Draft date: 11/4/26

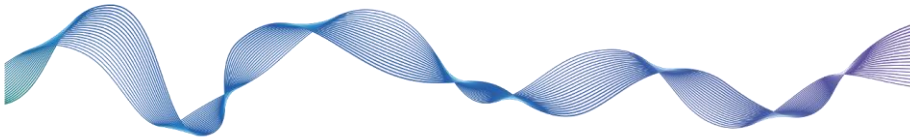
2026 Fall National Meeting
Dallas, Texas

THIRD-PARTY DATA AND MODELS (H) WORKING GROUP
Monday, November 16, 2026
8:00 – 9:00 a.m.
Convention Center—Texas D456—Level 3

ROLL CALL

Jason Lapham, Chair	Colorado	Phil Vigliaturo	Minnesota
Nicole Crockett, Vice Chair	Florida	Brad Gerling	Missouri
Charles Hale/ Richard Fiore	Alabama	Gennady Stolyarov/ Brandon Rocchio	Nevada
Alex Romero/ Chad Bennett	Alaska	Kevin Yan/ Vivian Connor	New York
Tom Zuppan/ Lori Dreaver Munn	Arizona	John Arnold/ Colton Schulz/ Tyler N. Erickson	North Dakota
Chandara K. Phanachone/ Ken Allen	California	Stewart Trego/ Matt Walsh	Ohio
George Bradner/ Wanchin Chou	Connecticut	David Dahl/ Eric Bredeson/ Ying Liu	Oregon
Lance Hirano/ Kathleen Nakasone	Hawaii	Michael McKenney	Pennsylvania
Weston Trexler/ Shannon Hohl	Idaho	Beth Vollucci/ Matthew Gendron	Rhode Island
Shannon Whalen	Illinois	Andreea Savu	South Carolina
Doug Ommen/ Jordan Esbrook	Iowa	Nicole Elliott	Texas
Craig Van Aalst/ Josh Carlson	Kansas	Rosemary Raszka	Vermont
Adam Patrick	Louisiana	Jessica Baggarley/ Eric Lowe	Virginia
Sandra Darby	Maine	Curt Kwak	Washington
Raymond A. Guzman	Maryland	Tmothy Cornelius	Wisconsin
Jackie Horigan	Massachusetts		

NAIC Support Staff: Kris DeFrain/Scott Sobel



AGENDA

1. Consider Adoption of its Summer National Meeting Minutes —*Jason Lapham (CO)* — Attachment A

2. Discuss and Expose the Property/Casualty (P/C) Pricing and Underwriting Framework and Confidentiality Pathway—*Jason Lapham (CO)* — Attachment B

3. Discuss Next Steps (Registry, Attestation, Etc.)—*Jason Lapham (CO)*

4. Discuss Any Other Matters Brought Before the Working Group —*Jason Lapham (CO)*

5. Adjournment

Draft Pending Adoption

Draft: 8/19/26

Third-Party Data and Models (H) Working Group
Columbus, Ohio
August 12, 2026

The Third-Party Data and Models (H) Working Group of the Innovation, Cybersecurity, and Technology (H) Committee met in Columbus, OH, Aug. 12, 2026. The following Working Group members participated: Jason Lapham, Chair (CO); Nicole Crockett, Vice Chair, and Richie Frederick (FL); Chad Bennett and Alex Romero (AK); Richard Fiore (AL); Lori Dreaver Munn (AZ); Ken Allen and Chandara K. Phanachone (CA); George Bradner and Wanchin Chou (CT); Doug Ommen and Jordan Esbrook (IA); Weston Trexler (ID); Julie Holmes (KS); Matthew Stewart (LA); Jackie Horigan (MA); Raymond A. Guzman (MD); Sandra Darby (ME); Phil Vigliaturo (MN); Brad Gerling (MO); Colton Schulz (ND); Gennady Stolyarov (NV); Kevin Yan (NY); Stewart Trego and Matt Walsh (OH); Michael McKenney (PA); Beth Vollucci (RI); Andreea Savu and Will Davis (SC); Marianne Baker (TX); Jessica Baggarley (VA); Mary Block (VT); and Timothy Cornelius (WI).

1. Adopted its July 16 and Spring National Meeting Minutes

Lapham stated that the Working Group met July 16. During this meeting, it took the following action: 1) discussed the draft Third-Party Framework, PC Pricing, and Underwriting Data and Models, which it exposed July 8 for a 28-day public comment period ending Aug. 5.

