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Regulatory Insights

Regulatory Recap: September & Q3 2026

Regulatory Recap: September 2026 (Fin. Services)

Legend
- Rulemakings
- Guidance
- RFC/RFI
- Reports/Alerts
- Agenda
- Withdrawal/Rescission

Executive Agencies

CISA*
- Guidance: Updated Insider Threat Guide on Physical and Cyber Threats
- Guidance: Using Cyber Decoys to Strengthen Detection and Response
- Guidance: CVE Program Strategy & Framework
- Guidance: Critical Infrastructure Operators and Third-Party ICS Integrators
- Guidance: Preparing for the Post-Quantum Era: A Call to Action
- Announcement: Nationwide Cybersecurity Exercise – Cyber Storm X

Departments

DOJ*
- Guidance: FOIA Best Practices on Requester Negotiations (OIP)
- Announcement: Fraud Enforcement and FCA – Justice Manual Updates

DOL*
- Guidance: Multiple Labor Initiatives in Ten Agencies under DOL

Treasury*
- Guidance: Reissued GTO re: MSBs Along Southwest Border (FinCEN)
- Report: Financial Trend Analysis on Health Care Fraud (FinCEN)
- Report: Digital Asset Investment Scams: '23-'25 Threat Patterns (FinCEN)
- Speech: "Deregulation," eSLR, SEC, New Auction System (Deputy Secretary)
- Statement: G20 Finance Track Priorities for 2026 (G20 Chair)

State Activities

CA*
- Signed into Law: AI Law - Independent Third-Party Evaluation and Audits
- Guidance: California Corporate Greenhouse Gas Reporting

CSBS
- Guidance: AI Supervisory Framework
- Guidance: Nonbank Mortgage Servicer Prudential Standards

NAIC*
- Statement: State Oversight of Evolving Insurance Landscape

NY*
- Proposal: Process for Filing Private Passenger Auto Insurance Rates (NY DFS)
- Guidance: Cyber Risk Assessments for Financial Services Entities (NY DFS)
- Statement: RAISE Act and Next Steps on Major AI Developers (Governor)

**Some items appear in both FS and cross-industry as they are relevant across all industries.*

Regulatory Agencies

Inter-agency*
- Final: Community Bank Eligibility for 18-Month Exam Cycle (FDIC, FRB, OCC)
- Final: Extension of Compliance Date for 2024 Form PF Amendments (SEC, CFTC)
- Proposal: Third-Party Risk Management Guidance (FDIC, FRB, NCUA, OCC)
- Guidance: Foreign AI Companies' Campaign Against U.S. AI Models (CISA, FBI, NSA)
- Guidance: FAQs on Verifiable Digital Credentials Under CIP Rule (FinCEN, FDIC, FRB, NCUA, OCC)
- Statement: SAR Confidentiality Requirements (FRB, FDIC, OCC, NCUA, FinCEN)

CFTC
- Final: Whistleblower Award Determination
- Final: Clearing Requirement for CAD and MXN - Denominated Interest Rate Swaps
- Guidance: No-Action Letter re: Providers of Passive Software
- Guidance: Updated FAQs Re: Crypto Assets and Blockchain Technologies
- Guidance: Staff Advisory on Mention Markets
- Speech: GENIUS Act, Payment Stablecoins, Treasuries & Derivatives (Chair)
- Speech: Digital Markets Regulation – Gaps in International Standards (Director)

FDIC
- Proposal: Merger Transactions
- Proposal: State Bank Parity
- Guidance: Consumer Compliance Examination Manual Updates
- Withdrawal: Statement on Supervisory Recommendations Development & Communication

FINRA
- Proposal: Amendments to the Implementation Schedule of SR-FINRA-2024-019

FRB
- Final: Amendments to the Stress Testing Framework
- Proposal: Application Procedures to Issue Payment Stablecoins
- Proposal: Responsibilities of PPSIs
- Guidance: Private Credit Survey FAQs (Dallas and New York Fed)
- Speech: Initial Findings from Independent Review of Bank Failure
- Speech: The Final Chapter on Modernizing Bank Regulatory Stress Testing
- Speech: Discount Window Changes, Treasury Market Function (Vice Chair)
- Speech: AI Operational Risk and Stress Testing (NY Fed Chief Risk Officer)

