

Draft Date: 10/6/26

Virtual Meeting

BIG DATA AND ARTIFICIAL INTELLIGENCE (H) WORKING GROUP

Thursday, October 8, 2026

11:00 – 12:00 p.m. ET / 10:00 – 11:00 a.m. CT / 9:00 – 10:00 a.m. MT / 8:00 – 9:00 a.m. PT

ROLL CALL

Nathan Houdek, Chair/ Coral Manning	Wisconsin	Connie Van Slyke	Nebraska
Doug Ommen, Co-Vice Chair	Iowa	Ned Gaines/Brandon Rocchio	Nevada
Mary Block, Co-Vice Chair	Vermont	Sean Rosene	New Hampshire
Richard Fiore	Alabama	Susan Ochs	New Jersey
Chad Bennett/Alex Romero	Alaska	Vanessa DeJesus/ Michael Lord	New Mexico
Tom Zuppan	Arizona	Nishtha Ram/Kevin Yan	New York
Jimmy Harris	Arkansas	Chuck Myers	North Carolina
Ken Allen	California	Jon Godfread/ Colton Schulz	North Dakota
Michael Conway/Debra Judy/ Jason Lapham	Colorado	Judith L. French/ Matt Walsh	Ohio
Joshua Hershman	Connecticut	Nicole Nash	Oklahoma
Karima M. Woods	District of Columbia	TK Keen	Oregon
Stuart Jones	Florida	Michael Humphreys	Pennsylvania
Matt Kilgallen	Georgia	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
Shaun Orme	Kentucky	Rachel Cloyd/Nicole Elliott/ Jamie Walker	Texas
Caleb Malone/ Saima Sanjida Shila	Louisiana	Scott A. White/Eric Lowe/ Michael Peterson	Virginia
Sandra Darby	Maine	Curt Kwak	Washington
Marie Grant	Maryland	Erin K. Hunter/ Joylynn Fix	West Virginia
Caleb Huntington	Massachusetts	Lela D. Ladd	Wyoming
Kate Stojsh	Michigan		
Sara Payne/Phil Vigliaturo	Minnesota		
Brad Gerling/Patrick Lennon	Missouri		
Michael Sweeney	Montana		

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

AGENDA

1. Consider Adoption of its August 31 Meeting Minutes Attachment 1
—*Commissioner Nathan Houdek (WI)*
2. Receive an Update on the AI Risk Evaluation Supplement Pilot
—*Coral Manning (WI)*
3. Hear Comments from Interested Parties Summarizing Their Written
Comments Received
—*Commissioner Nathan Houdek (WI)*
4. Discuss Any Other Matters Brought Before the Working Group
—*Commissioner Nathan Houdek (WI)*
5. Adjournment

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Big Data and Artificial Intelligence (H) Working Group
Virtual Meeting
August 31, 2026

The Big Data and Artificial Intelligence (H) Working Group of the Innovation, Cybersecurity, and Technology (H) Committee met Aug. 31, 2026. The following Working Group members participated: Nathan Houdek, Chair, and Coral Manning (WI); Doug Ommen, Co-Vice Chair (IA); Mary Block, Co-Vice Chair (VT); Alex Romero (AK); Rodney Zeigler (AL); Teri Ann Mecca (AR); Lori Dreaver Munn (AZ); Jennifer Bender (CA); Jason Lapham (CO); Wanchin Chou (CT); Karima M. Woods (DC); Richie Frederick (FL); Matt Kilgallen (GA); Weston Trexler (ID); Jack Engle (IL); Victoria Hastings (IN); Shaun Orme (KY); Saima Sanjida Shila (LA); Caleb Huntington (MA); Salama Karim-Camara (MD); Sandra Darby (ME); Kate Stojisih and Jake Martin (MI); Phil Vigliaturo (MN); Brad Gerling (MO); Colton Schulz (ND); Connie Van Slyke (NE); Sean Rosene (NH); Randall Currier (NJ); Gennady Stolyarov II (NV); Nishtha Ram (NY); Matt Walsh (OH); Nicole Nash (OK); Michael McKenney and Lindsy Swartz (PA); Matt Gendron (RI); Andreea Savu (SC); Haelly Pease (SD); Michael Schulz and Michael Barber (TN); Rachel Cloyd (TX); Eric Lowe (VA); and Lela D. Ladd (WY).

