 530A(a), (f)(1)(A), and (f)(3)(B).

* * * * *

Par. 2. Section 1.530A-1T is added to read as follows:

§ 1.530A-1T Trump accounts; general requirements; establishment of an initial Trump account; auto enrollment and auto accounts.

(a) *Overview*. This section provides rules regarding the general requirements for Trump accounts, the establishment of an initial Trump account, auto enrollment, and auto accounts. Paragraph (b) of this section provides definitions related to Trump accounts. Paragraph (c) of this section provides general requirements for Trump accounts, including rules on initial Trump accounts and the written governing instrument. Paragraph (d) of this section provides rules for the establishment of an initial Trump account, including auto enrollment by the Secretary of the Treasury or the Secretary's delegate. Paragraph (e) of this section provides rules for auto accounts. Paragraph (f) of this section provides rules for claiming auto accounts. Paragraph (g) of this section provides the applicability and expiration dates of this section.

(b) *Definitions*. For purposes of section 530A and the regulations thereunder, the following definitions apply--

(1) *Account beneficiary*. The term *account beneficiary* means the individual for whose benefit a Trump account was established.

(2) *Eligible individual*. The term *eligible individual* means any individual--

(i) Who has not attained age 18 before the end of the calendar year in which an election under paragraph (d) of this section is made;

(ii) For whom a social security number, within the meaning of section 24(h)(7), has been issued before the date on which an election under paragraph (d) of this section is made; and

(iii) For whom an election is made under paragraph (d) of this section.

(3) *Growth period*. The term *growth period* means, with respect to an account beneficiary, the period that begins when the initial Trump account under paragraph (b)(5)(i) or (ii) of this section is established and ends on December 31 of the calendar year in which the account beneficiary attains age 17. For example, a child born on October 1, 2025, would attain age 17 on October 1, 2042, and therefore the last day of the growth period with respect to the child would be December 31, 2042.

(4) *IRA*. The term *IRA* means an individual retirement account under section 408(a) and includes a custodial account that is treated as a trust pursuant to section 408(h). Accordingly, solely for purposes of section 530A and the regulations thereunder, the term *IRA* does not include an individual retirement annuity under section 408(b).

(5) *Initial Trump account*. The term *initial Trump account* means a Trump account created or organized by the Secretary pursuant to section 530A(b)(1)(A)(i) and maintained by a trustee selected by the Secretary pursuant to section 530A(g). An initial Trump account includes--

(i) An initial Trump account established pursuant to an election made by a person other than the Secretary (such as by using Form 4547, *Trump Account Election(s),* or successor form prescribed by the Secretary, or through an electronic application or webpage made available by the Secretary) as described in paragraph (d)(1)(ii) of this section;

(ii) An *auto account*, which is an initial Trump account created or organized by the Secretary as described in paragraph (d)(2) of this section and maintained by a trustee selected by the Secretary pursuant to section 530A(g). An auto account does not include an initial Trump account established pursuant to an election that the Secretary is deemed to have made as described in paragraph (d)(1)(iii) of this section if the account was established before auto enrollment began (as described in paragraph (d)(2)(i) of this section); and

(iii) A *claimed initial Trump account*, which is an initial Trump account created or organized by the Secretary to receive a qualified rollover contribution from an auto account as described in paragraph (f) of this section and maintained by a trustee selected by the Secretary pursuant to section 530A(g).

(6) *Master group trust*. The term *master group trust* means a trust that the Secretary establishes for the exclusive benefit of account beneficiaries of auto accounts for the purpose of holding investments of those auto accounts and that meets the applicable requirements of Revenue Ruling 81-100, 1981-1 C.B. 326, as modified from time to time, and is exempt from taxation under section 408(e).

(7) *Qualified ABLE rollover contribution*. The term *qualified ABLE rollover contribution* means a trustee-to-trustee transfer of the entire balance of a Trump account, made during the calendar year in which an account beneficiary attains age 17 to an ABLE account of that account beneficiary.

(8) *Qualified general contribution*. The term *qualified general contribution* is defined in section 530A(f) and § 1.530A-7T(b)(6).

(9) *Qualified rollover contribution*. The term *qualified rollover contribution* means a direct trustee-to-trustee transfer of an account beneficiary's entire Trump account balance to a Trump account for the same account beneficiary. A qualified rollover contribution may be either--

(i) A transfer from an auto account to a claimed initial Trump account; or

(ii) A transfer from any Trump account to a rollover Trump account.

