



February 6, 2026

Via Electronic Mail

Benjamin W. McDonough, Deputy Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

**Re: Request for Information and Comment on Reserve Bank Payment Account
Prototype (Docket No. OP-1877)**

Dear Deputy Secretary McDonough:

Blockchain Association (“BA”) respectfully submits this letter in response to the Board of Governors of the Federal Reserve System’s (the “Board”) *Request for Information and Comment on a Reserve Bank Payment Account Prototype* (the “Proposal”).¹ The Board issued the Request to solicit public input on the design and risk controls associated with offering a limited-purpose Payment Account that is separate and distinct from a full-service Reserve Bank master account and tailored to the needs of institutions focused on payments activities. BA appreciates the opportunity to provide input on whether, and under what conditions, Reserve Banks should offer a Payment Account that is separate and distinct from a full-service Reserve Bank master account (a “Master Account”).

BA is the leading nonprofit trade association representing the blockchain and digital asset industry in the United States. Our members include a broad cross-section of the digital asset ecosystem, including technology companies, financial services firms, infrastructure providers, and other stakeholders that develop, deploy, and operate products and services that increasingly intersect with the U.S. payments system. BA and its members have substantial experience with payment operations, compliance programs, risk management, and the practical realities of integrating new technologies with legacy financial infrastructure.

The Proposal appropriately identifies and prioritizes a set of risks relevant to the design of a Payment Account, including risks to the Reserve Banks, the overall payment system, financial stability, and the broader economy. The Request further explains that Payment Accounts would be subject to certain risk-mitigating features intended to reduce credit and operational risk such as limiting account access to Federal Reserve payment services that include automated controls to prevent overdrafts, excluding Payment Account holders from discount window access, and preserving Reserve Bank discretion to impose additional restrictions and controls on a case-by-

¹ 90 Fed. Reg. 60,096 (Dec. 23, 2025), *available at* <https://www.federalregister.gov/documents/2025/12/23/2025-23712/request-for-information-and-comment-on-reserve-bank-payment-account-prototype>

case basis. BA supports the Board’s objective of ensuring that any Payment Account offering is structured to mitigate these risks while supporting a safe, efficient, and resilient payments ecosystem.

This support for the Proposal is qualified, however, by the risk that the proposed Payment Account would perpetuate a two-tiered banking system in the United States, to the detriment of novel financial institutions that would be likely to participate in the proposed Payment Account. BA also has serious concerns about the commercial practicality of the program as proposed. Many of these concerns could be ameliorated through changes to the Proposal including paying interest on balances, providing access to FedACH®, and designing a more flexible overnight balance cap. The Board should be attentive to these risks and opportunities in continuing to develop Payment Accounts.

1. Background

It is well established that certain financial institutions have struggled to obtain access to Master Accounts. Historically such access was obtained relatively simply.² Recently, however, “novel banks seeking Federal Reserve accounts have encountered a murky, lengthy process from which some might not ever emerge.”³ This policy approach has particularly affected institutions which interact with cryptocurrency, like Custodia Bank, Inc. (“Custodia”) and Payward Financial, Inc., d/b/a Kraken Bank (“Kraken”), both Wyoming-chartered special purpose depository institutions (“SPDIs”) that have not yet been granted Master Account access.⁴

The lack of Master Account access for cryptocurrency-native financial institutions creates an array of downstream problems for the industry as a whole, notably including reduced efficiency in payment processing and settlement, and heightened operational fragility and increased costs caused by dependence on a small number of banks with access to such accounts for services. In practice, this reliance on a small set of traditional banks can constrain the availability of compliant on- and off-ramps, thereby raising costs and increasing operational risk arising from heightened concentration in a small number of service providers.

² Julie Andersen Hill, *Opening a Federal Reserve Account*, 40 Yale J. on Regul. 453, 458–59 (2023), available at https://scholarship.law.ua.edu/cgi/viewcontent.cgi?article=1754&context=fac_articles (“Operating Circular 1 provides the terms under which a Financial Institution may open, maintain, and terminate a Master Account. . . . Nothing in Operating Circular 1 suggests that the process of opening a Federal Reserve account is time-consuming for either the requesting institution or the Reserve Bank. Indeed, for nineteen years, the Master Account Agreement stated that “[p]rocessing may take 5-7 business days.”).

