Top Trends in Compliance AI Usage

A banker-facing analysis of anonymized Ask Kaia questions over a quarter

Ask Kaia

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Table of Contents

Executive Summary

Between April 1 and June 30, 2026, compliance professionals at U.S. financial institutions submitted **4,757 substantive questions** to Ask Kaia, 360factors' AI-powered compliance platform. While each question addressed a specific regulatory or operational issue, together they reveal something broader: where compliance teams encounter the greatest friction in their day-to-day work.

The findings show that compliance professionals are not using AI as a substitute for regulatory research. Instead, they are increasingly relying on it to interpret complex scenarios, review institution-specific documents, assess marketing materials, draft operational guidance, and apply regulatory requirements to real-world decisions. This shift suggests that the greatest value of AI lies not in replacing compliance expertise, but in accelerating the work that surrounds regulatory judgment.

Key Findings

- Compliance professionals are primarily using AI to support judgment, not just to retrieve regulations. Most questions involved applying regulatory requirements to specific customer scenarios, reviewing policy language, evaluating disclosures, or determining how existing guidance should be implemented. Rather than asking what a regulation says, users were asking how it should be applied in practice.
- Lending and mortgage compliance remains the industry's most complex operational domain. Lending-related topics accounted for **27.5%** (1309 questions) of substantive questions and frequently combined multiple regulatory requirements, borrower circumstances, disclosure obligations, and state-specific considerations. The volume and complexity of these questions reinforce that lending decisions rarely depend on a single regulation.
- Policy and document review is one of AI's most valuable compliance use cases. Nearly **30%** (1406 questions) of substantive questions involved reviewing, updating, mapping, or drafting policies, procedures, worksheets, checklists, notices, or other compliance documentation. This suggests that financial institutions view AI as a practical assistant for maintaining documentation rather than simply answering regulatory questions.
- Marketing, disclosures, deposits, and payment operations continue to generate significant day-to-day compliance demand. Questions involving deposit operations, payment processing, fees, and disclosures **(24%)**, and advertisements and customer communications **(16%)**, demonstrate that operational compliance challenges extend well beyond traditional regulatory interpretation. Small wording or process decisions can have meaningful compliance consequences.

- Recurring AI questions reveal opportunities to strengthen compliance programs. Repeated requests for clarification often indicate areas where policies are difficult to apply, procedures lack sufficient guidance, training materials require improvement, or staff needs better decision-support tools. Question data therefore provides a valuable lens into operational pain points that may otherwise remain hidden.

Why These Findings Matter

Collectively, these findings indicate that compliance work is becoming increasingly operational rather than purely regulatory. There is an opportunity for compliance leaders to rethink how AI is deployed. Rather than attempting broad automation, institutions can achieve meaningful value by using AI to support document review, policy analysis, marketing compliance, scenario evaluation, and operational decision-making, while maintaining human oversight, source-backed responses, and appropriate governance throughout the process.

How The Analysis Was Conducted

This report analyzes anonymized questions submitted to Ask Kaia, 360factors' AI-powered compliance platform, during Q2, 2026. Unlike surveys or interviews, which rely on respondents recalling their experiences, this analysis is based on actual questions compliance professionals asked while performing their day-to-day responsibilities. As a result, the dataset provides a direct view into the practical challenges financial institutions encounter as they interpret regulations, update documentation, review marketing materials, and make compliance decisions.

The original dataset contained **4,820 interactions**, including user prompts, follow-up requests, and system interactions. After removing blank entries, continuations, and non-substantive prompts (such as "continue"), the final analysis included **4,757 substantive questions**, representing **4,605 unique question texts**.

To identify recurring themes, each question was reviewed using a multi-label classification approach. Unlike traditional categorization, a single question could belong to multiple themes when appropriate. For example, a question asking whether a mortgage advertisement complies with state disclosure requirements may be classified under **Lending and Mortgage, Marketing and Advertising**, and **State Law** simultaneously. Consequently, percentages shown throughout this report represent the share of substantive questions associated with each theme and should not be added together.

Why Question Data Matters

Every compliance question represents a moment where existing guidance alone was not enough for a user to proceed confidently. Some questions sought clarification on regulatory requirements, while others focused on applying those requirements to institution-specific policies, customer scenarios, operational processes, or marketing materials. Collectively, these questions provide valuable insight into where compliance professionals most frequently require additional interpretation, documentation, or decision support.

