

# AI Adoption Trends in US Banking

Anonymized Tier-Level Analysis — Q1 2024 through Q4 2025

Research by Femi Onafowokan

**49**

BANKS ANALYZED

**8**

QUARTERS (Q1 '24 - Q4 '25)

**5**

SIGNAL SOURCES PER BANK

**1,051**

AI MENTIONS IN SEC FILINGS

**2.6x**

YEAR-OVER-YEAR GROWTH

**19**

AI KEYWORDS TRACKED

**12**

BANKS WITH SUSTAINED AI  
COMMITMENT

**23**

BANKS NEVER REACHING STRONG  
SIGNAL

**6**

FIRST "AGENTIC AI" MENTIONS

This report examines how 49 of the largest U.S. banks publicly communicate their AI activity, using only publicly available sources such as SEC filings, earnings calls, press releases, and industry research. It evaluates the level and nature of AI-related disclosures—distinguishing between meaningful strategic commitment and generic, boilerplate language. It does not assess the actual quality or effectiveness of a bank's AI capabilities.

# How to Read This Report

Every chart is built on a quarterly AI signal rating assigned to each bank across 5 source types.

**What we mean by "signal":** A publicly detectable indicator that a bank is engaging with AI — through SEC filings, executive commentary, partnerships, hiring, or industry coverage. A signal is not the same as capability. A bank can have strong AI programs with weak public signal, or a loud AI narrative with thin implementation. This report measures signal, not capability.

Rating	What It Means	Example Signals
<b>HIGH</b>	AI is a dominant strategic theme	Named AI products, quantified ROI, CEO framing AI as priority
<b>MOD</b>	AI is present but not dominant	1-2 source mentions, pilot programs, governance buildout
<b>LOW</b>	AI is tangential or defensive	Risk factor boilerplate, generic "technology investment"
<b>NONE</b>	No AI signal detected	No AI language in any source type for that quarter

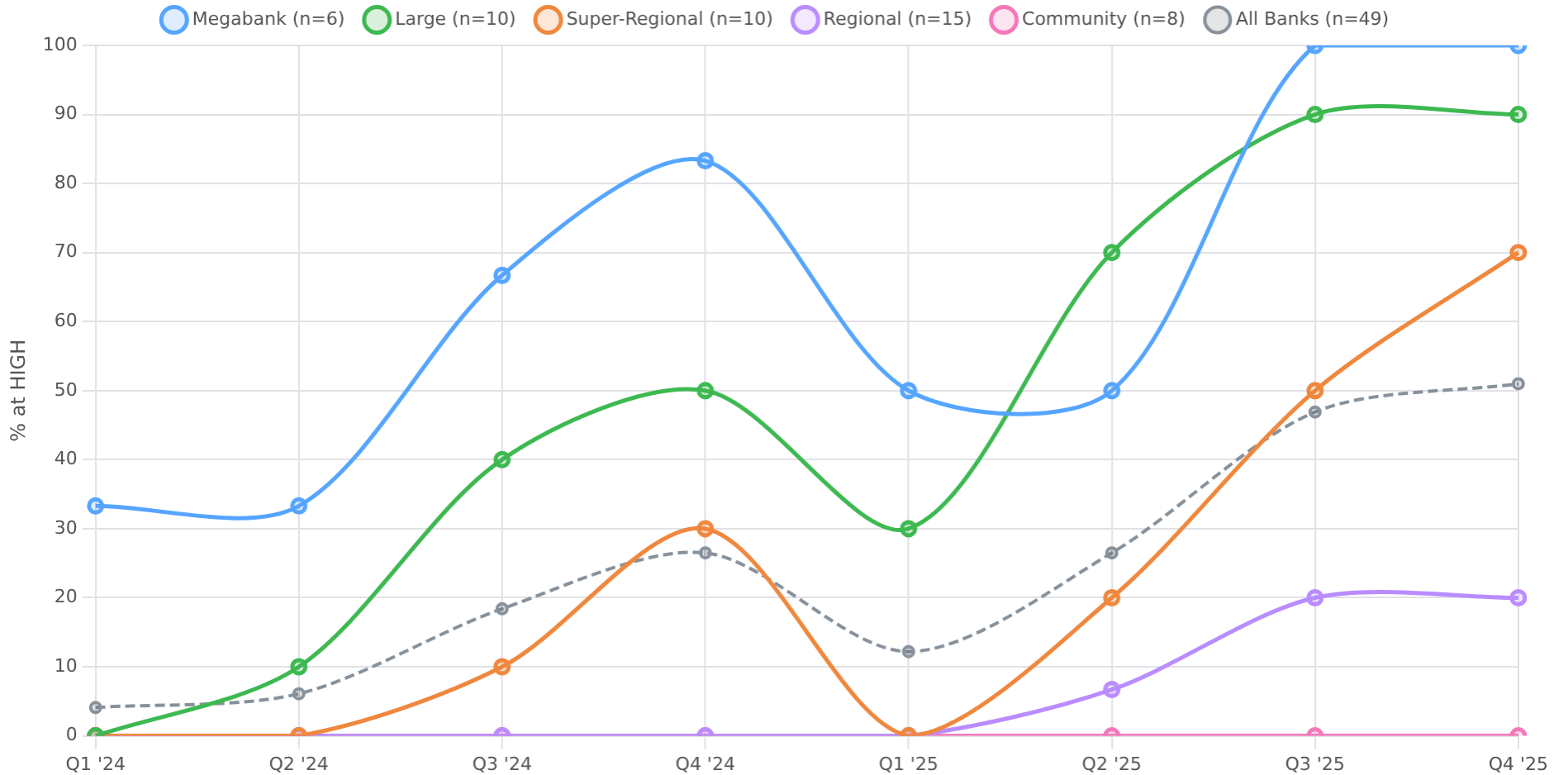
Sources: SEC filings, earnings calls, regulatory signals, announcements, industry research. Hybrid ratings (LOW-MOD, MOD-HIGH) count toward the higher bucket in aggregations.

