



Community Bankers
Association of Illinois
One Mission. **Community Banks.**

CBAI Urges Treasury/IRS to Deliver Maximum ACRE Act Benefits to Community Banks' Rural or Agricultural Borrowers

In a comment letter dated January 19, 2026, the Community Bankers Association of Illinois urged Treasury/IRS to allow community banks to deliver the maximum financial benefit to their agricultural or rural borrowers, which was the intent of Congress in the ACRE Act.

CBAI specifically encouraged Treasury/IRS to take the broadest view possible in defining *qualified real estate loans*, as well as the definition of *qualifying real estate* securing these loans. CBAI expressed appreciation for the *Safe Harbor* in determining that a loan is fully secured, urged that community banks be able to use their own internal FMV collateral determinations, and recommended a reasonable position on the restrictions concerning *refinancings, modifications and pre-enactment loans*. Finally, CBAI hopes that these loans would be treated in their entirety as *Bank Qualified* to ensure that the maximum amount of financial benefit may be passed along to community banks' agricultural or rural borrowers.

[Read CBAI Comment Letter to Treasury/IRS »](#)

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