



Independent AI Deployment Qualification Engine

Evidence Book · US Jurisdiction

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This is the Evidence Book supporting Qualification Certificate AQE-63528BB9. It contains the full findings, required actions, and question-by-question evidence behind that verdict. Keep it alongside the certificate.

Organisation	EXCEL INVESTS
Reference	AQE-63528BB9
Sector	Financial Services
Jurisdiction	US
Generated	22/09/2026
Classification	Confidential

01 Qualification Evidence

Findings are derived directly from intake responses. Each reflects a specific gap identified.

Findings reference regulatory frameworks to identify evidence gaps against named obligations. They are not legal advice and are not a determination that the organisation is in breach of any law or regulation. Independent legal advice should be sought before relying on this report for compliance purposes.

Data Readiness: **CONDITIONAL**

Qualification gaps

- Data assets are undefined or undocumented. Absence of a data inventory is a control deficiency that blocks reliable AI deployment.
- Mix of structured and unstructured data. Structuring gaps will constrain AI scope and introduce data integrity risk.
- Data is on-premise or fragmented across systems with insufficient accessibility. Integration failure is a deployment blocker.
- Data quality is inconsistent. Monitoring and validation controls would typically be expected before AI deployment.
- No data lineage documentation exists. Inability to trace data provenance is a governance control deficiency and an audit risk.

Required before Full Qualification

- Complete the data asset inventory, prioritising the datasets that would feed any AI use case.
- Make the data needed for the AI use case accessible without manual extraction or rekeying.
- Document data lineage for the datasets in scope, so provenance is traceable before AI use.

Qualification impact: Needs to be fixed before full qualification

How this was scored: Based on 5 questions in this area, averaging 3.6 out of 10. A score of 7 or higher is needed to pass this area without conditions.

Process Maturity: **CONDITIONAL**

Qualification gaps

- Some repetitive processes exist but are not fully mapped. Process gaps limit AI scoping confidence.
- Some decision patterns exist but criteria are inconsistent. Inconsistency introduces model risk in automated decision contexts.
- Process bottlenecks are unidentified. Inability to locate inefficiencies is an operational readiness gap that should be resolved before AI scoping.
- Criteria are partially consistent. Standardisation required before model validation is meaningful.

- Some automation attempted with mixed results. Prior failure patterns should be assessed before committing to AI deployment.

Required before Full Qualification

- Identify and quantify the process bottlenecks so AI scope and success measures can be set.
- Define the decision rules within those processes so the same inputs lead to the same outcome.
- Standardise decision criteria across teams before any model is validated against them.

Qualification impact: Needs to be fixed before full qualification

How this was scored: Based on 5 questions in this area, averaging 4.2 out of 10. A score of 7 or higher is needed to pass this area without conditions.

Tooling & Infrastructure: CONDITIONAL

Qualification gaps

- Modern tools exist but integration gaps limit AI potential and introduce operational risk.
- No AI tools currently in use. Awareness and enablement controls are absent, foundational capability gap.
- No oversight controls cover AI tool use, current or future. Any informal (shadow) AI use would be ungoverned, which creates regulatory exposure and audit vulnerability. For FS clients, unlogged AI-assisted decisions raise SEC/FINRA recordkeeping exposure.
- Partial integration. Manual data transfers introduce data integrity risk.
- Some legacy constraints present. Workarounds are available but add cost and delivery risk. For regulated sectors, workarounds that bypass audit logging or data lineage controls are not acceptable.

Required before Full Qualification

- Record where AI tools are, or will be, used, including informal use by staff.
- Put documented governance and oversight in place for all AI tool use, formal or informal.
- Modernise or connect the parts of the technology stack the AI deployment depends on.

Qualification impact: Needs to be fixed before full qualification

How this was scored: Based on 5 questions in this area, averaging 3.8 out of 10. A score of 7 or higher is needed to pass this area without conditions.

People & Capability: CONDITIONAL

Positive signals

- Strong internal AI awareness and capability, which supports effective human oversight.
- Clear AI ownership assigned, governance accountability is anchored.

Qualification gaps

- Leadership interest exists but no formal mandate or budget allocation. Insufficient safeguards for sustained AI governance.
- No AI training has taken place. Staff operating AI tools without understanding limitations or risk. This is a human control deficiency creating regulatory exposure.

Required before Full Qualification

- Put AI literacy training in place for staff who use, or will use, AI tools.
- Formalise leadership mandate and budget for AI governance beyond informal interest.

Qualification impact: Needs to be fixed before full qualification

How this was scored: Based on 4 questions in this area, averaging 6.0 out of 10. A score of 7 or higher is needed to pass this area without conditions.

Governance & Compliance: **CONDITIONAL**

Positive signals

- Risk and impact assessments are completed and maintained. Audit-ready posture confirmed.

