



Community Bankers of Michigan Regulatory Dispatch

June 17, 2026

Timely news and resources community bankers can use

CSBS FDIC Stablecoin Rules Must Respect State Authority and Address Issuer Risks

Washington, D.C. – In a [comment letter](#), the Conference of State Bank Supervisors (CSBS) recommended changes to the Federal Deposit Insurance Corporation's (FDIC) proposed rule to implement the GENIUS Act. The proposed changes would better reflect state authority and address issuer risks.

CSBS urged the FDIC to respect states' inherent authority over state-chartered insured depository institutions and their subsidiaries and to strengthen coordination and information sharing with state regulators to streamline oversight.

CSBS also recommended scaling risk-based capital requirements to reflect the size of an issuer's balance sheet, the composition of its assets, and the risks associated with its authorized activities, including those of digital asset service providers. Combined with GENIUS Act reserve requirements, these capital standards would help protect individual issuers and the broader stablecoin market from run risks and financial distress.

CSBS specifically recommended the FDIC:

- Coordinate supervision and information sharing with state regulators overseeing state-chartered banks and stablecoin issuer subsidiaries;
- Clarify that nothing in the rule preempts state requirements applicable to state-chartered banks and their relationships with stablecoin issuer subsidiaries;
- Revise proposed capital requirements to better reflect issuer size, reserve assets, and risk profiles while maintaining consistency with successful state regulatory frameworks;
- Work with other federal regulators to ensure consistent implementation of statutory limits on stablecoin issuer activities; and
- Provide additional regulatory and supervisory guidance regarding tokenized deposits to support responsible innovation by banks.

Statement from CSBS President and CEO Brandon Milhorn:

"State supervisors have extensive experience overseeing digital asset activities, money transmitters, and state-chartered financial institutions. Effective coordination between federal and state regulators will strengthen oversight, reduce duplication, and help ensure that innovation can occur within a safe and sound regulatory framework."

Read CSBS statements and comments on the GENIUS Act:

- [Treasury's Substantially Similar Principles for State Stablecoin Regimes Needs Recalibration](#)
- [OCC Stablecoin Rules Must Address Issuer Risks and Protect Consumers](#)

- [OCC Errs in Final Trust Charter Rule](#)
- [Stablecoin Framework Must be Sustainable](#)

CBM Insights

Q: Does the exception for a \$100K loan to an executive officer have to be the first lien on a "primary" residence or just any residence?

A: A bank may make a loan to an executive officer for any amount to purchase, construct, maintain or improve 'a residence' provided it's a first lien and owned by the executive officer. It does not have to be his or her primary residence. See below:

§ 215.5 Additional restrictions on loans to executive officers of member banks.

(c) A member bank is authorized to extend credit to any executive officer of the bank:

(1) In any amount to finance the education of the executive officer's children;

(2) In any amount to finance or refinance the purchase, construction, maintenance, or improvement of a residence of the executive officer, provided:

(i) The extension of credit is secured by a first lien on the residence and the residence is owned (or expected to be owned after the extension of credit) by the executive officer; and

(ii) In the case of a refinancing, that only the amount thereof used to repay the original extension of credit, together with the closing costs of the refinancing, and any additional amount thereof used for any of the purposes enumerated in this paragraph (c)(2), are included within this category of credit;

A bank can only finance 'a residence' of an executive officer. For example, if the bank has financed an executive officer's primary residence, a loan to finance the purchase, construction, maintenance, or improvement of a second home would subject to the "other purpose" limits of Regulation O.

Details:

4000 - Advisory Opinions

With regard to a second home, the extension of credit would be authorized under Reg O for any amount pursuant to 12 C.F.R. § 215.5(c)(2) if the second home is the only residence of the executive officer which the bank has financed and secured by a first lien. If the executive officer has already financed a first home through the bank, the loan for the second home would be subject to the "other purpose" limits of 12 C.F.R. § 337.3(c).

Bank Management

OCC GENIUS Act: Reporting Forms and Instructions for Permitted Payment Stablecoin Issuers Subject to the Jurisdiction of the Office of the Comptroller of the Currency (06/11/2026) – The Office of the Comptroller of the Currency (OCC) is proposing a new information collection that would include weekly and quarterly reporting forms that must be completed by permitted payment stablecoin issuers and foreign payment stablecoin issuers registered with the OCC under the Guiding and Establishing National Innovation for U.S. Stablecoins (GENIUS) Act. Comments are requested on these forms within 60 days of publication of the information collection in the *Federal Register*.