(10) *Qualified stock contribution*. The term *qualified stock contribution* is defined in § 1.530A-7T(b)(9).

(11) *Responsible party*. The term *responsible party* means the person who is authorized under the terms of the written governing instrument for a Trump account to act on behalf of the account beneficiary. A person's status as a responsible party under the written governing instrument does not, by itself, establish that the person is entitled under section 6103 to inspect or receive the account beneficiary's returns or return information.

(12) *Rollover Trump account*. The term *rollover Trump account* means a Trump account that is not an initial Trump account but is created or organized in the United States and established for the account beneficiary during his or her growth period pursuant to section 530A(b)(1)(A)(ii). A rollover Trump account must first be funded by a qualified rollover contribution from the account beneficiary's existing Trump account before receiving any other contribution. However, see paragraph (f)(3) of this section for a special rule regarding a qualified rollover contribution from an unfunded auto account. An individual may have only one Trump account containing funds at a time.

(13) *Secretary*. The term *Secretary* means the Secretary of the Treasury or the Secretary's delegate.

(14) *Traditional IRA*. The term *traditional IRA* means an IRA that is not a Roth IRA under section 408A.

(15) *Trump account*. The term *Trump account* means an account described in paragraph (c) of this section.

(c) *Trump accounts*--(1) *In general*. A Trump account is a type of traditional IRA described in section 530A(b)(1) for the exclusive benefit of an eligible individual and, after the death of the individual, his or her beneficiaries. A Trump account is subject to the same rules as other traditional IRAs, except as provided by section 530A or the regulations thereunder. For example, a Trump account is exempt from tax under section 408(e)(1) and subject to the prohibited transaction restrictions of section 408(e)(2). A Trump account can be either an initial Trump account or a rollover Trump account.

(2) *Written governing instrument*--(i) *In general*. Except as provided in this paragraph (c)(2) or in guidance published in the Internal Revenue Bulletin, the written governing instrument establishing a Trump account must meet the requirements of section 408(a)(1) through (6), which apply to other IRAs, as well as the requirements of section 530A(b)(1)(C)(i) through (iii), which apply only to Trump accounts. The written governing instrument generally must reflect both the rules that apply during the growth period and the rules that apply after the growth period.

(ii) *Designation as a Trump account*. The written governing instrument establishing a Trump account must clearly designate the account as a Trump account at the time of establishment. Accordingly, an existing account (such as an IRA that is not a Trump account) cannot be amended to become a Trump account. In addition, a Trump account must be titled to clearly identify the account as a Trump account for the benefit of the account beneficiary.

(iii) *Growth period*. With respect to the growth period, a written governing instrument establishing a Trump account must generally restrict the timing and annual amount of contributions to the Trump account in accordance with section 530A(b)(1)(C)(i) (and prohibit contributions under a Simplified Employee Pension (SEP) arrangement under section 408(k) or a Savings Incentive Match Plan for Employees (SIMPLE) IRA plan under section 408(p) in accordance with section 530A(h)(1)), prohibit distributions from the Trump account in accordance with section 530A(b)(1)(C)(ii), and require that the funds in the Trump account be invested only in an eligible investment in accordance with section 530A(b)(1)(C)(iii), as applied under § 1.530A-7T(d). Additionally, with respect to the growth period, the written governing instrument establishing a Trump account must meet the requirements of section 408(a)(1) through (6), except that a Trump account satisfies the cash contribution requirement in section 408(a)(1) if the written governing instrument establishing the Trump account meets the requirement that, except in the case of a qualified rollover contribution, no contribution will be accepted unless it is in cash or is qualified stock received in a qualified stock contribution described in § 1.530A-7T(d).

(iv) *Post growth period*. With respect to the period after the growth period, a written governing instrument establishing a Trump account must meet the requirements of section 408(a)(1) through (6), except that the section 530A(h)(1) prohibition against a Trump account receiving contributions under a SEP arrangement under section 408(k) or a SIMPLE IRA plan under section 408(p) continues to apply to a Trump account after the growth period.

(3) *Automatic approval for certain nonbank trustees*. Any person approved by the IRS as of December 31, 2025, to be a nonbank trustee of an IRA is automatically approved to be a nonbank trustee of a Trump account.

