



TREASURY DEPARTMENT
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG, PA 17120

May 7, 2026

STACY GARRITY
TREASURER

The Honorable Scott Bessent
Secretary
United States Department of the Treasury
1500 Pennsylvania Avenue NW
Washington D.C. 20220

Mr. Frank J. Bisignano
Chief Executive Officer
Internal Revenue Service
1111 Constitution Avenue NW
Washington D.C. 20224

Re: Comments on Proposed Regulations (REG-117270-25) for Section 530A Trump Accounts

Dear Secretary Bessent and Mr. Bisignano,

On behalf of the Pennsylvania Treasury Department, thank you for the opportunity to provide comments on the proposed regulations governing Section 530A Trump Accounts. Pennsylvania Treasury (“PA Treasury”) appreciates Treasury’s and the IRS’s continued engagement with states as you work to stand up this new national asset-building initiative.

As noted in our previous letter dated February 18, 2026, PA Treasury has significant expertise administering several large-scale, tax-advantaged savings programs—including PA 529, PA ABLE, and the Keystone Scholars Children’s Savings Account (CSA) program—totaling over \$10 billion in assets. Keystone Scholars, the nation’s first legislated, universal, automatic, at-birth CSA program, has established nearly 900,000 accounts since 2019, with families saving more than \$200 million beyond the program’s \$100 seed deposit and contributions from other sources. This statewide infrastructure provides a tested and practical foundation for implementing Trump Accounts at scale.

In response to the request for comments, we offer the following recommendations.

Clear Path for States to Become Authorized Administrators of Trump Accounts

PA Treasury’s most important recommendation is that Treasury and IRS establish a clear, flexible regulatory framework allowing states to serve as administrators of Trump Accounts—either directly as nonbank trustees or by engaging contracted partners who fulfill this role. Creating this pathway will enable states to:

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- Administer Trump Accounts, CSAs, 529s, ABLE programs, and state-facilitated retirement plans on a unified platform;
- Simplify and facilitate third-party contributions (state, local, philanthropic, and employer);
- Provide coordinated outreach, targeted engagement, and financial education across programs;
- Leverage existing recordkeeping, investment, and marketing infrastructure to minimize federal administrative burden and possibly reduce costs to the consumer.

A unified administrative structure would create substantial efficiencies for governments and families alike while increasing program transparency and accessibility. There are three key components to this recommendation:

1) Authority for States to Serve as Trustees or Authorized Administrators

The proposed regulations automatically approve existing nonbank IRA trustees to serve as Trump Account trustees and request comments on expanding eligibility for governmental entities. PA Treasury strongly supports such expansion since state agencies already administer major tax-advantaged savings vehicles with strong fiduciary controls and are well positioned to integrate Trump Accounts, reducing duplication and confusion.

We recommend that Treasury and IRS:

- Explicitly include state agencies administering tax-advantaged savings programs as eligible non-bank trustees for Trump Accounts;
- Provide a simplified and specific application process, or automatic approval, appropriate for governmental units;
- Allow states to designate contracted partners to serve as the formal trustee while the state functions as program administrator.

This approach will maximize program efficiency and strengthen coordination across federal and state savings initiatives.

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2) Clear State Role in Opening Accounts and Submitting Pilot Contribution Elections

Assuming federal automatic enrollment remains legally or operationally constrained in the short term, states can play a pivotal role in ensuring eligible children receive the benefit of both the account and the federal contribution.

PA Treasury recommends that the final regulations:

- Permit states to submit elections to open Trump Accounts and receive pilot contributions on behalf of families (with appropriate parental or guardian authorization);
- Explicitly authorize state-facilitated automatic enrollment pathways using state birth records or similar state data infrastructure.
- Define acceptable authorization mechanisms, including digital attestations, opt-out frameworks, and simplified consent.

This approach would materially reduce administrative friction and ensure that eligible children receive the \$1,000 pilot contribution as early as possible — particularly those in communities facing systemic barriers to financial participation.

3) Sharing of Participant Data with States

Meaningful state-federal partnership requires that states have timely access to basic participation information. Without this access, states cannot:

- Confirm whether an initial account has been opened for a resident child;
- Determine whether a pilot contribution election has been submitted and processed;
- Provide targeted outreach to low-engagement communities;
- Coordinate savings incentives across CSA, 529, ABLE, and other programs.

PA Treasury recommends that Treasury and IRS establish secure data-sharing mechanisms providing states with:

- Confirmation of Trump Account open status;
- Pilot contribution election and funding status;
- Limited, non-sensitive participation indicators necessary for targeted outreach.

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Making The Case for Federal Automatic Enrollment

Automatic enrollment remains one of the most effective mechanisms for ensuring broad, equitable participation in children’s savings programs. Pennsylvania’s Keystone Scholars program demonstrates that automatic enrollment is both feasible and powerful when executed through state-level infrastructure such as birth records.


We envision demonstrating, along with other states, that automatic enrollment can be a feasible pathway at the federal level. Our intent is that once automatic enrollment for Trump Accounts is successfully demonstrated at the state level—and its efficacy, compliance, and operational feasibility are clearly established—this can support a future shift toward federal automatic enrollment when statutory and operational constraints allow.

Conclusion

PA Treasury strongly supports the goals of Section 530A Trump Accounts and appreciates Treasury’s and IRS’s efforts to solicit and incorporate state feedback. We are ready and eager to partner in implementing this groundbreaking program, which holds significant promise for advancing financial security and long-term wealth-building for America’s children.

We welcome continued dialogue and stand ready to provide additional information or technical input as rulemaking and program implementation progresses.

Sincerely,



Stacy Garrity
Pennsylvania State Treasurer