Note for Community Banks

This information collection would apply to permitted payment stablecoin issuers and foreign payment stablecoin issuers for whom the OCC has regulatory authority pursuant to the GENIUS Act.

Highlights

- The OCC, as part of its continuing effort to reduce paperwork and respondent burden, invites comment on a new information collection, as required by the Paperwork Reduction Act of 1995 (PRA).
- On March 2, 2026, the OCC issued a proposed rule that would implement requirements of the GENIUS Act with respect to the issuance of payment stablecoins and certain related activities by entities subject to the OCC's jurisdiction. The OCC is proposing a new information collection that would include weekly and quarterly reporting forms that must be completed by permitted payment stablecoin issuers and foreign payment stablecoin issuers under the proposed rule.
- The proposed rule would require permitted payment stablecoin issuers and foreign payment stablecoin issuers to submit two reports to the OCC: (1) a weekly confidential reporting form to the OCC for each payment stablecoin it issues, and (2) a quarterly reporting form to the OCC.

Further Information

Please contact Shaquita Merritt, Clearance Officer, at (202) 649-5490, or David Stankiewicz, Director, Office of Financial Technology, at (202) 649-7299.

James M. Gallagher

Senior Deputy Comptroller and Chief National Bank Examiner

Related Links:

- [Reporting Forms and Instructions for Permitted Payment Stablecoin Issuers: Notice and Request for Comment \(PDF\)](#)
- [Instructions for OCC Reporting Form PS-01, Payment Stablecoin Activity and Reserve Weekly Reporting \(PDF\)](#)
- [OCC Reporting Form PS-01: Payment Stablecoin Activity and Reserve Weekly Reporting \(MS Excel\)](#)
- [Instructions for OCC Reporting Form PS-02, Permitted Payment Stablecoin Issuer and Foreign Payment Stablecoin Issuer Reports of Condition and Income \(PDF\)](#)
- [OCC Reporting Form PS-02: Permitted Payment Stablecoin Issuer and Foreign Payment Stablecoin Issuer Reports of Condition and Income \(MS Excel\)](#)

Joint [Rule Establishing Data Standards under the Financial Data Transparency Act of 2022](#) (06/10/2026) –

The Federal Deposit Insurance Corporation (FDIC) is issuing—in conjunction with the Department of the Treasury, Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, Consumer Financial Protection Bureau, Securities and Exchange Commission, Federal Housing Finance Agency, National Credit Union Administration, and Commodity Futures Trading Commission (collectively with the FDIC, the “Agencies”)—a joint final rule (Final Rule) as required by the Financial Data Transparency Act of 2022 (FDTA).

The Final Rule, which is designed to promote interoperability of financial regulatory data across the Agencies, establishes data standards for the collections of information reported to each Agency, as required by the FDTA. With respect to the FDIC, the Final Rule adds a new Subpart D to 12 C.F.R. Part 304, the FDIC's regulations on “Forms, Instructions, and Reports.”

The standards established pursuant to the Final Rule would later be considered by the FDIC and the other Agencies for potential incorporation (to the extent feasible) into data standards to be adopted for certain collections of information in separate rulemakings by the Agencies.

Statement of Applicability: The contents of, and material referenced in, this FIL apply to the FDIC.

Highlights:

Key Provisions of the Final Rule:

The Agencies are establishing the International Organization for Standardization (“ISO”) 17442 – Financial Services – the Legal Entity Identifier (“LEI”) as the legal entity identifier joint standard.

The Agencies are also establishing standards for the following pieces of information:

- Unique product identifier;
- Classification of financial instruments;
- Dates;
- States;
- Countries; and
- Currencies.

The Agencies are establishing that the data transmission schema and taxonomy format used have four properties, derived from the requirements listed in the FDTA.

FIL-28-2026

Links

[Final Rule \(PDF\)](#)

[The FDIC issued FIL-54-2024 when it proposed the joint rule required by the FDTA that is being finalized by the Final Rule: Proposed Joint Rule Establishing Data Standards under the Financial Data Transparency Act of 2022](#)

BSA / AML

No news to report this week.

