



Trump Accounts Under OBBBA

One, Big, Beautiful Bill Act

1

A Comprehensive Guide for Accounting and Finance Professionals



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

1

Disclaimer

- 🍏 For educational purposes only
- 🍏 Not tax or legal advice
- 🍏 Based on statute Notice 2025-68 and proposed regulations

2



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Learning Objectives

- 🍏 Identify the requirements for establishing a Trump Account under IRC § 530A
- 🍏 Distinguish between the Trump Account structure and the pilot contribution program under IRC § 6434
- 🍏 Apply contribution rules, including employer contributions and aggregate limits, to client scenarios
- 🍏 Evaluate the tax treatment of contributions and distributions from Trump Accounts
- 🍏 Recognize investment limitations and operational rules during the growth period
- 🍏 Analyze how Trump Accounts compare to 529 Plans

3



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

What Is a Trump Account?

- 🍏 A type of traditional individual retirement account (IRA)
 - Has limitations that do not apply to an IRA
- 🍏 Established for the exclusive benefit of an eligible individual
 - Must initially be created or organized by the IRS
- 🍏 Designated at its establishment as a Trump account
- 🍏 The eligible individual is the account beneficiary

4



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Big Picture: Why Trump Accounts Matter

The First Retirement-oriented Account That Can Start at Birth

- 🍏 Long-term tax-deferred growth
- 🍏 Birth through age 17: special rules apply
- 🍏 Age 18+: transitions to regular IRA rules
- 🍏 Multi-source funding options

5

Potential Impact

- 🍏 Decades of compounding before workforce entry
- 🍏 New planning opportunities for families



GUIDANCE TIMELINE



6



Legislative Origin

🍏 Created by OBBBA (July 4, 2025)

- IRC § 530A (accounts)
- IRC § 6434 (pilot program)

7

Two separate statutory systems enacted together but governed independently



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

Where We Are in the Guidance Timeline?

Legislation → Notice → Proposed Regulations → Soon: Final Regulations

🍏 Statute established Section 530A design

🍏 Notice 2025-68 provided initial operational guidance

8

🍏 Proposed regulations confirm that structure

🍏 Final regulations are still pending

We are transitioning from interpretation to implementation



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



What the Regulations Do NOT Address

Significant gaps remain:

- 🍏 Which firms will serve as Custodian
- 🍏 Reporting forms
- 🍏 Excess contribution correction procedures
- 🍏 Operational account design (post-growth period)
- 🍏 Coordination between multiple contributors (parents, employers, government)

9

Implication:

Advisors must monitor ongoing guidance, as key operational rules remain unresolved



What Advisors Should Be Careful About

- 🍏 Treating pilot contribution as an account
- 🍏 Missing coordination limits across contributors

10







**STRUCTURE:
ACCOUNT
VS.
PILOT
CONTRIBUTION**



A blue piggy bank is shown on a light green surface. To its right, a portion of a pink piggy bank is visible. The background is dark and out of focus.

11



The account and the pilot contribution are created under different Code sections and must be analyzed separately

12



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



12



Two Separate Legal Systems Govern Trump Accounts

§ 530A (The Account)

- 🍏 Establishes the account
- 🍏 Governs contributions, distributions, and investments

§ 6434 (Pilot Contribution)

- 🍏 One-time \$1,000 contribution
- 🍏 Requires separate election
- 🍏 Has its own eligibility rules

13



These Do Not Interact Automatically

- 🍏 Establishing a Trump Account does not, by itself, trigger pilot funding
- 🍏 Pilot eligibility does not create an account
- 🍏 Each requires a separate election
- 🍏 Each has its own eligibility requirements

14





Real-world Impact: What Happens When Anyone Gets This Wrong?

- 🍏 Family believes benefit is automatic
- 🍏 Child has an account but may not receive the pilot contribution
- 🍏 Error cannot be corrected after deadline

15



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



ELIGIBILITY AND ACCOUNT CREATION



16



One Trump Account Policy

🍏 Only one Trump account with a balance may exist at a time due to the full-balance rollover requirement

- To ensure clear management and oversight

17

🍏 This restriction helps streamline decision-making processes and prevents overlapping responsibilities



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

Establishment Deadline

🍏 Must be established before January 1 of the year the child attains age 18

🍏 After this date, a Trump Account cannot be **newly** established

18



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Eligible Child

- 🍏 Under age 18
- 🍏 Has Social Security number
- 🍏 Election must be made by an authorized individual

