



February 20, 2026

The Honorable Scott Bessent  
US Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

Re: Notice of Intent to Issue Regulations with Respect to Section 530A Trump Accounts (Notice 2025-68)

Dear Secretary Bessent,

We appreciate the opportunity to comment on Notice 2025-68 regarding forthcoming regulations for Section 530A Trump Accounts. Our work spans decades of research on family financial well-being, children's savings accounts, asset-building policy, and tax administration. Our recent analyses have examined the design of baby bonds and universal children's accounts (Cosic et al. 2024), patterns of take-up among low-income and immigrant families (Waxman et al. 2023), and lessons from federal and state programs that aim to expand access to long-term savings vehicles.<sup>1</sup>

We submit these comments to support Treasury in issuing clear, practical guidance that advances program integrity, reduces administrative burdens, and promotes broad participation among eligible children. We are employed by the Urban Institute, a nonprofit research organization dedicated to improving public policy through evidence and analysis, but these comments represent our own views and should not be attributed to the Urban Institute, its trustees, or its funders.

Below, we respond to Treasury's request for comments, offering specific feedback on questions posed in Notice 2025-68. Our principal recommendations are the following:

1. Ensure that Trump account trustees (non-bank and otherwise) follow best practices for consumer protection, which likely go beyond those required for individual retirement accounts (IRAs). *Responds to Section III Question A-3.*
2. Define qualified geographic areas using transparent criteria linked to outreach and reporting. *Responds to Section III Question H-2.*
3. Change the enrollment default from opt-in to opt-out. Barring full automatic enrollment, the enrollment default should be opt-out for children who appear on Form 1095 but not on a tax return. *Responds to Section III.A Question A-1.*
4. Develop and fund robust outreach campaigns based on learning from the introduction of other family tax benefits. Focus on children eligible for pilot program contributions and families least likely to file a tax return. Make the enrollment portal as simple as possible, asking for only the information needed to enroll in an account. Consider allowing people to direct refunds into Trump Accounts by modifying Form 8888. Develop benchmarks to track account establishment to ensure outreach resources are deployed efficiently. *Responds to Section III.B Question B-1.*

---

<sup>1</sup> Madeline Brown, Samantha Atheron, Jason Ewas, and Ray Boshara, "How "Trump Accounts" Measure Up to the Evidence in Early Wealth-Building Policy," *Urban Wire* (blog), Urban Institute, June 10, 2025, <https://www.urban.org/urban-wire/how-trump-accounts-measure-evidence-early-wealth-building-policy>.

We appreciate Treasury's commitment to the thoughtful implementation of Section 530A and welcome any opportunity for further engagement or technical discussion.

## 1. Ensure that Trump account trustees (non-bank and otherwise) follow best practices for consumer protection, which likely go beyond those required for IRAs.

*Responds to Section III.A Question A-3.*

Trustees will play a critical role in ensuring account integrity, portability, and a high-quality consumer experience, including compliance with fee caps and eligible investment definitions under Section 530A (b)(3). Financial institutions and non-bank trustees currently managing IRAs may need different requirements to service this program, which introduces child beneficiaries, new contribution types, strict investment rules, and specific antifraud needs. With regards to trustees, evidence suggests Treasury should:

- **Require trustees to maintain consumer-focused design and disclosure standards for the life of the account (e.g., mobile access, multilingual support) as part of approval criteria.** These include both UDAAP-compliant design and disclosure standards and those set forth by the Federal Deposit Insurance Corporation (FDIC) and the Consumer Financial Protection Bureau (CFPB) for youth savings accounts, in particular.

FDIC/CFPB youth savings guidance emphasizes accessibility, integration with school/community partners, clear disclosures, multilingual materials, mobile access, avoiding junk fees, and program structures that reduce friction for families unfamiliar with financial products. State and local automatic child development account programs already demonstrate how to meet these standards: for example, CalKIDS, the universal Children's Savings Accounts (CSA) program in California, has translated its program flier into 14 languages. Trustees should also provide regular updates on the account (at least annually) to support beneficiaries' financial education, like Social Security statements.

All trustees should be well-positioned to support families participating in the program, and given that at least some participants will be new to long-term savings, there is a growing need for advisor-led guidance. Savings guidance emphasizes accessibility, integration with school/community partners, clear disclosures, multilingual materials, mobile access, avoiding junk fees, and program structures.

