Compliance Roles & AI Adoption Matrix

ROLE	LEGACY	OPPORTUNISTIC	ADOPTIVE	TRANSFORMATIVE
CCO	**Relies on what has been done before.** Rejects all uses of AI as non-compliant and does not engage with AI vendors or internal initiatives.	Is aware of AI trends for compliance but **does not consider AI adoption a strategic priority**. Permits team to use AI for limited use cases.	Understands how AI can be deployed across different practice areas, and champions new AI initiatives internally. **Creates structure and incentives for the safe & effective use of AI.**	**Pioneers the strategic use of AI to advance key program objectives** and is an innovator for the business. Engages with the industry to co-create AI standards.
MANAGER	Opposes implementing any AI solutions for their team. **Defaults to manual processes** for managing and overseeing their team's work.	Experiments with AI capabilities provided by current vendors. **Allows but does not require the use of approved AI** tools by their team.	**Builds and implements AI-enabled workflows for their team.** Consistently uses AI for their own work, such as leveraging AI insights to understand program performance.	**Leads the overhaul of internal procedures to be fully AI-enabled.** Proactively seeks out innovative applications of AI, such as the use of Agentic AI to automate complex tasks.
ANALYST	Refuses to use AI for any part of their work; **manually works every alert/ case** and ignores opportunities to use AI even when available.	**Uses AI tools in an ad-hoc capacity**, such as to summarize files or cases. Saves a little bit of time using AI but does the majority of their work the "old way."	**Uses available AI tools whenever possible** to be more productive. Shares best practices with their team on how to use AI effectively.	**Sees mastering the effective use of AI as a core competency**; independently researches AI capabilities and brings ideas for novel AI applications to their team.
IT	Distrusts all AI vendors. **Believes that AI tools should be built in-house, if at all.** Champions legacy systems and prioritizes continuity over innovation.	**Facilitates evaluations of AI capabilities from existing vendors** when asked. Upholds all AI company policies, ensuring proper use.	**Partners with departmental leaders to define AI strategy** and evaluation frameworks. Supports the end-to-end implementation of new AI vendors, ensuring successful rollout.	**Spearheads internal transformation efforts to become an AI-native organization.** Promotes company-wide adoption of AI tools, leading the evaluation of new vendors.
REGULATOR	Doesn't personally use or experiment with AI technology. **Is skeptical of AI in a compliance setting** and is unable to effectively evaluate its use within a given program.	**Uses AI to analyze policy updates and monitor trends.** Generally understands the main use cases for AI in compliance, and personally employs AI tools as a way to cover more ground during an audit or review.	**Employs AI to fundamentally change certain aspects of the review process**, including moving beyond limited sampling and instead performing a more comprehensive and more real-time analysis.	Goes beyond looking at AI as a way to conduct oversight and **works to design and shape future, AI-influenced regulatory standards.**