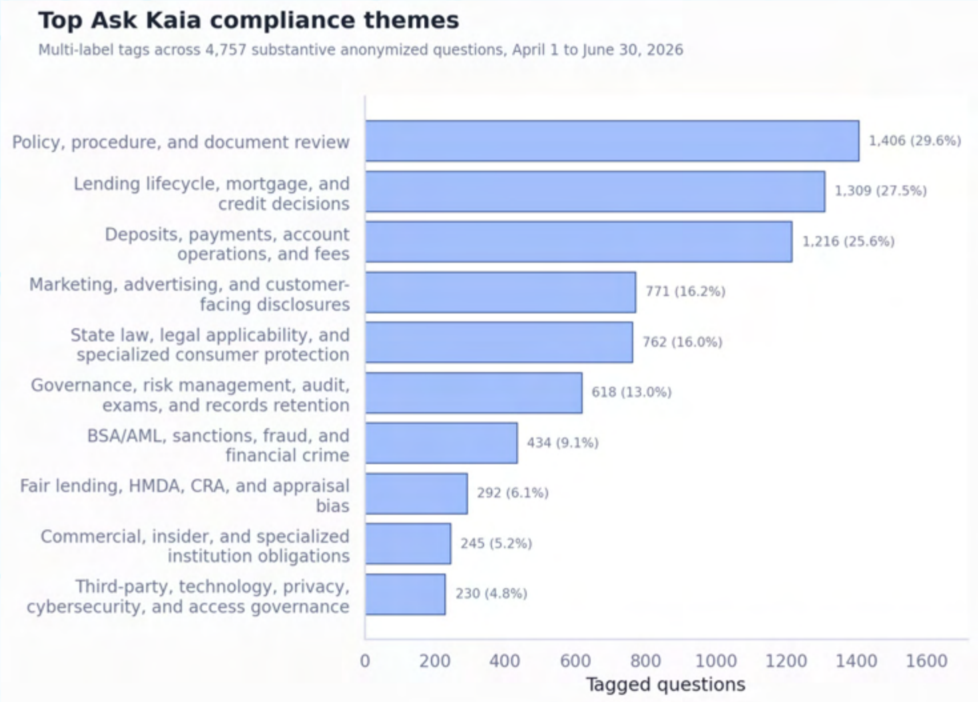

Figure 1. Source: 360factors Ask Kaia anonymized question export, April 1 to June 30, 2026. Multi-label tags, n=4,757 substantive questions.

Theme	Tagged questions	Share of substantive questions
Policy, procedure, and document review	1,406	29.6%
Lending lifecycle, mortgage, and credit decisions	1,309	27.5%
Deposits, payments, account operations, and fees	1,216	25.6%
Marketing, advertising, and customer-facing disclosures	771	16.2%
State law, legal applicability, and specialized consumer protection	762	16.0%
Governance, risk management, audit, exams, and records retention	618	13.0%
BSA/AML, sanctions, fraud, and financial crime	434	9.1%
Fair lending, HMDA, CRA, and appraisal bias	292	6.1%
Commercial, insider, and specialized institution obligations	245	5.2%
Third-party, technology, privacy, cybersecurity, and access governance	230	4.8%

Question volume should therefore be viewed as a demand signal, not a measure of regulatory risk. A higher volume of questions in a particular topic does not necessarily indicate that the area presents greater compliance risk or receives greater regulatory scrutiny. Rather, it highlights where compliance professionals consistently seek additional guidance during the course of their work.

Interpretation Notes

The findings presented in this report should be interpreted within the context of the available data. The analysis is based solely on anonymized user questions and does not include information about institution size, charter type, examination results, customer outcomes, or final compliance decisions. While every effort was made to classify questions consistently, the findings are intended to identify patterns in compliance activity rather than establish formal risk rankings or regulatory priorities.

Insight 1: Bankers Are Asking AI To Resolve Gray Areas, Not Recite Rules

Perhaps the most significant finding in this analysis is how compliance professionals framed those questions.

Across 4,757 substantive interactions, users rarely asked Ask Kaia to define regulations or summarize supervisory guidance. They presented institution-specific scenarios involving borrowers, deposit accounts, marketing campaigns, internal policies, operational procedures, and customer communications. Many questions required evaluating multiple facts simultaneously, determining how different regulatory requirements interacted, or assessing whether existing documentation adequately addressed a particular situation.

That distinction matters. Regulatory libraries and agency websites remain necessary, but the difficult work inside a bank is connecting facts to obligations. The questions show users moving through the middle layer of compliance: interpretation, policy fit, operational control design, evidence creation, and communication to staff or customers.