- **Facilitate portability and competition.** Establish a trustee-to-trustee transfer protocol and prohibit transfer fees that undermine the benefits of compounding. Publish a model transfer form and require trustees to provide rollover instructions in plain language.
- **Consider the potential benefits of credit unions and State Treasurers (non-bank) as trustees.** Credit unions are already under supervision by the National Credit Union Administration to ensure compliance with consumer protection requirements. In addition, they have an explicit focus on the well-being of their members and families. State Treasurer's offices have deep experience running 529 plans, ABLE programs, state retirement programs, and other custodial accounts. They bring a public-sector mission fit for child-centered savings and have pre-existing data interfaces with the Social Security Administration (SSA), state birth records, and federal agencies. They also have significant experience with program-level investment oversight, especially where investments are limited by statute (similar to Trump Accounts' statutorily limited eligible-investment rules).
- **Ensure that 530A trustees, non-bank or otherwise, meet readiness requirements consistent with CFPB's non-bank oversight.** This includes the ability to provide consumer-compliant data, rapid response to fraud or identity-verification risks, and annual certification with fee caps and investment restrictions.

By clarifying trustee requirements and investment guardrails, Treasury can ensure that Trump Accounts deliver low-cost, portable, and consumer-friendly options that preserve account value and build trust among families.

## 2. Define qualified geographic areas using transparent criteria linked to outreach and reporting.

*Responds to Section III.H Question H-2.*

Geographic targeting will play a central role in ensuring that Trump Accounts reach communities where children face the greatest barriers to long-term financial security. Notice 2025-68 requests comment<sup>2</sup> on how Treasury should designate “qualified geographic areas,” a determination that also carries statutory and philanthropic implications, including for the Dell and Dalio gifts,<sup>3</sup> which require location-based targeting.

Evidence from the CFPB and independent research institutions highlights that place-based strategies—particularly when paired with trusted local organizations—are essential for reaching marginalized families who are less connected to the formal financial system (CFPB 2013; Su and Morgan 2024).<sup>4</sup> By grounding geographic designations in transparent, data-driven criteria such as local poverty rates, income levels, and school-level equity indicators, Treasury can ensure that early investments in Trump Accounts are directed toward communities where inclusion gaps are largest and where seed contributions can have the greatest long-term effect.

The recommendations below outline how Treasury can establish a fair, evidence-based geographic-designation framework aligned with both statutory obligations and best practices in inclusive and transparent policymaking.

- Adopt transparent, data-driven criteria.
  - » Use American Community Survey (ACS) zip-code level median income, child poverty rates, as primary indicators.
  - » Incorporate school-level equity designations (e.g., Title I status) as supplemental criteria.
- Publish a methodology and update schedule.
  - » Release a Federal Register notice detailing data sources, weighting, and thresholds for designation.
  - » Commit to annual updates using the most recent ACS and IRS Statistics of Income data.
- Enable targeted outreach and evaluation.
  - » Pair geographic designations with enhanced outreach funding for community-based partners in high-priority areas.
  - » Require trustees to report activation and deposit rates by zip code to monitor impacts by geography and demographics, where possible.

By defining qualified geographic areas using transparent criteria and linking them to outreach and reporting, Treasury can ensure that Trump Accounts reach children in communities facing the greatest barriers to economic mobility.

## 3. Change the enrollment default from opt-in to opt-out.

*Responds to Section III.A Question A-1.*

Just over 54 percent of families held retirement accounts in 2022 (Aladangady et al. 2023). Rates of ownership vary from about 11 percent for families in the bottom 20 percent of the income distribution to over 80 percent for

---

<sup>2</sup> “Notice of Intent to Issue Regulations with Respect to Section 530A Trump Accounts,” IRS, accessed February 18, 2026.

<sup>3</sup> Jessica Dickler and Kate Dore, “Trump Accounts Get Funding from Companies, Philanthropists: Here’s Who Is Eligible for the Funds,” CNBC, December 17, 2025, <https://www.cnbc.com/2025/12/17/trump-accounts-dalio-blackrock-bny.html>.

<sup>4</sup> “An Evaluation of Financial Empowerment Centers: Building People’s Financial Stability As a Public Service,” Cities for Financial Empowerment Fund, accessed February 19, 2026, <https://cfefund.org/an-evaluation-of-financial-empowerment-centers-building-peoples-financial-stability-as-a-public-service/>.

families in the top 20 percent.<sup>5</sup> Average account values are similarly dispersed. Accounts in the bottom 20 percent of the income distribution have average balances of less than \$100,000, and those in the top 20 percent of the income distribution have more than \$1 million.