The Working Group also met June 29 and April 9 in regulator-to-regulator session, pursuant to paragraph 3 (specific companies, entities, or individuals) of the NAIC Policy Statement on Open Meetings) to discuss third-party regulatory framework drafts.

Commissioner Ommen made a motion, seconded by Trexler, to adopt the Working Group's July 16 (Attachment Five-A) and March 22 (*see NAIC Proceedings – Spring 2026, Innovation, Cybersecurity, and Technology (H) Committee*) minutes. The motion passed unanimously.

2. Discussed the Third-Party Regulatory Framework for P/C Pricing and Underwriting

Lapham said the Working Group exposed the third-party regulatory framework for property/casualty (P/C) pricing and underwriting July 8 for a public comment period ending Aug. 5. Eleven comment letters were received.

Scott Harrison (American InsurTech Council--AITC) said AITC is not wholly supportive of a registry and would prefer alternative ways achieve the objectives of transparency, accountability, etc. He identified four concerns with the registry: 1) it would create a new bureaucratic infrastructure; 2) the benefit to the third-party vendor is unclear; 3) the registry would be public and identify the third parties with which insurance carriers are doing business; and 4) an existing review process for P/C rating and underwriting appears to be working and could be used by other states.

McKenney and Stolyarov both said it should not be problematic to have a public registry; the fact that insurers are doing business with particular third parties in rating and underwriting is public information in the states. The proprietary part of models is what is considered confidential. McKenney noted that with 7,000 P/C rate filings in Pennsylvania, the insurance companies are not privy to third parties' data sets and model details. He said the point of this framework is to create an avenue for regulators to go directly to third parties and get information.

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He said it seems that alternative actions would require the adoption of a law by the legislature, where the outcome might not be uniform. Instead, state insurance regulators can implement this voluntary registry, work together, and get access to the information needed.

McKenney added that regulators want to have confidence that insurance carriers understand the models they are using and are using them appropriately in compliance with state laws and regulations. He said the registry would allow third parties to keep information confidential from insurers while still providing information regulators need. He said a level of transparency would be achieved.

Frederick said Florida has issues similar to Pennsylvania's. State insurance regulators would need to educate third parties to understand what they need to do to do business in a state. Transparency is needed for insurers too, at least to the extent that insurers would have a level of confidence and understanding about the information or tools they are using.

Kristen Abbott (American Property Casualty Insurance Association—APCIA) said this framework was a meaningful improvement over the original version, and APCIA appreciates that it has been narrowed to focus only on the P/C pricing and underwriting data and models. APCIA encourages a tailored, risk-based approach to any future expansion of the framework and further refinement of definitions and registration requirements to avoid unnecessary complexity and duplication. While the registry is described as voluntary, APCIA questions whether it would function that way in practice. It believes participation should remain truly voluntary and that insurers should not lose access to valuable third-party tools simply because a vendor chooses not to participate or disclose proprietary information to state insurance regulators. It also encourages continued focus on operational and implementation issues, including governance and reporting expectations, transition periods, treatment of legacy models, and situations where insurers depend on information that may only be available from vendors. Abbott said any final framework should recognize the practical limits of insurer oversight and support good faith compliance efforts. APCIA also appreciates the stronger confidentiality protections in the revised draft and encourages additional safeguards to proprietary vendor information and commercially sensitive insurer information.

Commissioner Ommen said this work has been ongoing for some time, and Iowa state insurance regulators have been investigating what can be done in Iowa. He said third-party vendors have been filing as advisory organizations. However, they are not really advisory organizations, so as a regulator, Commissioner Ommen said he is left with the question of whether to revoke or deny their registration as an advisory organization, to require them to withdraw from their registration, or to look for an alternative. He said APCIA appears to view the proposed voluntary process as a constructive alternative to state insurance regulators navigating varying state laws to identify a to receive filings. Abbott said feedback from members suggests this is a good starting point, with some further clarifications requested.

Tyler Hobbitzell (Blue Cross Blue Shield Association—BCBSA) said if the Working Group expands this work into other lines, BCBSA requests that it be evaluated independently with a stakeholder input. The final P/C product should not be presumed to apply to other lines. Lapham said that is the plan.

