

BANKING IN THE AGENTIC AGE

How regional and national banks can become the trusted operating system for AI-driven commerce.

A STRATEGIC FRAMEWORK

An internal-style strategy paper, written to be circulated inside a bank. Current as of July 23, 2026.

Regulatory citations point to primary sources. Forecasts and proposals are labeled as such and kept separate from present legal obligations.

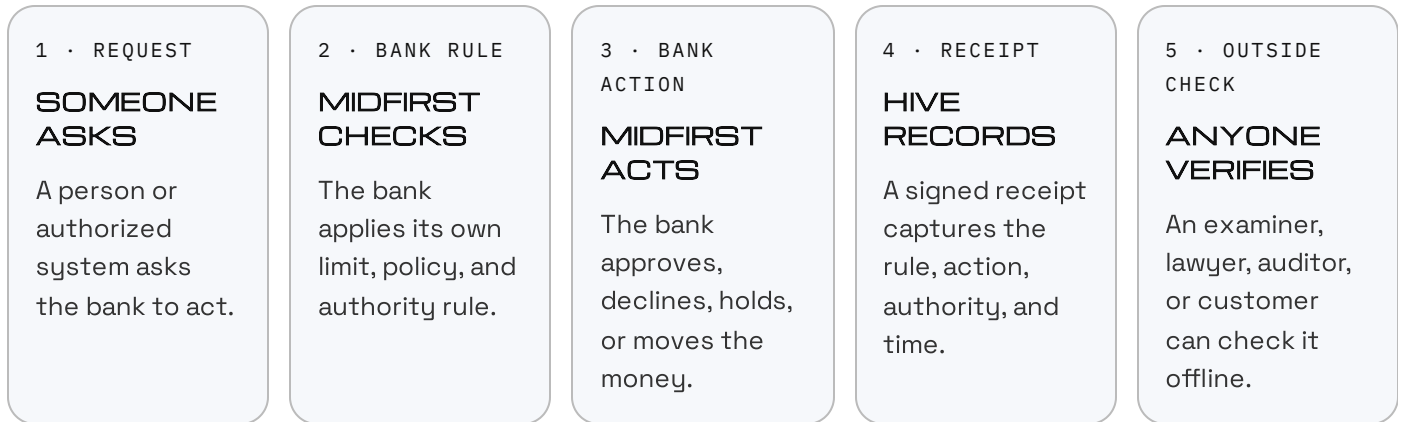
Doctrine: MidFirst writes the rules. MidFirst systems do the work.

Hive receipts the authority chain.

[START HERE](#)

THE WHOLE IDEA IN FIVE BOXES

A customer or authorized system asks MidFirst to do something. MidFirst checks its own rule and decides what happens. Hive adds a signed receipt so the decision can be checked later without relying only on the bank's own log.



Select any box for the plain-English explanation. MidFirst keeps the customer, rules, keys, decisions, and money. Hive provides only the independent proof layer.

1 · THE REQUEST

A person or authorized system asks the bank to act.

Examples include paying a bill, releasing a wire, changing a card limit, or sending a disclosure. **The request alone does not move money.**

2 · THE BANK RULE

MidFirst decides what must be true first.

MidFirst owns the policy, the authority limits, the approvals, and the signing keys. **Hive does not write the rule and cannot change it.**

3 · THE BANK ACTION

MidFirst's own systems approve, decline, hold, or execute.

The bank remains responsible for the customer relationship and the decision. **Hive never touches the account or the money.**

4 · THE SIGNED RECEIPT

Hive turns the authority chain into evidence.

The receipt records which rule was presented, which authority was used, what action was recorded, and when. **It proves the record, not that the decision was legally correct.**

5 · THE INDEPENDENT CHECK

The evidence can leave the bank and still be verified.

An examiner, auditor, lawyer, counterparty, or customer can check the receipt without a MidFirst login and without trusting Hive's database. **If one fact changes, the verification fails.**

SECTION 1

EXECUTIVE THESIS

The question is no longer whether software will initiate banking and payment activity on a customer's behalf. It is who the customer, the regulator, and the counterparty will trust when an autonomous agent, not a person, starts a transaction, and how that trust is proven after the fact.

MidFirst enters this era from strength. It is the largest privately owned bank in the United States, with more than \$42 billion in assets, a 19.7% total risk-based capital ratio, \$13.8 billion in available liquidity as of March 31, 2026, and four consecutive decades of profitability, according to figures the bank reports through its own newsroom ([MidFirst newsroom, Forbes profile](https://www.midfirst.com/about-us/latest-news/2026/rooted-in-community-built-to-thrive-inside-americas-largest-privately-owned-bank) <https://www.midfirst.com/about-us/latest-news/2026/rooted-in-community-built-to-thrive-inside-americas-largest-privately-owned-bank>)). It is expanding deliberately, most recently announcing the acquisition of Dallas Capital Bank to deepen its Texas commercial and private banking franchise ([MidFirst acquisition release](https://www.midfirst.com/about-us/latest-news/2026/midfirst-bank-to-acquire-dallas-capital-bank-accelerating-growth) <https://www.midfirst.com/about-us/latest-news/2026/midfirst-bank-to-acquire-dallas-capital-bank-accelerating-growth>)), and it is already staffing an internal AI function, evidenced by an open role that manages a bank-wide AI use-case backlog in a regulated environment ([MidFirst AI role posting](https://www.dice.com/job-detail/73981a25-d830-476a-9b45-ce6071bf09c9) <https://www.dice.com/job-detail/73981a25-d830-476a-9b45-ce6071bf09c9>)).

