

# **Scoring Guidelines**

## **How Grading Works**

- **1.** To rate a stablecoin, assign scores for each of the parameters (E.g., 1.1.1, 1.1.2, 1.1.3) based on the criteria given in Table A.
- 2. Calculate sub-factor scores using the parameter scores and weights.
- E.g., Score of Sub-factor 1.1 =
- [Wt. (1.1.1) x Score (1.1.1) + Wt. (1.1.2) x Score (1.1.2) + Wt. (1.1.3) x Score (1.1.3)] / [Sum of Wt. (1.1.1), Wt. (1.1.2), Wt. (1.1.3)]
- 3. Calculate factor scores using factor scores and weights (Same logic as In Step 2)
- E.g., Score of Factor 1 = [Wt. (1.1) x Score (1.1) + Wt. (1.2) x Score (1.2) + Wt. (1.3) x Score (1.3)] / [Sum of Wt. 1.2, Wt. 1.2, Wt. 1.3]
- **4.** Once all factor scores are calculated, convert scores for Management, Decentralization and Governance into Risk Grades (Very Low, Low, High etc.) using Table B.
- 5. Compare the Risk Grades from Step 4 against the Grading Scale in Table C and check which is the highest achievable grade, ignoring the Stability cut-off.
- 6. Now check whether the Stability factor score of the coin exceeds the Stability cut-off of the grade identified in the previous step. If it does, the grade identified in Step 5 applies. If not, move down to the next lower grade and check whether the Stability factor score exceeds the relevant cut-off. Repeat until the relevant grade has been identified.
- **7.** Note: If any red flag is triggered, a grade of 'F' is automatically assigned irrespective of Risk Grades and Stability factor scores.

## Table A - Factor Weights and Scores (Step 1)

Assign scores for each factor based on the criteria in the table

Factor Code	Factor Title	Weights	Points (0 to 1 scale)	
1	STABILITY	100%		
<u>1.1</u>	<u>Reserves</u>	50%		
1.1.1	Collateralization % & Type of Collateral	25%	<ul> <li>For fiat-denominated and stablecoin collateral:</li> <li>100% CR - 1</li> <li>95% to 100% CR - 0.5</li> <li>&lt;95% CR - 0</li> <li>The CR determines the maximum possible score but the exact asset mix determines the actual score. We apply a discounting factor to each fiat-denominated asset as follows:</li> </ul>	



			Asset Type	Discount
			Cash & Bank Deposits	0-5%*
			US Treasury Bills (<3Mo)	0%
			US Treasury Debt	0-5%**
			Non-US Treasuries (Issuer Disclosed)	0-15%
			Non-US Treasuries (Issuer Undisclosed)	30%
			Money Market Funds (Investing in US Treasuries only)	0%
			Money Market Funds (Mix of various short dated	070
			instruments) ^	0-15%
			Overnight Reverse Repos (Backed by US Treasuries	
			only) Term Rev Repos (<3Mo) (Backed by US Treasuries	0%
			only)	1.25%
			Credit Instruments (CP, CD, Corporate Bonds, Loans)	10-30%*
			Investments	35%
			Undisclosed Assets	35%
			*Based on bank/issuer's credit rating	
			** Based on maturity	
			^Based on asset mix	
			A fully-collateralized stablecoin backed entirely by long- Treasuries would attain a score of 0.95.	dated US
			For crypto collateral:	
			If collateral is BTC/ETH:	
			<ul> <li>&gt;220% CR - 0.875</li> <li>180% -220% CR - 0.75</li> </ul>	
			<ul> <li>150% - 180% CR - 0.625</li> </ul>	
			• 120% - 150% CR - 0.5	
			• <120% CR - 0	
			If non DTC/CTU	
			If non-BTC/ETH: Discount collateral value by 15% and apply scores as ab	ove
1.1.2	Storage of Assets	12.5%	<ul> <li>For stablecoins issued off-chain:</li> <li>With disclosed*, regulated custodians in reputable - 1</li> <li>With disclosed*, regulated custodians not in reputa</li> </ul>	-
			jurisdictions - 0.5 • With others / Undisclosed – 0	
			*If names of custodians/depository institutions are not penalty of 30% is applied	disclosed, a
			<ul> <li>For stablecoins issued on-chain:</li> <li>Assets in protocol's own smart contracts. Contracts</li> </ul>	audited
			<ul> <li>and immutable - 1</li> <li>Assets in protocol's own smart contracts. Contracts</li> </ul>	s audited -
			<ul> <li>0.75</li> <li>Assets in third-party smart contracts. Contracts are 0.5</li> </ul>	audited -



