



CBAI Weighs in on the Implementation of the GENIUS Act Concerning Payments Stablecoin

In a comment letter to the U.S. Department of the Treasury dated November 3, 2025, CBAI responded to an Advance Notice of Proposed Rulemaking (ANPRM) about the implementation of the GENIUS Act concerning payments stablecoin.

CBAI said it looks forward to working with policymakers to implement the GENIUS Act in a way that encourages community bank participation in this innovation in payments, does not cause the migration of deposits (i.e., disintermediation) which community banks use to lend in their communities, and safeguards the FDIC's Deposit Insurance Fund. The implementation of the GENIUS Act must also protect the safety and soundness of the broader banking and financial services industry, protect American taxpayers from bailouts of permitted payments stablecoin issuers ("PPSIs") and any digital assets market participants (including exchanges and custodians), and too-big-to-fail banks, which will likely seek to become PPSIs.

[Read CBAI's Comment Letter »](#)