OCC
- Guidance: Cybersecurity Supervision Work Program (CSW) Updates

SEC*
- Proposal: Amendments to Expand Retailization of Private Markets
- Proposal: Amendments to Rule 14a-4 re: Proxy Voting
- Proposal: Proxy Solicitation Modernization
- Proposal: Modernizing Transfer Agent Rules
- Report: Capital Markets Updated Statistics and Data Visualizations (DERA)
- Order: Innovation Exemption re: Trading of Tokenized NMS Stock; Statement (Chair)
- Speech: AI, Regulation NMS, Trade-Through Rule (Chair)
- Speech: Improving the Examination Process to be Accessible and Integrated
- Speech: Treasury Clearing Rule and Related Actions (Commissioner)
- Statement: 24-Hour Trading
- Withdrawal: Proposal to Rescind the Shareholder Proposal Rule
- Withdrawal: Proposal to Rescind "Pay-to-Play" Rule

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Regulatory Recap: September 2026 (Cross-Industry)

Legend
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Executive/Legislative/SCOTUS

OMB	Agenda: Memo: Universal Sign-on for Public Services
White House	Agenda: Executive Order: "Promoting Fair Competition in Livestock Markets and Expanding Market Access for American Meat Producers" Agenda: Executive Order: "Providing Meaningful Water Quality Improvements Through Collaboration and Oversight of Federal Support" Agenda: Memo: Restoring Reciprocity in Government Procurement Agenda: Statement: G20 Ministerial Innovation Consensus re: Emerging Technologies

Executive Agencies

CISA*	Guidance: Updated Insider Threat Guide on Physical and Cyber Threats Guidance: Using Cyber Decoys to Strengthen Detection and Response Guidance: CVE Program Strategy & Framework Guidance: Critical Infrastructure Operators and Third-Party ICS Integrators Guidance: Preparing for the Post-Quantum Era: A Call to Action Agenda: Announcement: Nationwide Cybersecurity Exercise – Cyber Storm X
EPA	Rulemakings: Proposal: Definition of Waters of the U.S. Agenda: Announcement: New Study on Potential Pollutants in Drinking Water Agenda: Announcement: Launch of G20 Water Reuse Initiative Withdrawal: Proposal to Repeal Remaining GHG Emission Standards Withdrawal: Repeal of 2024 Power Plant Regulations
FDA	Rulemakings: Final: Alternatives to Animal Testing RFC/RFI: RFI: Opportunities to Advance Development of Botanical Drug Products Agenda: Announcement: Launch of Expedited IND Pilot
NIST	Agenda: Announcement: NIST-Developed Quantum Sensors for Nuclear Monitoring
NTIA	Agenda: Meeting: Listening Session on FCC's E-Rate and Screen Use NPRM

Departments

DOE	RFC/RFI: RFI: Private Investment in Innovative American Energy Technologies Reports/Alerts: Report: American Resources for a Secure Future: A National Cooperative Subsurface Assessment Program Agenda: Statement: American Leadership in Nuclear Energy
DOJ*	Guidance: Guidance: FOIA Best Practices on Requester Negotiations (OIP) Agenda: Announcement: Fraud Enforcement and FCA – Justice Manual Updates
DOL*	Guidance: Guidance: Multiple Labor Initiatives in Ten Agencies under DOL
Treasury*	Agenda: Speech: "Deregulation," eSLR, SEC, New Auction System (Deputy Sec'y)

