

Ten Stablecoin Questions

for a Community-Bank Board Discussion

The Federal Reserve requested comment on two GENIUS Act proposals on September 24, 2026. The proposals may change. Use these questions to define what evidence your bank needs before any decision.

Bank: _____ Date: _____ Discussion owner: _____

1

What customer or business need are we evaluating?

Record customer requests, payment pain points, and evidence of demand.

2

What role would our bank consider?

Clarify whether the bank would issue, provide access, provide a related service, or monitor.

3

What existing payment options address the same need?

Compare experience, support, risk, cost, and operational impact.

4

Who would be accountable for the decision and operation?

Name business, compliance, fraud, technology, operations, and service owners.

5

What would we need to know about outside parties?

Examine roles, controls, information access, incidents, service commitments, and exit support.

Board discussion, continued

6

How would customers understand and use the service?
Plan plain-language information, support, complaint routes, and clear responsibilities.

7

Which risks would we test before deciding?
Consider fraud, scams, cyber incidents, disruption, liquidity, providers, and customer confusion.

8

What evidence should management bring to the board?
Ask for a use case, risk and legal analysis, operating model, due diligence, and assumptions.

9

What would cause us to pause, change course, or exit?
Define unresolved dependencies and triggers tied to service, risk, and regulatory change.

10

When will we revisit this?
Assign an owner, next review date, signals to monitor, and the next decision.

Decision record

Current decision: ☐ Monitor ☐ Research use case ☐ Request evidence ☐ Defer

Why this decision fits our customers and priorities:

Owner: _____ Next review date: _____

Source: Federal Reserve Board, September 24, 2026
For educational use. Obtain legal and regulatory advice for any contemplated activity.