**Tiers:** Megabank (>\$1T) — the 6 banks most people recognize by name. Large (\$200B-\$1T) — major nationals. Super-Regional (\$80B-\$200B) — multi-state footprints. Regional (\$40B-\$80B) — strong in specific geographies. Community (<\$40B) — local and specialized. Tier boundaries are analytical groupings, not competitive sets; your actual peer group may span tiers.

# A. AI Adoption Curve

Percentage of banks rated HIGH per quarter, by tier.

**100% of megabanks reached the highest signal rating by Q3 2025. 0% of community banks did.**

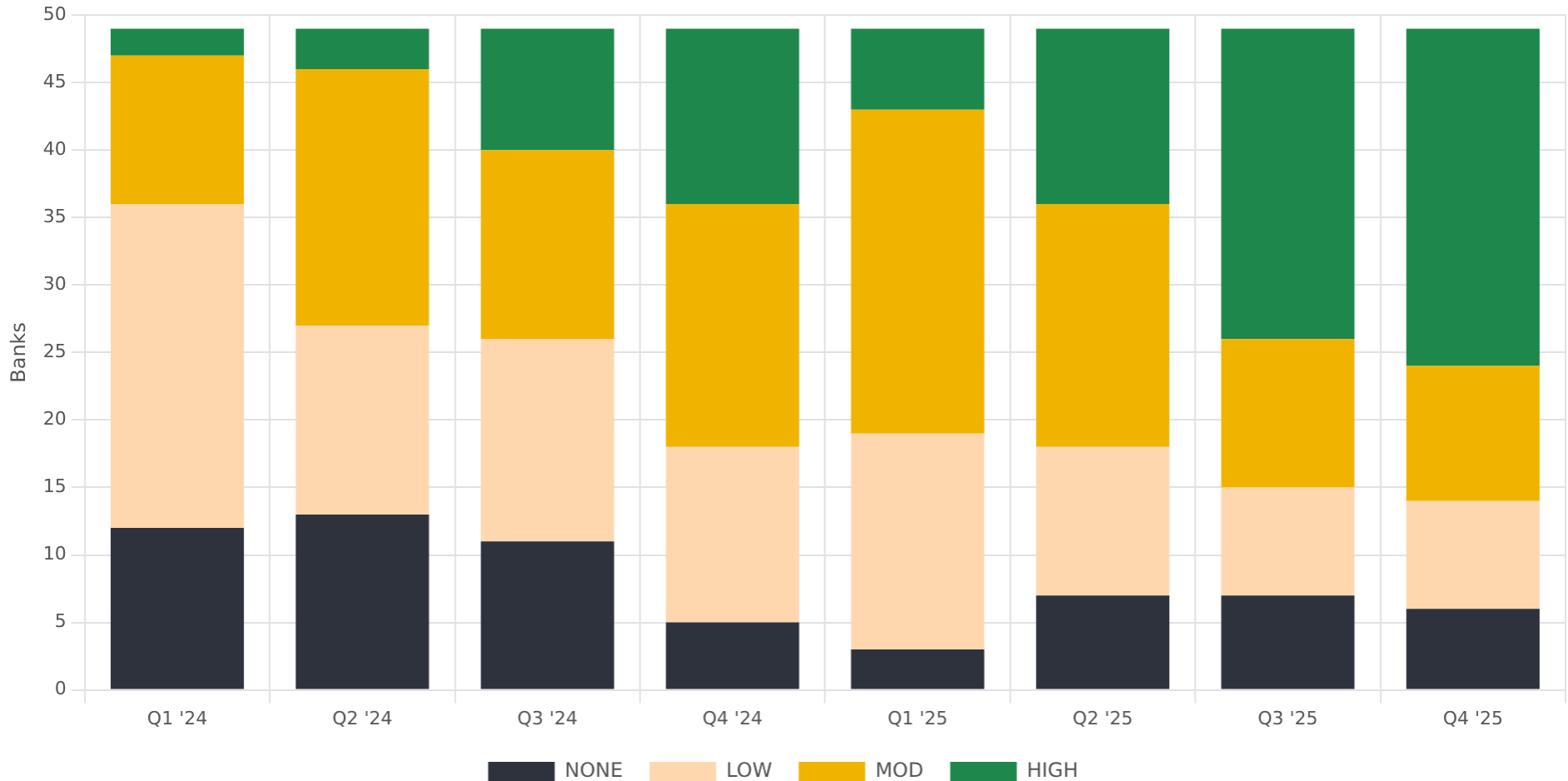


**The five-tier split widens over time.** Every megabank hit HIGH by Q3 2025. Nine of 10 large banks got there. Zero community banks did. The Q1 2025 dip reflects seasonal filing variation, not an adoption reversal.

## B. Signal Distribution Shift

All 49 banks categorized by rating each quarter. Watch the color bands shift from NONE/LOW toward MOD/HIGH.