(4) *Differences from other traditional IRAs*--(i) *During the growth period*. During the growth period, there are special rules for Trump accounts with respect to--

(A) Contributions (*see* section 530A(c));

(B) Investments (*see* section 530A(b)(3));

(C) Distributions (*see* section 530A(d), including a qualified ABLE rollover contribution);

(D) Reporting (*see* section 530A(i));

(E) Coordination with IRA rules (*see* section 530A(h)); and

(F) Qualified general contributions (*see* section 530A(f)).

(ii) *After the growth period*. After the growth period (that is, starting January 1 of the year in which the account beneficiary attains age 18), the rules under section 408 that apply to other traditional IRAs are generally applicable to Trump accounts, except as provided in section 530A(h).

(5) *Application of the birthday rule*. For purposes of section 530A, an individual attains an age on his or her birthday. For example, a child who is born on January 1, 2009, attains age 18 on January 1, 2027.

(6) *Closing a Trump account*. A funded Trump account may not be closed during the growth period unless all funds in the account have first been distributed in a distribution permitted under section 530A(b)(1)(C)(ii). After the growth period, the distribution restrictions under section 530A(b)(1)(C)(ii) do not apply. Additionally, after the growth period, an unfunded Trump account that is not an auto account may be closed by the trustee if provided by the terms of the written governing instrument. *See* paragraph (e)(4) of this section for a trustee closing an unfunded auto account at the end of the growth period or upon death of the account beneficiary.

(d) *Establishment of initial Trump accounts; auto enrollment*--(1) *Methods to establish an initial Trump account*--(i) *Election by the Secretary to establish an auto account.* Pursuant to section 530A(b)(2)(C)(i), the Secretary may make an election to establish an auto account, if the Secretary determines, based on information available to the Secretary, that the individual for whom the account is to be established has met the requirements of paragraphs (b)(2)(i) and (ii) of this section to be an eligible individual, and no prior election has been made under paragraph (d)(1)(ii) of this section.

(ii) *Election by a person other than the Secretary to establish an initial Trump account.* Pursuant to section 530A(b)(2)(C)(ii), a person other than the Secretary may elect to establish an initial Trump account, as defined in paragraph (b)(5)(i) of this section, for an individual who has met the requirements of paragraphs (b)(2)(i) and (ii) of this section to be an eligible individual if the person files a completed Form 4547, *Trump Account Election(s),* or successor form prescribed by the Secretary, or otherwise provides required information through an electronic application or web page made available by the Secretary, in accordance with applicable instructions, and no prior election to establish an initial Trump account has been made for such individual by another person or the Secretary. Once the election is made, such election is irrevocable.

(iii) *Deemed election*. If an initial Trump account was established pursuant to an election under paragraph (d)(1)(ii) of this section, but the election was made by an individual who, under the applicable instructions, was not authorized to make the election at the time that the election was made, then the Secretary is deemed to have made the election to establish the initial Trump account pursuant to section 530A(b)(2)(C)(i) and the Trump account that was already established will not cease to be a Trump account. This deemed-election rule concerns the validity of the Trump account and does not itself establish that the person who submitted the original election was entitled under section 6103 to receive the account beneficiary's return information or was authorized to execute a consent to disclosure on the beneficiary's behalf.

(iv) *Establishment of a claimed initial Trump account*. A person may irrevocably claim an auto account pursuant to paragraph (f) of this section and the account may be activated pursuant to paragraph (d)(3) of this section. One way to claim an auto account is by establishing a claimed initial Trump account (which is a separate account from the auto account) and having the funds in the auto account transferred to the claimed initial Trump account. See paragraph (f) of this section for other ways to claim an auto account.

(2) *Auto enrollment; establishment of an auto account*--(i) *In general*. On or about October 1, 2026, the Secretary shall make an election under paragraph (d)(1)(i) of this section to establish an auto account for each individual who the Secretary has determined has met the requirements of paragraphs (b)(2)(i) and (ii) of this section to be an eligible individual, and for whom no prior election has been made under paragraph (d)(1)(ii) of this section. An auto account shall be established for each such individual. Thereafter, the Secretary shall make subsequent periodic elections under paragraph (d)(1)(i) of this section to establish auto accounts for individuals who the Secretary determines meet the requirements of paragraphs (b)(2)(i) and (ii) of this section to be an eligible individual and for whom no prior election has been made under paragraph (d)(1)(ii) of this section, and shall establish auto accounts for eligible individuals for whom a Trump account has not been established.