19

Must meet eligibility at time of election



Authorized Individual — Election Priority Order

When Elections Are Made at the Same Time

- 🍏 If the account election (§ 530A) and pilot election (§ 6434) are made together:
 - The individual authorized under § 6434 (pilot rules)
 - Is also treated as the authorized individual to open the Trump account

When Elections Are Made Separately: Priority Order for Opening the Account

- 🍏 Legal guardian
- 🍏 Parent
- 🍏 Adult sibling
- 🍏 Grandparent

Higher-priority individuals override lower-priority elections

20





Responsible Party

Direct Account Activity Subject To Statutory Limitations

- Individual who made the election becomes the responsible party
- Directs permitted account activity
- Select investments
- Request rollovers

- ABLE rollover in age 17 year (Optional)
- May designate a successor responsible party, subject to custodian rules

Ensure compliance with account rules during the growth period

21



Authorized Individual vs. Responsible Party

Role	Authorized Individual	Responsible Party
Primary function	Opens account	Manages account
When relevant	At establishment	Ongoing
Authority source	Statutory election rules	Account agreement + law
Who qualifies	Limited hierarchy (guardian → parent → etc.)	Same person initially
Can they be different?	Initially no	Possibly later (successor allowed)

22





Case Study — Competing Elections Within a Family: 1 of 2

Facts

- 🍏 Child is born in 2026
 - 🍏 **Parent** files an election for the \$1,000 pilot contribution
 - 🍏 **Grandparent**, unaware of the election, opens a Trump Account
- No coordination between elections or account establishment**

23



Case Study — Competing Elections Within a Family: 2 of 2

What Happens?

- The pilot contribution requires:
 - A valid election
 - A Trump Account to receive the funds
- **Operational Reality:**
 - Both actions are processed by Treasury
 - Treasury must determine how to match a valid election to an existing account
- **Open Question**
 - How does Treasury resolve competing actions?
 - What happens if timing overlaps?

24

Outcome depends on operational rules not yet finalized





Planning Best Practice

Planning Best Practice

- 🍏 Identify in advance:
 - Who will open the account
 - Who will make the pilot election
- 🍏 Coordinate and document elections to avoid missed or delayed funding
- 🍏 Confirm whether a Trump Account already exists before making an election

25



© 2025 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

Where There Is Room for Errors

- 🍏 Assuming electing account means electing pilot contribution
- 🍏 Failing to coordinate among family members
- 🍏 Missing priority rules
- 🍏 Not verifying existing account

26



© 2025 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



TWO PHASES: 1) GROWTH PERIOD AND 2) POST-GROWTH PERIOD

27

The Two Phases

🍏 Growth period

🍏 Post-growth period

Each phase applies different contribution, investment, distribution, and reporting rules

28





Growth Period Defined

🍏 Begins at birth and ends on December 31 of the year the child attains age 17

🍏 Example:

- Child born on October 1, 2025
- Attains 18 on October 1, 2043
- The last day of the growth period for the child is December 31, 2042

29



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

Limitations During Growth Period

🍏 No aggregation with traditional IRAs

🍏 Invest only in eligible investments

🍏 Not allowed to make distributions (narrow exceptions apply)

🍏 Individual contributions are not deductible

30



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Transition to Post-growth Period

Rules That Remain

- Account continues as a Trump Account
- No aggregation with other IRAs when allocating basis
- No annuity option
- No SEP/SIMPLE contributions

New Rules Permitted

- Growth period restrictions under § 530A no longer apply
- Section 408 traditional IRA rules apply
- May be rolled over to an eligible retirement plan
- May be transferred to an IRA
- Roth conversions permitted
- Wider investment options allowed

31



Automatic Transfer After the Growth Period

Only if permitted under Trump Account agreement

-  Must be to a non-Trump traditional IRA for the beneficiary
-  Receiving IRA must be maintained by the **same trustee**
-  Must meet IRA transfer rules
-  Transferring account:
 - Does not remain open after the growth period and
 - Does not need to reflect post-growth period rules

32





Start Date

🍏 Contributions cannot be made before July 4, 2026

34





Five Contribution Types

- 1) Pilot contribution
- 2) Qualified general contributions
- 3) Employer contributions
- 4) Qualified rollover contributions
- 5) Contributions from other sources (such as the account beneficiary, parents, or any other person)

35



Qualified General Contributions

- 🍏 Governments and nonprofits may only make contributions through the Treasury Department
 - 🍏 Such contributions must be made in equal amounts to the Trump accounts of every account beneficiary in a qualified class

for members of a qualified class of account beneficiaries
- Funded by:

 - 🍏 States (or political subdivisions thereof),
 - 🍏 The United States,
 - 🍏 The District of Columbia,
 - 🍏 Indian tribal governments, or
 - 🍏 Section 501(c)(3) tax-exempt organizations)

36



36



Employer Contributions (Section 128)

- 🍏 Up to \$2,500 per employee per year. **Indexed as of 2028.**
- 🍏 Excluded from employee income
- 🍏 Subject to nondiscrimination rules
- 🍏 Requires written plan
- 🍏 Formal compliance required

37



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

Employer Contribution — Case Study + Tax Result

- 🍏 Employer contributes \$2,500
- 🍏 Deductible to employer
- 🍏 Not taxable to employee
- 🍏 Counts toward \$5,000 annual limit
- 🍏 Taxable upon distribution

38



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Employer Contribution — Multiple Children

Employer may:

- 🍏 Contribute \$2,500 to one child, or
- 🍏 Split across children (for example, \$1,250 each)
- 🍏 Employer contribution may NOT be more than \$2,500 on behalf of an employee

39



Qualified Rollover Contributions

- | | |
|--|---|
| 🍏 Made to a rollover Trump Account — first funding | 🍏 Basis carries over |
| 🍏 Trustee-to-trustee | 🍏 Transferring trustee provides the receiving trustee with a report — |
| 🍏 Entire balance — only one funded Trump account for an individual at any time | transferring account is a Trump account |
| 🍏 Trailing dividends sent to same rollover account | 🍏 Receiving trustee must confirm account type |

40



40





Other Contributions

- 🍏 From other sources: the account beneficiary, parents, or any other person
- 🍏 Capped at \$5,000 per year. **Indexed as of 2028.**
- 🍏 Create basis in the Trump account
- 🍏 Unlike IRAs, contributions do not require compensation

41



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Other Contributions: Pros and Cons

- 🍏 Pros: tax-deferred growth, family-funded savings
- 🍏 Cons: no deductibility, funds locked until 18
- 🍏 Alternative:
 - 529 plans,
 - Regular savings (UTMA/UGMA etc.),
 - Roth or traditional IRA (if child has compensation from a job)

42



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877





Multiple Contributors — What Counts Toward the \$5,000 Limit

Contribution Type	Limit	Counts Toward \$5K?
Pilot Contribution	\$1,000	No
Employer Contribution	\$2,500	Yes
Parent/Other Contributions	\$5,000	Yes
Government Contributions	Variable	No
Rollovers	N/A	No

43



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Case Study — Starting at Birth

Assumptions:

- 🍏 \$1,000 pilot contribution (age 0)
- 🍏 \$2,500 employer contribution annually (up to age 17)
- 🍏 Growth rate = 6% annually
- 🍏 No distributions

44



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877





Contribution Summary

Source	Amount
Pilot (one-time)	\$1,000
Annual Contributions	\$2,500
Years of \$2,500 Contributions	17

45



Growth Table: Results Vary by Calculator

Age	Approximate Value
17	\$73K
25	\$116K
35	\$209K
50	\$500K
65	\$1.2M

46





Mistake Risk: Failing To Coordinate Multiple Contributors

47

Multiple Contributors Increase Risk of Excess



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

47

Multiple Contributors Create Risk

- 🍏 Employer contributing \$2,500
- 🍏 Other individuals contributing \$5,000
- 🍏 Responsible party unaware of limits

Result:

- 🍏 Excess contributions
- 🍏 Correction requirements
- 🍏 Reporting complexity

48



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Salary Reduction Contributions — An Overlooked Feature

A Feature Many Practitioners Missed in Notice 2025-68

- 🍏 Employees may fund Trump Accounts through compensation reduction arrangements
- 🍏 Contributions made through employer programs
- 🍏 Similar concept to payroll deduction savings

49

Key Clarifications

- 🍏 Treated as employee contributions
- 🍏 Count toward the \$5,000 annual limit



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Section 125 Considerations — What Is Allowed?