Regulatory Agencies

Inter-agency*	Guidance: Guidance: Foreign AI Companies' Campaign Against U.S. AI Models (CISA, FBI, NSA) Guidance: Guidance: Protecting Tokens and Assertions from Forgery, Theft, and Misuse (NIST, CISA) Guidance: Guidance: MOU on Registration Review on Glyphosates (EPA, HHS) Agenda: Announcement: MOU re: Public Health and Financial Market Integrity (SEC, FDA) Agenda: Announcement: Interagency Effort to Address Fraud in the Trucking Industry (White House, DOJ, DOT, DHS)
FCC	Rulemakings: Proposal: 2027 High-Cost Loop Support Formula Rulemakings: Proposal: Five Proposals - NEPA, Spectrum, Ultra-Wideband, 911, TCPA Rulemakings: Proposal: Robocall Scorecard RFC/RFI: RFC: Radio Frequency Exposure Issues Agenda: Speech: Modernizing Universal Service Programs (Commissioner)
FTC	Rulemakings: Final: Revisions to FTC Rules of Practice Rulemakings: Proposal: Ad Optimization & Impersonation of Government and Businesses Guidance: Guidance: Price Transparency FAQs for Auto Dealers Withdrawal: Withdrawal: Rescission of Health Apps & Connected Devices Policy Statement
NRC	Rulemakings: Proposal: Groundwater Protection Standards re: Uranium In-Situ Recovery Sites Agenda: Statement: Radiation Protection Framework Proposal (Chair)
SEC*	Rulemakings: Proposal: Amendments to Expand Retailization of Private Markets Rulemakings: Proposal: Amendments to Rule 14a-4 re: Proxy Voting Rulemakings: Proposal: Proxy Solicitation Modernization Reports/Alerts: Report: Capital Markets Updated Statistics and Data Visualizations (DERA) Agenda: Speech: AI, Regulation NMS, Trade-Through Rule (Chair) Agenda: Speech: Improving the Examination Process to be Accessible and Integrated Agenda: Speech: Treasury Clearing Rule and Related Actions (Commissioner) Agenda: Statement: 24-Hour Trading Withdrawal: Withdrawal: Proposal to Rescind the Shareholder Proposal Rule

State Activities

CA*	Rulemakings: Signed into Law: AI Law - Independent Third-Party Evaluation and Audits Rulemakings: Signed into Law: Child Safety Chatbot and Social Media Laws Guidance: Guidance: California Corporate Greenhouse Gas Reporting Agenda: Executive Order: Independent Oversight of AI
NAIC*	Agenda: Statement: State Oversight of Evolving Insurance Landscape
NY*	Agenda: Statement: Frontier AI Models (Governor) Agenda: Statement: RAISE Act and Next Steps on Major AI Developers (Governor)

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Q3 2026: Regulatory Pulse

Third Quarter 2026 financial services-related executive and regulatory activity is primarily focused on Risk & Governance. Highlights include:

Risk & Governance

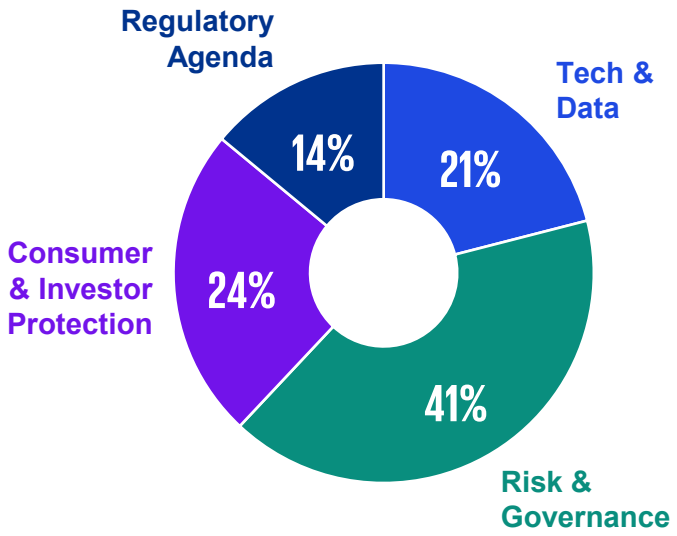
— Guidance on prediction markets (CFTC)
— Proposals for payment stablecoins (Treasury, FRB)
— Updates to risk management and examination manuals (FDIC)