(ii) *Account established after auto enrollment has begun*. Any initial Trump account established after auto enrollment has begun pursuant to an election under paragraph (d)(1)(i), (ii), or (iii) of this section is an auto account, regardless of whether the election was made before, on, or after October 1, 2026. If an election under paragraph (d)(1)(ii) of this section was made before October 1, 2026, but an initial Trump account was not established pursuant to that election on or before September 30, 2026 (for example, because the account agreement was not signed and thus the account was not activated, as described in paragraph (d)(3) of this section), an auto account shall be established pursuant to that election.

(3) *Account activation is required to establish the initial Trump account*. An election under paragraph (d)(1)(ii) of this section (for example, using Form 4547) does not by itself establish an initial Trump account (and contributions cannot be made until the account is established). To establish an initial Trump account that is not an auto account, the account must be activated (which includes signing the account agreement for the initial Trump account), pursuant to instructions from the trustee, after the election is made. For any auto account, the Secretary (as the responsible party) is deemed to have activated the account. Making a claim with respect to an auto account pursuant to paragraph (f) of this section (for example, using the electronic app) also does not by itself establish a claimed initial Trump account (and the qualified rollover contribution from the auto account or other contributions cannot be made until the claimed initial Trump account is established). To establish a claimed initial Trump account, the account must be activated (pursuant to instructions from the trustee) after the claim is made, as described in paragraphs (d)(1)(iv) and (f)(2) of this section.

(e) *Administration of auto accounts*--(1) *Responsible party*. The Secretary is the responsible party for an auto account.

(2) *Contributions*. During the growth period, an auto account may only accept qualified general contributions under section 530A(f) and a $1,000 pilot program contribution, if a pilot program election has been made by a pilot program-electing individual pursuant to section 6434. After the growth period, the auto account generally may not accept contributions.

(3) *Investment*--(i) *In general*. An auto account's sole investment must be its equitable interest in the master group trust, and the written governing instrument for the auto account must provide that the account adopts the provisions of the master group trust. The master group trust may hold only eligible investments described in section 530A(b)(3), cash to the extent permitted under section 530A(b)(1)(C)(iii), and

qualified stock contributed pursuant to a qualified stock contribution described in § 1.530A-7T(d), including successor qualified stock. With respect to the eligible investment requirement under section 530A(b)(1)(C)(iii), each auto account's interest in the master group trust consists of its undivided proportionate beneficial interest in those investments of the master group trust that are attributable to contributions allocated to qualified classes of which the account beneficiary was a member and any $1,000 pilot program contribution (if a pilot program election has been made by a pilot program-electing individual pursuant to section 6434) made to that account.

(ii) *End of the minimum holding period for qualified stock*. The trustee of the master group trust must sell any qualified stock as described in § 1.530A-7T(d) within a reasonable period of time after the end of the minimum holding period applicable to the auto account's interest in that stock (as described in § 1.530A-7T(d)(3)). The proceeds of such sale must be promptly invested in an eligible investment, as described in section 530A(b)(3), pursuant to the requirement of section 530A(b)(1)(C)(iii). An investment under this paragraph (e)(3)(ii) will be considered prompt if it occurs within 30 calendar days after the sale of the qualified stock.

(4) *Closing an auto account*. When an auto account is claimed pursuant to paragraph (f) of this section, the trustee will close the auto account as soon as practicable after a claim and transfer of all account funds described in paragraph (f) of this section has been completed. At the end of the growth period of the account beneficiary or, if earlier, when the trustee has knowledge of the death of the account beneficiary, an unfunded auto account will be closed by the trustee as soon as practicable thereafter.

(5) *Death of account beneficiary of a funded auto account during growth period*. The account beneficiary's estate is the beneficiary of the account beneficiary's auto account. If an account beneficiary dies during the growth period before the account

beneficiary’s funded auto account has been claimed pursuant to paragraph (f) of this section, the account will cease to be a Trump account on the day that the account beneficiary dies but will remain an IRA, which may be claimed pursuant to paragraph (f) of this section. However, if the auto account is unfunded when the account beneficiary dies, the account will be closed pursuant to paragraph (e)(4) of this section.