**73% of banks had no meaningful AI signal in Q1 2024. By Q4 2025, that dropped to 29%.**



**The industry is shifting right.** NONE+LOW dropped from 73% to 29%. The LOW band is a holding pattern — banks pass through MOD before reaching HIGH.

## C. Tier Gap Analysis

Average signal intensity by tier (0=NONE, 3=HIGH). Darker = stronger signal.

**The megabank-to-community gap grew from 1.75 to 2.38 over 8 quarters — and it's still widening.**

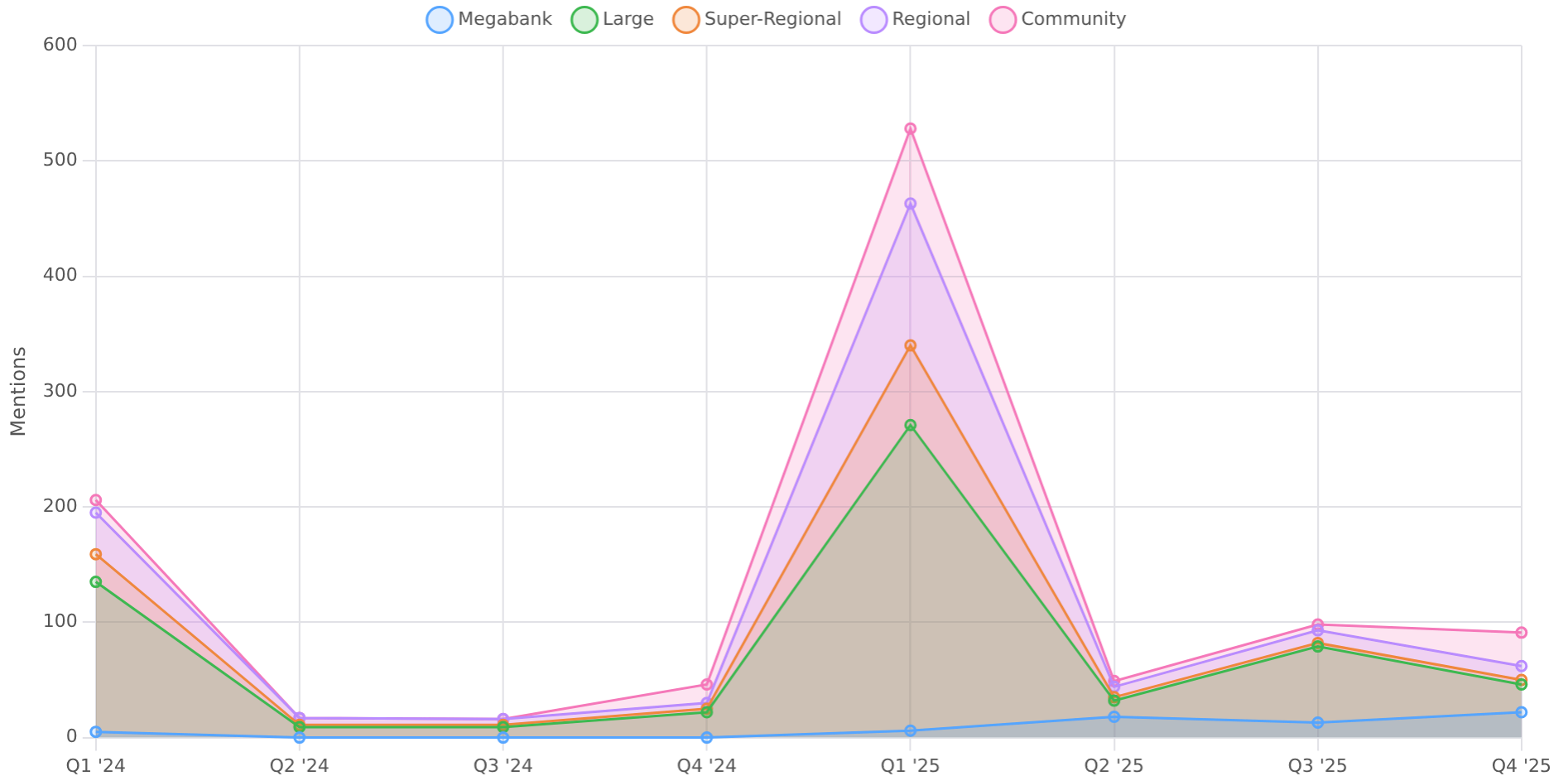
TIER	Q1 '24	Q2 '24	Q3 '24	Q4 '24	Q1 '25	Q2 '25	Q3 '25	Q4 '25
<b>Megabank (6)</b>	<b>2.0</b>	<b>2.33</b>	<b>2.58</b>	<b>2.83</b>	<b>2.5</b>	<b>2.5</b>	<b>3.0</b>	<b>3.0</b>
<b>Large (10)</b>	<b>1.5</b>	<b>1.7</b>	<b>2.15</b>	<b>2.35</b>	<b>2.1</b>	<b>2.7</b>	<b>2.85</b>	<b>2.9</b>
<b>Super-Regional (10)</b>	<b>1.0</b>	<b>1.5</b>	<b>1.3</b>	<b>2.2</b>	<b>1.8</b>	<b>2.1</b>	<b>2.3</b>	<b>2.6</b>
<b>Regional (15)</b>	<b>0.87</b>	<b>0.93</b>	<b>1.13</b>	<b>1.4</b>	<b>1.4</b>	<b>1.33</b>	<b>1.8</b>	<b>1.67</b>
<b>Community (8)</b>	<b>0.25</b>	<b>0.12</b>	<b>0.25</b>	<b>0.5</b>	<b>0.88</b>	<b>0.38</b>	<b>0.25</b>	<b>0.62</b>