³ *Id.*

⁴ See, e.g., Randall D. Guynn et al., *Davis Polk Discusses Rulings on Fed’s Denial of Master Accounts to Custodia and PayServices*, CLS Blue Sky Blog (Apr. 16, 2024), available at <https://clsbluesky.law.columbia.edu/2024/04/16/davis-polk-discusses-rulings-on-feds-denial-of-master-accounts-to-custodia-and-payservices/>

For this reason, BA has frequently supported improved Master Account access in the past. On January 19, 2024, it filed an amicus brief in the U.S. District Court for the District of Wyoming in *Custodia Bank, Inc. v. Federal Reserve Board of Governors and Federal Reserve Bank of Kansas City* (D. Wyo. No. 1:22-cv-00125-SWS), arguing in favor of Master Account access for SPDIs like Custodia.⁵ Then, on July 3, 2024 it filed a second amicus brief in the U.S. Court of Appeals for the Tenth Circuit in *Custodia Bank, Inc. v. Federal Reserve Board of Governors*, No. 24-8024 (10th Cir. Apr. 26, 2024).⁶ Most recently, on December 22, 2025, BA filed an amicus brief in support of Custodia’s petition to be heard *en banc* in the Tenth Circuit.⁷

The digital asset industry as a whole has recently experienced improved regulatory treatment in the United States.⁸ For instance, on March 7, 2025 the Office of the Comptroller of the Currency (“OCC”) issued Interpretive Letter 1183 reaffirming that national banks and federal savings associations may engage in crypto-asset custody, certain stablecoin-related activities, and distributed-ledger “node verification,” and eliminating the prior “supervisory non-objection” preclearance requirement associated with earlier guidance.⁹ OCC has also conditionally approved national trust bank charter applications by several digital asset firms.¹⁰

This beneficence, however, has not yet extended to Master Account access. As recently as October 2025, the Tenth Circuit denied Custodia’s appeal of the Board’s decision to deny its application for a Master Account.¹¹

⁵ Brief of Amicus Curiae Blockchain Association in Support of Plaintiff, *Custodia Bank, Inc. v. Board of Governors of the Federal Reserve System*, No. 1:22-cv-00125-SWS (D. Wyo. Jan. 19, 2024), ECF No. 257, available at <https://theblockchainassociation.org/wp-content/uploads/2024/01/Custodia-Blockchain-Association-Amicus-Brief.pdf> (hereinafter BA D. Wyoming Brief).

⁶ Brief of Amicus Curiae Blockchain Association in Support of Custodia Bank, Inc., *Custodia Bank, Inc. v. Federal Reserve Board of Governors*, No. 24-8024 (10th Cir. July 3, 2024), available at https://theblockchainassociation.org/wp-content/uploads/2024/07/24-8024_Amicus_Brief_Blockchain_Association.pdf

⁷ Brief of Amicus Curiae Blockchain Association in Support of Petition for Rehearing En Banc by Custodia Bank, Inc., *Custodia Bank, Inc. v. Federal Reserve Board of Governors*, No. 24-8024 (10th Cir. Dec. 22, 2025), available at <https://storage.courtlistener.com/recap/gov.uscourts.ca10.88322/gov.uscourts.ca10.88322.183.2.pdf>

⁸ See, e.g., Securities & Exchange Commission, Staff Accounting Bulletin No. 122 (Jan. 30, 2025), available at <https://www.sec.gov/rules-regulations/staff-guidance/staff-accounting-bulletins/staff-accounting-bulletin-122>

⁹ Off. of the Comptroller of the Currency, Interpretive Letter No. 1183 (Mar. 7, 2025), available at <https://www.occ.gov/topics/charters-and-licensing/interpretations-and-actions/2025/int1183.pdf>

¹⁰ See, e.g., Off. of the Comptroller of the Currency, OCC Conditionally Approves Five National Trust Bank Charter Applications (Dec. 12, 2025), available at <https://www.occ.gov/news-issuances/news-releases/2025/nr-occ-2025-125.html>

¹¹ *Appeals Court Rejects Crypto Firm’s Motion for Fed Master Account Access*, ABA Banking J. (Oct. 31, 2025), available at <https://bankingjournal.aba.com/2025/10/appeals-court-rejects-crypto-firms-motion-for-fed-master-account-access/>