(f) *Claiming an auto account*--(1) *In general*. A guardian or legal custodian having authority under applicable law to manage the account beneficiary’s property or financial affairs or the account beneficiary, if the account beneficiary has legal capacity, may file a claim for an auto account by providing required information through an electronic application or web page made available by the Secretary, in accordance with applicable instructions. A guardian or legal custodian making the claim must authenticate their identity and establish entitlement to the account beneficiary’s return information to inspect or receive the account beneficiary’s return information. The guardian or legal custodian must also execute any consent required under section 6103(c) for disclosures necessary to process the claim and transfer the account balance. During the growth period, claiming an auto account results in the entire balance of the auto account being transferred in a qualified rollover contribution either to a claimed initial Trump account with a trustee selected by the Secretary pursuant to section 530A(g) or to a rollover Trump account with a trustee other than a trustee selected by the Secretary pursuant to section 530A(g) that has been established for the account beneficiary. The qualified rollover contribution will only occur once the receiving account is established (which, in the case of a claimed initial Trump account, will require activation of the account for the account to be established, see paragraph (d)(3) of this section). After the growth period, claiming an auto account results in the entire balance of the auto account being transferred into an IRA that is not a Trump account that has been established for the account beneficiary.

(2) *Activation of claimed initial Trump account if there are multiple claims.* Until there has been a transfer of funds from the auto account into a receiving account, another claim may be filed under paragraph (f)(1) of this section. If multiple claims are filed under paragraph (f)(1) of this section with respect to an auto account, the responsible party for the claimed initial Trump account will be the first person who is authorized under paragraph (f)(1) of this section to claim the auto account and activates the receiving account (see paragraph (d)(3) of this section).

(3) *Claiming an unfunded auto account*. If an unfunded auto account is claimed pursuant to paragraph (f)(1) of this section, a claimed initial Trump account or rollover Trump account may be created and treated as being first funded by a qualified rollover contribution from the auto account for purposes of section 530A(b)(1)(A)(ii)(II).

(4) *Responsible party*. In general, if a guardian or legal custodian having authority under applicable law to manage the account beneficiary's property or financial affairs makes a claim for the auto account, that person will be the initial responsible party of the claimed initial Trump account or rollover Trump account that receives the qualified rollover contribution from the auto account when the account is established.

(5) *Death of account beneficiary*. If the account beneficiary dies before the auto account has been claimed, a person authorized under applicable law to act with respect to the account beneficiary's estate or property may claim the funds in the account through an electronic application or web page made available by the Secretary, in accordance with applicable instructions, provided that the person also establishes entitlement under section 6103(e)(3) and (e)(7), or other applicable authority, to receive the decedent's return information.

(g) *Applicability and expiration dates*. This section applies to taxable years beginning on or after January 1, 2026. This section expires on September 30, 2029.

Par. 3. Section 1.530A-7T is added to read as follows:

§ 1.530A-7T Qualified general contributions and qualified stock contributions.

(a) *Overview*. This section provides rules for qualified general contributions and qualified stock contributions. Paragraph (b) of this section provides definitions related to qualified general contributions and qualified stock contributions. Paragraph (c) of this section provides rules specific to qualified general contributions. Paragraph (d) of this section provides rules specific to qualified stock contributions. Paragraph (e) of this section provides rules for determining whether a general funding contribution made by a section 501(c)(3) organization will further a charitable purpose. Paragraph (f) of this section provides the applicability and expiration dates of this section.

(b) *Definitions*. For purposes of section 530A and the regulations thereunder, the following definitions apply--

(1) *Approved class*. The term *approved class* means a class that consists of not less than 5,000 account beneficiaries and that includes all account beneficiaries who--

(i) Are still in their growth period when the contribution is made to the Trump account;

(ii) Reside in one or more States or other qualified geographic areas specified by the terms of and on the record date(s) provided in the Treasury acceptance agreement with respect to the general funding contribution; and

(iii) Were born in one or more calendar years specified by the terms of the Treasury acceptance agreement with respect to the general funding contribution.

(2) *Eligible donor*. The term *eligible donor* means--

(i) An entity described in section 170(c)(1) (other than a possession of the United States or a political subdivision thereof) or an Indian Tribal government, or

(ii) An organization described in section 501(c)(3) and exempt from tax under section 501(a).

(3) *General funding contribution*. The term *general funding contribution* means a contribution that--

(i) Is made by an eligible donor; and

(ii) Specifies a qualified class of account beneficiaries to whose Trump accounts such contribution is to be distributed. For this purpose, an approved class is treated as a qualified class.

(4) *Minimum holding period requirement*. The term *minimum holding period requirement* means the period of time described in paragraph (d)(3) of this section during which the qualified stock may not be sold or otherwise disposed of.