Laura Panesso (ISO Verisk) focused on clarifying the scope of regulated entities, avoiding requirements that may deter participation, and removing provisions that might duplicate other processes. She said "licensee" was defined in the first draft of the framework and would like it reinstated because it would distinguish regulated entities from third-party vendors and provide needed clarity regarding the definitions. The annual attestation's Section 3B addresses the insurers' compliance with applicable law, which is not controlled by third parties who would sign

the attestation. She said use cases for third-party data and models may vary. Different statutes may apply to those different use cases, and the vendor may not always know the exact use case that a particular insurance company customer is implementing. Panesso suggested softening the requirement so that it is reviewed in conjunction with applicable laws rather than in compliance to provide some flexibility for those various use cases.

Lindsey Klarkowski (National Association of Mutual Insurance Companies—NAMIC) said the Working Group should avoid regulatory duplication and confusion by revising its charges to coordinate directly with the committee working groups that are also addressing third parties. Most recently, the Market Conduct Regulation Modernization (D) Working Group has been having active discussions at the Summer National Meeting. While the efforts of this Working Group are very well intentioned and an important exercise, NAMIC is concerned that the proposed frameworks are duplicative of current insurer responsibilities and risk creating confusion given the overlap with existing filing rules and existing filing practices that various states have adopted. NAMIC believes that efforts across the NAIC should be coordinated, and this Working Group should look at existing rules and practices, identifying if there are gaps, what they are, what is working well, and what will help to avoid this result.

Commissioner Ommen said Iowa accepts filings put in the square box of "advisory organization." However, he said they are not advisory organizations, and that is the experience in numerous states. He asked whether NAMIC had an alternative comprehensive approach. Klarkowski said the frameworks were walked through, but NAMIC recommends digging into them to identify pain points. She mentioned Arizona recently implemented a new advisory organization-type category specifically for data and model vendors. States are allowing nonlicensed entities to also file in the System for Electronic Rates & Forms Filing (SERFF) as an informational filing. NAMIC wants to avoid the growing patchwork of approaches that are happening and respects the effort to try and have some cohesiveness there. Klarkowski said she thinks the conversation needs to start with an evaluation of what is and is not working in the states. Chou asked NAMIC to submit a specific list of duplications. He said the lack of an NAIC framework has led states to be creative, and state insurance regulators want to address that patchwork to create something more cohesive across states.

Block said this project began after industry and third-party vendors raised concerns with regulators about the lack of a uniform framework and the resulting challenges across all 50 states. She said the Working Group needs to not relitigate how it started this in the first place and solve this problem.

Klarkowski said NAMIC members have not reported issues getting information from the third parties. She said a communication pathway is needed between third-party vendors and state insurance departments because, under the current structure, states do no provide consistent confidentiality protections for third parties that submit proprietary information to departments, and the formal relationship exists only between the third party and the insurer.

Bryan Rehor (ZestyAI) said that, as a third-party property analytics provider, ZestyAI supports most of the draft and believes a single NAIC-hosted registry is an improvement over the current state-by-state patchwork. The opportunity for vendors to file documentation directly with regulators is the right design because it gives them complete access while protecting the underlying methodology. He said ZestyAI endorses governance expectations tied to the NAIC Principles on Artificial Intelligence (AI) and *Model Bulletin on the Use of Artificial Intelligence Systems by Insurers*, which are standards that responsible vendors should already meet.

Rehor raised three points from his letter. First, a vendor officer would not be able to attest, within an annual attestation, that the data and models comply with insurance law in every state where an insurer uses them. He said the vendor does not control how a carrier implements a score, which rating plan it goes into, or where it is

deployed. Second, confidentiality with open records policies is a concern. The draft encourages states to extend trade secret protection, but it acknowledges that some states will need new statutes. Vendor filing obligations should not attach in a state unless that state provides protection equivalent to that given to insurers. Third, Section 2b allows a state insurance regulator to bar all insurers statewide from using a vendor's models. There should be some materiality threshold, a written notice, and a cure period.

Chou said the industry and vendors have a significant number of staff that state insurance regulators do not have, and that is why regulators are asking vendors to take ownership and sign off on what they have developed via the attestation. Rehor agreed with the need for attestation but said vendors should also be required to do the same because vendors do not control the final implementation of the products. He said a model solution can be deployed in a perfectly compliant manner, and that same solution can be deployed in a noncompliant manner. Vendors can attest that the solution licensed to the subscriber is compliant. Chou agreed that insurers have their own ownership and responsibility.