**The gap is widening.** Megabank-to-community gap grew from 1.75 to 2.38 over 8 quarters. Size is predictive of AI adoption, not just correlated.

## D. SEC Filing Mention Volume

AI keyword mentions in SEC filings by tier per quarter. Q1 spikes reflect 10-K annual filing seasonality. The year-over-year Q1 comparison (206 to 528, 2.6x) shows real growth.

**AI mentions in annual filings grew 2.6x year-over-year (Q1 2024: 206 → Q1 2025: 528).**

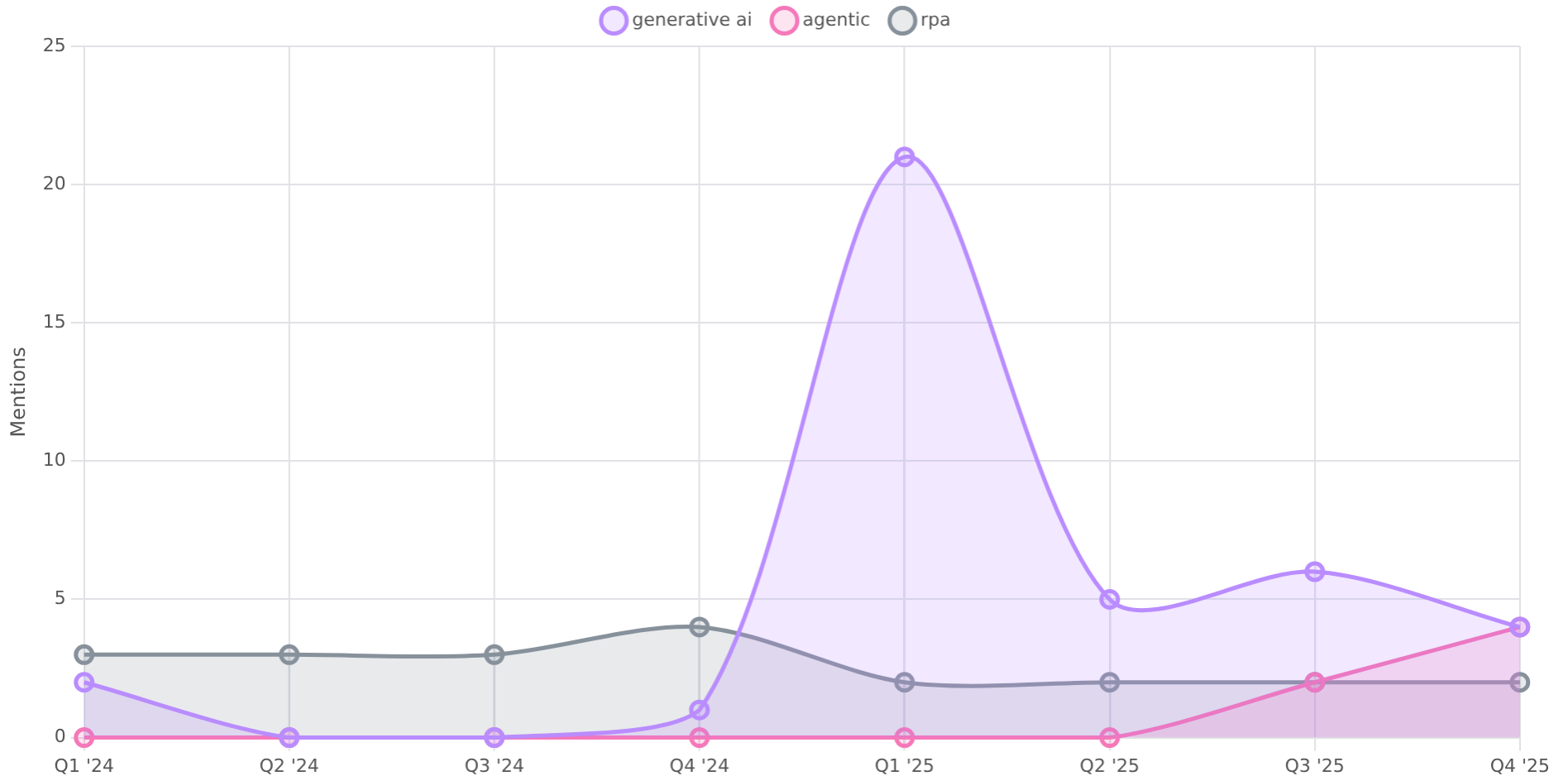


**Mention volume is noisy but directional.