(5) *Qualified class*. The term *qualified class* means any of the following classes of account beneficiaries--

(i) All account beneficiaries who are still in their growth period when the contribution is made to the Trump account.

(ii) All account beneficiaries who--

(A) Are still in their growth period when the contribution is made to the Trump account; and

(B) Reside in one or more States or other qualified geographic areas specified by the terms of and on the record date(s) provided in the Treasury acceptance agreement with respect to the general funding contribution.

(iii) All account beneficiaries who--

(A) Are still in their growth period when the contribution is made to the Trump account; and

(B) Were born in one or more calendar years specified by the terms of the Treasury acceptance agreement with respect to the general funding contribution.

(6) *Qualified general contribution*. The term qualified general contribution means a contribution made by the Secretary of the Treasury or the Secretary's delegate

pursuant to a general funding contribution from an eligible donor and distributed to the Trump accounts of a qualified class of account beneficiaries in the manner described in paragraph (c) of this section. A qualified general contribution also includes a contribution made by the Secretary pursuant to a general funding contribution that specifies an approved class to whose Trump accounts the contribution is to be distributed, and otherwise satisfies the requirements of paragraph (c) of this section (approved class contribution). A qualified general contribution also includes a qualified stock contribution.

(7) *Qualified geographic area*. The term *qualified geographic area* means a geographic area in which not less than 5,000 account beneficiaries eligible to receive the applicable qualified general contribution reside as of the record date and that is designated by the Secretary as a qualified geographic area.

(8) *Qualified stock*--(i) *In general*. The term *qualified stock* means stock that meets the requirements in paragraph (b)(8)(ii) of this section.

(ii) *Requirements for qualified stock*--(A) *Domestic corporation*. The issuer of the stock is a corporation that is domestic within the meaning of section 7701(a)(3) and (4).

(B) *Publicly traded*. The stock is listed on a national securities exchange that is registered under section 6 of the Securities Exchange Act of 1934 (15 U.S.C. 78f). *See* § 1.1092(d)-1(b)(1)(i).

(C) *Transferable without pre-existing restrictions*. The stock is not subject to any pre-existing transfer restriction, such as being a restricted security as defined in 17 CFR 230.144(a)(3). For purposes of this paragraph (b)(8)(ii)(C), the minimum holding period requirement in paragraph (d)(3) of this section is not a pre-existing transfer restriction.

(D) *Satisfaction of the requirements for qualified stock*. To be treated as qualified stock, stock must satisfy the requirements in paragraphs (b)(8)(ii)(A) through (C) of this section at the time of contribution to the Treasury Department as part of the general funding contribution. Following the contribution, the stock will continue to be treated as qualified stock so long as the requirement in paragraph (b)(8)(ii)(B) of this section is satisfied.

(9) *Qualified stock contribution*. The term *qualified stock contribution* means a qualified general contribution of qualified stock that otherwise satisfies the requirements of paragraphs (c) and (d) of this section.

(10) *Record date*. The term *record date* means the date(s) specified in a Treasury acceptance agreement as of which the Secretary determines the account beneficiaries eligible to receive a qualified general contribution.

(11) *Treasury acceptance agreement*. The term *Treasury acceptance agreement* means the written agreement or other documentation under which the Secretary accepts a general funding contribution as described in paragraph (c)(2) of this section.

(c) *Qualified general contributions*--(1) *In general*. All qualified general contributions must meet the requirements of paragraphs (c)(2) through (4) of this section.

(2) *Made by the Secretary pursuant to a general funding contribution*--(i) *In general*. A qualified general contribution will only be made by the Secretary pursuant to a Treasury acceptance agreement, as described in paragraph (c)(2)(iv) of this section, that has been validly entered into by the eligible donor and the Secretary, and is made in accordance with the terms of that agreement.

(ii) *Request to make a general funding contribution*. An eligible donor may request to make a general funding contribution on the form prescribed by the Secretary or through an electronic application or web page made available by the Secretary.

(iii) *Treasury Department approval.* The Secretary will review the request and may, in the Secretary's sole discretion, approve the request after determining that the request satisfies the requirements of this section and considering objective criteria, including the cost of implementation and operational feasibility of the contribution. If the request includes qualified stock, then the Secretary will consider the cost of transferring and administering the shares of qualified stock.

