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# Addressing top of mind issues for digital assets and fintech

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# Digital Assets Summit

With significant activity occurring simultaneously in the digital asset space—from evolving legislation to emerging technical capabilities—organizations may feel overwhelmed or pressured to adopt every new trend. However, a key takeaway from the summit is that **the first thing any company must understand is its own unique business strategy:**

- Some financial institutions are exploring the "DeFi Mullet" trend: maintaining a traditional, compliant "front end" for customer trust while partnering with decentralized platforms on the "back end" for technical execution. This approach enables established organizations to offer modern digital services.
- Decision-makers should evaluate how stablecoins and tokenized deposits may support economic transactions. By weighing the potential for highly efficient global payment settlements against the need to operate within traditional banking frameworks, organizations can objectively evaluate these tools as potential infrastructure.
- Organizations should monitor the latest releases and guidance from the Securities and Exchange Commission (SEC), Commodity Futures Trading Commission (CFTC), and other regulators to better understand jurisdictional boundaries. While regulatory opinions can vary over time, aligning with current agency standards and keeping an eye on future legislation allows companies to move forward with digital asset projects with a clearer sense of compliance.
- Leadership teams should also consider how stablecoins and tokenized deposits may transform their economic transactions. While remaining mindful of regulatory considerations within traditional banking frameworks, these tools can be evaluated for their potential to enhance efficiency in asset movement and global payments and should increasingly be viewed as critical infrastructure.
- Additionally, organizations must monitor and align their stablecoin strategies with the Guiding and Establishing National Innovation for US Stablecoins (GENIUS) Act. Historically, a lack of legislative clarity has been a major barrier to institutional entry; however, this act represents a significant step toward a federal regulatory framework for stablecoins in the US, providing the "rules of the road" necessary for confident, long-term participation.

Success is not found by chasing the "shiniest" innovation, but by identifying where a digital asset solution specifically solves a core business problem—whether that is improving capital efficiency, attracting new customers, or defending a market position against new entrants. Before moving toward implementation, leadership must ask: *"How does this technology improve our ability to execute our unique strategy?"*

## Opportunity

### 1 Strategy-first evaluation

Before pursuing any digital asset initiative, leadership should anchor decisions to a clearly defined business strategy—asking how the technology specifically improves capital efficiency, customer acquisition, or competitive positioning rather than adopting it for its own sake.

### 2 Regulatory monitoring and alignment

Organizations should actively track guidance from the SEC, CFTC, and emerging legislation such as the GENIUS Act, as this evolving regulatory clarity is increasingly providing the "rules of the road" needed to move forward with digital asset projects confidently and compliantly.

## Resources

- Fintech Fast 5: Key takeaways from the Digital Assets Summit

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# Markets update

Across the fintech and digital asset market, we continue to see significant activity with significant investments in blockchain infrastructure in anticipation of the GENIUS Act seemingly top of mind for both smaller private entities and large incumbent players. Here are some key themes shaping the latest industry moves:

- Digital assets and stablecoin infrastructure continue to move from the periphery to the center of strategic planning for traditional payment giants. This momentum is headlined by a multinational payment card servicer acquisition of a stablecoin-native payments infrastructure provider,[1] signaling an effort to combine traditional payments processes with crypto infrastructure. Furthermore, the institutionalization of crypto is accelerating, with several large incumbent fintech and payment companies announcing plans to build out their own GENIUS Act stablecoins, pointing to a future where programmable digital money is deeply embedded in standard payment flows.
- Large fintech and payments incumbents are continuing to prioritize operational efficiency and core business and look for ways to exit peripheral markets. We're aware of several large fintechs actively exploring the divestiture of noncore assets. This will allow them to free up capital, reduce complexity, and refocus resources on their primary growth engines in an increasingly competitive market.
- The regulatory landscape remains a critical battlefield. We are seeing active and ongoing discussions regarding banking licenses among several fintechs. As these companies mature, the desire to reduce reliance on third-party sponsor banks, optimize their cost of capital, and directly offer a wider suite of financial products is driving a renewed push toward obtaining formal banking charters. Some of this is playing out in mergers and acquisition (M&A) activity focusing on entities that have already obtained licenses being acquired by larger entities looking to enter those spaces.
- While private equity buyouts have taken a backseat in 2026 so far—likely due to valuation gaps and an increased cost of capital—corporate buyouts remain active.