			<ul> <li>Assets in multi-signature wallet - 0.25</li> <li>Assets in EOA accounts - 0</li> </ul>	
1.1.3	Asset Segregation	12.5%	<ul> <li>Assets segregated &amp; bankruptcy remote: 1</li> <li>Assets segregated &amp; not bankruptcy remote: 0.5</li> <li>Assets not segregated: 0</li> </ul>	
<u>1.2</u>	Market Feedback	20%		
1.2.1	Frequency of Deviation Below Peg	4%*	<ul> <li>Number of days where VWAP is less than peg price by 0.5% or more during the 180-day period preceding the reporting date:</li> <li>days - 1</li> <li>&lt;5% of days - 0.5</li> <li>5-10% of days - 0.25</li> <li>&gt;10% of days - 0</li> <li>For gold-backed tokens, we allow a deviation buffer of 0.75%/1.5% to reflect the impact of higher mint/burn fees (0.25% for XAUT and 1% on average for PAXG) which prevent perfect parity with the price of gold.</li> </ul>	
1.2.2	Max Deviation Below Peg	4%*	Biggest daily VWAP deviation (%) below peg price during the 180-day period preceding the reporting date: >2.5% - 0 1.5-2.5% - 0.25 0.5-1.5% - 0.5 <0.5%: 1	
1.2.3	Volatility (% per day)	4%*	Daily volatility during the 180-day period preceding the reporting date: <0.25% - 1 0.25-0.5% - 0.75 0.5-1% -0.5 1-2% - 0.25 >2% - 0	
1.2.4	Downside Volatility in a Downturn	4%*	Average deviation below peg during the 5 worst-performing days for BTC (DoD price change) during the 180-day period preceding the reporting date: <0.05% - 1 0.05-0.10% - 0.75 0.10-0.15% -0.50 0.15-0.2% -0.25 >0.2% - 0	
1.2.5	Liquidity Pool Imbalance	4%*	Stablecoin's % share of liquidity pool TVL:         Pool Scores for 2-token pools:         >75% - 0         60-75% - 0.25         40-60% - 0.5         25-40% - 0.75         <25% - 1	



			40-47% - 0.25
			26-40% - 0.5
			17-26% - 0.75
			<17% - 1
			(Balanced state is 33.33% share)
			Pool Scores for 4-token pools:
			>42.5% - 0
			30-42.5% - 0.25
			20-30% - 0.5 (Balanced State)
			12.5-20% - 0.75
			<12.5% - 1
			(Balanced state is 25% share)
			<b>Method of deriving scores</b> : Pool liquidity-weighted average of Pool Scores in the top 2-3 pools of a stablecoin.
			Calculation of a stablecoin's pool scores:
			Middle Tier (M) = Balanced State +/- 20% deviation
			(Example: In a 3-token pool, the balanced state is 33%. Pools with
			deviations within 20% (i.e, 33.33% +/- 6.6%) are assigned a base
			score of 0.5.
			M + 1 and M-1 = Balanced State +/- 20-50%
			M +2 and M-2 = Balanced State +/- >50%
	weights of 4% are used weighted.	d by defau	It. When one or more of the sub-factors is not applicable, the rest are
	-	d by defau <b>30%</b>	It. When one or more of the sub-factors is not applicable, the rest are
equally	weighted.	T	It. When one or more of the sub-factors is not applicable, the rest are Scores assigned based on mechanism:
equally <u>1.3</u>	weighted. Mechanism	30%	
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equally <u>1.3</u>	weighted. Mechanism	30%	Scores assigned based on mechanism: Mint & Redeem (Arbitrage/ Peg Stability Module) - 1 (Consistent peg stability as long the stablecoin is fully collateralized.
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equally <u>1.3</u>	weighted. Mechanism	30%	Scores assigned based on mechanism:         Mint & Redeem (Arbitrage/ Peg Stability Module) - 1         (Consistent peg stability as long the stablecoin is fully collateralized.         E.g., USDC, USDT, USDP)         Stableswap/Range-bound Liquidity (Reserves deployed as liquidity
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equally <u>1.3</u>	weighted. Mechanism	30%	Scores assigned based on mechanism:         Mint & Redeem (Arbitrage/ Peg Stability Module) - 1         (Consistent peg stability as long the stablecoin is fully collateralized.         E.g., USDC, USDT, USDP)         Stableswap/Range-bound Liquidity (Reserves deployed as liquidity on DEXs like Curve Finance/Uniswap v3) - 0.92         (Peg stability can exist for a prolonged period of time but not when liquidity pools are excessively unbalanced. E.g., FRAX)         Collateralized Debt Positions (Liquidation) - 0.67         (Doesn't contribute to peg stability, but maintains protocol stability.         E.g., DAI, RAI, LUSD)         Bonus points:         • If collateral can be redeemed by stablecoin holders at par - 0.17         (Redemption guarantees a price floor)