Lapham said the plan is for the drafting group to make revisions for consideration by the Working Group. Ideally, the plan is to have a finalized framework ready for consideration at the Fall National Meeting, but he said the Working Group will need to see how the work progresses over the next three or four months.

Having no further business, the Third-Party Data and Models (H) Working Group adjourned.

SharePoint/NAIC Support Staff Hub/Member Meetings/H Cmte/2026_Summer/WG-Third-Party/Summer-Minutes/Minutes-Third-PartyWG081226-Final.docx

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Regulatory Framework for Third-Party Data and Model Vendors
Property and Casualty Pricing and Underwriting Data and Models

EXECUTIVE SUMMARY

As one component of a broader pending regulatory framework for third-party data and model vendors, this document describes the first phase focused on third-party data and models utilized in property and casualty pricing and underwriting insurance functions (hereafter referred to as "third-party data and models").

The purposes are to 1) facilitate a process by which states are able to ensure that licensees'~~insurers'~~ use of third-party data and models complies with state insurance laws and regulations, including the Unfair Trade Practices Act, Unfair Claims Settlement Act, and other applicable regulatory standards and rate review authority, including prohibitions against unfair discrimination; 2) encourage robust third-party data and model governance standards; and 3) provide state insurance regulators with a comprehensive awareness of the third-parties that play a material role in property and casualty pricing and underwriting functions along with direct access to third-party data and models.

In addition to strengthening regulatory oversight, this framework offers direct value to third parties themselves in the following ways: 1) Signals commitment to shared standards and establishes participants as credible and identifiable actors; 2) Establishes practical access to information-sharing and consultation channels, streamlining routine filings and regulatory inquiries in which third-party data or models are implicated; and 3) Reflects commitment to good governance by proactively contributing to a process where responsibility is shared by all stakeholders that materially affect outcomes with significant consumer impact.

Licensees~~Insurers~~ remain fully responsible for compliance with all applicable insurance laws when using third-party data or models.

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Regulatory Framework for Third-Party Data and Model Vendors
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DEFINITIONS

Model:

Pricing Model—A simplified representation of how insurance losses, expenses, and risk factors relate to each other that is constructed for the purposes of developing rates, premiums, or rating factors for property and casualty insurance risks.

Third-Party Pricing Model Vendor—A person or entity, other than a licensee, that develops, maintains, or distributes a pricing model for use by licensees~~property and casualty insurers~~ in ratemaking. A third-party pricing model vendor does not itself assume the insurance risk associated with the model's output.

Underwriting Model—A simplified representation of relationships between risk characteristics, exposures, and expected insurance outcomes designed to inform or automate a licensee's~~property and casualty insurer's~~ decisions about whether to accept, decline, or modify the terms of property or casualty insurance risks.

Third-Party Underwriting Model Vendor—A person or entity, other than a licensee, that develops, maintains, or distributes an underwriting model for use by licensees~~property and casualty insurers~~ to provide actionable underwriting guidance such as an accept/decline recommendation, tier placement, or eligibility determination. A third-party underwriting model vendor does not itself assume the insurance risk associated with the model's output.

Data:

Pricing Data—Facts or information obtained from a source other than a licensee, used as input to a pricing model, or that informs the selection of such input, for the purposes of developing rates, premiums, or rating factors for property and casualty insurance risks. This includes output from other models supplied by third parties.

Third-Party Pricing Data Vendor—A person or entity, other than a licensee, that develops, maintains, collects, compiles, or distributes pricing data for use by both licensees or unlicensed persons or entities, in developing rates, premiums, or rating factors for property and casualty risks. A third-party pricing data vendor does not itself assume the insurance risk associated with the pricing decisions informed or influenced by that data.

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Underwriting Data—Facts or information obtained from a source other than a licensee, used as input to an underwriting model, or that informs the selection of such input, for the purposes of evaluating, accepting, declining, or modifying the terms of property and casualty risks. This includes output from other models supplied by third parties.

Third-Party Underwriting Data Vendor—A person or entity, other than a licensee, that develops, maintains collects, compiles, or distributes underwriting data for use by both licensees or unlicensed persons or entities, in evaluating, accepting, declining, or modifying the terms of property and casualty risks. A third-party underwriting data vendor supplies facts or information that serves as an input to an underwriting model, or that otherwise informs underwriting decisions made by licensees, but does not itself assume the risk associated with the underwriting decisions informed or influenced by that data.

Note: Third-party data vendors and third-party model vendors are not necessarily distinct. The same third-party vendor may, in fact, be a data vendor and model vendor.

