US Regulatory Consulting

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The five-pillar stablecoin regulatory readiness framework

The OCC's October 2026 guidance signals that successful participation in the regulated payment stablecoin ecosystem will require more than technological capability. Organizations should evaluate readiness across five interconnected pillars that align with the OCC's supervisory expectations.

The USRC stablecoin regulatory readiness framework

Pillar 1

Reporting and data infrastructure

Establish governance structures capable of supporting regulatory scrutiny and board accountability.

Key considerations include:

- Board and executive oversight
- Management committee structures
- Policy governance
- Risk appetite frameworks
- Control accountability and reporting lines
- Independent challenge and escalation processes

Do your governance practices align with those expected of regulated financial institutions?

Pillar 2

Licensing and regulatory readiness

Develop a structured approach to obtaining and maintaining regulatory approval.

Key considerations include:

- Licensing strategy selection
- Application readiness assessments
- Regulatory engagement planning
- Organizational structure reviews
- Shared-service and dependency mapping
- Regulatory documentation and recordkeeping

Could your organization support the OCC's detailed application requirements today?

Pillar 3

Reserve management* and financial controls

Implement controls that support reserve integrity, liquidity, and redemption obligations.

Key considerations include:

- Reserve asset governance
- Liquidity management
- Daily reconciliations
- Valuation controls
- Custodial oversight
- Financial reporting accuracy

Can reserve holdings withstand regulatory review and redemption stress?

Pillar 4

Reporting and data infrastructure

Build reporting capabilities capable of supporting weekly and quarterly regulatory submissions.

Key considerations include:

- Data governance
- Regulatory reporting controls
- Automated reporting processes
- Reconciliation frameworks
- Management information systems
- Data lineage and auditability

Could reporting obligations be fulfilled without manual intervention?

Pillar 5

Risk management and compliance

Establish risk and compliance programs consistent with prudential supervisory expectations.

Key considerations include:

- Enterprise risk management
- BSA/AML controls
- Sanctions compliance
- Third-party risk management
- Operational resilience
- Internal audit independence
- Consumer protection controls

Is risk management a regulatory requirement or a competitive advantage?

* Reserve management frameworks will likely be among the most heavily scrutinized elements of supervisory reviews.

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