The direction of travel is set by others already. Visa has launched Intelligent Commerce and a Trusted Agent Protocol ([Visa Intelligent Commerce](https://www.visa.com/en-us/solutions/intelligent-commerce) <https://www.visa.com/en-us/solutions/intelligent-commerce>)); Mastercard has launched Agent Pay ([Mastercard Agent Pay](https://www.mastercard.com/us/en/news-and-trends/press/2025/april/mastercard-unveils-agent-pay-pioneering-agentic-payments-technology-to-power-commerce-in-the-age-of-ai.html) <https://www.mastercard.com/us/en/news-and-trends/press/2025/april/mastercard-unveils-agent-pay-pioneering-agentic-payments-technology-to-power-commerce-in-the-age-of-ai.html>)); and the Federal Reserve Bank of New York's Innovation Advisory Council devoted its December 2025 session to agentic AI and payments, concluding that the industry is approaching a shift comparable to the move from face-to-face transactions to e-commerce ([NY Fed Innovation Advisory Council minutes](https://www.newyorkfed.org/medialibrary/media/aboutthefed/pdf/2025/iac-december-2025-minutes) <https://www.newyorkfed.org/medialibrary/media/aboutthefed/pdf/2025/iac-december-2025-minutes>)).

THE DOCTRINE, STATED PLAINLY

MIDFIRST WRITES THE RULES. MIDFIRST SYSTEMS DO THE WORK. HIVE RECEIPTS THE AUTHORITY CHAIN.

MidFirst writes and owns the authority rules that govern what any agent, its own systems, a customer's assistant, or a counterparty's software, may do on an account. MidFirst owns the customer, the policy, the decisions, the signing keys, the execution systems, and the regulated relationship. MidFirst systems and MidFirst-authorized agents perform the work. Hive receives the minimum signed event evidence it needs and issues independently verifiable receipts. Hive is not the bank, lender, payment network, custodian, policy-maker, or execution engine.

Three forces make this urgent rather than merely interesting. First, the rulebook for agentic AI is being rewritten in real time, with a gap exactly where agent-initiated transactions live: in April 2026 the OCC, Federal Reserve, and FDIC revised model risk management guidance and explicitly excluded generative and agentic AI from scope, calling them novel and rapidly evolving ([OCC Bulletin 2026-13](https://www.occ.treas.gov/news-issuances/bulletins/2026/bulletin-2026-13.html) (<https://www.occ.treas.gov/news-issuances/bulletins/2026/bulletin-2026-13.html>)), a narrowing that Federal Reserve Vice Chair for Supervision Michelle Bowman confirmed was deliberate ([Bowman speech, May 2026](https://www.federalreserve.gov/newsevents/speech/bowman20260501a.htm) (<https://www.federalreserve.gov/newsevents/speech/bowman20260501a.htm>)). Second, settlement is being solved by others, through stablecoins under the GENIUS Act ([GENIUS Act text](https://www.congress.gov/bill/119th-congress/senate-bill/1582/text) (<https://www.congress.gov/bill/119th-congress/senate-bill/1582/text>)) and tokenized deposits under the FDIC's clarified framework. Third, MidFirst already operates nearly every workflow this future requires; it simply has not yet instrumented those workflows with independently verifiable, agent-ready proof.

The recommendation is not to chase a flashy feature. It is to make MidFirst the bank whose authority rules, controls, and receipts are the most provable in its peer group, starting inside workflows it already runs, and building deliberately toward 2032.

SECTION 2

THE NEXT CUSTOMER IS NOT A PERSON

For a century, a bank's customer was a human being who walked into a branch, signed a card, and later logged into an app. The next actor initiating activity on an account will

increasingly be software: a customer’s assistant paying a bill, a corporate treasury system moving cash overnight, or a counterparty’s bot completing a purchase.

A PRECISE FRAMING, NOT A LEGAL CONCLUSION

These agents are not customers in a legal sense, and this paper does not treat them as one. An agent is an **authorized economic representative**, a software actor operating under authority the human customer delegated and the bank enforces. The human customer, and the bank’s relationship with that customer, remain the anchor of every obligation.

This distinction matters because the law that allocates loss was not written with software agents in mind. Under Regulation E, a consumer transfer is presumed authorized once the consumer furnishes access credentials to an agent, even if the agent acts outside what the consumer intended ([12 CFR 1005.6](https://www.consumerfinance.gov/rules-policy/regulations/1005/6) (<https://www.consumerfinance.gov/rules-policy/regulations/1005/6>); [Goodwin Law analysis](https://www.goodwinlaw.com/en/insights/publications/2026/06/insights-technology-aiml-authorizing-agentic-payments) (<https://www.goodwinlaw.com/en/insights/publications/2026/06/insights-technology-aiml-authorizing-agentic-payments>)). The practical consequence is that the party who can most cleanly prove what authority existed, and what policy was checked, at the moment an agent acted is in the strongest position when something goes wrong.

That is the strategic opening. The bank that can answer “what was this agent allowed to do, who granted it, and did the check run” with an independently verifiable record, rather than an internal log the counterparty must simply trust, becomes the trusted place for delegated financial authority.

SECTION 3

HOW BANKING EVOLVES: PROTECT MONEY, MOVE MONEY, CONNECT MONEY, GOVERN AUTHORITY

Each era of banking added a new core function without discarding the last. The agentic era adds a fourth.

