Big Data and Artificial Intelligence (H) Working Group

November 19, 2025

- Audio will be muted upon entry.

- To request to speak, use the "Raise Hand" feature. The chair will be alerted.

- Video optional.

- Use the "Chat" feature for questions, comments, or assistance.

- If joining by phone, press *6 to mute/unmute.

Webex help or other technical issues: (816) 783-8960

Connect access or other questions: (816) 783-8961

Roll Call

Michael Humphreys, Chair	Pennsylvania	Ned Gaines/Brandon Rocchio	Nevada
Mary Block, Co-Vice Chair	Vermont	Christian Citarella	New Hampshire
Doug Ommen, Co-Vice Chair	Iowa	Justin Zimmerman	New Jersey
Richard Fiore	Alabama	Kaitlin Asrow	New York
Alex Romero/Shauna Nickel	Alaska	Jacqueline Obusek	North Carolina
Tom Zuppan	Arizona	Jon Godfread/	North Dakota
Ken Allen	California	Colton Schulz	
Michael Conway/Debra Judy/	Colorado	Judith L. French/	Ohio
Jason Lapham		Matt Walsh	
Andrew N. Mais	Connecticut	Teresa Green	Oklahoma
Karima M. Woods	District of Columbia	TK Keen	Oregon
Stuart Jones	Florida	Elizabeth Kelleher Dwyer	Rhode Island
Weston Trexler	Idaho	Andreea Savu	South Carolina
Jack Engle	Illinois	Travis Jordan	South Dakota
Holly W. Lambert	Indiana	Carter Lawrence	Tennessee
Satish Akula	Kentucky	Nicole Elliott/	Texas
Nathan Strebeck	Louisiana	Rachel Cloyd	
Sandra Darby	Maine	Scott A. White/Eric Lowe/	Virginia
Marie Grant	Maryland	Michael Peterson	
Caleb Huntington	Massachusetts	Bryon Welch	Washington
Kate Stojsih	Michigan	Allan L. McVey/	West Virginia
Jacqueline Olson/Phil Vigliaturo	Minnesota	Joylynn Fix	
Brad Gerling/Patrick Lennon	Missouri	Nathan Houdek/	Wisconsin
Michael Sweeney	Montana	Timothy Cornelius	
Connie Van Slyke	Nebraska	Lela D. Ladd	Wyoming

NAIC Support Staff: Miguel Romero/Scott Sobel/Dorothy L. Andrews

1. Consider Adoption of September 29 Minutes

Attachment 1

—Commissioner Michael Humphreys (PA)

2. Hear a Preview of its Discussion at the Fall National Meeting

—Commissioner Doug Ommen (IA)

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Fall National Meeting Preview
Possible Discussion Plan

- Objectives of Meeting / Recap of Work Done (20 min.)

- Discuss and Edit Each Exhibit (45 min. each, 3 hrs. total)
  1. Focus on each column/question
  2. Discuss instructions to each exhibit

- Discuss Overall Instructions (30 min.)

- Two 10-min. breaks

3. Discuss Feedback, Reactions, and Revisions to the Artificial Intelligence (AI) Systems Evaluation Tool

—*Commissioner Michael Humphreys (PA)*

—*Commissioner Doug Ommen (IA)*

—*Mary Block (VT)*

—*Dan Mathis (IA)*

—*Amanda Theisen (IA)*

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AI System Evaluation Tool – Overall Clarifications

Intent

- Tool is developed to help regulators identify and assess AI systems' related risks.

Administration

- Supports existing market conduct, product review, form filing, financial analysis, or financial examination reviews.
- Tool and exhibits are optional; Questions can be tailored by state regulators.
- Based on Exhibit A, regulators will determine if further inquiry is necessary.

AI System Evaluation Tool – Overall Clarifications

Scope

- Scope is determined by the regulatory process within which this tool is used – i.e., a regulator will decide if a company is subject to an exam and then may use this tool if relevant

Coordination

- Company response should state whether information has been provided to other departments of insurance.
- BDAIWG working with (D) and (E) Committees.

AI System Evaluation Tool – Overall Clarifications

Materiality and Risk Assessment

- Clarified that this tool relies on company assessments but that regulators may request information to understand that assessment.
- The information gathered via this tool will assist regulators in assessing risk as well.

Confidentiality

- Follows Market Conduct and Financial Examination protections.

Definitions

- Several definitions were clarified and aligned to Bulletin as appropriate.

AI System Evaluation Tool
Exhibit A: Quantify Regulated Entity's Use of AI Systems

Purpose and Intent:

- To gather information and maintain an understanding on the extent and usage of AI systems to help determine risk assessment.
- Based on the responses, regulators may seek additional information in subsequent Exhibits.

General Feedback Received:

- Difficult to count number of models – *will continue to evaluate through pilot process.*
- Difficult to track AI-related complaints – *questions removed.*
- Focus on insurer core operations – *operations are grouped for now.*
- Future AI implementations are proprietary – *questions removed.*
- Should include prior authorization and utilization management/review – *added.*

AI System Evaluation Tool
Exhibit B: AI Systems Governance Risk Assessment Framework (Narrative & Checklist)

Purpose and Intent:

- To gather an understanding of, and information on, the company governance program including the process for acquiring, using, or relying on third-party AI systems and data.