1. Adopted its Summer National Meeting Minutes

Block made a motion, seconded by Trexler, to adopt the Working Group's Aug. 13 minutes (*see NAIC Proceedings – Summer 2026, Innovation, Cybersecurity, and Technology (H) Committee, Attachment Two*). The motion passed unanimously.

2. Heard an Update on the Proposed Changes to the AI Risk Evaluation Supplement

Manning provided an update on proposed changes to the AI Risk Evaluation Supplement, formerly known as the AI Systems Evaluation Tool. She said the Working Group is releasing a clean version 5.0 of the supplement rather than a tracked-changes document because the structural changes made to the tables and arrangement of information would have made a redline version difficult to read. She said the 5.0 release today begins a 30-day public comment period, with a public meeting planned in early October to receive verbal comments. States are also offering other opportunities for companies to provide input which will be taken into account as well. An additional 14-day comment period and two further public meetings will follow before a version 7.0 is presented for adoption at the Fall National Meeting.

Manning reviewed the substantive changes in the supplement, which include a clarification of the intent, in that it is designed to complement existing examination handbooks rather than serve as a standalone document. This is now stated explicitly, and decisions about which companies will receive supplement-related inquiries are addressed by existing handbook guidance, not separately within the supplement. Instructions throughout the supplement, including in each exhibit, were clarified, and examples were added showing when a regulator might use only a portion of the supplement rather than the entire document. New guidance on machine learning was added, including generalized linear models (GLMs), and regulators may now limit follow-up inquiries after receiving Exhibit A responses if they are not interested in reviewing all model types. The definition of materiality was revised to align with the *Financial Condition Examiners Handbook*, and additional language was added regarding risk assessment to ensure that inherent risk is considered before mitigation is applied.

Manning said that in Exhibit A, the supplement now distinguishes between AI systems, addressed in the left columns, and AI models, addressed in the right columns. Guidance was added indicating that either the regulator

will specify a materiality threshold or ask the company to specify its own. A request for a model inventory was added, and the exhibit now gathers more information on model types up front.

Manning continued to report that Exhibit B was clarified to focus on the company's AI Systems program which encompasses their governance program. Additional guidance was added to the narrative section on models with direct consumer impact, and a new question was added on explainability and transparency. The checklist section was restructured to request the document name and page number in company responses and to include new questions on materiality and third-party model oversight.

She said that the instructions and a few fields were clarified in Exhibit C to focus on the AI model. Additional examples of model-type responses were added, along with a request for more information on how a model was developed, and separate fields were created for model risks and model limitations, the latter now including a determination of whether the risk is high, moderate, or low.

She continued to state that, in Exhibit D, a field was added to indicate which AI models rely on the data elements, and a column previously requesting information by field was consolidated into a single overarching column across all data elements. The column addressing how information is used was clarified, and the supplement now explicitly states that regulators may customize the exhibit by adding or removing data fields, particularly to reflect relevance to a specific line of business. A note was added that regulators may request a data dictionary to gain a more complete understanding of the data used.

She said some definitions were modified to more closely align with those that exist in handbooks and other established documents, such as the definitions of agentic AI, an AI model drawn from National Institute of Standards and Technology (NIST) and White House executive order language, an AI program, direct consumer impact, GLMs, material financial impact, third parties, and materiality drawn from the NAIC *Model Bulletin on the Use of Artificial Intelligence Systems by Insurers*. The definition of inherent risk was clarified to better align with the *Financial Condition Examiners Handbook*.

Commissioner Ommen thanked all the companies involved in the pilot project and noted that the review and perspectives on the changes are valuable for those companies that have not been involved. He also thanked the companies involved in this effort.

Miguel Romero (NAIC) said a survey has been sent to companies that participated in the pilot, and a preliminary review of responses indicates that much of the feedback concerns the clarity of the information being requested, which the Working Group hopes the changes reflected in version 5.0 will address.

Commissioner Houdek reiterated that the exposure period for version 5.0 will run for 30 days and encouraged continued feedback through the formal comment process, noting that the Working Group will also follow up directly with companies that participated in the pilot. He said a meeting is tentatively scheduled for Oct. 8 to receive verbal comments following the exposure period, after which the Working Group will make additional revisions, release a version 6.0, take further comments, and work toward a final version 7.0.

Having no further business, the Big Data and Artificial Intelligence (H) Working Group adjourned.