ERA ONE	ERA TWO
PROTECT MONEY	MOVE MONEY

The vault. Keep deposits safe. Trust rests on the strength of the institution holding the cash.	Checks, cards, ACH, and wires. Trust rests on rails that move value reliably between parties.
ERA THREE CONNECT MONEY Online banking, open APIs, and aggregators. Trust rests on permissioned, connected access to accounts.	ERA FOUR · NOW GOVERN AUTHORITY Software acts on accounts. Trust rests on proving who was allowed to do what, and that the check ran.

Protecting, moving, and connecting money are now table stakes provided by many players. Governing and proving delegated authority is the function still in contention.

MidFirst already performs the first three functions at scale. The fourth, governing authority and proving it, is where a durable advantage is still available, because it is the one function that settlement vendors, card networks, and fintech issuers are not positioned to own on a bank’s behalf.

SECTION 4

IDENTITY, AUTHORITY, POLICY, PROOF, SETTLEMENT, AUDIT

This is the reference architecture MidFirst can use to reason about every agentic initiative. Read left to right: each layer answers one question, and the bank owns every layer except proof.

IDENTITY Who or what is acting? MIDFIRST · IAM	AUTHORITY What may it do, and who granted it? MIDFIRST
POLICY What are the exact limits right now? MIDFIRST	PROOF Evidence the policy was checked and honored. HIVE SIDECAR
SETTLEMENT	AUDIT

How does value actually move?

MIDFIRST · RAILS

How is the chain rebuilt later?

MIDFIRST

MidFirst owns identity, authority, policy, settlement, and audit. Hive contributes only at the proof layer, and only ever as a sidecar.

Identity asks who or what is acting, verified through MidFirst's own identity and access management, which already runs on an enterprise IAM platform ([MidFirst IAM procurement record](https://www.appsruntheworld.com/customers-database/purchases/view/midfirst-bank-united-states-selects-okta-identity-cloud-for-identity-and-access-management-iam) [https://www.appsruntheworld.com/customers-database/purchases/view/midfirst-bank-united-states-selects-okta-identity-cloud-for-identity-and-access-management-iam]). **Authority** asks what that actor may do and who granted it; these are bank-defined delegation grants and entitlement rules that MidFirst writes and owns. **Policy** is the set of specific, executable limits enforced in MidFirst's own core, card, and treasury systems. **Proof** is the only layer Hive touches: MidFirst's systems submit signed, minimal evidence at the moment of action, and Hive converts it into an independently verifiable receipt. **Settlement** is how value moves, through card rails, ACH, wire, FedNow, or increasingly stablecoins and tokenized deposits. **Audit** is how the full chain is reconstructed for exams, disputes, or litigation, using the receipt chain alongside the bank's own books, which the receipts corroborate rather than replace.

The layer that matters most for this doctrine is proof, and the layer most often confused with it is settlement. Neither a stablecoin nor a tokenized deposit proves that the party who initiated a transfer had the authority to do so, or that the policy check that should have run actually ran.

SECTION 5

FIVE NEW BANKING PRODUCTS

These are directional product concepts, not present commitments. Each extends a capability MidFirst already runs, and each is instrumented with independent receipts from day one.

1 · AGENT ACCOUNTS™ (WORKING LABEL)

BANK-OWNED LAYER

A new account class with agent-specific entitlements layered on the entitlement engine already live in Business Online Banking.

AGENT BEHAVIOR

A customer-designated agent initiates defined transaction types within programmatic, revocable, time-boxed limits the human sets.

RECEIPT CHAIN

Grant, then each instruction, then execution, then any override or revocation, each independently verifiable and time-ordered.

RISK

Reg E liability allocation for agent-initiated transfers is unsettled; naming an account after an undefined legal category carries brand and compliance risk.

2 · PROGRAMMABLE CARDS

BANK-OWNED LAYER

Extend the Commercial Card admin console and consumer Card Controls into agent-callable policy objects enforced by MidFirst's authorization system.

AGENT BEHAVIOR

An agent presents a MidFirst-issued token and completes purchases strictly within the pre-set policy object.

RECEIPT CHAIN

Policy-object creation, per-transaction authorization result, settlement, and any dispute.

RISK

Visa and Mastercard agent-identity stacks do not currently interoperate, so MidFirst may need to support both ([Goodwin Law](https://www.goodwinlaw.com/en/insights/publications/2026/06/insights-technology-aiml-authorizing-agentic-payments) (<https://www.goodwinlaw.com/en/insights/publications/2026/06/insights-technology-aiml-authorizing-agentic-payments>)).

3 · DYNAMIC MORTGAGES

BANK-OWNED LAYER

Underwriting and servicing systems expose defined, human-approved adjustment rules an agent can check against and invoke, never author.

AGENT BEHAVIOR

Monitoring and notification first: rate or life-event triggers propose actions like hardship-plan enrollment, consistent with MidFirst's existing hardship pathway.

RECEIPT CHAIN

Rule-set version, trigger event, proposed or executed action, and disclosure or adverse-action delivery.

RISK

Highest consumer-protection sensitivity; ECOA, FCRA, and UDAP obligations apply in full and demand explainability regardless of automation ([CFPB Circular 2022-03](https://www.consumerfinance.gov/compliance/circulars/circular-2022-03-adverse-action-notification-requirements-in-connection-with-credit-decisions-based-on-complex-algorithms/) (<https://www.consumerfinance.gov/compliance/circulars/circular-2022-03-adverse-action-notification-requirements-in-connection-with-credit-decisions-based-on-complex-algorithms/>)).