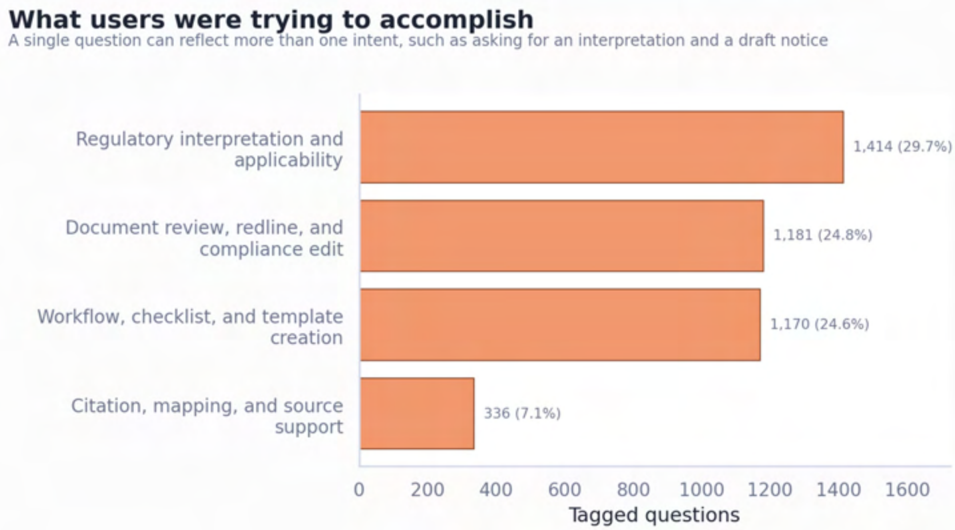

Figure 2. Source: 360factors Ask Kaia anonymized question export. Intent tags are multi-label and are based on language in the question text.

What This Means For Compliance Leaders

- **First, structured inputs produce more reliable outcomes.** AI answers improve when the user provides customer type, product, channel, state, timing, amount, document version, and what decision the institution must make.
- **Second, source mapping matters.** Users want to know not only the answer, but which policy, rule, or citation supports the answer.
- **Third, AI delivers the greatest value when integrated into compliance workflows.** Policy redlines, ad reviews, checklists, and training aids are not side tasks. They are where compliance guidance becomes operational behavior.

Insight 2: Lending And Mortage Questions Are The Centre of Gravity

Lending, mortgage, and credit-decision topics represented the largest concentration of Ask Kaia usage, appearing in **1,309** tagged questions, or **27.5%** of all substantive questions analyzed. On a primary-theme basis, lending was also the largest specific content category. The theme increased from April to June, reaching 28.0% of primary-theme questions in June compared with 19.8% in April.

The questions were rarely limited to simple regulatory lookups. They blended mortgage origination, servicing, advertising, adverse action, appraisal review, credit purpose, business versus consumer credit, HMDA treatment, flood, escrow, PMI, ARM notices, and state-law wrinkles. This is exactly the kind of fact pattern that is hard to handle through static guidance alone because the answer depends on product design, borrower facts, collateral, disclosure timing, and institutional policy.

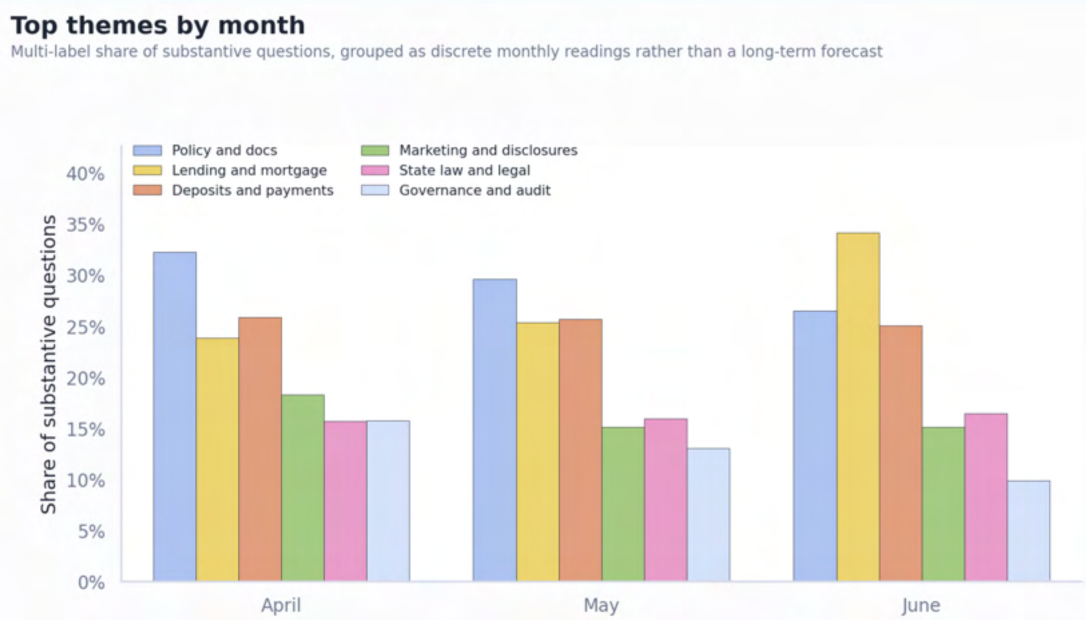

Figure 3. Source: 360factors Ask Kaia anonymized question export. Month shares are multi-label, best read as directional demand signals.