Together, these trends signal an industry in active transformation, where regulatory clarity, digital asset adoption, and strategic consolidation are rapidly redrawing competitive boundaries and rewarding those who move decisively to position themselves at the intersection of traditional and digital finance.

## Opportunity

### 1 Seamless integration of digital asset services

Consider combining traditional payment infrastructure with stablecoin-native platforms, embedding programmable digital money directly into standard payment flows. Management should carefully consider the appropriateness of the partners they select in their integration process.

## Resources

US Insights: Pulse of Fintech H2'2025

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[1] "Mastercard to acquire BVNK to connect on-chain payments and fiat rails," March 17, 2026

# Regulatory update

The US regulatory landscape for fintech and digital assets is undergoing a profound transformation, shifting rapidly from a period of jurisdictional uncertainty toward a highly structured, institutional framework. This evolution is currently characterized by unprecedented interagency coordination, most notably in the sweeping, cross-jurisdictional efforts to implement the GENIUS Act's stablecoin regulations ahead of its 2027 effective date. As regulators like the SEC and CFTC provide long-awaited clarity on crypto asset classification, the boundary between traditional finance and digital assets is simultaneously being tested and redefined—evidenced by watershed moments in systemic access:

- Federal agencies are actively implementing the GENIUS Act through coordinated actions: the Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency, and National Credit Union Administration have each issued proposed rules for permitted payment stablecoin issuers (PPSI) and insured depository institutions under their jurisdictions—covering licensing and application processes as well as prudential standards (e.g., reserves, capital, liquidity, and custody); the Financial Crimes Enforcement Network and Office of Foreign Assets Control have jointly proposed anti-money-laundering and countering the financing of terrorism and sanctions compliance requirements treating PPSIs as financial institutions under the Bank Secrecy Act;; and the US Treasury has proposed principles to assess whether state level stablecoin regimes are “substantially similar” to the federal framework, collectively advancing implementation ahead of the GENIUS Act’s effective date (January 18, 2027, or 120 days after final rules).
- State-chartered digital asset banks are beginning to secure landmark approvals for Federal Reserve master accounts. By granting these nontraditional firms' direct access to core US payment infrastructure, these limited-purpose accounts significantly reduce reliance on intermediary banks and enable faster, more efficient fiat settlement for institutional clients. In response, there has been pressure on central banks to provide transparency on how they will maintain standards and apply requirements consistently to crypto-native firms.
- The SEC and CFTC jointly issued an interpretation that clarifies when crypto assets are (and are not) securities, providing fintechs and digital asset firms clearer regulatory boundaries, reduced classification uncertainty, and a more workable path for token issuance, staking, and other crypto activities as Congress advances broader market structure legislation.

These developments mark an inflection point for US digital finance, as regulators are no longer reacting to the rise of digital assets but actively architecting the rules-based framework under which they will be integrated into mainstream financial infrastructure. For fintechs and digital asset firms, regulatory fitness is fast becoming a competitive differentiator, and the foundational decisions being made today will define the structure and participants of US digital finance for the decade ahead.

## Opportunity

### 1 Strategic expansion into SMB markets

A clearer regulatory on-ramp for provide opportunities for firms developing payment, lending, and financial services products tailored to small and medium-sized businesses.

### 2 Modernization of settlement rails

Consider pursuing a Federal Reserve master account to eliminate dependence on correspondent banking.

### 3 Enhanced AI-driven commerce

With regulators now providing clearer standards around stablecoin issuance and crypto asset classification, banks should evaluate how AI-driven commerce capabilities can be integrated into their operations.

## Resources

Gaining Momentum

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