

2025 Summer National Meeting Minneapolis. Minnesota

BIG DATA AND ARTIFICIAL INTELLIGENCE (H) WORKING GROUP

Tuesday, August 12, 2025 11:00 a.m. – 12:00 p.m.

Meeting Summary Report

The Big Data and Artificial Intelligence (H) Working Group met Aug. 12, 2025. During this meeting, the Working Group:

- 1. Adopted its July 16 minutes. During this meeting, the Working Group took the following action:
 - A. Adopted its Spring National Meeting minutes.
 - B. Discussed an artificial intelligence (AI) systems evaluation tool.
 - C. Heard a preliminary summary of comments from the request for information (RFI) on a possible AI model law.
 - D. Heard a presentation on the use of agentic AI in the insurance industry.
- 2. Heard comments from interested parties on their responses to the RFI regarding a possible AI model law. The RFI was issued May 15 for a 45-day public comment period ending June 30. The Working Group received 33 written responses from state departments of insurance (DOIs), consumer representatives, health provider groups, trade organizations, InsurTechs, an advisory organization, and consultants. Fifteen organizations also provided verbal comments addressing topics such as: support of a possible AI model law; whether existing laws, regulations, and/or the *Model Bulletin on the Use of Artificial Intelligence Systems by Insurers* are sufficient; goals that should be considered in an AI model law; reactions to the three pillars of governance, transparency, and accountability; whether an AI model law should be general or vary by line of business; whether governance should vary by company size; whether an AI model law should address third-party AI data and model vendors; and recommendations to reference state legislation and other industry templates. The comments and feedback helped the Working Group better understand industry perspectives, concerns and rationales, as well as identify key information and decision points for consideration. The Working Group will use these insights to determine next steps in developing a possible AI model law.
- 3. Discussed next steps for the development of an AI systems evaluation tool. On July 16, the Working Group discussed an initial draft of this tool, which consists of four exhibits that allow regulators to progressively investigate AI governance, testing protocols, high-risk models, data sources, and financial implications while simultaneously serving as a checklist for insurers. The tool and each exhibit are optional, and regulators may tailor the questions as needed. On July 7, the Working Group exposed the tool for a 60-day public comment period ending Sept. 5.