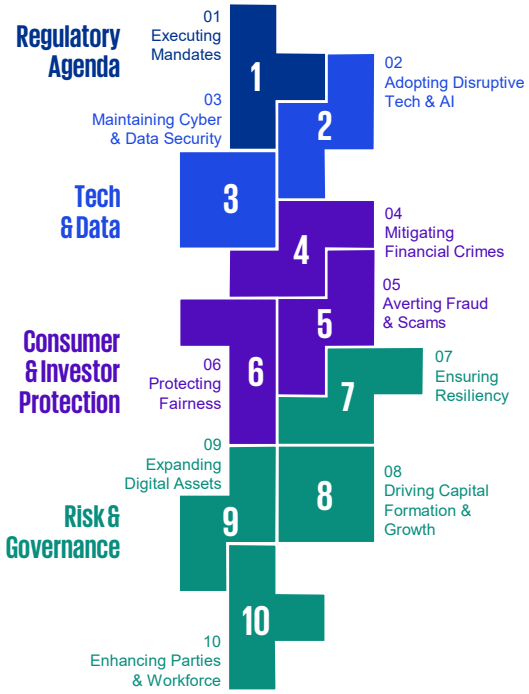
Exclusive of financial services, cross-industry executive and regulatory activity is primarily focused on Tech & Data. Highlights include:

Tech & Data

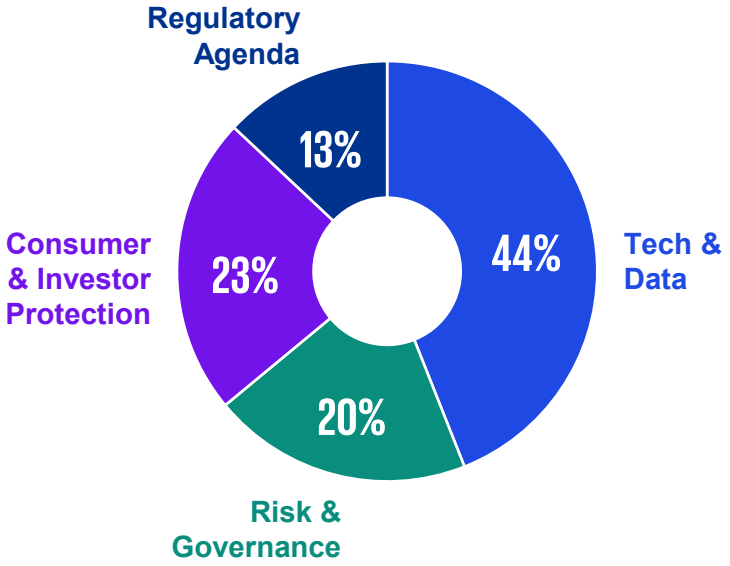
— Guidance on cyber security (CISA, DHS, NIST, White House)
— Guidance related to quantum computing (CISA, NIST, Treasury)
— Laws, statements, and guidance related to AI (CA, NY, CISA, NIST, DOE)

Financial Services Regulatory Activity





Cross-Industry Regulatory Activity



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Q3 2026: Financial Services Regulatory Alerts