Licensee—Any insurer, advisory organization, rating organization, or other similar organization engaged in pricing or underwriting property and casualty insurance that is required to be licensed or otherwise authorized to perform insurance-related functions under applicable state law and is subject to examination by the [department of insurance].

PROPOSED STRUCTURE

1. **Registry:** Third-party data and model vendors would be encouraged to voluntarily register through a shared multi-state registry hosted by the National Association of Insurance Commissioners ("NAIC"). The registry would function as a central repository and access point for third-party data and model vendors to provide required descriptions of their corporate governance structure as well as their data and model governance programs and to which licensees ~~insurers~~ they have supplied ~~purchased~~ data and/or models. As a condition of registration, third-party data and model vendors would commit to respond within specified timeframes to insurance regulator requests for information about the pricing and underwriting data and models they supply to licensees~~property and casualty insurers~~ including potentially the data and/or models themselves.

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a. Corporate governance documentation must include contact information, legal entity, ownership structure, and responsible officers.

b. Model and data governance programs ~~must~~ are expected to be consistent with the NAIC's AI Principles and Model Bulletin and demonstrate robust governance standards and risk management controls including governance, roles, responsibilities, and internal oversight.

   i. For models, documentation should consist of purpose, intended use, modeling approach, assumptions, inputs, outputs, limitations, performance metrics, and validation processes.

   ii. For data, documentation should consist of accuracy, completeness, timeliness, representativeness, auditable data lineage, and quality controls; data governance and provenance controls; ~~roles, responsibilities, and internal oversight;~~ process for identification and remediation of missing or incomplete data.

   iii. Third-party data and model vendors should include, in their contracts with licensees, the party responsible for disclosing~~e~~ to consumers the usage of data ~~usage~~, explaining how consumers can access and correct data records,[1] and defining~~e~~ any limitations of corrections.

~~c. Upon request, third-party data and model vendors should provide regulators with information such as that described in the *NAIC Model Review Manual* and the *Catastrophe Modeling Primer*, including the following: model documentation, input and output specifications, validation, performance, and any fairness/bias testing results, change logs and audit trails, and other information reasonably necessary for regulatory evaluation of a property and casualty rate, rule, or underwriting guideline filing.~~

[1] https://www.ftc.gov/business-guidance/resources/consumer-reports-what-information-furnishers-need-know

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~~d.~~c. Regulators will have access to the registry which will indicate the third-party vendors that are providing licensees~~insurers~~ with models and/or data for use in underwriting and/or pricing property and casualty products offered in their state along with which licensees~~insurers~~ have purchased the data and/or models . The registry will also indicate the type of registration applicable in each respective state (e.g., "Data and Model Vendor," "Insurance Support Organization," "Advisory Organization"). Information made public will include the vendor names and may include other non-confidential information such as the intended use(s) (e.g., P/C pricing) of data and models they have listed with their registration.

d. Information submitted to the Registry by a model or data vendor will be subject to a data sharing agreement between the NAIC and the Vendor. In this data sharing agreement, the NAIC will agree to share confidential information submitted by model or data vendors only with jurisdictions that attest they can maintain the confidentiality of such information. The NAIC will concurrently enter into MOUs with participating jurisdictions regarding access to the Registry, and as such, the confidentiality of vendor information will be governed by each participating state's statutory confidentiality protections and open records laws. Additionally, participating jurisdictions will have to attest that they will only share any confidential information accessed from the Registry with other jurisdictions that have also entered into the MOU with the NAIC.

Note: States may need to enact laws or amend existing statutes to specifically provide confidentiality protections with respect to information from third-party data and model vendors.

~~e. Information submitted to the NAIC's registry by a model or data vendor will be treated as confidential by the NAIC. The NAIC is not subject to open records laws in any state. The confidentiality of vendor information will be governed by each state's open records laws. However, if a vendor designates certain~~

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~~information submitted to the registry as confidential, whether governance information or data or models, the NAIC will commit to sharing that information only with states that have the authority to keep it confidential. States may have statutes that permit confidential treatment of trade secrets and for exam work papers. States may also need to create statutes that apply specifically to information from third-party data and model vendors or amend existing statutes to include them.~~

2. **Rate and Underwriting Filings:** A~~n~~ licensee~~insurer~~ will still ~~continue to~~ be required to file its rates and underwriting rules in accordance with each state's laws and regulations. This new framework also does not change any state's requirements for the filing of data and models.

