



Updates on (Automation) Updates: CBP Electronic Refunds and Electronically Submitted VSDs

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In the fast-paced world of International Trade, companies must stay informed about the latest updates to the multitude of rules and regulations to avoid delays, fines, and penalties that hinder business. This article will cover recent changes to automation concerning U.S. Customs and Border Protection's (CBP) new electronic refund process, and Voluntary Self-Disclosures (VSDs). It will highlight what you need to know about these changes and who needs to take action to keep your business up to date.

1. Electronic Refunds Update

On February 20th, 2026, the U.S. Supreme Court ruled that President Trump could not use emergency powers to impose tariffs. This could lead to substantial refunds on tariffs paid since President Trump dubbed "Liberation Day." While the refund process may be lengthy, CBP's recent update on electronic refunds is meant to make it smoother. Beginning February 6th, 2026, CBP will issue all refunds electronically via Automated Clearing House (ACH).¹ You must ensure you are enrolled in the Electronic Refund system, as it is now up-and-running.

- **If you currently receive ACH refunds:**
 - You don't have to reenroll, but you should double-check that your information is accurate.
- **If you don't already receive electronic refunds via ACH:**
 - You must register for an Automated Commercial Environment Secure Data Portal (ACE Portal) to receive electronic refunds. Click [here](#) for further information.
 - If you don't have a CBP Form 5106 on file, you must submit a CBP Form 5106 or have a customs broker submit an electronic CBP Form 5106.
 - If you have a CBP Form 5106 on file, you must submit the modernized application webform.
- **If you have a current CBP Form 4811 on file that authorizes a broker to receive refunds:**
 - You should ensure that the "4811 notify party" permits the broker to receive ACH refunds. Effective February 6, 2026. If you **need to add or modify a notify party**, use the recently updated CBP Form 4811. The previous version of the form is no longer accepted. You can find the new form [here](#) by searching for the form number.

¹ U.S Customs and Border Protection, 91 FR 21, (2025).

CBP also notes that the bank you direct your refunds to must be able to process FedACH payments. For more information about electronic refunds, visit [here](#).

2. Voluntary Self-Disclosures (VSDs) Updates

On February 6, 2026, the Office of Foreign Assets Control (OFAC) launched a new portal for VSDs that is up and running.² To view the OFAC's new portal and learn more, visit [this website](#).

Additionally, since January, 2024, the Bureau of Industry and Security (BIS) has encouraged VSDs pertaining to violations of the Export Administration Regulations (EAR) to be submitted via email.³ This process differs from the online portal SNAP-R, which only handles export and import licensing pertaining to commodities, software, technology, and activities subject to the Export Administration Regulations (EAR), 15 C.F.R. parts 730-774. While neither agency requires electronic submission of VSDs, they are highly encouraged over paper submission as they streamline the entire process, making it easier for their users.

In short, CBP's recent switch to electronic refunds and automation updates to VSDs is meant to ease the trading process. However, businesses must stay up-to-date about such changes for maximum efficiency. For further assistance in navigating the vast complexities of international trade law, [contact](#) expert attorneys at Schulz Trade Law.

² U.S Department of the Treasury, *Launch of Voluntary Self-Disclosure Portal*, (2026), <https://content.govdelivery.com/accounts/USTREAS/bulletinsthe/4082377>.

³ U.S. Department of Commerce, Assistant Secretary for Export Enforcement, *Memorandum for All Export Enforcement Officials*, Washington D.C., (2024).