General Feedback Received:

- Should provide written guidance – *Tool is an assessment for now.*
- Clarify concern/degree of "consumer impact" – *definition clarified.*
- Expands scope beyond the Bulletin – *updated instructions to clarify that the Tool helps to identify and assess risk and ensure compliance, which aligns with the expectations of the Bulletin.*
- Some questions are model-specific; may be difficult to aggregate up – *edits were made.*
- Other specific clarifications – *edits were made.*

AI System Evaluation Tool
Exhibit C: AI Systems High-Risk Model Details

Purpose and Intent:

- Purpose: To gather an understanding of, and information on, high-risk AI models.

General Feedback Received:

- Insurer self-assessment of "high-risk" may be inconsistent – *regulator to review criteria.*
- Definitions of "residual", "adverse consumer, financial, or financial reporting impact", "model risk classification" are unclear – *clarified in Definitions.*
- Confidentiality concerns – *follows market conduct and financial examination protections.*

AI System Evaluation Tool
Exhibit D: AI Systems Model Data Details
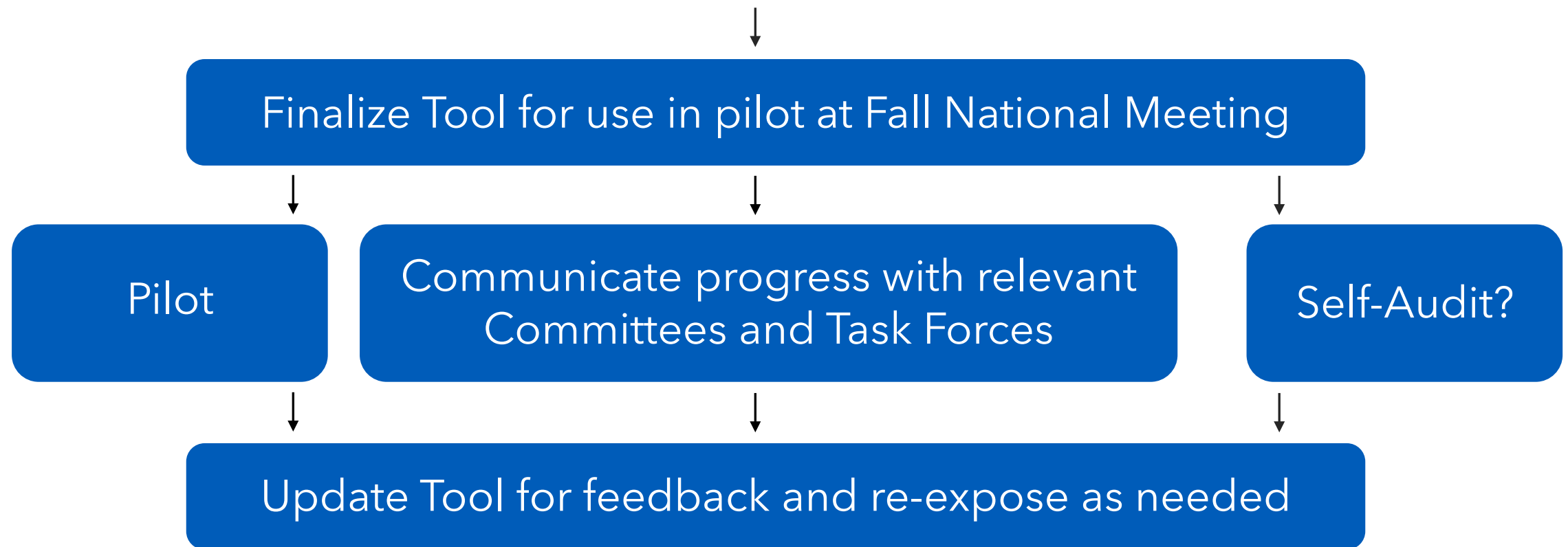
Purpose and Intent:

- Purpose: To gather information about the sources and types of data used in AI system models.

General Feedback Received:

- Recommendations for assessments of data architecture – ***regulator to review company assessment.***

- Include data more relevant to health insurers – ***added genetic information, pre-existing conditions, diagnostic data, etc.***

- Concerns about names of third-party vendors and/or confidentiality – ***follows market conduct and financial examination protections.***

- Other specific clarifications – ***edits were made.***

AI Systems Evaluation Tool – Development Plan

Release of Tool 2.0 in November

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Finalize Tool for use in pilot at Fall National Meeting

↓   ↓   ↓

Pilot   **Communicate progress with relevant Committees and Task Forces**   **Self-Audit?**

↓   ↓   ↓

Update Tool for feedback and re-expose as needed

AI Systems Evaluation Tool – Pilot Specifics

- States will use tool on a mix of financial and market exams
- States will share insights on experiences with tool to pilot group
- States that use the tool may use all or part of the tool

4. Other Matters

—Commissioner Michael Humphreys (PA)

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