



October 29, 2020

Commissioner Jon Godfread, Chair
Superintendent Elizabeth Kelleher Dwyer, Vice Chair
Innovation and Technology (EX) Task Force
National Association of Insurance Commissioners
1100 Walnut Street
Suite 1500
Kansas City, MO 64106

Via Electronic Mail: dmatthews@naic.org

Re: Innovation and Technology Task Force Charges

Dear Commissioner Godfread and Superintendent Dwyer:

The American Property and Casualty Insurance Association (APCIA) appreciates the opportunity to provide feedback on the Innovation and Technology (EX) Task Force's (Task Force) 2021 charges. APCIA offers one recommended change to the Big Data and Artificial Intelligence (EX) Working Group (Working Group) charges for your consideration.

Importantly, we applaud the thoughtful approach that the first sentence of Charge A establishes through research and evaluation of existing regulatory frameworks. It is a critical first step to understand how big data and AI are being utilized and to perform a gap analysis before recommending next steps. However, as drafted the second sentence could be read to presuppose the outcome of this research and gap analysis and may unnecessarily rush development of model governance. The suggestions below are intended to provide flexibility to the Working Group and avoid creating undue pressure to rush into development of a solution for these evolving tools while maintaining the Working Group's interest on governance.

Suggested Edit

A. Research the use of big data and artificial intelligence (~~IA~~ AI) in the business of insurance and evaluate existing regulatory frameworks for overseeing and monitoring their use. Present findings **and recommend next steps, if any**, to the Innovation and Technology (EX) Task Force, **recommend which may include** model governance for the use of big data and AI for the insurance industry.

Respectfully,

A handwritten signature in black ink that reads "Angela Gleason".

Angela Gleason
Senior Director, Cybersecurity & Counsel