

Achieving AI Fluency in Compliance

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.