

# Update on NAIC's Consideration of AI Model Law for Insurers

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On May 12, 2025, the National Association of Insurance Commissioners' (NAIC) Big Data and Artificial Intelligence (H) Working Group released a Request for Information (RFI), signaling that it may draft a model law to regulate insurers' use of artificial intelligence (AI) systems.

Building on the NAIC's 2020 Principles on Artificial Intelligence and 2023 Model Bulletin on the Use of Artificial Intelligence Systems by Insurers, the RFI asks stakeholders whether uniform statutory requirements are needed across the United States and, if so, how they should address governance, transparency, and accountability. The questions explore whether obligations should vary by company size, how third-party vendors should be covered, whether existing state laws or industry templates might serve as models, and other related subjects. Written comments are due by June 30, 2025.

Insurers, AI vendors, and other stakeholders should promptly assess whether they wish to provide comments and generally consider how a potential model law could affect their operations. Providing feedback during the RFI window could shape a future framework. The RFI is also a reminder to regulated entities of [existing guidance](#) on AI systems and the use of "Big Data" published by the NAIC and the New York State Department of Financial Services, as well as the [novel Colorado legislation](#) mandating certain anti-discrimination testing, among other requirements. Insurers and other stakeholders still have an early opportunity to proactively align internal legal and regulatory compliance strategies with potential future requirements, particularly around documenting AI use, mitigating discriminatory outcomes, and preparing for confidential examination tools that regulators are developing.

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National Law Review, Volume XV, Number 149

Source URL: <https://natlawreview.com/article/update-naics-consideration-ai-model-law-insurers>

