



From AI Experimentation to Operational Impact

How Banks Can Adopt AI Responsibly
Using the Maker-Checker-Verifier
Framework

By Onsetto



Artificial Intelligence has quickly become one of the most discussed topics in banking.

Boards are asking about it. Executives are evaluating it. Vendors are promoting it. Employees are experimenting with it. Yet despite the excitement, many financial institutions remain uncertain about where to begin.

The challenge isn't determining whether AI has potential. Most bankers already recognize that it does. The challenge is determining how to implement AI safely, compliantly, and in a way that delivers measurable business value.

For many banks, the question is no longer:

"Should we use AI?"

The question has become:

"How do we use AI responsibly to improve customer experience, strengthen relationships, and grow our business?"

The answer starts by focusing less on technology and more on banking outcomes.

The opportunity is bigger than automation

When bankers hear the term AI, many immediately think about automation. But the most valuable applications of AI are not about replacing people. They're about helping bankers spend more time banking.

Across the industry, institutions are beginning to use AI to:

- Accelerate commercial prospect research
- Create more personalized treasury and business banking proposals
- Improve customer onboarding experiences
- Reduce manual document review
- Streamline policy and procedure management
- Enhance operational consistency
- Improve call quality monitoring
- Identify growth opportunities across existing relationships

The common thread is simple:

AI works best when it reduces administrative burden and allows employees to focus on judgment, relationship building, and customer service.

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One area where **AI** can deliver immediate **value**

Consider account acquisition and onboarding. Winning a new business relationship is only the beginning. Customers expect onboarding to be simple, efficient, and well coordinated. Yet account switching remains one of the most manual and frustrating experiences in banking.

Customers often must identify recurring payments, update ACH instructions, redirect direct deposits, notify vendors, and manage multiple administrative tasks before fully moving their relationship.

These manual processes create friction for both customers and bankers. AI has the potential to simplify and accelerate many aspects of this experience by helping identify recurring transactions, organizing account information, generating onboarding communications, and supporting relationship managers throughout the transition process. Importantly, AI does not replace the banker.

It enables the banker to focus on customer relationships while technology helps streamline operational tasks. This is the type of practical, customer-focused application where AI can create meaningful value without introducing unnecessary risk.

As banks evaluate AI opportunities, three common mistakes often emerge.

1

Mistake #1: Waiting for Perfect Clarity

Many institutions delay adoption because they are waiting for complete regulatory certainty. While caution is understandable, waiting too long can create its own challenges. Employees may begin using AI independently without established policies, approved tools, or governance standards.

The result is often uncontrolled experimentation rather than controlled innovation. Banks do not need to solve every AI question before taking action. They need a framework that allows them to start small, manage risk, and learn responsibly.

2

Mistake #2: Letting AI Adoption Happen Informally

In many organizations, AI usage is already occurring. Marketing teams may use AI to draft content. Operations teams may use it to summarize documents. Relationship managers may use it to prepare customer communications. While these use cases can create efficiencies, they can also introduce inconsistency if they occur without appropriate oversight. Successful AI adoption requires intentional governance, approved use cases, employee training, and documented controls.

3

Mistake #3: Focusing on Technology Instead of Workflows

The most common question banks ask is:

"Which AI tool should we buy?"

A better question is:

"Which banking processes could benefit from AI assistance?"

The institutions seeing the greatest success are not starting with technology. They are starting with workflows.

Simpler way to think about AI

Many AI conversations become overly technical. Fortunately, bankers already understand the concepts needed to govern AI effectively. Every banking process contains three fundamental functions:

Maker

The Maker creates the work.

Examples include:

- Preparing a loan package
- Drafting a treasury proposal
- Creating a customer communication
- Building an account onboarding plan

Checker

The Checker reviews the work for accuracy, completeness, and compliance.

Examples include:

- Identifying missing documentation
- Confirming policy requirements
- Verifying data accuracy
- Flagging inconsistencies

Verifier

The Verifier provides final approval and accountability.

Examples include:

- Approving customer communications
- Authorizing credit recommendations
- Validating compliance reviews

The Goal Is Not to Remove Bankers

The most successful AI implementations do not replace lenders, treasury officers, relationship managers, compliance professionals, or operations teams.