Topic	KPMG Insights	Regulatory Alerts/Articles
Transfer Agents *Sept 2026*	• **Technology Neutral:** Revises rules to reflect increased use of electronic systems and changes in securities processing and record ownership; applies regardless of technology used and allows for but does not mandate distributed ledger and blockchain. • **Revised Processing Thresholds:** Accelerates processing requirements to one business day and tightens the "fail rate" necessitating capability reviews of third-party arrangements, risk management and controls, and electronic systems. • **Securityholder Communications:** Organizations should review communication and payment processes for inactive or unreachable securityholders and prepare to address notice requirements and requirements around electronic delivery failures. • **Expanded Application:** Smaller firms relying on the current exemption would be subject to the proposed operational, recordkeeping, reporting, and internal control requirements.	Registered Transfer Agents: SEC Proposed Rule
Investment Advisor Compliance *Sept 2026*	• **Review Priority:** Consistent with the SEC's 2026 Examination Priorities for investment advisers, including evaluating the effectiveness of the compliance program and changes related to the business model or new services. • **Supervisory Insight:** Offers a view into the supervisory and examination process. • **Double-Check:** Advisers are encouraged to review practices, policies and procedures for adequacy and effectiveness, and to implement appropriate modifications to their annual review processes, especially in the areas highlighted by the Risk Alert.	Risk Alert: SEC Investment Adviser Annual Compliance Reviews
Third-Party Risk *Sept 2026*	• **Tailoring & Prioritization:** Proposal aims for banking organizations to tailor TPRM based on risk assessments and prioritize higher-risk relationships. • **Experience-Driven:** Proposed approach based on "supervisory experience" and "stakeholder feedback" that finds the existing guidance does not provide sufficient focus on tailoring risk management, incentivizes process-driven approaches over risk-focused practices, and discourages new and innovative third-party relationships. • **Community Bank Considerations:** Additional guidance is directed toward the reliance of many community banks on third parties, especially regarding higher-risk relationships such as with core service providers; notably, the agencies signal heightened scrutiny of core service providers.	Third-Party Risk Management: Proposed Guidance; Joint Statement
Cryptocurrency *Sept 2026*	• **Clarification:** Explains that the "security" at issue is the covered investment contract rather than the underlying crypto asset itself; clarifies also when a covered investment contract ceases to exist and becomes subject to the proposed safe harbor. • **Fit-for-Purpose:** Establishes an offering framework specifically tailored to covered investment contracts involving crypto assets which may reduce compliance costs for issuers and potential delays related to regulatory uncertainty. • **Regulatory Runway:** Extended duration (four years) of the startup exemption is intended to "provide issuers with a regulatory runway during which they could attempt to fulfill their representations or promises to engage in essential managerial efforts under covered investment contracts" while ensuring that investors remain sufficiently protected and informed. • **State Preemption:** Preemption of state securities law registration and qualification requirements proposed for covered investment contracts offered under the Regulatory Crypto Asset exemptions, including certain secondary market transactions. • **Market Structure:** The SEC continues to support Congressional efforts to codify a comprehensive market structure framework (e.g., the CLARITY Act); changes to the proposal are possible should legislation pass this year. The CFTC has also stated that it will "move swiftly" to establish rules for the cryptocurrency market if legislation does not pass.	Regulation Crypto Assets: SEC Proposed Rules

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Q3 2026: Financial Services Regulatory Alerts



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CRA *Aug 2026*	• **Continued Priorities:** Proposal is consistent with and continues efforts to limit regulation to statutory mandates and tailor supervision to an institution's circumstances, including size and business strategy. • **Promotion of Strategic Plans:** Process changes and clarifications are intended to promote utilization of the strategic plan option, especially by banks with business models that may not be well captured by standard CRA tests (e.g., de novo banks with nontraditional business models). • **Raised Asset Thresholds:** Proposed asset thresholds would result in significant numbers of smaller, community banks (up to $10 billion) being relieved of certain data collection and reporting requirements. • **Regulatory Divergence:** CRA regulations historically have been, and currently are, interagency rules applied by the OCC, FDIC, and FRB; it is unclear whether the proposal will move forward with just two of the three agencies participating though OCC did finalize and subsequently rescind separate rules in 2020 and 2021.	Community Reinvestment Act: OCC, FDIC Joint Proposed Rule
Resolution Submissions *July 2026*	**"Substantial Revision":** Proposal would modify the current IDI Rule in many respects, narrowing its scope, compliance, and risk based on key modifications including: • **Increased Threshold:** Raises the applicable threshold for resolution submissions from $50 billion to $100 billion in total assets – effectively reducing the number of CIDIs from 48 to 32. • **Three-Year Cycle:** Moves all CIDIs to a three-year filing cycle and eliminating the requirement for interim supplemental filings. • **Compliance Focus:** Eliminates the FDIC credibility determination and associated enforcement authorities in favor of a shift to reviews for compliance with the applicable requirements in all material respects, limiting direct engagement with CIDI staff.	Resolution Submissions: FDIC Proposal
BSA/AML/CFT *July 2026*	• **Modernization.** Moving towards a focus on effectiveness of program design and implementation, explicitly encouraging risk-based allocation of resources toward higher-risk areas and use of proactive analytics and innovative technologies. • **Big Changes.** Potential to codify risk assessments as a regulatory requirement, including consideration of the AML/CFT Priorities; introduction of new notice and consultation framework for banks that would shift supervisory and enforcement actions toward "significant or systemic implementation failures." • **Independent Testing.** Treasury and FinCEN suggest independent auditors of the AML/CFT programs should assess against objective criteria and not substitute their own subjective judgments for that of the financial institution. • **Potential Concerns.** • Broadly defined terms, such as "significant," "systemic," and "material" may need additional clarification for consistency across financial institutions and federal regulators; differing levels of requirements pose risk of inconsistent treatment between banks and non-banks. • **Updated July 2026: If finalized as proposed, the FRB's decision to not include coordination and cooperation with FinCEN on supervisory and enforcement actions will likely introduce divergent expectations for AML/CFT programs and priorities across banking organizations.	BSA/AML/CFT: FinCEN and Federal Banking Agency Reform Proposals April 2026 **Updated July 2026**

