
Five Rulemakings in Ten Weeks: Inside the GENIUS Act Implementation Sprint

Date: 05/05/26

[External Link: Five Rulemakings in Ten Weeks: Inside the GENIUS Act Implementation Sprint](#)

Within the last two months, federal regulators issued five proposed rules implementing the Guiding and Establishing National Innovation for U.S. Stablecoins Act (the “GENIUS Act”). The Office of the Comptroller of the Currency (“OCC”), Federal Deposit Insurance Corporation (“FDIC”), National Credit Union Administration (“NCUA”), Department of the Treasury (“Treasury”), and the Financial Crimes Enforcement Network/Office of Foreign Assets Control (“FinCEN/OFAC”) converted a six-month-old statute into a substantially complete proposed regulatory regime. The pace is statutorily driven; the GENIUS Act requires final implementing rules by July 18, 2026.

The OCC’s proposal has become the gravitational center of the federal stablecoin framework: the FDIC has expressly aligned its proposal with the OCC’s, Treasury has used the OCC framework as the baseline against which state regimes will be measured, and the NCUA has built on a parallel architecture.

Attorneys

- Gary E. Kalbaugh
- Lewis Rinaudo Cohen

Practice

- CahillINXT – Digital Assets & Emerging Technology