Qualification gaps

- Regulatory obligations are known but compliance mapping is incomplete. Partial controls are insufficient under regulatory scrutiny.
- Automated decisions exist but oversight controls are partial. Insufficient safeguards for auditability or regulatory review.
- No AI or data governance policies exist. Absence of policy documentation is a foundational control deficiency, no governance baseline is present.
- Some evidence exists but is not structured or audit-ready. Insufficient safeguards for regulatory or legal review. Evidence should be structured to support reconstruction of AI-assisted decisions, unstructured notes or ad hoc records do not satisfy regulatory expectations.

Required before Full Qualification

- Formalise AI-specific policy so it explicitly covers AI-assisted decision processes, not just general data governance.
- Document how AI contributes to decisions affecting individuals, and put human oversight in place for each.
- Structure AI evidence so any AI-assisted decision can be reconstructed under external scrutiny.

Qualification impact: Needs to be fixed before full qualification

How this was scored: Based on 5 questions in this area, averaging 4.8 out of 10. A score of 7 or higher is needed to pass this area without conditions.

SAMPLE

02 Required Actions Before Full Qualification

Actions are grouped by area. Each one comes from a specific answer that scored below the pass level, lowest-scoring first.

Data Readiness

1	Complete the data asset inventory, prioritising the datasets that would feed any AI use case.
2	Make the data needed for the AI use case accessible without manual extraction or rekeying.
3	Document data lineage for the datasets in scope, so provenance is traceable before AI use.

Process Maturity

4	Identify and quantify the process bottlenecks so AI scope and success measures can be set.
5	Define the decision rules within those processes so the same inputs lead to the same outcome.
6	Standardise decision criteria across teams before any model is validated against them.

Tooling & Infrastructure

7	Record where AI tools are, or will be, used, including informal use by staff.
8	Put documented governance and oversight in place for all AI tool use, formal or informal.
9	Modernise or connect the parts of the technology stack the AI deployment depends on.

People & Capability

10	Put AI literacy training in place for staff who use, or will use, AI tools.
11	Formalise leadership mandate and budget for AI governance beyond informal interest.

Governance & Compliance

12	Formalise AI-specific policy so it explicitly covers AI-assisted decision processes, not just general data governance.
13	Document how AI contributes to decisions affecting individuals, and put human oversight in place for each.
14	Structure AI evidence so any AI-assisted decision

	can be reconstructed under external scrutiny.
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03 What Happens Next

This deployment is qualified to proceed, subject to the conditions listed above. Complete those actions, then request a reassessment. A new certificate will be issued confirming full qualification once they're met.

Priority areas identified by client: Backoffice

04 Qualification Obligations

QUALIFICATION CONDITIONAL. Partial governance controls exist but insufficient safeguards remain. Current posture may not satisfy NIST AI RMF GOVERN and MANAGE function requirements, or sector-specific model risk expectations, under regulatory scrutiny. Priority remediation is required: risk and impact assessment completion, policy formalisation, and accountable ownership assignment. This assessment aligns with governance, auditability, and model risk management expectations observed in US financial, healthcare, and public sector regulatory frameworks.

Obligation	Relevance	Status
NIST AI RMF. GOVERN	Organizational accountability, risk tolerance, and AI governance policy	REVIEW
NIST AI RMF. MANAGE	Ongoing risk response, monitoring, and incident management for deployed AI	REVIEW
State AI Laws (CO, CA, TX)	Automated decision-making affecting individuals; algorithmic transparency obligations	REVIEW
Sector Regulator Expectations (SEC / FINRA / OCC / HHS)	Model risk management, explainability, and audit trail requirements by sector	UNASSESSED
ISO/IEC 42001:2023	AI management system standard, increasingly referenced in US procurement and enterprise procurement	UNASSESSED

This report was produced using the AI Qualification Engine (AQE). Findings are consistent for the same inputs. This report does not constitute legal or regulatory advice.

SCORING METHODOLOGY

This page explains how the Deployment Exposure and Deployment Control scores on the Qualification Decision page were derived.

Deployment Exposure (0-100)

Derived from the decision class this system operates in (informational through fully autonomous), the scale of deployment (single team through enterprise-wide), and the number of deployment-blocking governance signals identified elsewhere in this report. Higher autonomy, wider scale, and more blocking signals increase the score.

Deployment Control (0-100)

Derived from whether a named accountable owner is confirmed, whether that owner holds authority to stop or delay the deployment unilaterally, and whether the deployment has confirmed board or senior-level visibility. Absence of a named owner caps this score regardless of the other factors.

Governance & Compliance override

A Governance & Compliance dimension result of ESCALATE combined with high deployment exposure results in Not Qualified regardless of the scores above. Combined with low exposure, it caps the outcome at Qualified with Conditions.

Thresholds and reproducibility

Thresholds and scoring weights are fixed for a given framework version and do not vary between runs, between organisations, or over time. The same inputs assessed against the same framework version will always reproduce the same scores and the same verdict.

Reference AQE-63528BB9 · Rules version 2026-02-US · Same inputs will always reproduce this reference and these findings.

Reproducibility: Ruleset 68f1741f0e8b622f... · Decision 820b2f4553c2e190... — recompute independently to verify this determination.