(iv) *Treasury acceptance agreement*. The Treasury acceptance agreement must identify the eligible donor, the aggregate funding amount or funding commitment, the qualified class, the record date or dates, whether the identity of the eligible donor will be reported to account beneficiaries, and any other information required by the Secretary. If the general funding contribution consists of qualified stock, the Treasury acceptance agreement must also include information about the name and employer identification number (EIN) of the issuer of the qualified stock, the number of shares of qualified stock that will be contributed, and any other information required by the Secretary.

(3) *Made to a Trump account of an account beneficiary in the qualified class of account beneficiaries*--(i) *In general*. A qualified general contribution is made to the Trump account of each account beneficiary in the qualified class of account beneficiaries specified in the Treasury acceptance agreement. The qualified class for a general funding contribution is the qualified class identified in the Treasury acceptance agreement. If the qualified class proposed in the eligible donor's request differs from the qualified class identified in the Treasury acceptance agreement, the qualified class identified in the Treasury acceptance agreement controls.

(ii) *Approved class contributions*. For purposes of section 530A(f)(1)(B), an approved class used for an approved class contribution is treated as a qualified class.

(iii) *Manner of contribution*. A qualified general contribution must be made in cash to a Trump account, except in the case of qualified stock contributed as part of a qualified stock contribution.

(4) *Is in an equal amount*--(i) *In general*. A qualified general contribution must be made in an equal amount to the Trump account of each account beneficiary in the

qualified class. Thus, every account beneficiary in the qualified class must receive the same amount, which may be provided in cash, shares of qualified stock, or a combination of cash and shares. Details regarding the form and amount of the qualified general contributions will be addressed in the Treasury acceptance agreement. The amount of the qualified general contribution made to the Trump account of each account beneficiary is determined based on the ratio of--

(A) The amount of the general funding contribution allocated under the Treasury acceptance agreement to the applicable record date; to

(B) The number of account beneficiaries in the qualified class who are determined under paragraph (c)(4)(iv) of this section to be eligible to receive the qualified general contribution on the applicable record date.

(ii) *Approved class contributions*. For purposes of section 530A(f)(1)(C), an approved class used for an approved class contribution is treated as a qualified class.

(iii) *Multiple record dates*. If eligibility is determined using multiple record dates, each account beneficiary who receives a qualified general contribution for any of the record dates pursuant to the general funding contribution must receive the same amount.

(iv) *Determination of account beneficiaries in a qualified class*--(A) *In general*. Whether an account beneficiary is part of a qualified class will be determined for each qualified general contribution based on the record date for that contribution, which may be a single date or multiple dates. For example, with respect to the first record date, contributions would be made to all account beneficiaries determined to be eligible as of that date, while with respect to subsequent record dates, contributions would be made only to those account beneficiaries who are eligible as of that subsequent record date and did not receive a contribution with respect to any preceding record date.

(B) *Information based on Treasury Department records*. The Secretary will determine who is an account beneficiary eligible to receive a qualified general contribution based on information obtained during the election process of § 1.530A-1T(d)(1)(i) and (ii), as updated by information reported to the Secretary under section 530A(i) as of the applicable record date.

(d) *Qualified stock contributions*--(1) *Overview*. This paragraph (d) provides rules for qualified stock contributions, including requirements and procedures for making a qualified stock contribution, and rules for the administration of qualified stock contributions.

(2) *Eligible investment requirement of section 530A(b)(1)(C)(iii)*. The eligible investment requirement of section 530A(b)(1)(C)(iii) is not violated by the acceptance and holding of qualified stock received in a qualified stock contribution.

(3) *Minimum holding period requirement*--(i) *In general*. The minimum holding period requirement lasts until the earlier of--

(A) The date that is 5 years after the qualified stock contribution is received by the Trump account; and

(B) The end of the growth period for the account beneficiary of the Trump account.

(ii) *Stock disposition during the minimum holding period*. If qualified stock is disposed of in violation of the minimum holding period requirement, the trustee must repurchase a number of shares of the same class of qualified stock equal to the number of shares sold or otherwise disposed of as soon as practicable.

(iii) *Satisfaction of the minimum holding period requirement*. Upon satisfaction of the minimum holding period requirement, the qualified stock may be sold or otherwise disposed of. During the growth period, the proceeds of a sale or other disposition must be invested in an eligible investment. See the eligible investment requirement during the growth period in section 530A(b)(1)(C)(iii).