Stakeholders representing traditional financial institutions have argued that granting access to Custodia, and similar novel financial institutions, would disrupt the safe functioning of the American economy:

Because master account holders have direct, unmediated access to Reserve Bank services, including the Fedwire Funds Service, they can pose risks to the financial system. These risks include, but are not limited to, credit risk, cybersecurity risk, and reputational risk. Each of these risks, if left unmitigated, can cause disruption throughout the financial system and macroeconomy.¹²

While BA agrees that the health of the financial system and macroeconomy are important considerations for the Board, traditional financial institutions' recent aggressive turn is best understood as an attempt to dissuade competition from cryptocurrency products.¹³ Stifling competition via rules limiting access will do more harm than good, and BA believes Master Account access is a critical step in integrating cryptocurrency into the broader economy.

2. Novel Financial Institutions

While Master Account access remains a critical policy goal of the digital asset industry, BA welcomes the proposed Payment Accounts, in principle, as an intermediate step to facilitate tighter integration of novel financial institutions into the broader financial ecosystem.

Currently, the Board's 2022 Account Access Guidelines (the "Guidelines") govern access to Master Accounts. The Guidelines set forth the risks and considerations Reserve Banks apply in evaluating account and services requests.¹⁴ The Guidelines further establish a three-tiered system, with Tier 1 generally comprising federally insured depository institutions, Tier 2 comprising eligible institutions that are not federally insured but are subject to federal prudential supervision, and Tier 3 including "[e]ligible institutions that are not federally insured" and are not subject to federal prudential oversight.¹⁵ These state-chartered entities in Tier 3, the Fed noted, may pose greater risks and "[a]ccordingly, [they] generally receive the strictest level of review."

¹² Brief for BAnk Policy Institute & The Clearing House Ass'n L.L.C. as Amici Curiae in Support of Defendants-Appellees and Affirmance, *Custodia Bank, Inc. v. Federal Reserve Board of Governors*, No. 24-8024 (10th Cir. 2024), available at <https://ia600404.us.archive.org/3/items/gov.uscourts.ca10.88322/gov.uscourts.ca10.88322.010011106342.0.pdf>

¹³ See Ye Xie & Anya Andrianova, *The \$3 Trillion Stablecoin Link That's Got Wall Street Doubting*, Bloomberg (Dec. 3, 2025), available at <https://www.bloomberg.com/news/articles/2025-12-03/the-3-trillion-stablecoin-link-that-s-got-wall-street-doubting>

¹⁴ Bd. of Governors of the Fed. Rsv. Sys., *Guidelines for Evaluating Account and Services Requests* (Docket No. OP-1747) (Aug. 15, 2022), available at <https://www.federalreserve.gov/newsevents/pressreleases/files/other20220815a1.pdf>

¹⁵ *Id.*

Crucially, Tier 2 may include a number of federally chartered, crypto-native trust companies and Tier 3 includes Wyoming SPDIs like Custodia and Kraken, as well as other state-chartered banks structured to provide novel financial products or to provide traditional banking services for digitally native assets. Since both Tiers 2 and 3 may have difficulty obtaining Master Account access, this taxonomy risks leaving the cryptocurrency industry broadly under-resourced with traditional bank services, especially for tokenized assets and crypto-native customers.

While concerns the Board articulated in the Guidelines may be reasonable in some circumstances, such risks and challenges should be balanced against the growing need for novel technologies like cryptocurrency to interface with the broader economy through banking institutions.

Congress has long sought to “maintain[] a dual banking system in the United States” under which federal and state regulators have parallel authority to charter banks.¹⁶ State-chartered banks have historically initiated use of innovative technologies, such as negotiable order of withdrawal (“NOW”) accounts,¹⁷ savings accounts that allow withdrawal by check. “Congress authorized NOW accounts only after several states demonstrated that this convenient service was highly desirable to both consumers and banks.”¹⁸ These opportunities are particularly relevant now because, as BA noted in 2024, “as federal legal support for innovation stagnates, other countries are actively courting the next wave of technology by providing regulatory frameworks that facilitate innovation while protecting market participants.”¹⁹

Similarly, federally chartered institutions without deposit insurance promise to undergird a growing economy of stablecoins permitted under the Guiding and Establishing National Innovation for U.S. Stablecoins Act (“GENIUS”). Their smooth functioning will be essential to realize the full potential of the medium.

