

Risk-Based Supervision for Inclusive Digital Financial Services

CAPSTONE MARKING RUBRIC

Task 1: 5-Year Strategy for Data-Driven RBS of DFS [60 marks]

Criterion	Excellent (Full Credit)		Adequate (Partial Credit)		Poor (Minimal/No Credit)	Total Pts
	9 - 10 points	7 - 8 points	5 - 6 points	3 - 4 points	0 - 2 points	
Supervisory Philosophy and Outcomes	<p>Clear, coherent philosophy that would lead to RBS based on high-quality data and clear outcome metrics. Explains how the approach balances financial integrity with inclusion and reduces incentives for overcompliance.</p>	<p>Philosophy is described well with some minor gaps in clarity and reference to data and metrics. Outcomes clear, but not but could be better and more refined. Good recognition of proportionate AML/CFT or inclusion but not integrated well.</p>	<p>Philosophy described but with gaps in clarity or weak reference to data and metrics. Outcomes mentioned but vague or not measurable. Partial recognition of proportionate AML/CFT or inclusion but not well integrated.</p>	<p>Philosophy partially described but with large gaps in clarity. Weak reference to data and metrics. Insufficient outcomes mentioned that are vague or not measurable. Only nominal recognition of proportionate AML/CFT or inclusion.</p>	<p>Philosophy vague or generic. No meaningful mention of data, metrics, or outcomes. Ignores inclusion-AML/CFT balance and Meridia’s supervisory context.</p>	10
	<p>Provides a coherent data reform strategy. Identifies current weaknesses and proposes realistic data harmonization, data quality controls, and cross-department governance. Strong linkage to RBS.</p>	<p>Provides a coherent data reform strategy. Identifies most current weaknesses and proposes data harmonization, data quality controls, and cross-department governance that are realistic for the most part. Some RBS linkage.</p>	<p>Identifies most data problems but proposals are generic or incomplete. Key elements such as governance, validation, or interoperability are weak or insufficient. Limited linkage to RBS.</p>	<p>Identifies only a few data problems, and proposals are generic or incomplete. Key elements such as governance, validation, or interoperability are missing. No demonstrable linkage to RBS.</p>	<p>Superficial or unrealistic plan. Does not reflect and address data fragmentation issue. No meaningful standards, governance, or reform logic.</p>	
SupTech	<p>Identifies high-impact SupTech use cases that support RBS and the data reform plan. Shows awareness of lessons from the failed chatbot project. Describes a sound vendor approach, as needed (e.g., avoid lock-in, ensure customizability, open standards, model oversight, internal ownership).</p>	<p>Identifies a SupTech use case that demonstrates some support for RBS and the data reform plan. Shows awareness of lessons from the failed chatbot project. Describes a vendor approach, if needed, but there is room for improvement, (e.g., avoid lock-in, ensure customizability, open standards, model oversight, internal ownership).</p>	<p>SupTech options listed but with insufficient rationale or limited alignment. Vendor considerations are shallow and need more depth. Linkage to supervisory philosophy or data reform strategy needs refinement.</p>	<p>SupTech options listed but with weak rationale or limited alignment. Vendor considerations are non-existent or shallow. There is very weak linkage to supervisory philosophy or data reform strategy.</p>	<p>SupTech ideas are vague or irrelevant. No vendor strategy (where vendor needs exist) or learning from past failures. No link to RBS or data reform.</p>	10