			humans. E.g., Open Market Operations. E.g., USDD, CeloUSD)	
			Seigniorage Shares / Bonds - 0 (Short-term peg stability can be achieved but no long-term protocol stability in the absence of collateral. E.g., UST, sUSD, ESD, DSD)	
1.3.2	Primary Liquidity Access	15%	Liquidity access: Generally available to all* holders - 1 Generally available to some holders - 0.5 (E.g., USDT) Available only at shutdown to all holders - 0.25 (E.g., RAI) No primary liquidity - 0 (E.g., USDD) Liquidity cost: *Redemption prerequisites such as completion of KYC/account onboarding etc. to comply with applicable laws in force will not affect the score.	
2	MANAGEMENT			
<u>2.1</u>	Restrictions	100%*		
2.1.1	Known Core Team	50%	Core Team Known: 1 Core Team Unknown: 0	
2.1.2	Jurisdiction Score (WJP Rule of Law)	50%	Our Jurisdiction Score is an average of a country's 'Regulatory Enforcement' score and 'Civil Justice' score from the World Justice Project's Rule of Law Index.	
* 100%	is the default weight. 5	0% is used	when the M.2 Track Record is also scored.	
<u>2.2</u>	Track Record	50%*		
2.2.1	Team's Background	50%	Track Record is not scored by default for most coins. Scoring is done only when there are justifiable causes for concern with the team's history.	
* 0% is t	the default weight. 50%	6 when the	M.2 Track Record is scored.	
3	IMPLEMENTATION	N/A	Not assessed currently	
4	DECENTRALIZATION	100%		
4.1	Regulatory Oversight	20%	• Issuer is regulated in any capacity in a reputable jurisdiction: 0	
			<ul> <li>Issuer is indirectly connected to a regulatory body through a reporting relationship (E.g., FinCen in USA) or through regulated intermediaries         <ul> <li>a) Both issuer and associates domiciled in a reputable jurisdiction - 0.25</li> <li>b) Issuer or associates not domiciled in reputable jurisdictions - 0.5</li> </ul> </li> <li>Issuer is unregulated and has no ties to a regulatory body - 1</li> </ul>	



4.2	Custodian Risk	20%	For reserves held off-chain: Assets held by 1 custodian/bank: 0 Held by 2-3 custodians/banks: 0.5 Held by >3 custodians/banks: 1 For reserves held on-chain: EOA - 0 Team controlled multi-sig: 0.25 Governance controlled multi-sig - 0.5 Smart Contract: 1	
4.3	Type of Collateral	20%	USD-denominated assets held off-chain/other fiat-backed stablecoins: 0 Cryptocurrencies: 1	
4.4	Decision Making & Voting Power	20%	Company or Protocol without Token voting - 0 Protocol with token & non-insiders / non-private investors holdings <50% - 0.25 Protocol with token & non-insiders / non-private investors holding 50-75% - 0.5 Protocol with token & non-insiders / non-private investors holding >75% - 1	
4.5	User Blacklisting	20%	Blacklisting possible - 0 Blacklisting not possible - 1	
5	GOVERNANCE	100%		
		10070	For fiat-backed and asset-backed stablecoins issued by a registered entity	
5.1	Holder Protection	28.5%	<ul> <li>1) Issuer regulated as a stablecoin issuer (E.g., by the NYDFS) - 1</li> <li>2) Issuer regulated in other capacities:</li> <li>(E.g., by the SEC/ as a Money Transmitter or Payment Institution etc.)</li> <li>With Bankruptcy protection for holders - 0.75</li> <li>Without bankruptcy protection for holders - 0.5</li> <li>3) Issuer registered with a government authority/agency (E.g., FinCen) AND Contractual protections - 0.25</li> <li>4) Contractual protections only - 0</li> </ul>	
5.2	Periodic Reserves Attestations	28.5%	<ul> <li>The overall score is an average of the scores of (A) and (B) below.</li> <li>A) Type of Attestation <ul> <li>Opinion / Examination - 1</li> <li>Agreed Upon Procedures (no opinion) - 0.5</li> <li>None - 0</li> </ul> </li> <li>B) Frequency of Attestation: <ul> <li>Monthly or better - 1</li> <li>Quarterly - 0.5</li> <li>Half-yearly - 0.25</li> <li>Annually - 0.125</li> <li>None - 0</li> </ul> </li> </ul>	
5.3	Financial Audits	28.5%	Annual full-scope audit performed or statutorily required to be performed? Yes - 1	