4 · COMMERCIAL TREASURY AGENTS

BANK-OWNED LAYER

A policy engine on the existing treasury stack lets treasurers define agent-executable liquidity actions within human-set ceilings that MidFirst's core enforces.

AGENT BEHAVIOR

An agent monitors balances and initiates pre-approved sweep, ACH, or short-term actions, similar to cash-management use cases central banks have studied experimentally ([BIS Working Paper 1310](https://www.bis.org/publ/work1310.htm) (<https://www.bis.org/publ/work1310.htm>)).

RECEIPT CHAIN

Policy definition, monitoring or decision trigger, execution, and end-of-day reconciliation to the ledger.

RISK

Researchers caution that safeguards, human oversight, and further study are needed before scaling; model risk guidance currently excludes agentic AI.

5 · PRIVATE BANKING DELEGATION

BANK-OWNED LAYER

Extend the Private Bank relationship model with formal, digitally executed delegation-of-authority instruments, signed under E-SIGN and UETA standards, for family offices and multi-entity owner-clients ([MidFirst Private Banking & Wealth](https://www.midfirst.com/private-wealth) (<https://www.midfirst.com/private-wealth>)).

AGENT BEHAVIOR

A principal's designated agent executes pre-approved actions, such as rebalancing within defined bands, under the trust or account governing documents.

RECEIPT CHAIN:

instrument execution, periodic re-affirmation, each delegated action, and fiduciary reporting.

RISK

Fiduciary and estate-law delegation is jurisdiction-specific and slow-moving; reputational risk in high-net-worth relationships is asymmetric.

PRODUCT-NAMING CAUTION · AGENT ACCOUNTS™

Agent Accounts™ is a working label only. No conflicting live U.S. financial-services trademark was found in the sources reviewed, but that is not a clearance. A full USPTO and common-law search plus outside counsel review is required before any public use ([USPTO Trademark Center](https://trademarkcenter.uspto.gov/) (<https://trademarkcenter.uspto.gov/>)).

The term is also descriptive, which raises registrability questions, and marketing copy must never imply that the agent is a legal agent in the fiduciary sense unless the bank intends those duties. It requires trademark clearance and consumer testing, and it is not presented here as an existing MidFirst or Hive product.

SECTION 6

WHY STABLECOINS ALONE ARE NOT ENOUGH

Stablecoins and tokenized deposits solve settlement: moving value with programmable, near-instant finality. The GENIUS Act created a federal framework for payment stablecoins with full reserve backing, monthly attestations, and executive certifications ([GENIUS Act text](https://www.congress.gov/bill/119th-congress/senate-bill/1582/text) (<https://www.congress.gov/bill/119th-congress/senate-bill/1582/text>); [Richmond Fed overview](https://www.ri) (<https://www.ri>

chmondfed.org/banking/banker_resources/news_flash/2025/20251118_genius_act)), and the FDIC has clarified that tokenized deposits remain insured bank liabilities distinct from stablecoins ([coverage of FDIC guidance](#) (<https://thecryptocurrencypost.net/fdic-clarifies-tokenized-deposit-insurance-in-fil72025-distinguishing-tokenized-deposits-from-stablecoins/>)).

But settlement answers only how value moves. It does not answer three questions that matter more as software initiates transactions:

- Did the party who started the transfer have the **authority** to do so?
- Did the **policy checks** that should have run actually run before value moved?
- Is the resulting record **tamper-evident and independently reconstructable** after the fact, without relying solely on any one party’s logs?

Settlement will get commoditized. Trust, authority, and proof will not.

The strategic premise of this paper

A programmable dollar that moves instantly but carries no proof of the authority behind it simply moves a disputed transaction faster. The proof layer is a separate function from settlement, and it is the one this framework recommends MidFirst source independently rather than assume a settlement vendor will provide.

SECTION 7

HELP NOW: CURRENT BANK WORKFLOWS AND RECEIPT ATTACHMENT POINTS

These are workflows MidFirst already runs, unchanged. In each, Hive receives signed evidence from MidFirst’s own systems and issues an independently verifiable receipt, without touching the decision path. Every row restates a cautious claim limit: the receipt proves an event was recorded, not that the decision was lawful, fair, accurate, or compliant.

BANK ACTION (UNCHANGED)	RECEIPT RECORDS	WHAT IT DOES NOT PROVE
Treasury multi-level approval before ACH or wire release (Business Online Banking (ht	Each approver’s authenticated action,	That approvers held actual authority under