** The Q1 spike is an artifact of 10-K filing length, not an AI event. Mid-year quarters are quieter because 10-Qs are shorter. Compare Q1 to Q1 for the real trend.

## E. Keyword Evolution: Emerging Terms

Low-frequency but narratively significant terms in SEC filings. These mark inflection points in how banks talk about AI.

**"Agentic AI" went from 0 mentions to 6 in two quarters — the fastest-emerging term in the dataset.**

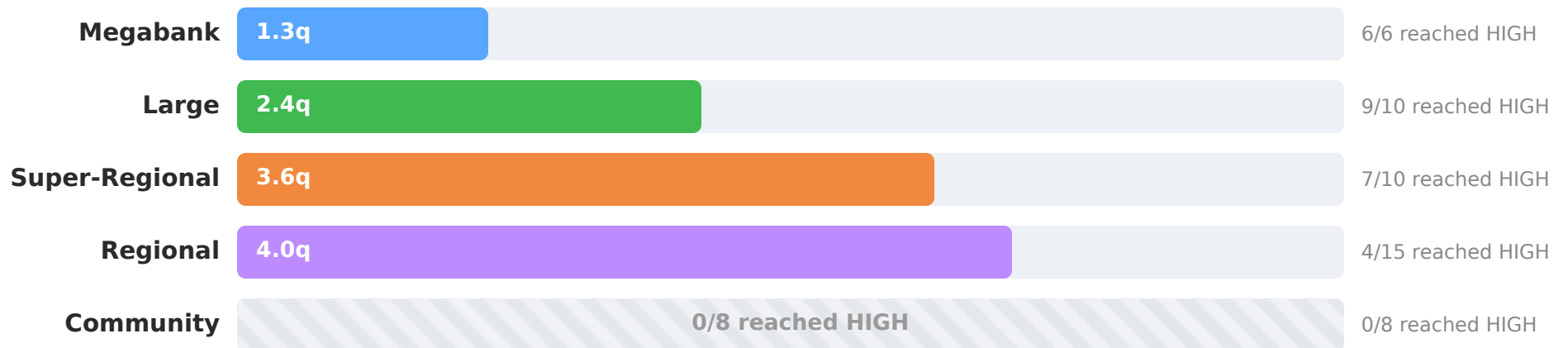


**"Agentic AI" is the newest signal.** Zero mentions before Q3 2025, then 6 across two quarters. Marks a shift from AI-as-tool to AI-as-autonomous-actor. "RPA" is fading as the old automation paradigm gives way.