Trump Accounts offer a way to expand access to retirement accounts and increase savings, but their success will depend on focusing on families least likely to have a retirement account.

- Accounts can be opened for children younger than 18 at the end of the year, provided they have a Social Security number. Once the account is opened, the child becomes the account owner. The legislation directs that enrollment can occur either through Treasury’s election or by a third party in the Marketplace. Early guidance indicates enrollment will occur when a parent, guardian, or authorized individual takes one of two actions: (1) making an election on a newly created tax form, Form 4547, when filing taxes, or (2) enrolling via a website operated by the US Government.

Although the guidelines aim to simplify enrollment, requiring families to open accounts reduces the likelihood that an adult will enroll an eligible child, undermining universal participation. Moreover, the definition differs from that in IRC Section 6434, which already defines qualifying children and dependents, introducing yet another definition of child into an already complex tax code.

Treasury should consider the following when establishing who may open an account. Under current guidance, some children will be excluded from the accounts because no eligible individual can open them on their behalf. The draft guidance suggests that a legal guardian, parent, adult sibling, or grandparent can open an account on behalf of the eligible individual. Nationwide, about 3.7 million children live in households without a parent serving as their primary caregiver. Often, children without a parent serving as a primary caregiver are being cared for by relatives. Few of these non-parent caregivers seek guardianship (Pew Charitable Trusts 2023).

This unnecessarily strict definition of who can open an account may preclude someone actively involved in a child’s life from opening an account. Moreover, it diverges from the more commonly used tax code definition of a qualifying child, creating additional confusion. Finally, some tax unit heads are themselves younger than 18. Will these individuals be unable to open an account on their own behalf?

- We further reflect that the ordering of who should control the account before the child reaches age 18 should reflect the order already present for determining qualifying children in IRC Section 6434 and should be considered unnecessary in cases where only one account has been opened on behalf of a child.
- Having two methods to open an account, via Form 4547 or a government-run website, should allow more people to enroll in the accounts. We affirm that an estimated 3 to 12 percent of children do not appear on a tax return (Gee et al. 2025), making another enrollment pathway essential.

### *Opt-in Structure Reduces Participation*

Evidence shows that opt-in designs for early wealth-building and retirement programs have historically led to low participation rates, particularly among low-income families. According to our analysis of the Survey of Income and Program Participation 2023,<sup>6</sup> when 529 college savings plans are not linked to statewide Child Development Associate (CDA) programs (meaning they are opt-in as opposed to opt-out), we see an average participation rate of

---

<sup>5</sup> “Survey of Consumer Finances (SCF),” Federal Reserve, accessed February 18, 2026, <https://www.federalreserve.gov/econres/scf/dataviz/scf/chart/>.

<sup>6</sup> Madeline Brown and Damir Cosic, “Automatic Enrollment, Not Opt-In, Is the Only Way to Guarantee That Trump Accounts Don’t Leave Behind Children from Low-Income Families,” *Urban Wire* (blog), Urban Institute, January 20, 2026, <https://www.urban.org/urban-wire/automatic-enrollment-not-opt-only-way-guarantee-trump-accounts-dont-leave-behind>.

13 percent among families who have children younger than 18, but only 4 percent among those in the bottom half of the income distribution.

We modeled what would have happened for families who currently have college-age children if a similar policy had been in place at the time of their birth. Our estimates assume that only families who file federal income taxes would enroll and receive the initial \$1,000 contribution. For demonstration's sake, we also assume that every family that files federal income taxes and is eligible actually checks both the box to claim their account and the \$1,000, even though people regularly miss out on tax benefits because they don't know about them (Goslinger et al. 2025; Karpman and Maag 2022; Singh 2025).

Under this simulation, 7 percent of families in the bottom quintile of the income distribution would not own Trump Accounts, compared with nearly universal coverage among the top quintile. This translates to nearly \$600 million in loss of federal benefits for the lowest-income quintile. In fact, the loss of benefits may be much higher. The benefits of the account may be unclear, particularly for families who do not know whether their child will receive a philanthropic contribution to the account. On the other hand, since the accounts are framed as belonging to the individual, people may be more likely to participate (De La Rosa et al. 2021).