   a. If a third-party vendor's data and/or model is used, that data and/or model must be filed in either the licensee~~insurer~~'s own filing or as a separate filing submitted directly to the regulator, as requested by the regulator. In either case, the third-party data and model vendor is required to provide all information requested similarly to what is required of a~~n~~ licensee~~insurer~~ filing its own data and/or model. For instance, upon request, third-party data and model vendors should provide regulators with information such as that described in the *NAIC Model Review Manual* and the *Catastrophe Modeling Primer*, including the following: model documentation, input and output specifications, validation, performance, and any fairness/bias testing results, change logs and audit trails, and other information reasonably necessary for regulatory evaluation of a property and casualty rate, rule, or underwriting guideline filing.

   b. Failure on the part of a third-party data or model vendor to provide a regulator with requested data and/or model information may result in the regulator prohibiting licensees~~insurers~~ from using the data and/or model for pricing or underwriting any property and casualty insurance product offered in the state subject to each state's applicable administrative procedures including written notice and cure period requirements.

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c. Some states may not have the ability to approve a third-party data or model as a separate filing because the state is limited to evaluating a~~n~~ licensee's~~insurer's~~ filing or rates. In these cases, the third-party data or model filing will be evaluated as if it is part of a~~n~~ licensee's~~insurer's~~ filing with the expectation that the licensee~~insurer~~ demonstrates the use of the data or model produces actuarially sound rates.

d. To access the registry and to facilitate third-party data and model vendors' submission of requested data and/or models, states are encouraged to commit to providing the same confidentiality and intellectual property protections to third-party data and model filings as are afforded to licensees~~insurers~~ for confidential, proprietary, and trade-secret information under state laws.

Note: To achieve consistent confidentiality protections, states are encouraged to create a "model and data vendor" licensure/registration similar to requirements for advisory or rating organizations with the following modifications: 1) in addition to organizational governance requirements, require data and model governance; 2) require no examinations or limit the scope of examinations to data and model governance; 3) require participation in the proposed registry; and 4) require an annual data and model governance attestation.

States may use alternative approaches to achieve the same goal of confidentiality.

3. **Annual Attestation:** Through the shared multi-state registry, vendors must annually update governance documentation, contact information, and any other required documentation. A senior leader with relevant technical expertise and vested with formal organizational authority to approve data and model governance must attest that:

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a. The governance program is implemented and effective for the data and models used by licensees~~insurers~~ for pricing and underwriting property and casualty products.

b. Sufficient records are maintained enabling an independent party to reconstruct all material changes to each model or dataset, as applicable. Such records are expected to be retained until the model or dataset is no longer in use and produced when requested by a regulator.

~~b. The data and models third-party vendors provide to insurers comply with applicable insurance laws and regulations in each state in which insurers use the data and models for pricing and underwriting property and casualty products.~~

4. **Material Changes Notifications:** Vendors must submit to the registry material modifications to a dataset or model, including decommissioning of a model. Regulators may request documentation if the changes indicate a significant alteration of model behavior, risk, or consumer impact. Material modifications are changes to a dataset or model reasonably expected to significantly impact model performance, capabilities, behavior, or risks.

   For models or datasets in which material changes may occur between annual attestations, vendors are expected to maintain sufficient records to reconstruct all material changes to each model or dataset as applicable. Such records are expected to be retained until the model or dataset is no longer in use and produced when requested by a regulator.

LICENSEE~~INSURER~~ RESPONSIBILITIES

This framework maintains the longstanding principle that licensees~~insurers~~ are responsible for their own compliance obligations. Licensees~~Insurers~~ must validate model suitability for their book(s) of business, ensure contractual access to necessary information, meet all pricing and underwriting requirements, even when using third-party data and/or models.

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Regulatory oversight of third-party data and model vendors and the data and models they supply to licensees~~insurers~~ **does not reduce licensee~~insurer~~ accountability**. Licensees~~Insurers~~ remain responsible for the following:

1. Assessing model suitability for their own data and business use cases
2. Conducting licensee~~insurer~~-level model validation, testing, and monitoring
3. Ensuring that any data provided by a third-party data vendor is sufficiently complete, accurate, and appropriate for its intended use
4. Ensuring compliance with laws pertaining to pricing, underwriting, unfair trade practices, and unfair discrimination
5. Maintaining contacts permitting licensee~~insurer~~ and regulator access to necessary model or data information