What Bankers Were Asking In This Theme

Common lending-related questions included:

- Whether a specific loan scenario should be classified as consumer or business credit.
- How to handle adverse action requirements, denial reasons, incomplete applications, and multiple applicants.
- Whether particular mortgage disclosures, servicing notices, rate-change notices, PMI timing, or escrow actions were required.

- How to review appraisal or valuation language for bias and fair lending concerns.
- How to review mortgage advertising, NMLS references, Equal Housing language, APR trigger terms, and product-specific disclosures.

Relevant regulatory areas included TILA and Regulation Z, ECOA and Regulation B, HMDA and Regulation C, RESPA and Regulation X, along with applicable state-law requirements.

In practice, many lending questions required more than a regulatory citation. They required a structured compliance analysis: identifying the relevant facts, determining which authority governs, documenting the rationale, identifying approval requirements, and determining what information should be communicated to customers.

Insight 3: Policy And Document Review Is No Longer A Back-Office Request

Policy, procedure, and document review appeared in **1,406** tagged questions, or **29.6%** of substantive questions. This was the largest multi-label theme because many compliance questions extended beyond interpretation and required users to create, modify, or assess operational documents. Users asked for policy updates, redlines, templates, worksheets, summaries, policy mappings, and document impact assessments.

This finding is especially important for compliance leaders. It shows that teams are using AI at the point where guidance turns into written controls. The user is not only looking for a general answer. The user wants to know how a policy, procedure, form, checklist, training aid, audit worksheet, or customer notice should change.

What This Says About Clarity Beyond Basic Guidance

- **Users need policy fit, not just rule text.** A rule citation does not tell a compliance officer whether their current wording is sufficient or how a procedure should be updated.
- **Users want traceability.** Questions about mapping policies to citations and identifying documents affected by a rule change show a need for defensible source-to-policy links.
- **Users are trying to reduce review friction.** Repeated asks for redlines, summaries, worksheets, and templates suggest that compliance work is constrained by time and drafting capacity.

For banks and credit unions, this points toward a practical AI operating model: restrict AI to source-backed drafting and analysis, require human approval before changes are adopted, and keep an audit trail showing the source, prompt, answer, reviewer, and final decision.

Insight 4: Marketing And Disclosure Review Is A Natural AI Entry Point

Marketing, advertising, and customer-facing disclosure questions appeared in **771** tagged questions, or **16.2%** of substantive questions. Many questions included product category, distribution channel, and state. The pattern suggests that bankers see advertising review as a practical AI use case because the task is repetitive, fact-specific, and often time-sensitive.

The questions extended beyond mortgage advertising. Users sought guidance on deposit products, savings promotions, email campaigns, website content, social media posts, branch materials, Equal Housing language, APR and APY trigger terms, FDIC advertising requirements, NMLS references, disclaimers, and customer-facing notices.

Where Banks Are Seeking Clarity

Common questions focused on:

- Which terms or claims trigger additional disclosure requirements or change the compliance review process.
- Whether disclosures are complete and appropriate for the specific product, channel, and jurisdiction.
- Whether disclaimers, conditions, and required metadata are positioned sufficiently close to the relevant promotional terms.
- Whether advertising materials introduce fair lending, UDAAP, deposit insurance, or customer confusion risks.
- Whether content is appropriate for its intended format, including social media, email, websites, branch materials, or print.

Marketing compliance is a strong candidate for controlled AI adoption because organizations can define required inputs, approved source materials, reviewer roles, and expected outputs. The most effective workflow is not “ask anything about this ad.” It is a structured review that collects product, channel, state, target audience, offer terms, rate or fee terms, imagery, disclaimers, and final approval status before generating compliance guidance.

Insight 5: Deposits, Payments, And Fees Show Front-Line Complexity

Deposits, payments, account operations, and fees appeared in **1,216** tagged questions, or **25.6%** of substantive questions. This theme was stable across the period, suggesting an ongoing need rather than a one-month spike.

