[GENIUS Act Implementation: OCC Reporting Forms and Instructions for Permitted Payment Stablecoin Issuers](#)

COMMENT LETTER

GENIUS Act Implementation: OCC Reporting Forms and Instructions for Permitted Payment Stablecoin Issuers

August 11, 2026
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Chief Counsel's Office, Attention: Comment Processing
Office of the Comptroller of the Currency
400 7th Street SW, Suite 1E-216
Washington, DC 20219
1557-NEW

Re: *Reporting Forms and Instructions for Permitted Payment Stablecoin Issuers Subject to the Jurisdiction of the Office of the Comptroller of the Currency*

The Conference of State Bank Supervisors ("CSBS")[1] provides the following comments on the notice and request for comment issued by the Office of the Comptroller of the Currency ("OCC") entitled *Reporting Forms and Instructions for Permitted Payment Stablecoin Issuers Subject to the Jurisdiction of the Office of the Comptroller of the Currency*.[2]

The OCC proposes reporting forms for the stablecoin issuers it supervises to satisfy proposed weekly and quarterly reporting requirements. The OCC should work with the other stablecoin regulators, potentially via the Federal Financial Institutions Examination Council ("FFIEC" or "Council"), to publish standardized forms applicable to all issuers instead of adopting reporting forms on its own. Jointly adopted reporting forms would improve consistency of reporting, reduce burden, and align with the statutory mandate in the Guiding and Establishing National Innovation for U.S. Stablecoins ("GENIUS") Act for the federal stablecoin regulators to coordinate implementation.

If the OCC does finalize the proposed forms alone, it should limit the availability of the streamlined quarterly reporting form to issuers who engage only in the specific issuer activities authorized by Section 4(a)(7)(A) of the GENIUS Act. Issuers who engage in digital asset service provider activities or other national trust charter activities should not have access to streamlined quarterly reporting, as their activities pose additional risks that require greater transparency and scrutiny by regulators and the public.

Read the full comment letter.

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CSBS is the nationwide organization of state banking and financial regulators from all 50 states, the District of Columbia, and the U.S. territories. The views presented in this letter may not reflect the policy of individual states.

- 2

OCC, Notice and Request for Comment, *Reporting Forms and Instructions for Permitted Payment Stablecoin Issuers Subject to the Jurisdiction of the Office of the Comptroller of the Currency*, 91 Fed. Reg. 35795 (June 12, 2026).

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