## F. Speed to HIGH

Average quarters from first MOD rating to first HIGH rating, by tier. How quickly does real AI activity become a strategic priority?

**Megabanks go from first real AI activity to strategic priority in ~1 quarter. Regionals take 4+.**

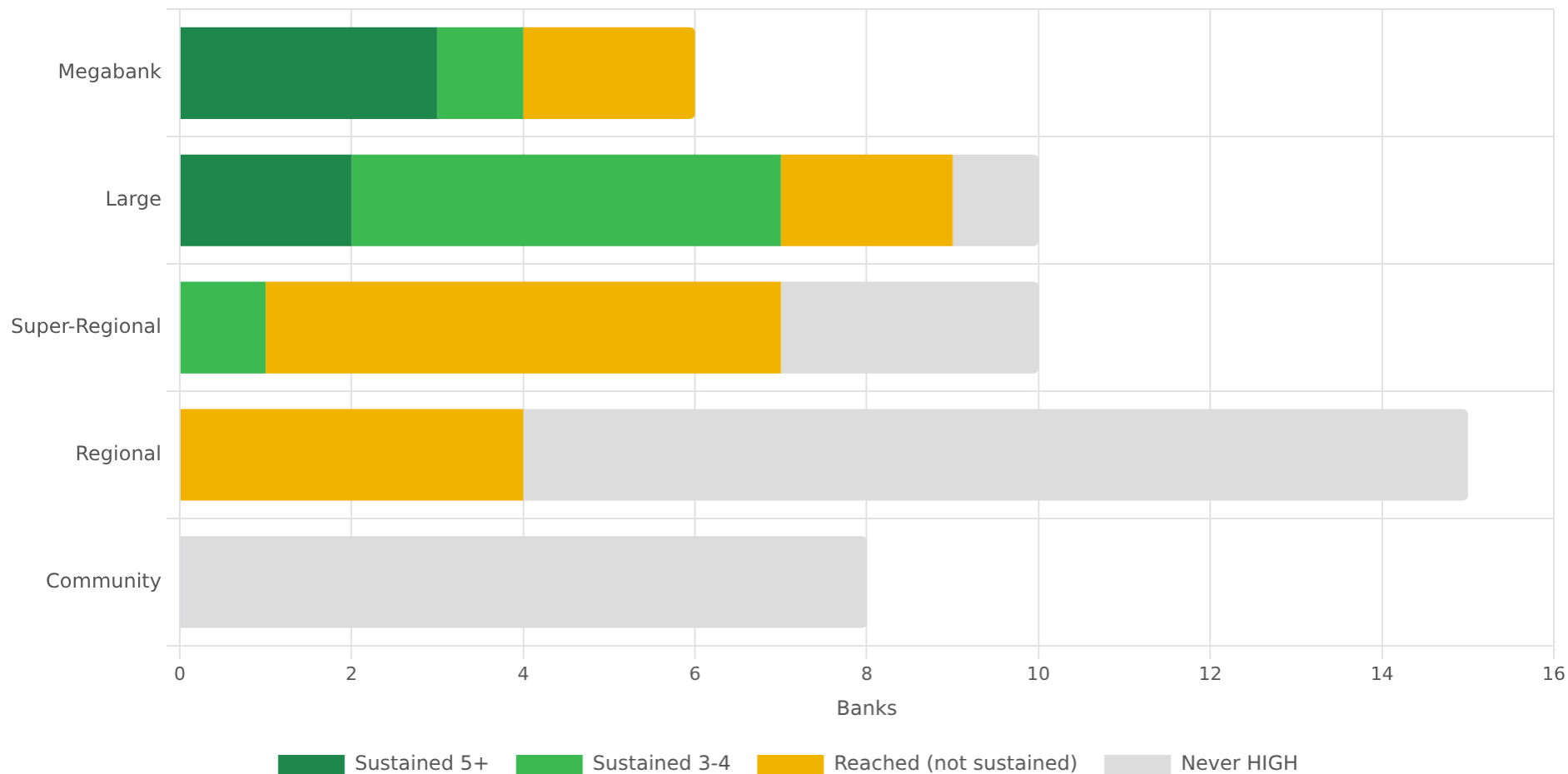


**The compounding gap:** Megabanks converted in ~1 quarter. Regionals took a full year, and only 4 of 15 got there. By the time a regional reaches HIGH, the megabank has been executing for a year.

## G. Sustained vs. Flash HIGH

Reaching HIGH once could be a strong quarter. Staying there means AI is structurally embedded in the bank's strategy and narrative.