### *Automatic Enrollment Increases Participation, Particularly Among Those Least Likely to Participate*

A substantial body of literature related to retirement savings suggests that Americans are more likely to participate in a savings program if enrollment is automatic, rather than requiring people to opt into the program. Adding a form to a tax return has been an unreliable way to encourage people eligible for other savings-related tax benefits to enroll.

The Savers' Credit is a federal income tax credit designed to encourage low- and moderate-income workers to save for retirement. The credit has changed in recent years, but in its first year, analysts at the Joint Committee on Taxation found that 34 percent of qualified taxpayers could have claimed \$496 million in benefits but did not. The average credit missed would have been worth \$184, similar to the average credit claimed, \$199 (Koenig and Harvey 2005).

If the goal is for every child to have an account, evidence strongly supports automatic enrollment as the most effective method. Evidence suggests that automatic enrollment—especially in a “plan” structure like a 529 or 401(k)—helps reduce barriers to access and increases the likelihood that all who could benefit from the program do, provided they're aware of the program. Specifically, research demonstrates that automatic enrollment:

- **Drives near-universal participation:** Maine's Harold Alfond College Challenge increased participation from 40 percent to nearly 100 percent after adopting automatic enrollment. SEED for Oklahoma Kids and San Francisco's Kindergarten to College programs achieved similar results (Loya, Garber, and Santos 2017).
- **Improves cost efficiency:** After implementing automatic enrollment, Maine could shift resources from recruitment campaigns to family engagement and education (Clancy, Huang, and Sherraden 2025).
- **Boosts savings among low-income families:** Universal programs show higher savings rates among low- to moderate-income households compared with opt-in models (Aspen Institute 2007). Research on the SEED for Oklahoma Kids demonstration found that low-income families who had accounts opened for them were more likely to make deposits than those who did not (Beverly, Clancy, and Sherrade 2016). Evidence from the UK found that lower-income families saved a greater proportion of income than higher-income families (Aspen Institute 2007).
- **Encourages voluntary contributions:** Maine's CDA catalyzed \$197 million in family contributions alongside \$72 million in state investments. By May 2023, Maine's CDA had invested \$72 million for 145,000 children and catalyzed \$197 million in family contributions. These results demonstrate that automatic enrollment enhances voluntary saving rather than discouraging it (Clancy, Huang, and Sherraden 2025).

- **Builds popularity, increasing program success and sustainability:** Universal CSAs are popular—69 percent of survey respondents supported the idea (Clancy, Huang, and Sherraden 2025). In local and state models, operational hurdles (e.g., collecting SSNs for 529 accounts) can make automation complex, but the federal nature of Trump Accounts nullifies this challenge.

In response, Treasury should consider the following:

- **Establish an account for all eligible individuals using existing tax data:** The Treasury Secretary should further ensure that a \$1,000 deposit is made into all accounts eligible for the pilot program and direct that the funds be invested in an eligible fund.
- **Prioritize establishing accounts for children:** Barring full automatic enrollment, the Treasury Secretary should prioritize establishing accounts for children who appear on Form 1095 but not on a tax return (Department of the Treasury 2021).
- **Auto-credit the pilot contribution:** When eligibility is verified (birth window, SSN), automatically credit the \$1,000 pilot to the established account; this is consistent with Section 6434 and the Notice’s exception from offset and integrity safeguards.
- **Permit prepopulation and multichannel elections:** Permit elections via Form 4547, the online portal, and tax filing, with prepopulation from SSA identifiers to reduce friction; the Notice already contemplates multichannel mechanics and mid-2026 portal activation.

In addition, the inclusion of a parental Social Security number field on Form 4547 is inconsistent with statutory requirements—Section 530A mandates only that the child possesses a Social Security number—and may significantly suppress participation among eligible families.

A robust body of research shows that immigrant families avoid programs when agencies request personal information beyond what is strictly required, even when their children are fully eligible. Analysis by KFF finds that confusion and fear related to public charge policies lead to reduced enrollment in Medicaid and CHIP among a much broader population than those legally subject to public charge determinations, including US-citizen children in immigrant families.<sup>7</sup>

Similarly, national immigrant advocacy organizations warn that administrative requests for additional identifying information—such as Social Security numbers—intensify the “chilling effect” deterring families from accessing benefits for which they legally qualify.<sup>8</sup> Prior research compiled by CLASP shows that, in past episodes of heightened immigration policy scrutiny, millions of eligible people avoided public programs solely because of fear and misperception about how personal information might be used, with particularly acute impacts on mixed-status households.<sup>9</sup>

These concerns highlight that retaining or requiring parental SSNs on Form 4547 risks undermining the program’s core goal of broad, equitable participation. Treasury should therefore remove the parental SSN field or clearly indicate that it is not required for account establishment.

