

Andrés Garcia,
Internal Revenue Service
Room 6526, 1111 Constitution Avenue NW
Washington, DC 20224

OMB Control Number: 1545-2336

January 5, 2026

Dear Mr. Garcia,

Thank you for the opportunity to comment on the information collection associated with Form 4547 and Form 8879-TA. These comments focus on whether the current process design aligns with the nature of the Trump Account election and whether it supports, rather than inhibits, taxpayer participation.

1. The current design applies tax return execution principles to a non-tax election

Form 8879-TA exists because it mirrors how taxpayers authorize third parties to electronically file legal tax documents, such as income tax returns, through an Electronic Return Originator (ERO). In that context, the process is familiar and appropriate. Taxpayers expect to review a completed return, sign under penalties of perjury, and authorize transmission of a legally binding tax filing.

The election to establish a Trump Account using Form 4547 is fundamentally different. It does not determine tax liability, affect refunds, or satisfy a filing obligation. It is an enrollment action to establish a retirement-style account for a child and, in some cases, request a Treasury-funded contribution.

Applying income tax return execution mechanics to this type of election introduces legal formality and procedural complexity that are unrelated to the substance of the transaction.

2. The use of Form 8879-TA will inhibit participation

Most taxpayers encounter Form 8879 only in the context of filing a tax return through a CPA or consumer tax software. Requiring a similar authorization for a child account election creates several barriers to adoption:

- Taxpayers must be told they are signing under penalties of perjury for an action that feels like benefit enrollment rather than tax compliance.
- Taxpayers must navigate multiple forms and signatures to complete a single election.

- Trustees must explain why a retirement account election requires the same execution model as a tax return, which is not intuitive to users.

These factors increase confusion and abandonment risk and are likely to suppress participation in a program that is intended to be broadly accessible.

3. The approach creates unnecessary and inefficient implementation costs

The draft instructions for Form 4547 explicitly contemplate a future Treasury-managed online election process. That acknowledgement raises a significant implementation concern.

Requiring EROs and software providers to build support for Form 8879-TA, including PIN workflows, authorization retention, and related compliance logic, only to bypass those mechanisms once a direct online process is available, creates avoidable cost and rework. Many intermediaries will reasonably question whether to invest in supporting a complex authorization framework for a process that is expected to be replaced.

This approach risks fragmented adoption and inconsistent availability during the initial rollout period.

4. A simpler and more appropriate system architecture exists

This program does not require a tax return execution model to function securely or effectively. A more appropriate architecture would separate the government's role in validating eligibility and funding from the trustee's role in account onboarding and administration.

Under such a model:

- The authorized individual would complete the election through a Treasury-managed online process, including identity verification and consent.
- Treasury would validate the election, authorize and initiate the initial government contribution where applicable, and create a program-level election or entitlement record.
- Treasury would then transfer the initial contribution, along with minimal reference information necessary to support reconciliation, to the trustee or custodian designated by the beneficiary or authorized individual.
- The designated trustee or custodian would be responsible for completing all remaining onboarding steps required to fully establish the custodial account,

including collecting beneficiary and account information, executing account agreements, and performing any required institution-level verification.

- Once onboarding is complete, the trustee would administer the account in accordance with program rules.

This architecture aligns responsibilities with existing operational realities. Treasury validates eligibility and funds the benefit, while trustees perform the account establishment and administration functions they are already equipped to handle. It avoids forcing a tax-centric, form-driven process onto a non-tax election and eliminates the need for income tax return–style signature authorization constructs.

If the objective is to rapidly launch the program, a paper-based or tax-form-based process may appear expedient. However, that approach defers the necessary systems design work and introduces avoidable complexity that will later need to be unwound. A purpose-built, Treasury-managed election and trustee onboarding model would better support long-term adoption, scalability, and administrative efficiency.

5. Conclusion

The concern raised in this comment is not about the need for safeguards or authorization. It is about using safeguards that are appropriate for the transaction being performed.

By modeling the Trump Account election on income tax return filing mechanics, the current design adds complexity that is unnecessary, confusing to taxpayers, costly to intermediaries, and likely to suppress adoption. A direct Treasury-managed enrollment and data transfer model would better serve the policy objectives of the program and materially reduce respondent burden.

Thank you for considering these comments.

Respectfully submitted,

Wendy Walker
Vice President, Regulatory Affairs
Sovos Compliance