(iv) *Exceptions to the minimum holding period requirement*. The minimum holding period requirement does not prohibit a disposition required under paragraphs (d)(5) or (6) of this section. In addition, notwithstanding that requirement, qualified stock may be disposed of--

(A) To effectuate a qualified ABLE rollover contribution as defined in section 530A(d)(4)(B);

(B) To permit cash in lieu of fractional shares that cannot be transferred in kind as part of a qualified rollover contribution (for example, if fractional shares cannot be transferred as part of a qualified rollover contribution, the transferring trustee may sell the fractional shares and transfer cash as part of the qualified rollover contribution instead);

(C) If the responsible party directs the trustee to accept a tender offer for the qualified stock; or

(D) If the issuer of the qualified stock is acquired (by merger, purchase, or otherwise).

(v) *Minimum holding period requirement with respect to qualified rollover contributions*. A qualified rollover contribution does not change or reset the minimum holding period for qualified stock.

(4) *Successor qualified stock*. If the Trump account receives stock (new stock) by reason of owning qualified stock (original stock), the new stock will be treated as qualified stock if the new stock satisfies the requirements in paragraph (b)(8)(ii) of this section (successor qualified stock). New stock will be treated as successor qualified stock under this paragraph (d)(4) regardless of whether the new stock is received in a nonrecognition transaction (as defined in section 7701(a)(45)), and regardless of

whether the new stock is issued by the same corporation as the original stock. Successor qualified stock is subject to the same minimum holding period as the original stock measured from the date of the contribution of the original stock (for example if Company A stock was received by the Trump account on date X, any successor qualified stock received by reason of owning Company A stock would be treated as having been received by the Trump account on date X).

(5) *Consequences of notification of removal from listing*. If the trustee becomes aware of the filing of a notification of removal of qualified stock that it holds from listing on a national securities exchange described in paragraph (b)(8)(ii)(B) of this section (*see* SEC Form 25), the trustee must promptly sell or dispose of the stock, invest the cash proceeds from that disposition in an eligible investment described in section 530A(b)(3), and disclose how the proceeds were invested to the account beneficiary (for an auto account, disclosure to the Secretary, as the responsible party, is not required). For purposes of this paragraph (d)(5), a sale or disposition of the stock and the investment of the proceeds will be considered prompt if the sale or disposition and investment of the proceeds occur as soon as practicable.

(6) *Corporate distributions and other transactions*. If, by reason of owning qualified stock, the Trump account receives cash or other property that is not successor qualified stock, then the trustee must promptly sell or dispose of the other property, invest the net proceeds (and the distributed cash) in eligible investments described in section 530A(b)(3), and disclose how the proceeds were invested to the account beneficiary. An investment under this paragraph (d)(6) will be considered prompt if it occurs within 30 calendar days of receiving the cash or other property.

(7) *Qualified stock in the master group trust*. If, as a result of a qualified general contribution, an auto account (through its equitable interest in the master group trust) owns an equitable interest in stock that meets all the qualified stock requirements in

paragraph (b)(8)(ii) of this section, the applicable equitable interest is treated as qualified stock for purposes of this paragraph (d).

(e) *Tax implications of contributions*--(1) *To the contributor to an eligible donor*. Contributions made to an eligible donor that is an organization described in section 501(c)(3) and exempt from tax under section 501(a) to fund a general funding contribution satisfying the requirements of this section are deductible under section 170, subject to the other requirements of that section. With regard to individuals making a gift to an organization qualifying as an eligible donor for purposes of section 530A, whether or not that eligible donor subsequently makes a general funding contribution, the gift is to an organization described in section 2522.

(2) *To the eligible donor*--(i) An eligible donor described in section 501(c)(3) and exempt from tax under section 501(a) furthers one or more of its purposes described in section 501(c)(3) by providing a general funding contribution, including by providing such amount through a distribution from a donor advised fund.

(ii) By making a general funding contribution, the eligible donor is making an expenditure for a purpose specified in section 170(c)(2)(B). In addition, a general funding contribution is neither a grant to an individual for purposes of section 4945 nor a distribution to a natural person for purposes of section 4966. Additionally, to the extent that an obligation to exercise expenditure responsibility arises under sections 4945 and 4966, a donor that makes a general funding contribution satisfying the requirements of this section is treated as exercising expenditure responsibility in accordance with section 4945(h) with respect to that contribution.

(f) Applicability and expiration dates. This section applies to taxable years beginning on or after January 1, 2026. This section expires on September 30, 2029.

Approved: September 25, 2026.

Frank J. Bisignano,

C*hief Executive Officer.*

Kevin M. Salinger,

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