---

<sup>7</sup> Samantha Artiga, Drishti Pillai, Sammy Cervantes, Akash Pillai, and Matthew Rae, “Potential ‘Chilling Effects’ of Public Charge and Other Immigration Policies on Medicaid and CHIP Enrollment,” KFF, December 2, 2025, <https://www.kff.org/medicaid/potential-chilling-effects-of-public-charge-and-other-immigration-policies-on-medicaid-and-chip-enrollment/>.

<sup>8</sup> Ed Waltz, “Public Charge Proposal Puts Millions at Risk, Advocates Warn,” Protecting Immigrant Families, November 17, 2025, <https://pifcoalition.org/resources/press/public-charge-proposal-puts-millions-at-risk-advocates-warn/>.

<sup>9</sup> “Research Estimating Impact of Proposed Public Charge Rule: What Study to Use?,” Protecting Immigrant Families, June 2013.

#### 4. Develop and fund robust outreach campaigns based on learning from the introduction of other tax benefits.

*Responds to Section III.B Question B-1.*

As noted above, failing to automatically enroll all eligible individuals will likely result in many individuals eligible for an account not having one. Children in families with low incomes are much more likely to experience poverty as adults compared to their peers (National Academies of Sciences, Engineering, and Medicine 2024). They are also less likely to be claimed on a tax return (Gee et al. 2025), reducing the likelihood of enrollment on a tax form.

Treasury should develop and fund outreach efforts to increase program participation. We outline below the elements of successful outreach campaigns that Treasury should consider. As part of any outreach campaign, Treasury could develop and report on performance benchmarks (discussed in more detail below) to analyze where additional efforts to increase participation may be most productive.

The clearest benefit provided by the new Trump Accounts is the \$1,000 seed funding for children born between January 1, 2025, and December 31, 2028. This could be an important first step for many children who face barriers to saving.

The process for enrolling and funding the accounts could be similar to the one used to disburse advance child tax credit payments from July to December 2021, or to economic impact payments delivered in 2020 and 2021 to the vast majority of eligible families. If Treasury is unwilling or unable to automate account creation, they should follow the steps below to develop an effective outreach campaign.

- **Use existing data to drive outreach, especially among young children.** Reach out to families with children born during the qualifying period who appear in either the Enumeration at Birth Data or on a Form 1040 to indicate that the child is eligible for a Trump Account to be opened on their behalf with an initial deposit of \$1,000.

Other tax data should also be used for outreach. In 2021, when the Treasury sought to increase participation in the advanced child tax credit, Treasury released data from health insurance forms that showed the number of children, by zip code, that appeared in tax forms related to health insurance (1095 data) and not on a tax return (Department of the Treasury 2021). This information can again be useful for targeting outreach campaigns to children unlikely to learn about Trump Accounts through the tax filing process.

- **Clearly indicate the impact of signing up for the account and the impact of not signing up.** This could be as simple as returning a postcard to confirm that sign-up has been completed or that sign-up is pending. For example, will children who are not signed up forego the intended \$1,000 seed funding and any other deposits made to groups they are part of? Or will Treasury keep track of these accounts and make them available when opening an account? If a family opens an account but fails to designate how the money will be invested, will there be a default benefit, or will children miss out on any potential earnings from the seed funding and additional investments?
- **Develop messages for trusted messengers.** A large body of research, including studies that focused on delivering tax benefits to children, suggests that working with trusted messengers can improve program participation. Trusted messengers are people who have established trust in society, including nurses and other health professionals in child-serving settings (Airi, Godinez-Puig, and Rueben 2022; Choi et al. 2026; Cox, Caines, and Rosenbaum 2021). Treasury could work with the IRS Office of Taxpayer Services to create appropriate outreach materials and connect with a broad group of trusted messengers.
- **Develop material with specific groups in mind.** Treasury should develop specific materials aimed at immigrants, who research has shown can face additional barriers to claiming tax benefits for their eligible children (Karpman and Maag 2022). Besides engaging trusted community messengers, communication must be clear, simple, delivered frequently, and delivered in multiple languages appropriate for communities. It

must also clearly indicate whether there are immigration-related implications for accessing child benefits. In the recent past, immigrants have opted not to participate in programs because of immigration status concerns (Gonzalez, Karpman, and Caraveo 2022).