- 🍏 Salary reduction contributions may be offered through a Section 125 cafeteria plan
 - Only for the employee's dependent's Trump Account
- 🍏 **Not Allowed** — Contributions through Section 125 to the employee's own Trump Account

50



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877





Pilot Contribution

- 🍏 \$1,000
- 🍏 One-time
- 🍏 Requires election

52





Eligible Child — Pilot Contribution

- 🍏 U.S. citizen
- 🍏 Valid Social Security number
- 🍏 Born within eligibility window (2025–2028)
- 🍏 Must meet eligibility at time of election

53



Pilot Election Timing

- Must be made during the eligible child’s eligibility window
- 🍏 Begins at birth
 - 🍏 Ends before January 1 of the year the child turns 18
 - 🍏 Late election may result in missed contribution

54





Pilot Contribution: Operational Flow

- 🍏 Election made by authorized individual
- 🍏 Election identifies eligible child
- 🍏 Treasury processes the election
- 🍏 Contribution deposited into the child's Trump Account

55



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

Possible Pitfall

- 🍏 Confusing eligibility for account vs. pilot
- 🍏 The account exists, but the election is not properly completed

56



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



What Advisors Are Asking: “How Do You Actually Get the \$1,000?”

- 🍏 Step 1: Election must be made (Form 4547)/www.TrumpAccount.gov
- 🍏 Step 2: Account must exist (or be opened through the process)
- 🍏 Step 3: Election must be processed — not just filed
- 🍏 Step 4: Treasury deposits into the child’s Trump Account

57



Pilot vs. Account

Feature	§ 530A Account	§ 6434 Pilot
Purpose	Ongoing account	One-time funding
Requires election	Yes	Yes (separate)
Eligibility	Broad	Narrow (2025–2028 births)
Contribution limit	\$5K (annual up to 17)	\$1,000 (one-time)
Exists without other	Yes	No

58





Eligible Investments During Growth Period

- 🍏 Index-tracking mutual funds or ETFs
- 🍏 Must track:
 - S&P 500 OR
 - Broad-based U.S. equity index
- 🍏 Fees $\leq$ 0.1% of fund balance
- 🍏 No active management or sector-specific focus

60





Ineligible Investments

- 🍏 Sector-specific indexes
- 🍏 ESG indexes
- 🍏 Leveraged or inverse funds
- 🍏 Money market funds or cash (except temporarily)
- 🍏 Any investment that fails Treasury criteria

61



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Trustee Responsibilities

- 🍏 Ongoing monitoring of investment eligibility
- 🍏 Removal of investments that become ineligible
- 🍏 Documentation requirements
- 🍏 Default investment must be an eligible investment

62



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877





Advisor Risk

🍏 Ineligible investments may cause compliance failures and require correction



DISTRIBUTIONS





During Growth Period

- 🍏 Distributions are generally prohibited during the growth period
- 🍏 Exceptions
 - Qualified rollover
 - Qualified ABLE trustee-to-trustee transfer rollover (age 17 year only)
 - Achieving a Better Life Experience (ABLE) Account
 - Not counted as part of ABLE contribution limit
 - Excess contribution corrections
 - Death

65



© 2025 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877

Taxation and Penalties (After Age 18)

- 🍏 Distributions generally taxable as ordinary income
- 🍏 Basis (after-tax contributions) recovered tax-free
- 🍏 Early distributions may be subject to 10% penalty
- 🍏 IRA exceptions may apply

66



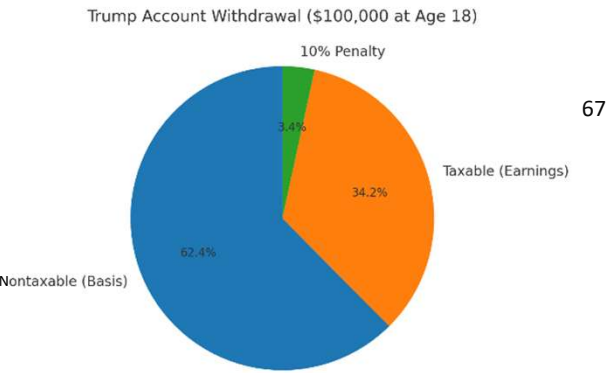
© 2025 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Case Study: Taxation Trump Savings Account

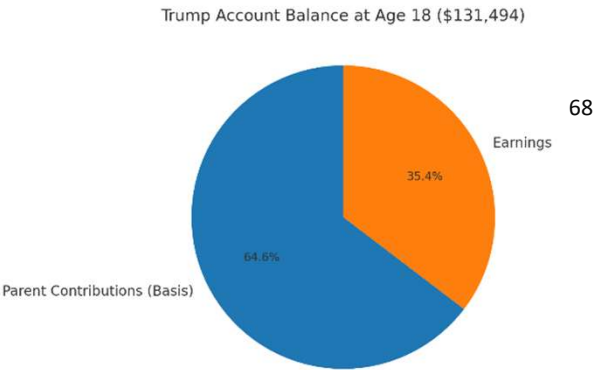
Assumptions

- 🍏 Pilot Contribution: \$1,000
- 🍏 Parent Contributions: \$5,000 annually for 17 years
- 🍏 Growth rate: 5%
- 🍏 Account FMV at age 18: **\$131,494**
- 🍏 Distribution: **\$100,000**



Taxation Trump Savings Account

- 🍏 Result
- 🍏 Nontaxable/basis: \$64,642
- 🍏 Taxable: \$35,358
- 🍏 10% penalty : \$3,536





Advisor Questions Spotlight:

Will there be tracking of “basis” in the account for after-tax contributions when it comes time for distributions?

