

CBP Moving to Fully Electronic Refunds: What Importers Need to Know Now

WRITTEN BY

Ryan Last | Charlene C. Goldfield | Daniel N. Anziska

U.S. Customs and Border Protection (CBP) has issued an interim final rule (the [Rule](#)) that will fundamentally change how customs refunds are paid. Effective February 6, 2026, CBP will, with limited exceptions, stop issuing paper refund checks and instead pay all refunds electronically via Automated Clearing House (ACH). The Rule implements federal law requiring electronic federal payments and aligns with [Executive Order 14247](#), which requires that all federal payments and collections move away from paper checks and be conducted electronically. Comments on the Rule are due March 3, 2026, under docket [USCBP-2025-1076](#).

Who Is Affected and What Is Changing

The Rule applies broadly to all CBP refund recipients, including importers, brokers, filers, sureties, service providers, facility operators, foreign trade zone operators, carriers, and any third parties designated on CBP Form 4811. Historically, most refunds (e.g., overpayments of duties, fees, taxes; refunds after liquidation/reliquidation; drawback; protest-related refunds; Harbor Maintenance Fee refunds) have been issued as paper checks by the U.S. Department of the Treasury (Treasury) and mailed to the importer or a designated agent. While ACH refunds have been available on an optional basis, under the Rule electronic refunds will now be the standard and, in most cases, required method of payment.

ACE Portal and ACH Enrollment Now Central

To receive refunds after February 6, 2026, most refund recipients must enroll in CBP's [ACH Refund program](#) through the Automated Commercial Environment (ACE) Secure Data Portal (ACE Portal):

- Importers who already participate in ACH Refunds will continue receiving electronic refunds without interruption, but should review and update banking information as needed via the ACH Refund Authorization tab in ACE.
- Importers who are not yet enrolled must first obtain an ACE Portal account (if they do not already have one) and then complete the ACH Refund application in ACE, providing required banking details for a U.S. bank account.
- Foreign importers must either establish a U.S. bank account or designate a third party (e.g., a customs broker) with a U.S. bank account to receive refunds on their behalf.

Existing CBP Form 4811 designations remain valid for identifying third-party refund recipients, but the designated third party must also enroll in ACH Refunds via ACE to receive funds electronically. If the third party does not enroll, the refund will default to the importer's ACH Refund account. CBP emphasizes that Form 4811 must be submitted using a CBP-approved method (including the ACE Portal "Notify Parties" functionality).

Waivers and the End of Routine Checks

Although the Rule effectively ends routine paper checks, it incorporates the waiver framework in [31 C.F.R. § 208.4](#).

. In limited hardship or other qualifying circumstances, CBP, in coordination with Treasury, may still issue a U.S. Treasury check. To seek a waiver and payment by check, an importer must contact CBP's Revenue Division in writing and demonstrate that one of the regulatory waiver criteria applies. CBP and Treasury, however, expect these waivers to be rare, and CBP is planning and investing on the assumption that nearly all refunds will be electronic going forward.

Interest, Risk Allocation, and Compliance Responsibilities

The Rule also clarifies how interest is treated when refunds cannot be delivered because of missing or incomplete banking information. CBP remains obligated under [19 U.S.C. § 1505\(b\)](#) to refund excess deposits generally within 30 days of liquidation or reliquidation, and interest under [19 U.S.C. § 1505\(d\)](#) can accrue on late refunds.

However, if CBP timely certifies an electronic refund but cannot complete the payment solely because the importer or designated third party failed to provide valid banking information, no interest will accrue on that refund. In other words, once CBP has done its part and the only barrier is your (or your agent's) banking setup, the clock stops for interest purposes.

The Rule also underscores that:

- It is the importer's responsibility to ensure the accuracy of any third-party designation (via Form 4811) and to notify CBP if information must be updated or revoked.
- Importers remain responsible for providing and maintaining correct banking information in ACE; otherwise, refunds may be rejected and delayed until the ACH information is properly submitted and CBP notified.

Practical Takeaways for Importers and Other Refund Recipients

Those who receive CBP refunds should treat this as both a compliance and a cash management issue:

- If you do not already have an ACE Portal account, plan to create one as soon as practicable and designate an account owner with appropriate internal authority.
- Once in ACE, complete the ACH Refund Authorization using a U.S. bank account that aligns with your internal treasury controls and reconciliations.
- Review and update any Form 4811 designations and coordinate with brokers or other third parties to ensure they also enroll in ACH Refunds if they are intended refund recipients.
- For non-U.S. entities, assess whether to open a U.S. bank account or rely on a trusted U.S. intermediary for refunds.
- Consider whether you might qualify for a waiver under 31 C.F.R. § 208.4; if so, be prepared to substantiate and formally request that relief.

With the February 6, 2026, effective date approaching and comments due March 3, 2026, importers and other trade participants should begin planning now to avoid delayed or rejected refunds once paper checks are phased out.

RELATED INDUSTRIES + PRACTICES

- Sanctions + Trade Controls