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Q3 2026: Financial Services Regulatory Alerts



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Joint Data Standards *July 2026*	• **Data Trend:** Continues a trend to integrate financial and risk data stores which would allow regulators to more easily aggregate and analyze information. • **Data Sharing:** Intended to facilitate sharing of information among the financial services agencies by setting common parameters for data identification and transmission. • **Future Rulemaking:** Will not impact regulatory reporting requirements without further action by the individual agencies to implement the standards through agency-specific rulemaking or other actions. • **Data Standardization:** Anticipate system updates, including mapping, may be needed to align with the data standards, including common identifiers, once implementing regulations are promulgated.	Joint Data Standards: Interagency Final Rule
Regulatory Priorities *July 2026*	• **"Zoom Out":** Robust lists of rulemaking actions that represent what has happened nearly as much as what to anticipate • **"Zoom In":** Rulemakings reflect key priorities of the administration, including capital requirements (e.g. banking agencies), crypto and digital assets (e.g., banking agencies, SEC, CFTC, FinCEN), market structure/access (e.g., SEC, CFTC), and mortgages (e.g., CFPB long term agenda). • **Interesting call outs:** • SEC and CFTC agendas are dominated by rule proposals that have yet to be released suggesting much change ahead • Agencies are coordinating/harmonizing efforts on many rulemakings (e.g., banking agencies and FinCEN on payment stablecoins, SEC and CFTC on crypto assets) • OCC preemption rulemakings are agenda items consistent with stated focus on protecting federal authorities • CFPB outlines an active regulatory agenda despite staffing constraints and other uncertainties • "Reconsideration" of existing rules continues	Regulatory Agendas: FRB, FDIC, OCC, CFPB, SEC, CFTC, and FinCEN

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Q3 2026: Cross-Industry Regulatory Alerts