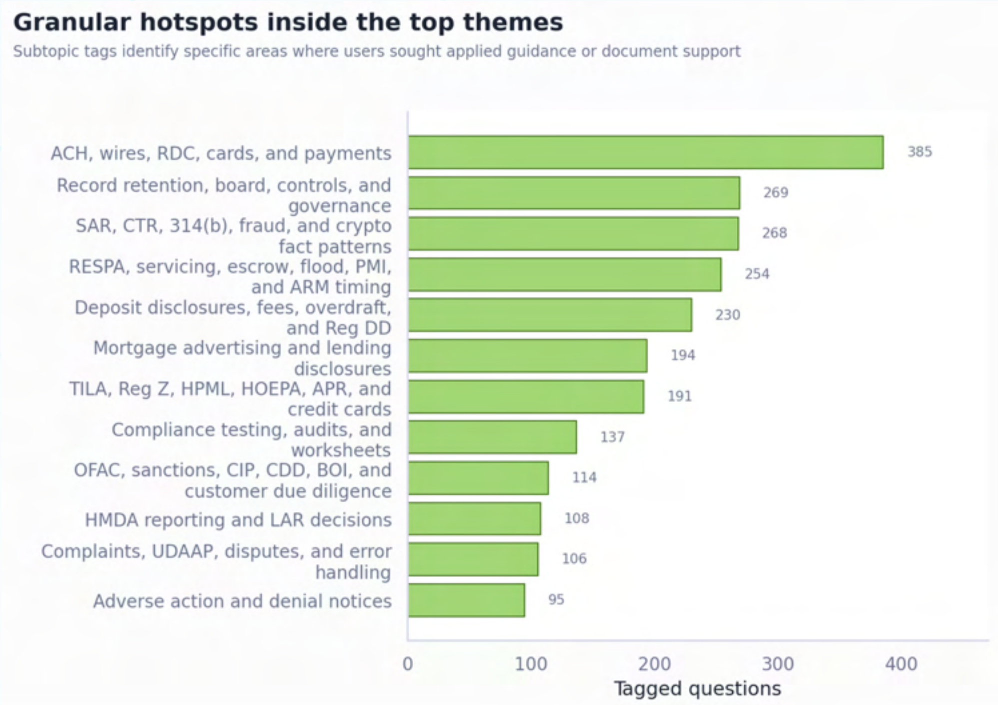

Figure 4. Source: 360factors Ask Kaia anonymized question export. Hotspots are specific subtopic tags inside broader themes.

Payment-related topics including ACH, wires, remote deposit capture (RDC), cards, and payment transactions represented the highest-volume subcategory, with 385 tagged questions. Deposit disclosures, fees, overdraft requirements, and Regulation DD appeared in 230 tagged questions, while funds availability, check holds, and Regulation CC generated 82 tagged questions.

These areas share a common challenge: small operational decisions can quickly affect customer experience, regulatory compliance, and potential risk exposure.

Typical Clarity Gaps In The Theme

Common questions included:

- Whether a payment or transfer scenario is covered by Regulation E or by a different rule set.
- How to handle ACH, wire, RDC, direct deposit, card, or cash-app style fact patterns.

- Which funds availability timing, hold, or exception rule applies to a check deposit.
- How to handle overdraft, fee, and Truth in Savings language in disclosures and customer communications.
- How to resolve ownership, beneficiary, garnishment, levy, account closure, and trust-account questions that combine operations with state law.

The strategic implication is that payment and deposit compliance should not be treated as a static training topic. Banks need easy access to decision aids, escalation triggers, and updated playbooks that reflect how customers actually transact.

Insight 6: BSA/AML Questions Are Decision Support Requests

BSA/AML, sanctions, fraud, and financial crime appeared in **434** tagged questions, or **9.1%** of substantive questions. On a primary-theme basis, BSA/AML questions were more concentrated in April and declined in share by June. The questions in this category were typically operational and scenario-driven rather than focused on general regulatory interpretation.

Users asked about SAR and CTR field treatment, 314(b) collaboration, fraud versus SAR decisions, CTR exemption reviews, cash deposits connected to crypto purchases, customer risk indicators, and BSA staff job aids. These questions show a demand for consistent decision support: what facts to collect, whether to file, how to code, what to document, and how to train frontline or BSA staff.

Implication For Compliance Strategy

Financial crime teams can benefit from AI-supported checklists and decision matrices, but only when those tools are grounded in current BSA/AML procedures, authoritative sources such as FFIEC and FinCEN guidance, institution-specific risk appetite, and appropriate review controls.

For this category, AI is best positioned to support information gathering, analysis, and documentation workflows. Final determinations, particularly SAR filing or non-filing decisions, should remain subject to qualified human judgment and institutional governance.

Insight 7: Fair Lending, HMDA, And CRA Questions Are About Evidence And Judgment

Fair lending, HMDA, CRA, and appraisal bias appeared in **292** tagged questions, or **6.1%** of substantive questions. Demand for this category increased in June, with appraisal-bias concerns appearing frequently. HMDA and CRA questions also reflected practical needs for reporting, monitoring, and community engagement rather than only requests for regulatory interpretation.

Fair lending questions are especially valuable as signals because they indicate where bankers need more than a rule summary. They need help assessing evidence, documenting reasoned decisions, and connecting the answer to data, loan files, policy language, and customer-facing activity.