- **Sustain the outreach campaign over multiple filing seasons.** Trust building is often considered a year-round, long-term strategy that cannot be successfully executed only at tax time. Instead, Treasury must work consistently with trusted community messengers to ensure successful efforts (Godinez-Puig et al. 2025).
- **Collaborate with SSA, Department of Education, Department of Veterans' Affairs, and others.** Treasury should work with other federal departments to foster cross-agency collaboration among agencies serving similar populations. Families with children interact with multiple federal agencies. During the COVID-19 pandemic, Treasury partnered with multiple agencies to improve awareness of economic impact payments.<sup>10</sup>

Treasury should also work to simplify enrollment as much as possible. We commend the effort to develop a simplified filing platform for people who fail to file a Form 4547 to enroll a child in a Trump Account. Analysis from tax seasons 2020 and 2021 showed that simplified filing allowed over 100,000 households to access around \$440 million in tax benefits.

Simplified filing is a necessary complement to robust outreach efforts. Key to the tool's success was asking only the minimum amount of information needed to deliver the intended benefit (Code for America 2022). However, we issue one caveat: This tool must be distinct from the tax filing process. Otherwise, people who enroll a child in an account via this tool may be interpreted to have filed a tax return. Any attempt to file a tax return electronically will be rejected, potentially preventing them from receiving important tax benefits.

Treasury should consider aiding families to fund Trump Accounts in the future. We suggest that families be given the opportunity to make allowable contributions at tax time. One way to do this would be to modify Form 8888, which allows families to split their tax refund into multiple accounts. Once established, the Trump Account could be explicitly listed as an allowable account.

### *Performance Benchmarks Can Help Successfully Deploy Outreach*

Understanding who has signed up for accounts and who may be left out will be important for ongoing outreach and education efforts. It can also help those philanthropic organizations identify where assistance is needed to ensure the groups they serve benefit as intended under the law. Finally, it can encourage sub-federal-level actors, such as state and local governments, to increase participation in the program.

We recommend that Treasury establish enrollment and engagement benchmarks segmented by income to help ensure broad and inclusive participation and publish participation benchmarks segmented by income and geography. Section 530A(i) imposes specialized trustee reporting (including sources of contributions and basis) distinct from Section 408(i); to the extent possible, Treasury can leverage these data for program oversight and public reporting without exposing taxpayer return information.

Respectfully Submitted,

Madeline Brown  
Senior Policy Associate  
Urban Institute

Elaine Maag  
Senior Fellow  
Urban-Brookings Tax Policy Center

---

<sup>10</sup> Patty Murray and Ron Wyden, "[Economic Impact Payments to Student Aid Recipients](#)," June 16, 2020.