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Science & Technology *Sept 2026*	• **Science and Technology Leadership as National Security:** Details science and technology (S&T) leadership as a national security objective for the Administration and sets out how federal research and development would support national security. • **Public-Private Partnership:** Calls for fostering increased public support for private R&D and technology enterprises, including incentives and rewards for private partners and alignment of infrastructure and funding with security priorities. • **Emerging Technologies Guide Priorities:** Builds on federal initiatives to advance emerging technologies, including AI infrastructure and quantum innovation, indicating priorities for future federal research and agency and department efforts.	The White House National Security Science and Technology Strategy
Payment Stablecoins *Aug 2026*	• **Continuing Focus:** Continues the steady roll-out of rule proposals to implement the GENIUS Act in advance of the January 18, 2027, effective date. Currently, there is no clear release date for final regulations by the federal payment stablecoin regulators potentially resulting in compressed timelines for payment stablecoin issuers and other market participants to prepare for compliance. • **Scope:** Provides "fundamental architecture" for payment stablecoins including defined terms and restrictions applicable to the issuance, offer, and sale of payment stablecoins; clarifies extraterritorial reach. • **Mutually Exclusive:** Defines payment stablecoin issuers and digital asset service providers, indicating that the rules for both may not be mutually exclusive. • **Rolling Changes Ahead:** Provisions regarding digital asset service providers would come into effect in July 2028, indicating continued change past the effective date of the GENIUS Act.	GENIUS Act: Treasury Proposal for Issuance, Offer, and Sale of Payment Stablecoins
Beneficial Ownership *Aug 2026*	• **Interim Changes Made Permanent:** FinCEN's final rule makes permanent changes found in the March 2025 interim final rule that remove requirements for BOI reporting for domestic companies generally and for foreign companies about U.S. persons. • **Exemptions Expanded:** The final rule expands the interim rule's changes to include exemptions to BOI reporting for U.S. persons acting as "company applicants" for foreign companies as well as for U.S. persons that have applied for FinCEN IDs. • **BOI Data Deletion:** FinCEN announced deletion of existing data about U.S. persons from the BOI database and provides details on the process it intends to follow to complete data deletion though no specific timeframe is given.	CTA Beneficial Ownership Information (BOI) Reporting: FinCEN Final Rule
AI *Aug 2026*	• **Landmark Convergence:** The new Illinois AI Safety Act is based on New York's recent RAISE Act and California's TFAIA; California's law was the first state law to address potentially catastrophic risks from AI; Illinois' law is the first to require third-party audits. • **Large Developers/Models:** Currently only a few companies and models may meet the revenue and compute thresholds, but recent trends suggest this number could rapidly increase between now and 2030; these thresholds will be subject to annual evaluation and may be revised based on technology and/or standards developments. • **Unclear Future:** Some state AI laws may be challenged/preempted under EO 14365 or the White House National Policy Framework for AI; it is unclear whether the option to defer to federal laws/guidance may alleviate some or all of this risk. • **De Facto National Standard?:** As states converge on similar legislative priorities for safe deployment of frontier AI models, the requirements could effectively establish a "de facto" national standard in lieu of federal legislation or regulations.	State AI Safety Laws: California, New York, and Illinois

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Q3 2026: Cross-Industry Regulatory Alerts