Common Patterns

Common questions included:

- Reviewing appraisals or property evaluations for potential bias, discriminatory language, or other concerns.
- Determining HMDA requirements, including reportability, action taken, demographic data collection, thresholds, and reporting implications.
- Understanding CRA responsibilities related to outreach, community development activities, assessment areas, and oversight board or management.
- Connecting fair lending requirements to marketing practices, pricing decisions, denial reasons, underwriting processes, and product accessibility.

The strategic implication is that fair lending AI use cases should be evidence-driven and carefully controlled. Banks should establish review criteria, maintain supporting documentation, protect sensitive information, and ensure that AI-generated analyses are reviewed by qualified fair lending or compliance professionals.

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Insight 8: State Law And Specialized Consumer Protection Questions Add Complexity

State law, legal applicability, and specialized consumer protection topics appeared in **762** tagged questions, representing **16.0%** of substantive questions. This category included state-specific requirements, credit union considerations, garnishment and levy rules, E-SIGN requirements, TCPA, COPPA, ADA, SCRA, debt collection, title release, unclaimed property, NCUA guidance, and questions involving federal charter or regulator applicability.

This theme highlights where generic regulatory guidance often falls short. Users may understand the underlying federal requirement but still need to determine whether the answer varies by jurisdiction, charter type, regulator, product structure, or customer circumstances.

For compliance AI systems, this reinforces the need for contextual reasoning and clear escalation paths. Questions involving state law, legal interpretation, litigation risk, or counsel review should include appropriate guardrails, source attribution, and human oversight to ensure decisions align with institutional requirements and applicable law.

Insight 9: Third-Party, Technology, Privacy, And Cyber Questions Are Smaller But Important

Third-party risk, technology, privacy, cybersecurity, and access governance topics appeared in **230** tagged questions, representing **4.8%** of substantive questions. Questions covered vendor oversight, privacy policy updates, user access management, internal information sharing, AI disclosures, interpreter requirements, and digital banking or technology controls.

Although this was one of the smaller themes in terms of volume, it should not be viewed as a lower priority. Questions involving third-party relationships, privacy, and technology often have enterprise-wide implications because a single vendor, system change, access decision, or digital channel can affect multiple business processes, products, and compliance controls.

Current interagency guidance emphasizes that third-party risk management should extend across the entire relationship lifecycle and be tailored to each institution’s size, complexity, risk profile, and the nature of the relationship. Consistent with that approach, AI tools supporting these areas should provide source-backed guidance while operating within established governance, security, and access-control frameworks.

What These Questions Reveal About Where Guidance Stops Helping

One of the clearest patterns in the Ask Kaia dataset is that compliance professionals rarely struggle to find regulatory guidance. They struggle to apply it consistently in real-world situations. Most questions emerged after users had already identified the relevant regulation. What they needed was help translating that guidance into operational decisions, institution-specific documentation, and customer-facing actions.

Across nearly 4,800 substantive questions, five recurring points of friction emerged:

- **Translating fact patterns into regulatory obligations.** Users sought guidance on how to evaluate specific customer scenarios, loan structures, payment transactions, marketing campaigns, or suspicious activities under applicable regulations.
- **Aligning institutional policies with regulatory expectations.** Many questions focused on whether existing policies, procedures, forms, or checklists adequately reflected regulatory requirements and what changes might be needed.
- **Creating defensible documentation.** Compliance professionals frequently asked how decisions should be documented, what evidence should be retained, and how to demonstrate compliance during audits or examinations.
- **Navigating jurisdictional and institutional complexity.** Questions often depended on state law, charter type, regulator, product, delivery channel, or other institution-specific factors that generic guidance could not fully address.
- **Communicating compliance requirements clearly.** Users regularly requested assistance drafting customer notices, board summaries, staff guidance, training materials, and other communications that translate regulatory obligations into consistent operational practices.

For compliance leaders, these recurring questions represent more than isolated requests for assistance. They provide a valuable diagnostic tool for identifying where compliance programs may need additional attention. Repeated questions can highlight unclear policies, inconsistent procedures, fragmented source material, or training gaps long before those issues surface during audits or regulatory examinations. Viewed this way, AI interaction data provides clear guidance on where compliance programs can improve clarity, consistency, and operational effectiveness.

How Financial Institutions Can Act On These Insights

The research findings suggest that the most effective AI strategy would not be broad automation, but targeted decision support embedded within existing compliance workflows. Instead of attempting to replace human judgment, financial institutions should focus on well-defined tasks where AI can accelerate analysis, improve consistency, and reduce manual effort while maintaining appropriate human oversight.

The opportunities identified in this research are concentrated in 6 areas where compliance professionals repeatedly sought assistance reviewing documents, evaluating scenarios, drafting communications, and translating regulatory requirements into operational guidance. These use cases are well suited to AI because they can be supported by authoritative source material, standardized workflows, and clear approval processes.