69



Advisor Questions Spotlight:

Will there be tracking of “basis” in the account for after-tax contributions when it comes time for distributions?

70

Yes. Custodians will need to track basis to prevent double taxation, since contributions are after-tax and only earnings are taxable.





Trump Account vs. 529 Plan vs. UTMA

Feature	Trump Account	529 Plan	UTMA/UGMA Account
Primary purpose	Long-term retirement savings starting at birth	Education savings with limited retirement saving flexibility	General-purpose savings/investment account for a minor
Who can fund	Parents and others	Parents and others	Parents and others
Earned income required	No	No	No
Use restrictions before age 18	No distributions permitted during growth period, except ABLE rollover in year age 17	Education expenses only; otherwise earnings taxable and potentially penalized	No restrictions on use for the benefit of the minor (subject to fiduciary standard)
Tax treatment of earnings	Tax-deferred growth; taxable when distributed	Tax-deferred growth; taxable when distributed; tax-free if used for qualified education expenses	Earnings taxed annually: subject to kiddie tax rules (unearned income above threshold taxed at parents' rate)
Roth conversion opportunity	Roth conversion permitted at age 18 and after; taxable to the extent of pre-tax amounts	Limited Roth rollover for unused amounts (subject to caps and earned income requirement)	None
Penalty exposure	10% penalty on pre-age 59 ½ distributions of earnings	10% penalty on earnings for non-qualified distributions	No penalty; standard capital gains and income tax rules apply
Long-term planning focus	Maximize growth first, manage taxes later	Education first, retirement secondary	Flexibility first; tax efficiency is limited

72





Planning Opportunities

- 🍏 Coordinate with:
 - 529 plans
 - ABLE accounts
 - Employer and nonprofit funding
- 🍏 Consider Roth conversion planning after age 18
- 🍏 Prepare for transition:
 - Financial education
 - Distribution strategy
 - Future contribution planning

73



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Comparison With Other Accounts

- 🍏 Trump Account: for children under 18, \$5k limit
- 🍏 Traditional IRA: requires compensation
- 🍏 Roth IRA: requires compensation. After-tax. Income limits apply.
- 🍏 529 Plan: for education, broader contribution limits

74



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877





The Real Opportunity

- 🍏 Starts at birth
- 🍏 Long-term compounding advantage
- 🍏 Layered funding:
- 🍏 Pilot contribution
- 🍏 Employer contributions
- 🍏 Other contributions
- 🍏 Small early contributions → significant long-term impact

76





What Advisors Must Get Right

- 🍏 Separate § 530A and § 6434 every time
- 🍏 Confirm both elections are completed
- 🍏 Coordinate all contribution sources
- 🍏 Apply regular traditional IRA rules only after transition

77



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877



Final Thought

Trump Accounts represent a structural shift in how early savings can be funded and grow

- 🍏 Savings beginning at birth
- 🍏 Multiple funding sources
- 🍏 Integration with employer programs
- 🍏 Long-term tax planning opportunities

78

Closing Insight: Advisors who focus only on the regulations will miss the larger opportunity



© 2026 Denise Appleby, The IRA Whisperer | www.DeniseAppleby.com | Denise@ApplebyconsultingINC.com |
LinkedIn @DeniseAppleby | Online @ ApplebyIRA | 973-313-9877





TRUMP ACCOUNT SYSTEM

Feature	§ 530A Trump Account	§ 6434 Pilot Contribution
Purpose	Core account structure	One-time government-funded contribution
Function	Holds assets, receives contributions, governs investment and distribution rules	Provides initial funding to an existing Trump Account
Timing	Exists throughout the growth period	Occurs only if eligibility and election requirements are met
Requirement	Must be established under § 530A	Requires separate eligibility and election under § 6434
Dependency	Independent legal structure	Cannot exist without a Trump Account
Governing Law	IRC § 530A	IRC § 6434

79



Thank You

80

Denise 'The IRA Whisperer' Appleby
www.DeniseAppleby.com | Denise@ApplebyConsultingINC.com