**26 banks reached the top rating at least once. Only 12 held it for 3 or more consecutive quarters.**

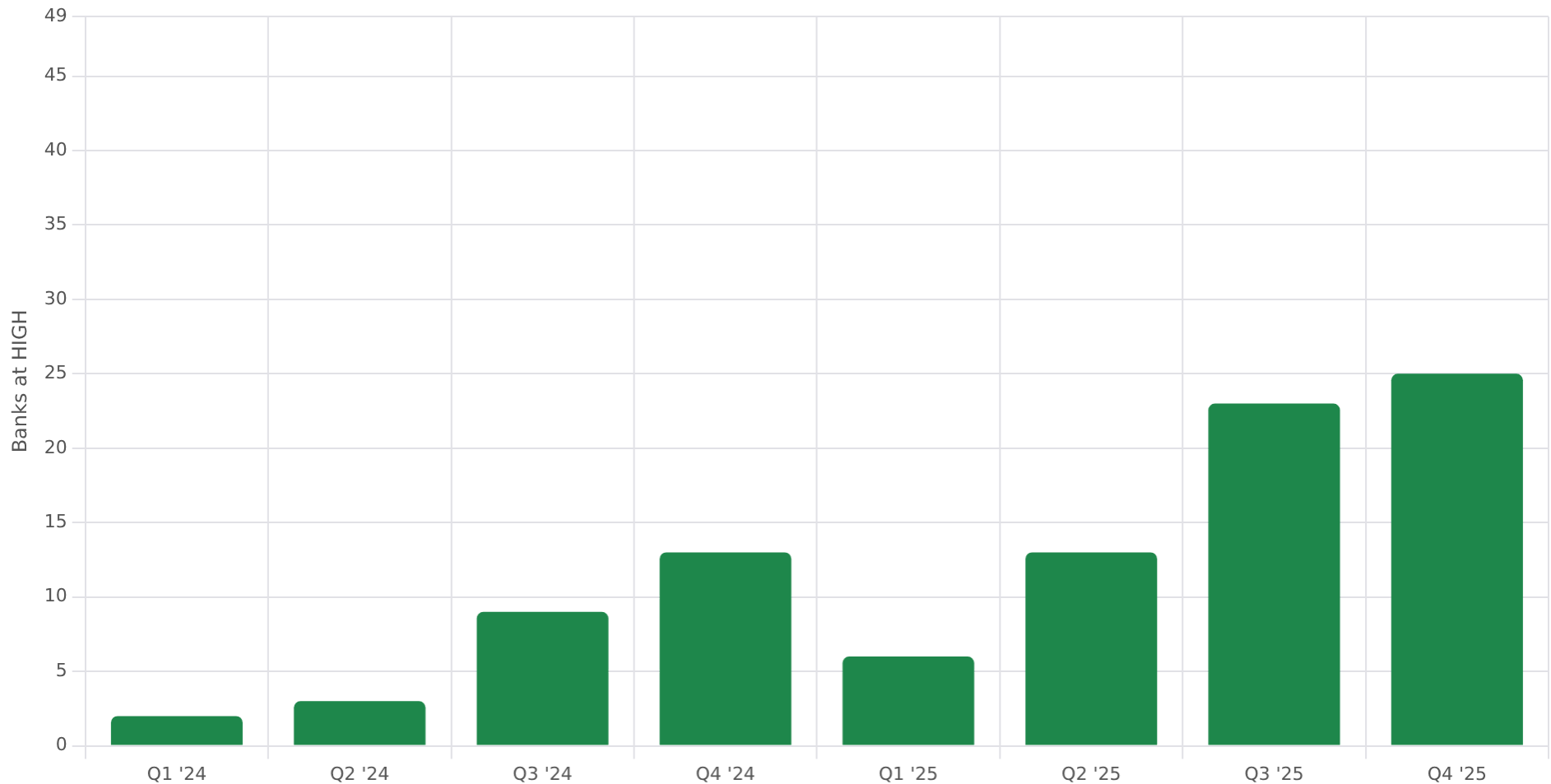


**26 banks reached HIGH, but only 12 sustained it for 3+ consecutive quarters.** 4 of 6 megabanks sustained. 1 of 10 super-regionals. Zero regionals or community banks. Sustained HIGH is the credibility filter.

## H. The Inflection Point

How many banks were rated HIGH each quarter — the clearest single measure of industry-wide AI momentum.

**Banks at the highest rating nearly doubled in H2 2025 — from 13 to 25 in just two quarters.**



**Two phases:** Q1-Q4 2024 (2 to 13, driven by megabanks). Q1-Q4 2025 (6 to 25, as super-regionals crossed). 23 of 49 banks never reached HIGH — overwhelmingly regional and community tier.