6 Emerging Use Cases for AI Adoption in Financial Institutions		
Use Case	**How AI Can Help**	**Recommended Governance**
Policy And Procedure Review	Compare policies against regulatory requirements, identify missing controls, propose revisions, and generate reviewer notes.	Require human approval before implementation and maintain version history with supporting citations.
Marketing And Advertising Review	Review product terms, disclosures, rates, fees, trigger terms, disclaimers, imagery, and fair lending or UDAAP considerations.	Use structured review templates and formal approval workflows before publication.
Lending Scenario Analysis	Guide users through applicable requirements for lending, servicing, disclosures, adverse action, flood insurance, PMI, and related regulations based on specific fact patterns.	Escalate complex or high-impact cases to compliance or legal review.
Deposit And Payment Guidance	Generate decision aids for Regulation E, Regulation CC, Regulation DD, ACH, RDC, wire transfers, overdrafts, and related operational scenarios.	Align AI guidance with approved policies and update content whenever regulations or internal procedures change.
BSA/AML Decision Support	Draft SAR and CTR checklists, exemption review prompts, fraud assessment guides, and frontline escalation resources.	Require qualified human review for filing decisions and retain supporting evidence.
Training And Knowledge Management	Identify recurring questions and convert them into FAQs, job aids, micro-training modules, and policy updates.	Regularly review AI-generated content to ensure guidance remains accurate and current.

The organizations that realize the greatest value from AI are likely to be those that treat it as a governed extension of their compliance program rather than a standalone technology initiative. By combining authoritative content, structured workflows, human oversight, and ongoing monitoring, financial institutions can improve consistency, reduce routine effort, and help compliance teams focus their expertise where professional judgment is needed most.

Recommended 90-Day Action Plan

The findings in this report point to several practical actions that financial institutions can take to improve the effectiveness of their compliance programs. The recurring question patterns suggest that many compliance challenges stem not from a lack of regulatory information, but from difficulties applying that information consistently across policies, procedures, and operational decisions.

Instead of pursuing broad automation, institutions can focus on high-value, well-governed use cases that address the areas where compliance professionals most frequently seek guidance.

90-Day Action Plan		
Timeline	**Priority**	**Recommended Actions**
Days 1–30	Understand Your Demand	Review recurring compliance questions to identify high-friction topics, policy gaps, and training needs. Prioritize areas where staff consistently seek guidance, such as lending, policy review, marketing compliance, or deposit operations. Establish governance principles for AI use, including approved data sources and human review requirements.
Days 31–60	Apply AI to High-Value Workflows	Introduce AI into well-defined compliance activities such as policy reviews, marketing and disclosure reviews, lending scenario analysis, and internal knowledge support. Focus on workflows where AI can accelerate research and drafting while maintaining human oversight. Measure answer quality, reviewer feedback, and operational efficiency.
Days 61–90	Turn Insights into Continuous Improvement	Analyze AI interaction trends to identify recurring questions, emerging regulatory concerns, and opportunities to improve policies, procedures, and training. Incorporate these insights into compliance reporting and use them to strengthen governance, documentation, and knowledge management over time.

Key Metrics To Measure AI's Impact On Compliance

As financial institutions expand the use of AI in compliance, success should be measured by more than productivity gains alone. The most meaningful metrics are those that demonstrate whether AI is improving consistency, strengthening governance, and helping compliance teams focus their expertise where it matters most.

Measuring AI's Impact on Compliance	
Metric	**What It Reveals**
Question volume by theme	Identifies the compliance topics where employees most frequently seek guidance, highlighting potential policy or training gaps.
Recurring question rate	Reveals areas where existing policies, procedures, or job aids may be unclear or difficult to apply consistently.
Escalation rate	Measures how often AI-assisted work still requires review by compliance, legal, BSA/AML, fair lending, or other subject matter experts.
Source-backed response rate	Tracks the percentage of AI outputs supported by approved regulations, policies, or authoritative references.
Review outcomes	Measures how often AI-generated content is accepted, revised, rejected, or escalated by human reviewers.
Time to usable draft	Quantifies efficiency gains for activities such as policy updates, marketing reviews, checklists, and internal guidance.
Compliance improvement opportunities	Tracks how often AI interactions uncover policy gaps, training needs, documentation weaknesses, or process improvements.

Organizations that monitor these metrics consistently will gain more than operational efficiencies—they will also develop a clearer understanding of where their compliance programs require additional guidance, governance, or investment.

Questions Every Compliance Leader Should Be Asking

The findings in this report suggest that AI should prompt more than technology discussions. It should encourage compliance leaders to re-examine how their teams access knowledge, apply regulatory requirements, and maintain consistency across the organization.