Deposit / Retail Operations

FTC [How to spot a CAPTCHA scam](#) (06/08/2026) – The FTC is getting reports about a new phishing scam that looks a lot like the CAPTCHA requests you might be used to seeing. Real CAPTCHAs give you image- or text-based tasks to prove you’re not a robot — something like typing letters and numbers exactly as they appear, or matching pictures of things like fire hydrants or traffic lights. Here’s how the fake CAPTCHA requests happen...and how you could wind up installing malware on your own device.

You get an **unexpected CAPTCHA request** while browsing a website. The screen looks a lot like a regular CAPTCHA, asking you to verify you’re human. But the message says to type a series of commands — something like “Windows + R,” then “Ctrl + V,” and then “Enter”. The screen might say “security verification,” but you’re actually following the steps to paste and **run hidden malware on your device**. Once it’s there, scammers can quickly steal your email account login data, mobile banking credentials, or any other information they can get access to.

Real CAPTCHAs won’t ask you to run commands on your device. If you notice something downloading to your device after responding to a CAPTCHA, act quickly to **remove the malware** and protect yourself:

- **Disconnect from the internet.** This stops scammers from accessing your online shopping or banking accounts.
- **Run a security scan to remove the malware.** Keep your software and apps up to date to catch viruses.

- **Change your passwords and enable two-factor authentication** (using a different device) in case the malware already gave a hacker access to your accounts.

If you spot a CAPTCHA or pop-up that you think is trying to spread malware, report it to the FTC at [ReportFraud.ftc.gov](https://www.reportfraud.ftc.gov).

Comment: Find ways to share this information with your customers.

Human Resources

No news to report this week.

Lending

CFPB [Statement on Ability To Repay and Immigration Status](#) (06/08/2026) – SUMMARY: The Consumer Financial Protection Bureau (Bureau or CFPB) is issuing this statement to remind creditors of their obligations under the Truth in Lending Act (TILA) as implemented by Regulation Z, and consistent with Executive Order 14406, titled “Restoring Integrity to America’s Financial System.”

Details:

Under TILA and Regulation Z, before lending to consumers for dwelling-secured transactions like mortgages, creditors must make “a reasonable and good faith determination at or before consummation that the consumer will have a reasonable ability to repay the loan according to its terms.”³ Regulation Z sets forth parameters that lenders must follow to make such “reasonable and good faith” determinations of a consumer’s ability to repay. For instance, a creditor must consider “the consumer’s current or reasonably expected income or assets.”⁴ Those creditors relying on a consumer’s current income must in turn consider their “current employment status.”⁵ As the regulations make clear, employment can take a number of forms—including part time, seasonal, irregular, and the like. A creditor may rely on any such employment income to determine loan repayment ability, “so long as the creditor considers those characteristics of the employment.”⁶ And for those creditors relying on the consumer’s expected income in addition to or instead of current income, “the expectation that income will be available for repayment must be reasonable and verified with third-party records that provide reasonably reliable evidence of the consumer’s expected income.’

DATES: This statement is applicable on June 8, 2026.

Comment: Share with appropriate personnel.

Technology / Security

No news to report this week.

[Open for Comment](#)

Included only when specific to or relevant for community banks to comment on. Date posted may not be the same as the Federal Register Date.

05.20.2026

FRB [Proposed Revisions to the Federal Reserve Policy on Payment System Risk and the Guidelines for Account and Services Requests](#)

SUMMARY: The Board of Governors of the Federal Reserve System (Board) is issuing a notice and request for comment on proposed revisions to the Federal Reserve Policy on Payment System Risk (PSR Policy), including the proposed addition of a new Part IV, to accommodate the provision by Reserve Banks of special-purpose accounts that would clear and settle certain

payment activity (Payment Accounts). The Board is also proposing updates to its guidelines for Federal Reserve Banks (Reserve Banks) to utilize in evaluating requests for access to Reserve Bank account and services (Account Access Guidelines or Guidelines) to accommodate requests for access to Payment Accounts. Finally, the Board is encouraging Reserve Banks to pause decisions on requests for Reserve Bank accounts and services from institutions that are Tier 3 under the Account Access Guidelines until the Board has completed its policy development process on the Payment Account proposal. **DATE: Comments must be received on or before July 27, 2026.**