# Key Findings

Anonymized observations from analyzing AI adoption patterns across 49 banks over 8 quarters.

## The Self-Funding Flywheel

Banks that quantified AI-driven cost savings in early quarters showed accelerated adoption in subsequent periods. By Q4 2025, every megabank framed AI as self-funding.

## Governance-First vs. Move-Fast

Banks that led with governance frameworks achieved more consistent trajectories. Governance-first banks took longer to reach HIGH but stayed there.

## The Agentic AI Signal

"Agentic AI" appeared in zero filings before Q3 2025. By Q4 2025, it appeared across multiple tiers — signaling a shift from AI-as-tool to AI-as-actor.

## The Disclosure Gap

Several banks showed strong internal AI activity but minimal public signal. 60% of regionals have some AI deployment but only 20% communicate it strategically.

## M&A as AI Blocker

Banks mid-acquisition averaged 1.5 rating points lower than peers, with suppression lasting 3-4 quarters post-close.

## Community Bank AI Desert

Zero community banks achieved HIGH in any quarter. Structural barriers: no AI leadership, vendor gaps, and a relationship model that views AI as threatening.

## CFO-Led vs. CTO-Led Strategies

Banks where the CFO led AI narrative showed faster adoption. CFO framing anchors AI to ROI; CTO framing often stalled at "innovation."

## The Disclosure Arbitrage

Some banks have strong internal AI but weak public signals — and vice versa. The gap between disclosure and reality is widest in the super-regional tier.

## The 8-K Silence

Of 1,051 AI mentions in SEC filings, only 9 appeared in 8-K material event disclosures. No bank considers AI material enough for standalone disclosure.

**Questions for Your Board:** Where does our bank fall on the Sustained vs. Flash spectrum? Do we have a named AI governance role — and if not, are we deploying faster than we're governing? Is our AI language in SEC filings still defensive boilerplate, or has it shifted to strategic framing?

# Key Terms

**SEC Filing:** Legally required document submitted to the Securities and Exchange Commission. Banks file 10-Ks (annual, 100+ pages), 10-Qs (quarterly, shorter), and 8-Ks (material events).

**Earnings Call:** Public quarterly call where CEO/CFO discuss results with analysts. Transcribed and publicly available.

**Governance (AI):** Policies, frameworks, committees, and oversight for managing AI risk. Not government regulation.

**Disclosure:** Information made public via filings or voluntarily. A "disclosure gap" means public signals underrepresent actual AI activity.

**Boilerplate:** Generic legal language that says nothing specific. "AI may pose risks" is boilerplate; naming a product and its ROI is not.

**Agentic AI:** AI that acts autonomously across multi-step workflows. A shift from copilots (AI-as-tool) to AI-as-autonomous-actor.

**M&A:** Mergers and acquisitions. Consumes executive bandwidth for years, suppressing AI signals.

**Risk Factor:** Section of the 10-K (Item 1A) disclosing material risks. How AI appears here reveals the board's mental model.

**Deployment:** AI in production affecting operations, vs. AI being piloted or discussed.

**Disclosure Arbitrage:** Gap between public signal and actual capability. Strong AI + weak disclosure = undervalued by signal analysis.

# Methodology

**Scope:** 49 of the 50 largest US banks by total assets. Q1 2024 through Q4 2025 (8 quarters). Each bank assessed across 5 signal sources per quarter.

**Signal Sources:** SEC filings (10-K, 10-Q, 8-K), earnings call transcripts, regulatory signals, public announcements, and industry research.

**Tiers:** Megabank (>\$1T, n=6), Large (\$200B-\$1T, n=10), Super-Regional (\$80B-\$200B, n=10), Regional (\$40B-\$80B, n=15), Community (<\$40B, n=8).

**Hybrid Ratings:** LOW-MOD counts toward MOD; MOD-HIGH counts toward HIGH in chart aggregations.

**Keywords (19):** artificial intelligence, machine learning, generative AI, gen-AI, AI, LLM, NLP, deep learning, neural network, chatbot, virtual assistant, RPA, intelligent automation, agentic, copilot, GPT, large language model, natural language processing, robotic process automation.

**Limitations:** Mention counts skewed by filing seasonality. Ratings measure public signal, not capability. This analysis measures adoption signals, not risk signals. Keyword counts from filings only.

**Coming in Phase 2 (Q2 2026):** A governance dimension added to this dataset — AI risk factor classification, governance structure assessment, and regulatory preparedness scoring across the same 49 banks. The goal: a Deployment vs. Governance maturity matrix identifying which banks are deploying AI faster than they are governing it.