As AI becomes part of everyday compliance work, leadership teams should consider the following questions:

- Where do our compliance professionals most frequently seek additional guidance, and what does that reveal about our policies or training?
- Which recurring questions indicate that our procedures are difficult to interpret or apply consistently?
- Which compliance activities would benefit most from AI-assisted research, document review, or decision support while still requiring human judgment?
- How do we ensure every AI-assisted recommendation is supported by authoritative regulatory or internal sources?
- What governance processes are in place to review, approve, and retain AI-assisted work products?
- How do we protect sensitive information while enabling employees to use AI responsibly?
- What measures will demonstrate that AI is improving consistency, reducing manual effort, and strengthening compliance risk?

The organizations that derive the greatest value from AI will not necessarily be those that automate the most tasks. They will be those that use AI to strengthen decision-making, improve operational consistency, and continuously learn from the questions their compliance teams ask every day.

Caveats And Assumptions

- The data is anonymized and question-based. It does not include institution profiles, asset sizes, examiner findings, customer outcomes, or final decisions made by the user.
- Theme counts are based on keyword-assisted, multi-label tagging and reviewer judgment. They should be read as directional demand signals, not formal risk ratings.
- Some questions were under-specified, contained excerpts from documents, or included follow-up wording without the full prior context. These were classified only when the text included enough signal.
- The report includes financial institutions of all types when the question text indicated banks, credit unions, mortgage lenders, or other covered financial institutions. It does not separate results by institution type because the export did not contain that field.
- Regulatory references are included to orient readers. They are not a substitute for institution-specific legal analysis, supervisory guidance, or counsel review.

Appendix A: Detailed Theme Counts

Theme	Tagged questions	Share of substantive questions
Policy, procedure, and document review	1,406	29.6%
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Fair lending, HMDA, CRA, and appraisal bias	292	6.1%
Commercial, insider, and specialized institution obligations	245	5.2%
Third-party, technology, privacy, cybersecurity, and access governance	230	4.8%
Complaints, UDAAP, disputes, and customer harm	147	3.1%

Appendix B: Detailed SubTopic HotSpots

Subtopic	Tagged questions	Share of substantive questions
ACH, wires, RDC, cards, and payments	385	8.1%
Record retention, board, controls, and governance	269	5.7%
SAR, CTR, 314(b), fraud, and crypto fact patterns	268	5.6%
RESPA, servicing, escrow, flood, PMI, and ARM timing	254	5.3%
Deposit disclosures, fees, overdraft, and Reg DD	230	4.8%
Mortgage advertising and lending disclosures	194	4.1%
TILA, Reg Z, HPML, HOEPA, APR, and credit cards	191	4.0%
Compliance testing, audits, and worksheets	137	2.9%
OFAC, sanctions, CIP, CDD, BOI, and customer due diligence	114	2.4%
HMDA reporting and LAR decisions	108	2.3%
Complaints, UDAAP, disputes, and error handling	106	2.2%
Adverse action and denial notices	95	2.0%
Appraisal bias and valuation fairness	93	2.0%
CRA and community development	86	1.8%
Third-party and vendor management	84	1.8%
Funds availability, check holds, and Reg CC	82	1.7%
Cyber, privacy, and access governance	68	1.4%
Policy mapping and regulatory change impact	43	0.9%

Appendix C: Selected Regulatory Reference Points

The sources below were used to orient the topic interpretation. The Ask Kaia question data is the source for theme volume and trend findings.

Area	Reference	Link
TILA / Regulation Z	12 CFR Part 1026, Truth in Lending (Regulation Z)	Open source
ECOA / Regulation B	12 CFR Part 1002, Equal Credit Opportunity Act (Regulation B)	Open source
HMDA / Regulation C	12 CFR Part 1003, Home Mortgage Disclosure (Regulation C)	Open source
RESPA / Regulation X	12 CFR Part 1024, Real Estate Settlement Procedures Act (Regulation X)	Open source
EFTA / Regulation E	12 CFR Part 1005, Electronic Fund Transfers (Regulation E)	Open source
Truth in Savings / Regulation DD	12 CFR Part 1030, Truth in Savings (Regulation DD)	Open source
Regulation CC	12 CFR Part 229, Availability of Funds and Collection of Checks (Regulation CC)	Open source
BSA/AML	FFIEC BSA/AML Examination Manual	Open source
Third-party risk management	Federal Reserve SR 23-4, Interagency Guidance on Third-Party Relationships: Risk Management	Open source
FDIC signs and advertising	12 CFR Part 328, FDIC official signs, advertising statement, false advertising, and misuse of name or logo	Open source
UDAAP	12 U.S.C. 5531, Prohibiting unfair, deceptive, or abusive acts or practices	Open source
CRA	FFIEC Community Reinvestment Act resources	Open source

Prepared by 360factors using anonymized Ask Kaia data.