Organizational Design	9 – 10 points	7 – 8 points	5 – 6 points	3 – 4 points	0 – 2 points	10
	Proposes a clear structure aligned with market segments (e.g., banks, PSPs including EMIs, digital lenders) and supervisory functions (e.g., prudential, conduct, AML/CFT, data management, analytics). Defines roles, coordination mechanisms, and how data governance and SupTech will operate across departments.	Proposes a feasible structure that aligns with market segments (e.g., banks, PSPs including EMIs, digital lenders) and supervisory functions (e.g., prudential, conduct, AML/CFT, data management, analytics). The structure is sound but requires further refinement. Includes most of the following: roles, coordination mechanisms, and how data governance and SupTech will operate across departments.	The structure presented is possible, but the roles or integration is unclear and needs a lot of additional work. Some segmentation has been included but lacks depth. Limited attention to data governance or cross-department coordination.	Structure presented, but there are issues with the structure, and the roles or integration are unclear. Little to no segmentation included. Limited attention to data governance or cross-department coordination.	Organizational design is missing or unrealistic. No segment-based structure; no clarity on functions or integration.	
Capabilities and Staffing	8 points	6 – 7 points	4 – 5 points	2 – 3 points	0 – 1 point	8
	Identifies skills needed. Proposes realistic hiring, training, and retention strategies, etc. Describes the cultural change toward judgment-led, proportionate supervision and explains how supervisors assess inclusion impacts and avoid incentivizing overcompliance.	Identifies skills needed. Proposes hiring, training, and retention strategies, etc., that require further refinement. Includes reference to the cultural change toward judgment-led, proportionate supervision and provides some explanation of the impact of how supervisors assess inclusion impacts and avoid incentivizing overcompliance.	Skills and staffing needs were identified, but with insufficient detail. Training or culture change was included but was only partially developed. Inclusion-related supervisory behaviour is mentioned but needs further refinement.	Some reference to skills and staffing needs but lacks structure and detail. Training or culture change is limited and only partially developed. Inclusion-related supervisory behaviour was mentioned, but weak.	The capabilities plan is generic or absent. No culture change elements. No link to inclusion or supervisory behaviour.	
Risk Register	9 – 10 points	7 – 8 points	5 – 6 points	3 – 4 points	0 – 2 points	10
	Provides a solid and discussion covering risks such as implementation, operational, data, legal/policy, vendor, inclusion, and reputational risks. Mitigations are feasible and realistic, aligned with scenario constraints.	Provides a discussion covering risks such as implementation, operational, data, legal/policy, vendor, inclusion, and reputational risks that is mostly clear. Mitigations are aligned with scenario constraints but may not be feasible or realistic.	Some relevant risks were identified but are uneven and require further refinement. Mitigation strategies are included but are vague or incomplete.	Some risks were identified but not necessarily relevant, or insufficiently described, or missing key categories. Mitigation strategies are incomplete.	Risks are largely missing or irrelevant. Mitigations absent or unrealistic.	



Task 2: AI Pilot Proposal [40 marks]

Criterion	Excellent (Full Credit) 5 or 6 points	Adequate (Partial Credit) 3 or 4 points	Poor (Minimal/No Credit) 0 – 2 points	Pts
Problem Definition and Inclusion Challenge	Clear, accurate, and concise description of the AML/CFT and inclusion challenges; directly grounded in the case here; identifies weaknesses, overcompliance, data/reporting problems, and supervisory constraints.	Describes some challenges but lacks clarity, completeness, or connection to scenario;	Vague, incorrect, or generic; misses key elements; not based on the case here.	6
Pilot Purpose and Conceptual Design	Presents a coherent, well-scoped pilot; clear AML/CFT + inclusion objectives; shows good reasoning for why the pilot is relevant and testable in Meridia.	Pilot concept unclear or overly broad; objectives partially defined; relevance only partially justified.	Pilot missing, unrealistic, or not aligned with objectives or context.	6
FSP Perspective	Strong description of how FSPs use AI/data to strengthen AML/CFT, support proportionate CDD/monitoring, and reduce exclusion; clear link to pilot objectives.	Mentions AI or improved processes but with limited detail; unclear link to CDD, monitoring, or inclusion; partial alignment with objectives.	Weak or missing; no meaningful tech component; unclear or irrelevant actions for FSPs.	6
Supervisor Perspective	Clear description of how the central bank uses technology to gain timely insights, detect overcompliance, enhance monitoring effectiveness, and improve supervisory judgement; explains how supervisors would interpret and act on insights.	Some tech-related ideas included but lack specificity; limited clarity on how insights will be used by supervisors; partial coverage of the supervisory objectives here.	SupTech component missing or superficial; insignificant role for supervisors; no meaningful use of insights	6
Criterion	Excellent (Full Credit) 4 points	Adequate (Partial Credit) 2 or 3 points	Poor (Minimal/No Credit) 0 or 1 point	
Data Requirements and Governance	Identifies broad categories of data; articulates general standards (accuracy, proportionality, transparency); describes reasonable safeguards; is clearly high-level without unnecessary technical detail.	Mentions data needs but vaguely; governance principles are partially covered; may drift into unnecessary technical detail or miss key principles.	Data element missing or incorrect; overly technical; no articulation of principles or safeguards.	4
Inclusion Link and Expected Outcomes	Explains clearly how pilot supports more proportionate AML/CFT, addresses overcompliance, reduces exclusion, and defines meaningful indicators to measure inclusion outcomes.	Attempts to link pilot to inclusion but lacks clarity or depth; indicators present but vague or limited.	No clear connection to inclusion; indicators are missing or irrelevant.	4
Implementation Approach and Governance	Practical and realistic plan; identifies institutions, roles, key steps, sequencing, timeline, governance arrangements, and vendor approach if relevant.	Plan exists but is incomplete, overly generic, or lacks realistic sequencing; unclear governance or roles.	Plan is missing, unfeasible, or unrealistic; governance absent.	4
Risk Assessment and Mitigation	Identifies major categories of risk (e.g., regulatory, supervisory, operational, data, tech, inclusion, reputational) and proposes feasible, appropriate mitigation strategies.	Identifies some risks, but uneven or missing categories; mitigation strategies are vague or incomplete.	Risks not identified or no mitigation offered; unrealistic or irrelevant items.	4