			No - 0
			NO - 0
5.4	Redemption Policy	14.5%	Are timelines for redemption clearly stipulated in the issuer's Terms of Service? Yes - 1 No - 0
			For stablecoins issued and managed natively on-chain
5.1	Voting System	50%	Are governance votes binding and executed automatically on-chain? No - 0 Yes - 1
5.2	Anti-Governance Attack Measures	50%	Score is a sum of (A) and (B)
			<ul> <li>A. Preventive Measures: Immutable Contracts - 1 (Contracts cannot be modified)</li> <li>Vote Escrow - 0.17 (Longer the lock duration (future-looking lock period), higher the voting power.)</li> <li>Time-weighted voting power - 0.25 (Longer the duration for which governance tokens were locked (historical lock period), higher the voting power)</li> <li>Voting cliffs - 0.5 (Users must lock up tokens for a predefined period, after which voting rights kick In. No disproportionate voting power).</li> </ul>
			<b>B. Reactive Measures:</b> Emergency Shutdowns 0.17 Time delays - 0.34 Veto & exit rights for stablecoin holders - 0.5 If 2 or more reactive measures exist, score = higher of (0.4, score of superior measure)
6	EXTERNALS	N/A	Not assessed currently



## Table B - Risk Grades

Factor	Very Low Risk	Low Risk	Moderate Risk	High Risk
Management	. 0.02		0.00	
Decentralization	>0.83	0.66 – 0.83	0.33 – 0.66	<0.33
Governance				

Convert factor scores into risk grades using the table below

## Table C - Grading Scale

Assign grades using the Stability cut-off and risk criteria given below:

Grade	Stability cut-off	Risk Criteria
A+	0.97 (Highly stable)	<ul> <li>Fiat/asset-backed stablecoins: "Very Low Risk" in Governance and Management factors.</li> <li>Additional Conditions: Reserves must be bankruptcy-remote.</li> <li>On-chain stablecoins: "Very Low Risk" in Governance, Management and Decentralization.</li> </ul>
A	0.9 (Stable)	<ul> <li>Fiat/asset-backed stablecoins: "Very Low Risk" in Governance and Management factors.</li> <li>Additional Conditions: Reserves must be bankruptcy-remote.</li> <li>On-chain stablecoins: "Very Low Risk" in Governance. "Very Low Risk" in at least 2 factors in total.</li> </ul>
A-	0.8 (Stable)	<ul> <li>Fiat/asset-backed stablecoins: "Very Low Risk" and "Low Risk" (or better) in Governance and Management factors respectively.</li> <li>Additional Conditions: Reserves must be bankruptcy-remote.</li> <li>On-chain stablecoins: "Low Risk" (or better) in Governance. "Very Low Risk" in at least 2 factors in total.</li> </ul>
В+	0.75 (Moderately stable)	Fiat/asset-backed stablecoins: "Low Risk" (or better) in Governance and Management factors. On-chain stablecoins: "Low Risk" (or better) in Governance. "Very Low Risk" and "Low Risk" (or better) in at least 2 factors in total.



В	0.7 (Moderately stable)	<ul> <li>Fiat/asset-backed stablecoins: "Low Risk" (or better) in Governance and Management factors.</li> <li>On-chain stablecoins: "Low Risk" (or better) in Governance. "Low Risk" (or better) in at least 2 factors in total.</li> </ul>
В-	0.65 (Moderately stable)	<ul> <li>Fiat/asset-backed stablecoins: "Low Risk" and "Moderate Risk" (or better) in Governance and Management factors.</li> <li>On-chain stablecoins: "Low Risk" (or better) in Governance. "Low Risk" and "Moderate Risk" (or better) in at least 2 factors in total.</li> </ul>
c	0.6 (Moderately stable)	Fiat/asset-backed stablecoins: "Moderate Risk" (or better) in Governance and Management factors. On-chain stablecoins: "Low Risk" (or better) in Governance.
D (Unsafe)	<0.6 (Unstable)	Fiat/asset-backed stablecoins: "High Risk" in Governance or Management factors. On-chain stablecoins: "Moderate Risk" or "High Risk" in Governance.
F (Fail)		Any red flag triggered

## **Red Flags**

Red Flags are highly negative traits of a stablecoin, the existence of which automatically results in a failing grade (F).

## Examples:

- Stablecoins with zero or endogenous collateral.
- Known issues pertaining to a stablecoin issuer's team, such as current/prior involvement in scams, theft, or criminal activities.
- Stablecoin reserves controlled by Externally-Owned Accounts.
- Collateral-drain functions in smart contracts which enable a person or a group of persons to transfer reserves to addresses not whitelisted by governance.
- Core smart contracts have not been audited by a reputed audit firm.