BANK ACTION (UNCHANGED)	RECEIPT RECORDS	WHAT IT DOES NOT PROVE
tps://www.midfirst.com/business-and-commercial/online-and-mobile-banking/business-online-banking))	role, and the final release event	the client's own governance
Positive Pay and ACH Positive Pay matching and exception decisioning (Information Management (https://www.midfirst.com/business-and-commercial/treasury-management/information-management))	The file version, the match result, and the pay or return outcome	That the underlying check or payee was legitimate
Card controls: commercial limit changes and consumer Card Controls (Commercial Card (https://www.midfirst.com/business-and-commercial/card-solutions/credit/commercial))	Each control change and the authenticated session that made it	That the limit was appropriate; it does not resolve a Reg E or TILA dispute
Open Access consent capture for aggregator data sharing (Open Access (https://www.midfirst.com/open-access))	Which aggregator, which accounts, what scope, and when	That the consent was informed, voluntary, or legally sufficient
Mortgage disclosures and E-SIGN delivery (FDIC E-SIGN manual (https://www.fdic.gov/consumer-compliance-examination-manual/x-3-electronic-signatures-global-and-national-commerce-act-e))	What was rendered and delivered, through which channel, and when	ECOA, Reg B, or TILA-RESPA compliance of the underwriting decision
Fraud and security events , including Fraud Text Alert confirmations (card security (https://www.midfirst.com/ways-to-bank/preventing-fraud/resources/debit-and-credit-card-security))	The alert sent, the customer reply, and the resulting action	Whether a transaction was in fact unauthorized under Reg E
Model and governance records for AI-assisted outcomes (OCC Bulletin 2026-13 (https://www.occ.treas.gov/news-issuances/bulletins/2026/bulletin-2026-13.html))	Which model version and evaluation applied to an outcome	The correctness of the model or the bank's model governance

None of these require a new banking product, a new charter posture, or a new counterparty risk. They strengthen the evidence trail on services MidFirst already provides. The interactive demonstration in Section 8 shows one of these chains built and checked live.

SECTION 8

BUILD TOWARD 2032: A PHASED ROADMAP

Every phase is deliberately reversible and instrumented with receipts from the start. Dates are directional and contingent on the regulatory clarity tracked in Section 10.

PHASE	FOCUS	WHAT SHIPS	GATE TO ADVANCE
Phase 0 • now	Instrument today’s workflows	Signed receipts as a sidecar on the Section 7 workflows; no decision path changes	Third-party risk review of the proof sidecar (OCC Bulletin 2023-17 (https://www.occ.gov/news-issuances/bulletins/2023/bulletin-2023-17.html))
Phase 1	Machine identity	Extend the entitlement engine to recognize a machine-identity actor type, reusing existing IAM	Internal AI governance sign-off; identity-fraud controls tested against deepfake risk (FinCEN alert (https://www.fincen.gov/news/news-releases/fincen-issues-alert-fraud-schemes-involving-deepfake-media-targeting-financial))
Phase 2	Narrow delegated execution	Agent-initiated actions in reversible categories, such as bill pay on existing rails and zero-balance sweeps	Card-network agent-program registration where relevant; dispute-liability posture documented
Phase 3 • toward 2032	Bank as operating system for delegated authority	Programmable cards, treasury agents, and private-banking delegation at scale, each receipted end to end	Agentic-AI-specific supervisory guidance that regulators have signaled is coming

INTERACTIVE: A COMMERCIAL TREASURY AGENT AUTHORITY CHAIN

Run a realistic treasury sequence in your browser. An invoice above a threshold triggers a chain of approvals and checks; if every gate passes, a signed receipt is issued and the bank executes. Change a policy or an input after signing to watch verification fail, then reset.

Everything runs in this tab. Made-up example, not MidFirst data.

A real hybrid Ed25519 and ML-DSA-65 signature is built and checked locally.

Press **Run the authority chain** to build and check the treasury receipt.

SECTION 9

THE NEW BALANCE SHEET: AUTHORITY, IDENTITY, DELEGATION, POLICY, TRUST

A bank’s balance sheet has always listed what it holds and what it owes. In the agentic era, a parallel ledger becomes strategically decisive, made of assets that do not appear in a call report but determine who wins the delegated-authority relationship.

NEW ASSET	WHAT IT IS	WHY IT COMPOUNDS
Authority	The rules the bank writes for what any actor may do on an account	Once customers delegate through the bank’s rules, switching cost rises with every grant
Identity	Verified identity of people, systems, and authorized agents	A trusted identity graph is hard to rebuild elsewhere and gates every action
Delegation	The living record of who authorized whom, for what, and until when	The delegation-of-record position is a natural monopoly per relationship
Policy	Executable limits enforced in the bank’s own core systems	Policies encode institutional expertise that competitors cannot copy quickly
Trust	Independently verifiable proof that the above were honored	Provable trust is the one asset a settlement vendor cannot provide for the

NEW ASSET	WHAT IT IS	WHY IT COMPOUNDS
		bank

These assets reinforce one another. Authority is only credible with verified identity; delegation is only safe with enforced policy; and all of it is only defensible when the honoring of each is independently provable. The receipt layer is what turns the first four from internal claims into external evidence.

SECTION 10

REGULATORY AND RISK GUARDRAILS

STANDING LIMITATION

Never state or imply that a receipt alone proves legality, fairness, truth, accuracy, intent, or compliance. A receipt proves that a specific, defined event occurred, as attested by signed evidence from a specific system, at a specific time. Every guardrail below is read with that limit in place.

The table separates present, binding-adjacent obligations from forecasts and proposals that are not yet law or binding guidance.