Structurally, the Guidelines disadvantage crypto-native banks. State-chartered banks in Tier 3 are subjected to “the strictest level of review,” and consequently, to BA’s knowledge, no such banks have received Master Account access since the Guidelines were adopted in 2022. Even Tier 2 banks, which are subject to federal prudential oversight, may face challenges obtaining Master Accounts because they are subject to “an intermediate level of review.” In light of this, to the extent the proposed Payment Accounts “would generally receive a more streamlined review than a request for a Master Account from a comparable institution” and this review would be more likely to ultimately grant access to Tier 2 and Tier 3 institutions, BA welcomes the Board’s Payment

¹⁶ *In re S. Indus. Banking Corp.*, 872 F.2d 1257, 1260 (6th Cir. 1989).

¹⁷ Arthur E. Wilmarth Jr., *The Expansion of State Bank Powers, the Federal Response, and the Case for Preserving the Dual Banking System*, 58 *Fordham L. Rev.* 1133, 1152 (1990), *available at* <https://theblockchainassociation.org/wp-content/uploads/2024/01/Custodia-Blockchain-Association-Amicus-Brief.pdf>

¹⁸ *Id.* (internal quotations omitted).

¹⁹ BA D. Wyoming Brief, *supra* note 5.

Accounts prototype proposal as a potential intermediate solution to allow crypto-native Tier 2 and Tier 3 institutions access to clearing and settlement payments through the Federal Reserve system.

A Payment Account, however, should not serve as a permanent lower tier of the banking system, whereby traditional federally chartered banks have access to a comprehensive suite of services through the Federal Reserve system that are permanently denied to an underclass of Tier 2 and Tier 3 institutions. Instead, the Board should consider Payment Accounts as an intermediate on-ramp for Tier 2 and Tier 3 institutions without other paths to access to achieve speedy integration into the Federal Reserve system.

This access is particularly important as GENIUS is scheduled to take effect no later than January 18, 2027. GENIUS creates an explicit path for institutions to qualify as permitted payment stablecoin issuers (PPSIs) through Tier 2 and Tier 3 financial institutions.²⁰ As these federal and state regulated entities constitute increasing transaction volume, access to the Federal Reserve system will be critical to settle and clear payments underlying stablecoin issuance and redemption efficiently. But access to the Federal Reserve system is not merely an efficiency gain; it is the ultimate realization of the GENIUS Act's stability objectives, allowing PPSIs to eliminate counterparty risk by holding reserves directly at a Federal Reserve Bank, the gold standard for reserve safety.²¹

While the Proposal specifies that it will streamline the application process, it also states that, in evaluating Payment Account applications, “[t]he relevant Reserve Bank would have the discretion to approve or deny the request. Similar to requests for Master Accounts, Reserve Banks would be expected to review a request for a Payment Account under the Guidelines.” Since the Guidelines have not, thus far, permitted meaningful participation by Tier 3 financial institutions in Master Accounts, there is a legitimate question as to whether they will do so for Payment Accounts. The Board should consider designing Payment Accounts to include a credible pathway to fuller integration into the payments system for institutions that demonstrate appropriate operational capacity and risk controls, rather than entrenching a permanent two-tier regime for novel charter types.

²⁰ Guiding and Establishing National Innovation for U.S. Stablecoins Act, Pub. L. No. 119-27, S. 1582, 139 Stat. ____ (2025), available at <https://www.govinfo.gov/link/plaw/119/public/27?link-type=pdf>

²¹ See Yesha Yadav, *et al.*, Payments and the Evolution of Stablecoins and CBDCs in the Global Economy (Vand. L. Rsch. Paper No. 23-19, 2023), available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4425922 (“This inherently higher risk means that money held by a private bank is considered to be less moneyish than physical cash or money deposited in Fed master accounts.”).

3. The Fed Should Consider Prototype Payment Accounts Limitations Carefully.

Academic literature has suggested that access to a Master Account is critical for banking access among financial institutions in the United States.²² According to Professor Peter Conti Brown of the University of Pennsylvania Wharton School of Business, “[t]he master account allows a financial institution to participate in the payment system. Without it, a financial institution can’t really function as a financial institution. It becomes instead a kind of storage locker.”²³

Payment Accounts, as outlined in the Proposal, may permit more liberal, albeit limited, access by addressing the risks identified in the Guidelines. In particular, the Proposal would allow clearing and settling of an institution's payments. This new access, however, comes paired with limitations like the absence of interest on balances, overnight balance limits, and lack of access to FedACH®, which could undermine the commercial practicality of Payment Accounts.