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Prediction Markets *Aug 2026*	• **Growing Markets:** "Significant increase" in the number of event contracts listed for trading on prediction markets, as well as in the diversity of events underlying such contracts. Particular interest in "gaming" contracts. • **Clarifying Scope:** Proposal seeks to clarify the scope of permissible contracts – those that are in the public interest – through many examples. However, potential for contracts ultimately found to be contrary to the public interest could be listed for trading before a final determination is made. • **Jurisdictional Issues:** Ongoing federal/state jurisdictional disputes/lawsuits and state enforcement activity; potential for federal legislation. • **Future Rulemaking:** Additional rulemakings may address DCM Core Principles, the treatment of swaps and futures contracts similar to event contracts that are not listed on DCMs, or the application of the CEA and CFTC regulations to blockchain-based prediction markets.	Prediction Markets: CFTC Proposal on Public Interest Determinations
Payment Stablecoins *Aug 2026*	The name of the game is "alignment" as NYDFS reaffirms its U.S. dollar-backed payment stablecoin framework and proposes a framework intended to: • Align with the federal regulatory framework under the GENIUS Act, including in areas of BSA/AML/CFT, sanctions compliance, certifications, and prohibited activities. • Be at the forefront of state efforts to align new and existing requirements for payment stablecoin issuers with the federal prudential regulations.	GENIUS Act: New York Payment Stablecoin Proposed Rule
Payment Stablecoins/ Bank Secrecy Act *Aug 2026*	• **New Category of Financial Institution:** PPSIs would be treated as financial institutions under the Bank Secrecy Act (separate from money service businesses) and required to maintain effective customer identification programs; the proposed requirements are intended to be comparable to those for other financial institutions (e.g., banks, broker-dealers). • **Element of a Larger Effort:** Rules for PPSIs would align with FinCEN's AML/CFT proposals/reforms for U.S. financial institutions more broadly, emphasizing program effectiveness, risk-based assessments, and the allocation of resources to higher-risk areas. • **Primary vs. Secondary Market:** Under the proposal, CIP obligations would apply to direct relationships between a PPSI and a customer (i.e., primary market activity) but not extend to activity where the PPSI is not a party to the transaction other than via a smart contract (i.e., secondary market activity). • **Seeking Balance:** The agencies propose to balance innovation and scalability with strong AML/CFT controls for PPSIs of all sizes and relationships (e.g., standalone or bank subsidiary) to protect against regulatory gaps that could create new entry points for illicit finance.	GENIUS Act: Interagency Customer Identification Program Proposed Rule
Payment Stablecoins *July 2026*	• **Ongoing Implementation:** Building on previously issued proposals to implement the GENIUS Act, the OCC continues to propose requirements for the issuance of payment stablecoins. • **Visibility:** Information collection proposals, including weekly reporting of daily data, signals intent to establish supervisory visibility of PPSIs and FPSIs with potentially substantial operational implications for reporting entities. • **"Bank-like" Reporting:** Proposed quarterly reporting would mirror bank Call Report information; OCC seeks comment on whether PPSIs and FPSIs should be required to file both the proposed reporting forms as well as the Call Report and other reporting obligations.	GENIUS Act: OCC and FDIC Proposed Reporting Forms for PPSIs

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Q3 2026: Cross-Industry Regulatory Alerts

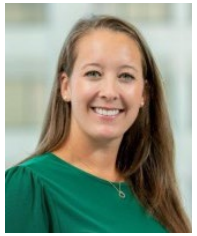


Topic	KPMG Insights	Regulatory Alerts/Articles
Payment Stablecoins *July 2026*	• **Unified Focus:** NCUA proposal aligns with provisions in the proposed FDIC and OCC standards, including reserve requirements, capital, risk management, and custody (as appropriate), as well as the FinCEN/OFAC proposal on BSA/AML/CFT compliance, including a focus on program effectiveness and risk-based supervision. • **De Novo Terms:** NCUA states that it would expect to shorten the de novo period for an entity that has a history of operating a stablecoin business prior to the effective date of the NCUA's final rule or for a PPSI that converts to an NCUA-PPSI charter from another primary Federal payment stablecoin regulator. • **Potential for Change:** Though closely aligned with the GENIUS Act, the NCUA has posed nearly 200 questions (note the FDIC and OCC together posed nearly 350), which could generate significant input from interested parties ahead of a final rulemaking.	GENIUS Act: NCUA Proposal on Payment Stablecoin Issuance by Credit Union-Affiliated Entities
Quantum Computing *July 2026*	• **America First Resilience Strategy:** A “whole-of-government approach” to build quantum capability and to strengthen cryptographic protections to defend against such capabilities by adverse actors. • **Broad Effort:** Public/Private effort to cover research, manufacturing, commercialization, and application consistent with the national cybersecurity strategy to protect national security, critical infrastructure, and the digital economy. • **Accelerated Compliance Timeline:** Directs relatively near-term deadlines including a post-quantum cryptography pilot in 2027, the fielding of next-generation quantum sensor projects by 2028, and the migration of “high value assets” and “high impact systems” (including those of covered contractors) to post-quantum cryptography standards by 2030 (key establishment) and 2031 (digital signatures). • **Compliance Considerations:** Government contractors and organizations engaged in critical infrastructure activities should watch for forthcoming guidance regarding migration to post-quantum cryptography standards as well as consider opportunities to participate in public/private partnerships/research/training.	Executive Orders: Quantum Innovation and Protections

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GENIUS Act(ivity)!



GENIUS Act:
Regulatory Alerts

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