TOPIC	PRESENT OBLIGATION TODAY	FORECAST / PROPOSAL
Model risk management	Revised April 2026 guidance excludes generative and agentic AI and is non-binding by its own terms (OCC 2026-13 (https://www.occ.treas.gov/news-issuances/bulletins/2026/bulletin-2026-13.html))	A request for information on AI and agentic-AI model risk is planned
Third-party risk	2023 interagency guidance applies now to any proof or AI vendor (OCC 2023-17 (https://www.occ.gov/news-issuances/bulletins/2023/bulletin-2023-17.html))	Simplification of TPRM guidance for AI signaled, not yet issued (Bowman (https://www.federalreserve.gov/newsevents/speech/bowman20260501a.htm))

TOPIC	PRESENT OBLIGATION TODAY	FORECAST / PROPOSAL
Agentic payment liability	Reg E, TILA/Reg Z, and UCC Article 4A apply today, unmodified for agents (Goodwin Law (https://www.goodwinlaw.com/en/insights/publications/2026/06/insights-technology-aiml-authorizing-agentic-payments))	No agent-specific liability statute exists; card-network rules are private contract
Stablecoins	GENIUS Act enacted and in force since July 2025 (Congress.gov (https://www.congress.gov/bill/119th-congress/senate-bill/1582/text))	Implementing rulemaking still underway
AI chatbots and UDAAP	UDAAP authority applies now to AI-driven customer interactions (CFPB spotlight (https://www.consumerfinance.gov/about-us/newsroom/cfpb-issue-spotlight-analyzes-artificial-intelligence-chatbots-in-banking/))	No agentic-specific UDAAP rule yet
ECOA/FCRA and AI credit	Apply in full today regardless of model type (CFPB Circular 2022-03 (https://www.consumerfinance.gov/compliance/circulars/circular-2022-03-adverse-action-notification-requirements-in-connection-with-credit-decisions-based-on-complex-algorithms/))	No agentic-lending-specific rule yet
International AI governance	FSB, BIS, and NIST frameworks exist as voluntary or consultative	FSB sound-practices report in consultation, comments closed July 22, 2026 (FSB (https://www.fsb.org/2026/06/sound-practices-for-responsible-adoption-of-artificial-intelligence-ai-consultation-report/))

The practical takeaway: independently verifiable receipts of the authority grant and the security procedure followed are directly useful evidence inside the frameworks that already apply, especially UCC Article 4A's commercially reasonable security procedure standard for commercial payment orders. They do not change the law; they materially strengthen the bank's ability to demonstrate good-faith compliance with it.

SECTION 11

OPERATING MODEL: BANK-OWNED RULES AND EXECUTION, HIVE INDEPENDENT PROOF SIDECAR

The operating model is a clean separation of duties, which is precisely what lets the bank adopt agentic capabilities aggressively while keeping the audit trail independent of the systems being audited.

MIDFIRST OWNS AND OPERATES

The customer relationship and every regulated obligation

The authority rules and delegation grants

The policy limits, enforced in the bank's own core

The signing keys, held in the bank's own hardware

The execution systems that move money, and the books of record

HIVE PROVIDES, AS A SIDECAR

Receipt of the minimum signed event evidence needed

An independently verifiable receipt for each event

Offline verification anyone can run without an account

HIVE IS NOT

the bank, lender, payment network, custodian, policy-maker, or execution engine, and it holds no customer money and no bank keys.

The sidecar receives a signed, minimal, purpose-built evidence packet at the moment of an event and returns a receipt that MidFirst, its customer, its auditors, or a court can check without relying solely on MidFirst's own logs. Each decision is recorded as a one-way fingerprint, never the underlying message. This is evidentiary infrastructure, not a new decision-maker. It does not judge.

SECTION 12

RELEVANT HIVE PRIMITIVES: HELP NOW VERSUS HELP NEXT

These are the building blocks under the receipt layer, in plain English. The tag shows whether each is ready to attach to today's workflows or is part of the longer build. Patent-pending methods are marked.

INKFRAME V1

HELP NOW



The evidence floor. Holds a decision still using content-addressed roots and a hybrid signature, so changing one byte breaks the seal.

SIGR

HELP NOW



Signed Inference Guarantee Receipt. Seals the model, inputs, and outcome of one decision into a single signed exhibit.

IMPRIMATUR

HELP NOW



A pre-attestation gate. Signs a clearance before an action runs and refuses any call without a valid, unexpired pass.

AFIR

HELP NOW



Attested Fragmented Inference Routing. Breaks a request into signed sub-tasks so only the pieces that matter are signed.

AFIR-STREAM

HELP NOW

The same fragmented proof approach for continuous flows, such as an ongoing treasury or payments stream.

AFIR-OCR DOCPROOF

[HELP NOW](#)

Fragmented proof for scanned documents, such as mortgage files, so each extracted field carries its own evidence.

SIGR SIBLING-R3PV

[HELP NOW](#)

Receipt Proof Vector. Rolls many receipts from one event into a single trust score that flags the weakest link for triage.

MIR

[HELP NOW](#)

Model Identity and Memory Proof. Pins an outcome to the exact model version, memory, routing, and evaluation that produced it.

MORSC

[HELP NOW](#)

Model Roster Source. Keeps the signed roster of which models are approved to run, so a bad output cannot be blamed on a mystery model.

HIVEBOUND

[HELP NOW](#)

Binds an actor to a named identity so a receipt can say who acted, not just that something happened.

TYPED SIGNER

[HELP NOW](#)

Records what kind of actor signed: a person, a bank system, or an authorized agent operating under delegated authority.

ORIGINPROOF

[HELP NOW](#)

Records where an input came from, so the source of a document or instruction is part of the evidence.

STRUCTURAL LATERATION

[HELP NOW](#)

Cross-checks a claim against independent signals so a single forged input cannot stand alone.

