



*2025 Fall National Meeting
Hollywood, Florida*

THIRD-PARTY DATA AND MODELS (H) WORKING GROUP

Tuesday, December 9, 2025

11:45 a.m. – 12:45 p.m.

Meeting Summary Report

The Third-Party Data and Models (H) Working Group met Dec. 9, 2025. During this meeting, the Working Group:

1. Adopted its Summer National Meeting minutes.
2. Adopted its Sept. 26 e-vote minutes. The Working Group took the following action:
 - A. Adopted definitions for third-party data and model vendors.
3. Adopted its Oct. 29 minutes. During this meeting, the Working Group took the following action:
 - A. Discussed goals for a third-party regulatory framework and plans of action.
4. Discussed the Third-Party Data and Model Regulatory Framework, which was developed by state insurance regulators from Colorado, Florida, Iowa, Pennsylvania, and Vermont. The draft framework would apply to defined third-party data and model vendors across property/casualty (P/C), health, and life insurance. The framework would apply when data and/or model(s) are used in an insurer's functions that have direct consumer impact, including pricing, underwriting, claims, utilization reviews, marketing, and fraud detection. The framework would require third parties to register with a state department of insurance (DOI) and submit their governance program for approval of registration. States may use a discretionary filing process if they wish to receive filings of data and models in addition to registration. The goals of the framework are to ensure that regulators have timely access to third-party data and models and to confirm that third parties maintain strong governance practices to protect insurers and consumers.
5. Exposed the Third-Party Data and Model Regulatory Framework for a 60-day public comment period ending Feb. 6, 2026.