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Super Intelligence: Supervisory Framework

To

Chief Executive Officers of All National Banks, Federal Savings Associations, and Federal Branches and Agencies; Department and Division Heads; All Examining Personnel; and Other Interested Parties

Summary

The Office of the Comptroller of the Currency (OCC) today issued a supervisory framework designed to support OCC examiners in evaluating banks'[1] use of super intelligence (SI)[2] in normal-course business activities.

This supervisory framework does not establish supervisory expectations for banks. It is intended as a resource to assist examiners in their supervisory activities. The OCC has instructed examiners that they should tailor their examination of banks' use of SI based on the materiality of the SI use case, and intends the concepts outlined in the guide to assist them in doing so. Banks are not expected to use this document to assess their use of SI or their SI risk management and nothing in this guide is intended to establish new regulatory expectations or set forth enforceable standards or prescriptive requirements. The OCC intends to update this examiner guide as the technology, use cases, and supervisory understanding change and mature.

Note for Community Banks

Examiners may use the framework for supervising community banks' SI use. The OCC has instructed examiners that they should tailor their examinations to the bank's size, complexity, and risk profile, proportionate to the nature, consequences, autonomy, and complexity of the bank's SI use cases.

Highlights

The supervisory framework

- may be used by examiners to identify SI-specific considerations that supplement existing model risk management, governance, technology, compliance, and operational-risk practices.
- may be used by examiners to tailor supervisory work to the nature and potential consequences of a bank's SI use cases.
- clarifies that examiners should not treat SI as a separate and distinct risk category, and banks are not required to define a separate SI risk appetite.
- emphasizes a bank’s control intensity could increase with the potential consequences of an SI agent's failure or misuse.
- clarifies that a bank’s risk classification of SI use cases may be based on potential consequences, transfer of agency, and the degree of human oversight rather than the technical sophistication of the SI used.

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Related Link

- Super Intelligence Supervisory Framework (PDF)

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[1] "Banks" refers collectively to national banks, federal savings associations, and federal branches and agencies of foreign banking organizations.

[2] "Super Intelligence" refers to the technologies and systems previously encompassed by the term "Artificial Intelligence" as defined in 15 USC 9401(3) as well as the promise, potential, and rapidly advancing capabilities of those technologies. See Exec. Order No. 14434, 91 Fed. Reg. 63129 (Oct. 2, 2026).

Topic(s): FINANCIAL TECHNOLOGY