CUSTOMER CONSOLE

[HELP NOW](#)

Where a customer sees and manages their own receipts and, in the build-ahead, their delegation grants.

COMMAND CENTER

[HELP NOW](#)

Where the bank's risk and audit teams view receipts across business units and triage exceptions.

REGISTRY

[HELP NOW](#)

The signed catalog of policies, model versions, and authorities that receipts point back to.

CARNAC™ FAMILY

[HELP NOW](#)

The proof plane, including CarnacPrompt™, Carnac Gateway™, and Carnac Live Ink™, that carries evidence through a request.

CARNAC GATEWAY™

[HELP NOW](#)

The entry point where inbound work picks up proof obligations before it is allowed to proceed.

CARNAC LIVE INK™

[HELP NOW](#)

Captures proof as work happens, in the moment, rather than reconstructing it afterward.

CARNAC PROMPT™ GENESIS

[HELP NEXT](#)

The origin record for a prompt or instruction that an agent acts on, tying the first cause to the chain.

SPIRE

HELP NEXT

The routing spine that carries proof obligations across systems as an action moves through the bank.

SMARTAGENT ROUTE GRAPH

HELP NEXT

A signed map of how an agent's task was routed, so the path itself is part of the evidence.

HOWLER

HELP NEXT

Raises an alarm when a receipt is missing or a check fails, so gaps surface instead of hiding.

HIVESEAL · QPUF

HELP NEXT



A hardware root of trust. Keys are born from quantum-grade randomness, live in silicon, and cannot be exported.

SIGR ANCHOR · XCALIBUR

HELP NEXT

The high-assurance signing path for the most sensitive receipts, where the strongest guarantees are required.

CAPITOLARE

HELP NEXT



A neutral venue where authorized agents meet, do work, settle, and leave with a receipt that outlives the venue.

PROTECTED FLOW

HELP NEXT



Reframes a high-value payment receipt as risk, compliance, and recovery infrastructure rather than a log line.

See the full canon of primitives at [the Hive canon](#). Help now means it can attach to a workflow MidFirst runs today; help next means it is part of the deliberate build toward 2032.

CLOSING DOCTRINE

MIDFIRST WRITES THE RULES. MIDFIRST SYSTEMS DO THE WORK. HIVE RECEIPTS THE AUTHORITY CHAIN.

MidFirst remains the bank in every sense that matters: it owns the customer, writes the authority, sets the policy, holds the keys, runs the execution systems, and answers for every decision. Hive contributes one thing, at one layer: independently verifiable proof that the authority chain was honored. A receipt proves what authority, policy version, input, approval, or action was recorded, and when. It does not prove legality, fairness, accuracy, truth, intent, or compliance by itself.

The recommendation is disciplined and reversible. Start inside the workflows MidFirst already runs, where receipts attach as a sidecar and change nothing about how the bank decides. Build machine identity and narrow delegated execution only as internal governance and external rules mature. Keep every step provable from the first day. The bank that fills the current governance vacuum with disciplined, independently verifiable controls will set the market's expectation for everyone that follows.

CHARTER 001 • AN ILLUSTRATIVE INVITATION

Charter 001 is a one-of-one genesis concept, an illustrative invitation for the first bank that chooses to make its automated decisions independently provable. It does not exist until MidFirst affirmatively participates. There is no signed deal, no category lockout, no customer status, no pilot, and no endorsement, and Hive does not promise broad exclusivity.