These limitations should be evaluated in two lights. First, access limitations for prudentially regulated stablecoin issuers and novel institutions that bank digital asset institutions reduce the efficiency of intermediation between cryptocurrency economies and the broader economy. Second, while a Payment Account system accessible by a broader range of novel financial institutions could increase access overall, it will only do so if Payment Accounts are commercially practical.

The Board should carefully consider the limitations imposed on Payment Accounts. Certain of these limitations, for example, overnight balance limits, may be ill-suited for the high settlement velocity required for global payments facilitators. Accordingly, removing the static \$500 million cap on overnight balances in the Proposal and expanding the cap to 25% of assets instead would ensure the proposed Payment Accounts could scale reasonably to account for both real-world settlement demand and institutions’ verified risk profiles.

Other restrictions, such as those on FedACH® Services, may meaningfully curtail financial institutions' usefulness to end users. Although available services might be sufficient for large-scale applications like stablecoin reserve management, ACH is the default retail payments rail for the U.S. economy.^{24,25} Moreover, by denying interest on balances, the proposed Payment Account may be commercially impractical for large-value dollar payments.

²² Peter Conti-Brown, *The Fed Wants to Veto State Banking Authorities. But is That Legal?*, Brookings Inst. (Nov. 14, 2018), available at <https://www.brookings.edu/articles/the-fed-wants-to-veto-state-banking-authorities-but-is-that-legal/>

²³ *Id.*

²⁴ Business Wire, *Same-Day ACH Passes Major Milestone in 2024 as the ACH Network Shows Higher Growth* (Jan. 30, 2025), available at <https://www.businesswire.com/news/home/20250130612926/en/Same-Day-ACH-Passes-Major-Milestone-in-2024-as-the-ACH-Network-Shows-Higher-Growth>

²⁵ The Board identified FedACH® Services as unavailable on the ground that, at present, there is no automated capability to reject transactions that would result in daylight overdrafts. Without taking a

Together, these limitations could undermine the Board’s laudable purpose of improving Federal Reserve service access by effectively relegating Payment Account candidates to permanent second-tier status, and even have an adverse selection effect on the risk profile of such institutions over long time horizons.

Given this, in designing the Payment Accounts prototype, the Board should consider whether the limitations imposed on Payment Accounts will, in practice, prevent account holders from offering meaningful payment functionality to end users, including by restricting access to core retail payment rails such as FedACH® Services or by making it commercially impractical to use Payment Accounts.

4. Responses to Specific Questions from the Board.

(1) Would the design of the Payment Account prototype support payment activities of eligible institutions?

BA believes that Payment Accounts could support payment activities from eligible institutions that have not yet acquired Master Accounts.

Since the publication of the Guidelines, to BA’s knowledge, few, if any, Tier 3 financial institutions have been approved for a Master Account. Tier 2 institutions also face “intermediate scrutiny” that may lead to persistent challenges in gaining Federal Reserve access. If the Proposal remediates this, it may be a net positive for the digital asset industry. That said, there is a legitimate question as to whether the limited access granted by Payment Accounts would be commercially impractical, and if the model fails to win adoption, it will not matter if it expands access.

Without interest on balances, and a strict proposed limit on overnight balances, Payment Account users will be forced to hold money elsewhere. It is not economically viable to forgo interest on very large balances for any meaningful period of time, as the opportunity cost of lost interest becomes significant. Without permitted daylight overdrafts or overnight negative balances, that will mean that very large transactions must be carefully managed. While the Proposal is a positive step in permitting access to Federal Reserve services, these features risk making the Proposal commercially impractical. In order to promote success, some amount of interest on balances, more flexible overnight balance limits, as well as other excluded features identified elsewhere in this letter like FedACH® access, should be included in the final Payment Accounts.

(3) What barriers to innovation in payments would a Payment Account eliminate or alleviate?

position on whether that limitation is necessary to achieve the stated policy objective, BA encourages the Board to explore and, where appropriate, to promote the development of operational solutions that would permit access to FedACH® Services in a future iteration of the framework.