Instead, AI handles repetitive work while bankers focus on:

- Relationship building
- Customer service
- Decision-making
- Exception management
- Strategic thinking

In other words: AI should help bankers spend more time banking.

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AI ³ M Level	Banking meaning	Maker	Checker	Verifier	Practical example
 Level 0: Human-driven	Work is manual and often inconsistent	 Human	 Human	 Human	 A loan assistant manually reviews a file checklist and a supervisor signs off
 Level 1: AI-assisted checking	AI helps find errors, gaps, or inconsistencies	 Human	 AI	 Human	 Staff prepares a commercial loan file; AI flags missing documents; a human approves the final file
 Level 2: AI-initiated, human-managed	AI drafts or assembles the first version; humans review and approve	 AI	 Human	 Human	 AI drafts a credit memo summary from bank-approved data; analyst reviews; manager approves
 Level 3: AI-human synergy	AI creates and performs final systematic verification; humans focus on judgment-heavy review	 AI	 Human	 AI	 AI assembles a loan package and verifies checklist completion; a banker reviews exceptions and judgment items

 AI³M = AI in the roles of Maker, Checker, and Verifier across the process.

The banking **AI** adoption framework

Once banks understand the Maker-Checker-Verifier concept, they can determine the appropriate role for AI within each process.

Level 0: Manual Process

Humans perform all work, reviews, and approvals.

Example: A loan operations employee manually reviews documentation and a supervisor approves the final package.

Level 1: AI-Assisted Review

Humans create the work. AI helps identify missing information, inconsistencies, or exceptions. Humans remain responsible for decisions.

Example: A loan package is assembled by staff while AI identifies missing signatures or incomplete documentation.

Level 2: AI-Assisted Creation

AI generates an initial work product.
Humans review, modify, and approve the output.

Example: AI drafts a commercial banking proposal or onboarding plan using approved data sources, while bankers refine recommendations and approve the final deliverable.

Level 3: AI-Enabled Workflow

AI supports creation and systematic verification while humans focus on judgment, oversight, and exception management.

Example:

AI assembles onboarding documentation, verifies checklist completion, and routes exceptions to employees for review. Importantly, the goal is not to move every process to Level 3. The objective is to match AI capabilities with business value, customer impact, and risk tolerance.

Where banks should start

The best AI initiatives share four characteristics:

- Repetitive
- Document-intensive
- Measurable
- Operationally important

Strong starting points include:

- Commercial prospecting
- Treasury proposal generation
- Account onboarding and switching
- Loan documentation review
- Policy management
- Call quality monitoring
- Vendor due diligence
- Board reporting support
- Customer communication drafting

These areas often provide meaningful efficiency gains while preserving human oversight and accountability.

Five Questions Every Bank Should Ask Before Implementing AI

Before launching any AI initiative, management should ask:

What business problem are we solving?

AI should address a clearly defined operational or customer challenge.

How will this improve customer or employee outcomes?

The objective should be measurable value, not technology adoption.

- What role should AI play?
- Should AI act as a Maker, Checker, or Verifier?
- Understanding its role helps define appropriate controls.
- .What oversight is required?
- Human accountability should remain clear throughout the process.
- 5How will we measure success?

Success should be measured through outcomes such as:

- Reduced cycle times
- Improved customer experience
- Lower error rates
- Faster onboarding
- Increased employee productivity
- Stronger relationship growth

Moving from curiosity to confidence

Banks do not need to become artificial intelligence experts overnight. They need a practical framework for evaluating opportunities, managing risk, and delivering measurable business outcomes. The institutions that will succeed are not those deploying the most AI.

They are the institutions deploying AI thoughtfully.

They are improving workflows, reducing friction, strengthening customer relationships, and enabling employees to focus on higher-value work. Because in banking, success is not measured by how much AI you implement.

It is measured by how effectively you use it to serve customers, support employees, and grow relationships. That is how banks move from AI experimentation to operational impact.

About the author



Rob Zwink is Chief Technology Officer at Onsetto and a technology executive with more than 20 years of experience building scalable financial technology platforms. His leadership experience spans JPMorgan Chase, BillGO, ClickSWITCH, and SafeChain Financial, where he helped drive innovation in payments, account switching, fraud prevention, and financial services technology. At Onsetto, Rob leads product innovation, security, and AI strategy, helping financial institutions modernize customer acquisition, onboarding, and relationship growth.