PRIMARY SOURCES

- **MidFirst product and corporate pages:** [Information Management](https://www.midfirst.com/business-and-commercial/treasury-management/information-management) (<https://www.midfirst.com/business-and-commercial/treasury-management/information-management>), [Business Online Banking](https://www.midfirst.com/business-and-commercial/online-and-mobile-banking/business-online-banking) (<https://www.midfirst.com/business-and-commercial/online-and-mobile-banking/business-online-banking>), [Commercial Card](https://www.midfirst.com/business-and-commercial/card-solutions/credit/commercial) (<https://www.midfirst.com/business-and-commercial/card-solutions/credit/commercial>), [Open Access](https://www.midfirst.com/open-access) (<https://www.midfirst.com/open-access>), [Private Banking & Wealth](https://www.midfirst.com/private-wealth) (<https://www.midfirst.com/private-wealth>), [Mortgages](https://www.midfirst.com/borrow/mortgage) (<https://www.midfirst.com/borrow/mortgage>), [Dallas Capital Bank acquisition](https://www.midfirst.com/about-us/latest-news/2026/midfirst-bank-to-acquire-dallas-capital-bank-accelerating-growth) (<https://www.midfirst.com/about-us/latest-news/2026/midfirst-bank-to-acquire-dallas-capital-bank-accelerating-growth>), [Forbes profile via newsroom](https://www.midfirst.com/about-us/latest-news/2026/rooted-in-community-built-to-thrive-inside-americas-largest-privately-owned-bank) (<https://www.midfirst.com/about-us/latest-news/2026/rooted-in-community-built-to-thrive-inside-americas-largest-privately-owned-bank>).
- **Model risk and third-party risk:** [OCC Bulletin 2026-13](https://www.occ.treas.gov/news-issuances/bulletins/2026/bulletin-2026-13.html) (<https://www.occ.treas.gov/news-issuances/bulletins/2026/bulletin-2026-13.html>), [Bowman speech, May 2026](https://www.federalreserve.gov/newsevents/speech/bowman20260501a.htm) (<https://www.federalreserve.gov/newsevents/speech/bowman20260501a.htm>), [OCC Bulletin 2023-17](https://www.occ.gov/news-issuances/bulletins/2023/bulletin-2023-17.html) (<https://www.occ.gov/news-issuances/bulletins/2023/bulletin-2023-17.html>).
- **Stablecoins and tokenized deposits:** [GENIUS Act text](https://www.congress.gov/bill/119th-congress/senate-bill/1582/text) (<https://www.congress.gov/bill/119th-congress/senate-bill/1582/text>), [Richmond Fed overview](https://www.richmondfed.org/banking/banker_resources/news_flash/2025/20251118_genius_act) (https://www.richmondfed.org/banking/banker_resources/news_flash/2025/20251118_genius_act), [FDIC tokenized-deposit coverage](https://thecryptocurrencypost.net/fdic-clarifies-tokenized-deposit-insurance-in-fil72025-distinguishing-tokenized-deposits-from-stablecoins/) (<https://thecryptocurrencypost.net/fdic-clarifies-tokenized-deposit-insurance-in-fil72025-distinguishing-tokenized-deposits-from-stablecoins/>).
- **Consumer protection and payment liability:** [Reg E, 12 CFR 1005.6](https://www.consumerfinance.gov/rules-policy/regulations/1005/6) (<https://www.consumerfinance.gov/rules-policy/regulations/1005/6>), [CFPB Circular 2022-03](https://www.consumerfinance.gov/compliance/circulars/circular-2022-03-adverse-action-notification-requirements-in-connection-with-credit-decisions-based-on-complex-algorithms/) (<https://www.consumerfinance.gov/compliance/circulars/circular-2022-03-adverse-action-notification-requirements-in-connection-with-credit-decisions-based-on-complex-algorithms/>), [CFPB chatbot spotlight](https://www.consumerfinance.gov/about-us/newsroom/cfpb-issue-spotlight-analyzes-artificial-intelligence-chatbots-in-banking/) (<https://www.consumerfinance.gov/about-us/newsroom/cfpb-issue-spotlight-analyzes-artificial-intelligence-chatbots-in-banking/>), [Goodwin Law, Authorizing Agentic Payments](https://www.goodwinlaw.com/en/insights/publications/2026/06/insights-technology-aiml-authorizing-agentic-payments) (<https://www.goodwinlaw.com/en/insights/publications/2026/06/insights-technology-aiml-authorizing-agentic-payments>).
- **BSA/AML and electronic records:** [FinCEN CDD Rule](https://www.fincen.gov/resources/statutes-and-regulations/cdd-final-rule) (<https://www.fincen.gov/resources/statutes-and-regulations/cdd-final-rule>), [FinCEN deepfake alert](https://www.fincen.gov/news/news-releases/fincen-issues-alert-fraud-schemes-involving-deepfake-media-targeting-financial) (<https://www.fincen.gov/news/news-releases/fincen-issues-alert-fraud-schemes-involving-deepfake-media-targeting-financial>), [FDIC E-SIGN manual](https://www.fdic.gov/consumer-compliance-examination-manual/x-3-electronic-signatures-global-and-national-commerce-act-e) (<https://www.fdic.gov/consumer-compliance-examination-manual/x-3-electronic-signatures-global-and-national-commerce-act-e>).
- **Card networks and standard-setters:** [Visa Intelligent Commerce](https://www.visa.com/en-us/solutions/intelligent-commerce) (<https://www.visa.com/en-us/solutions/intelligent-commerce>), [Mastercard Agent Pay](https://www.mastercard.com/us/en/news-and-trends/press/2025/april/mastercard-unveils-agent-pay-pioneering-agentic-payments-technology-to-power-commerce-in-the-age-of-ai.html) (<https://www.mastercard.com/us/en/news-and-trends/press/2025/april/mastercard-unveils-agent-pay-pioneering-agentic-payments-technology-to-power-commerce-in-the-age-of-ai.html>), [NY Fed IAC minutes](https://www.newyorkfed.org/medialibrary/media/aboutthefed/pdf/2025/iac-december-2025-minutes) (<https://www.newyorkfed.org/medialibrary/media/aboutthefed/pdf/2025/iac-december-2025-minutes>), [BIS Working Paper 1310](https://www.bis.org/publ/work1310.htm) (<https://www.bis.org/publ/work1310.htm>), [FSB consultation report](https://www.fsb.org/2026/06/sound-practices-for-responsible-adoption-of-artificial-intelligence-ai-consultation-report/) (<https://www.fsb.org/2026/06/sound-practices-for-responsible-adoption-of-artificial-intelligence-ai-consultation-report/>).

Private strategic framework prepared for MidFirst Bank · noindex / nofollow / noarchive / nosnippet · this paper does not state or imply that MidFirst is a customer, partner, pilot, or endorser · the demonstrations, amounts, and receipts shown are made up to illustrate how the service works and are not MidFirst data · a signed record that a rule ran is not a statement of legal, regulatory, or compliance status · Agent Accounts™ is an internal working label, not an existing MidFirst or Hive product, and requires trademark clearance and consumer testing · Carnac™, CarnacPrompt™, Carnac Gateway™, and Carnac Live Ink™ are Hive marks · signatures use a hybrid of Ed25519 and ML-DSA-65 (NIST FIPS 204) · all Hive methods patent pending · [Back to the MidFirst overview](#) · Hive Civilization Inc. · Wyoming, USA