A Payment Account would eliminate or alleviate several barriers to innovation in payments by providing a predictable and proportionate pathway to Federal Reserve payment rails for novel institutions that do not fit neatly within the traditional Master Account framework. In particular, the prospect of approval within a defined and relatively short timeframe might reduce the uncertainty, delay, and cost that currently deter new entrants from building compliant payment products in the United States. Just as importantly, Payment Accounts could enable a payments environment in which new entrants can participate directly in core clearing and settlement functions and intermediate between cryptocurrency economies and the broader dollar economy. This could facilitate direct participation by a range of Tier 2 and Tier 3 financial institutions that currently only offer such services through banking partners. This structure will only strike a workable balance between protecting system integrity and fostering innovation, however, if using it is commercially practical.

(4) Would the design potentially increase the range of risks identified in the Guidelines?

The proposed Payment Accounts may reduce some risks identified in the Guidelines. The restricted functionality may mechanically reduce credit, liquidity, settlement, and “flight-to-safety” risks identified in the Guidelines. This relative safety, however, will only be valuable if the proposed Payment Accounts are commercially practical. If the limitations of these accounts make them commercially impractical, they may drive high integrity actors away from regulated rails, potentially leading to adverse selection among Payment Account users and increasing risk. The proposal most meaningfully reduces risk if it creates an on-ramp to give eligible financial institutions access to Master Accounts.

(7) How might the Federal Reserve condition access to a Payment Account on the applicant having an acceptable AML, Bank Secrecy Act (“BSA”) and Countering the Financing of Terrorism (“CFT”) compliance programs and, more generally, how can the Federal Reserve best constrain AML/BSA/CFT risks associated with a Payment Account?

The Federal Reserve should consider provisioning approval of a Payment Account to applicants in good standing who maintain AML, BSA, and CFT compliance programs, as demonstrated through compliance with existing federal and state-law requirements applicable to such institutions' charter. For example, Wyoming’s supervisory framework for SPDIs requires covered institutions to maintain written BSA/AML compliance programs and related controls tailored to their risk profiles and activities, providing a concrete illustration of how state-level prudential requirements may supply a basis for evaluating program adequacy in the Payment Account context.²⁶ Similarly, New York-chartered limited purpose trust companies operate under New York State Department of Financial Services (“NYDFS”) prudential supervision, and NYDFS requires “regulated institutions” to maintain

²⁶ See Wyo. Code R. Dep’t of Audit, Banking Div. ch. 20, § 7 (2025), available at <https://www.law.cornell.edu/regulations/wyoming/021-20-Wyo-Code-R-SS-20-7>

transaction monitoring and sanctions filtering programs designed to detect potential BSA/AML violations and to prevent dealings with sanctioned parties, with annual certification of compliance.²⁷ Crucially, these state-chartered institutions remain subject to federal AML/CFT requirements under BSA and implementing Treasury/Financial Crimes Enforcement Network (“FinCEN”) regulations.²⁸ Recognizing such federal and state-law compliance as relevant evidence of program adequacy would allow the Federal Reserve to promote broader access to payment rails without compromising its interest in ensuring that Payment Account holders can operate safely within the U.S. financial system.

8. Are there additional features or limits that the Board should consider in the design of the Payment Account prototype?

For reasons stated above, BA believes that access to FedACH®, a more flexible and higher overnight balance limit, and Payment Account access to interest on balances held at a Reserve Bank will meaningfully improve the commercial practicality of the Proposal.

5. Conclusion

For the foregoing reasons, BA urges the Board to consider paths through which Payment Accounts can be used to expand Federal Reserve access to novel financial institutions without creating a two-tiered access model.

Respectfully Submitted,

/s/ Ashok Pinto

Ashok Pinto
Executive Vice President
Legal and Government Relations

cc: Aaron J. Brogan, Brogan Law PLLC

²⁷ See 3 N.Y. Comp. Codes R. & Regs. tit. 3, § 504.3 (2026), available at <https://www.law.cornell.edu/regulations/new-york/3-NYCRR-504.3>

²⁸ See 31 U.S.C. § 5318 (2026), available at <https://www.law.cornell.edu/uscode/text/31/5318>