## References

- Airi, Nikhita, Luisa Godinez-Puig, and Kim Rueben. 2022. "Helping New Mothers Understand the Benefits of Filing Taxes." Washington, DC: Tax Policy Center, Urban Institute, and Brookings Institution.
- Aladangady, Aditya, Jesse Bricker, Andrew C. Chang, et al. 2023. *Changes in US Family Finances from 2019 to 2022: Evidence from the Survey of Consumer Finances*. Washington, DC: Board of Governors of the Federal Reserve System.
- Aspen Institute. 2007. "The UK Child Trust Fund: Early Results." New York: Initiative on Financial Security.
- Beverly, Sondra G., Margaret M. Clancy, and Michael Sherrade. 2016. "The Early Positive Impacts of Child Development Accounts." St. Louis, MO: Washington University, Center for Social Development.
- CFPB (Consumer Financial Protection Bureau). 2013. *Empowering Low Income and Economically Vulnerable Consumers*. Washington, DC: CFPB.
- Choi, Kristen, Cecile Yama, Yvette Leon, and Lynn Kersey. 2026. "Pilot of Health Care Workers Promoting Tax Filing and Receipt of Tax Credits for Low Income Families." *The Journal for Nurse Practitioners* 22 (1): 105603.
- Clancy, Margaret, Jin Huang, and Michael Sherraden. 2025. "The Case for Automatic Enrollment in Trump Accounts: Lessons from Maine's CDA." Washington University, Center for Social Development Brief No. 25-51. <https://doi.org/10.7936/V1H4-2C90>.
- Code for America. 2022. *Lessons from Simplified Filing in 2021: Client Experience and Outreach Learnings from the Operation of the GetCTC Simplified Filing Tool*. Oakland, CA: Code for America.
- Cosic, Damir, Madeline Brown, Amalie Zinn, Sonia Torres Rodríguez, and Ofronama Biu. 2024. "Modeling the Impact of a Federal Baby Bonds Program: Impacts on Financial Wealth, College Attainment, Student Debt, Home Equity, and Retirement Savings." Washington, DC: Urban Institute.
- Cox, Kris, Roxy Caines, Arloc Sherman, and Dorothy Rosenbaum. 2021. "State and Local Child Tax Credit Outreach Needed to Help Lift Hardest-to-Reach Children Out of Poverty." Washington, DC: Center on Budget and Policy Priorities.
- De La Rosa, Wendy, Eesha Sharma, Stephanie M. Tully, Eric Giannella, and Gwen Rino. 2021. "Psychological Ownership Interventions Increase Interest in Claiming Government Benefits." *Proceedings of the National Academy of Sciences of the United States of America* 118 (35). <https://www.pnas.org/doi/full/10.1073/pnas.2106357118>.
- Department of the Treasury. 2021. *By ZIP Code: Number of Children under Age 18 with a Social Security Number Who Are Not Found on a Tax Year 2019 or 2020 Tax Return but who Appear on a Tax Year 2019 Form 1095 and Associated Number of Policy Holders*. Washington, DC: US Department of the Treasury.
- Gee, Geoffrey, Jacob Goldin, Joseph Gray-Hancuch, Ithai Z. Lurie, and Vedant Vohra. 2025. "The Claiming of Children on U.S. Tax Returns." Working Paper 2025-06. Chicago: Becker Friedman Institute for Economics.
- Godinez-Puig, Luisa, Aravind Boddupalli, and Livia Mucciolo. 2022. "Lessons Learned from Expanded Child Tax Credit Outreach to Immigrant Communities in Boston". Washington, DC: Urban Institute.
- Gonzalez, Dulce, Michael Karpman, and Clara Alvarez Caraveo. 2022. "Immigrant Families in California Faced Barriers Accessing Safety Net Programs in 2021, but Community Organizations Helped Many Enroll." Washington, DC: Urban Institute.

- Gosliner, Wendi, Heena Shah, Kaitlyn Jackson, Lia C. H. Fernald, and Rita Hamad. 2025. "It's Confusing as Hell': A Qualitative Study of Barriers Accessing Poverty Alleviation Benefits Through the US Earned Income Tax Credit." *Health Affairs Scholar* 3 (9): qxaf162. <https://doi.org/10.1093/haschl/qxaf162>.
- Karpman, Michael, and Elaine Maag. 2022. "Lack of Awareness and Confusion over Eligibility Prevented Some Families from Getting Child Tax Credit Payments." Washington, DC: Urban Institute.
- Koenig, Gary, and Robert Harvey. 2005. "Utilization of the Saver's Credit: An Analysis of the First Year." *National Tax Journal* 58 (4). <https://doi.org/10.17310/ntj.2005.4.08>.
- Loya, Rebecca, Judith Garber, and Jessica Santos. 2017. *Levers for Success: Key Features and Outcomes of Children's Savings Account Programs*. Waltham, MA: Brandeis Institute on Assets and Social Policy.
- National Academies of Sciences, Engineering, and Medicine. 2024. *Reducing Intergenerational Poverty*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/27058>.
- Pew Charitable Trusts. 2023. "Outdated Court Policies Can Leave Children Without a Legal Guardian." Washington, DC: Pew Charitable Trusts.
- Singh, Devyani. 2025. *Designed for Filing, Not for Families: Reimagining Tax Credit Delivery*. Washington, DC: New America.
- Su, Yipeng, and Anna Morgan. 2024. "Promoting Rural Financial Well-Being and Inclusion: Aligning Strategies with Community Needs." Washington, DC: Urban Institute.
- Waxman, Elaine, Elaine Maag, Poonam Gupta, Julie Salas, Gabriella Garriga, Ilham Dehry, Danielle Kwon, Heather Hand, and Jonathan Schwabish. 2023. "Share Our Strength Community of Practice Grant Case Studies." Washington, DC: Urban Institute.