Eight AI scoping questions

Use these questions to identify which records apply. Keep unanswered questions visible.

CSBS is discretionary for state bank and nonbank oversight. Each state decides its use. It creates no new legal obligations.

National banks follow OCC oversight. Credit unions follow NCUA oversight. This checklist organizes preparation for institution review.

1. Where is AI used?

Where the answer lives: Use register and a record of the business areas checked.

2. Which AI systems, tools and uses have been identified?

Where the answer lives: Current inventory, business purposes and accountable roles.

3. Does AI face customers or support or influence decisions?

Where the answer lives: Output samples, review rules and consumer-impact records.

4. Which AI capabilities depend on vendors or external platforms?

Where the answer lives: Vendor register, oversight materials and agreements.

5. Where is AI embedded in vendor products, and what was disclosed?

Where the answer lives: Product updates, vendor disclosures and unanswered feature questions.

6. Which generative AI tools or language models are in use?

Where the answer lives: Approved and known tools, input limits and output-review rules.

7. How are AI uses separated by risk or required review?

Where the answer lives: Risk assessments, proposed tiers and governance decisions.

8. What sensitive information enters, passes through or leaves AI?

Where the answer lives: Data classifications, handling terms and control records.

A No or unclear answer about AI use can require checking vendor and software inventories, approved tools and recent changes.

Agents: record allowed actions, human checkpoints, logs, reversibility and who can restrict or halt the system.

Core Examiner Guide, pages 3 and 7: https://www.csbs.org/node/584241

Source checked October 16, 2026. A record on hand still needs scope, owner and evidence review.

19 records examiners may request

Status: On hand / Partly / Not yet. Mark applicability separately; explain any record that does not apply.

Record	Status
Governance and oversight	
AI policies, standards or procedures	_____
Governance, committee or oversight materials	_____
Management or board reporting on AI use and risks	_____
Reports or dashboards monitoring AI use, performance, issues and risks	_____
Employee guidance or training on AI	_____
AI inventory and use cases	
Inventory of AI systems, tools, models or uses	_____
Business purposes, ownership and use	_____
Use descriptions, risk assessments, ratings or tiering	_____
Vendor products with known or possible embedded AI	_____
Change management records for AI systems, models, tools or uses	_____
Generative AI and emerging use	
Policies, guidance or limits for generative AI and language models	_____
Approved or known generative AI tools in use	_____
Business purposes, data controls and output review	_____
Additional materials, as applicable	
Vendor or third-party oversight of AI capabilities	_____
Model validation, testing, monitoring or control materials	_____
Consumer compliance, notices, complaints or remediation	_____
Recent AI-generated or AI-assisted consumer-facing outputs	_____
Terms on data use, retention, sharing or AI training	_____
Internal audit, compliance reviews, control testing, tracking logs or independent assessments	_____

Requests depend on AI use and examination scope. These labels paraphrase the Core Examiner Guide, page 4.

Source: https://www.csbs.org/node/584241. Checked October 16, 2026.

Keep inspection, evidence assessment and institution acceptance separate from checklist status.