



July 16, 2025

NCOIL Financial Services & Multi-Lines Issues Committee
Chair Assemblyman Gandolfo and Vice Chair Senator Grayson
c/o Will Melofchik
via email: wmelofchik@ncoil.org

Chair Gandolfo and Vice Chair Grayson,

On behalf of ACLI, AHIP, APCA, and NAMIC, we write today to provide feedback on the NCOIL Model Act Regarding Insurers' Use of Artificial Intelligence ("Model Act"), which is based on legislation that failed to pass the Florida legislature. Our collective trade organizations represent the majority of the U.S. insurance industry across nearly all lines of business.

The use of AI promises numerous benefits, including reducing costs and improving efficiency across various operational areas, which will be realized by consumers, as well as carriers. We believe it is critical for NCOIL and the industry to work collaboratively to create balanced policies that protect consumers while helping ensure insurance policyholders realize the benefits of AI through its development and deployment in the industry.

We do not believe a one-size-fits-all approach that fails to recognize different AI model types and the different ways in which different lines of insurance utilize AI is the best way forward.

Developing a model law on the use of AI is premature and would require a more comprehensive and thoughtful discussion and understanding than has been undertaken to date. As NCOIL notes in its recent comments to the NAIC, "AI is evolving so rapidly that legislative attempts around it might be difficult to keep pace"¹ and therefore result in standards that quickly become outdated; whereas there is robust existing technology-neutral law that applies consistent standards and expectations in the business of insurance regardless of the tool used.

Therefore, to assist us in providing appropriate feedback and before NCOIL further pursues any official action, we collectively and respectfully request that the Financial Services & Multi-Lines

¹ NCOIL comments to the NAIC Big Data and Artificial Intelligence (H) Working Group, June 30, 2025, p. 116, <https://content.naic.org/sites/default/files/inline-files/AI%20Model%20Law%20Request%20for%20Informa%20on-Comments%20Received%207.3.25.pdf>

Issues Committee further consider and discuss the specific risks applicable to specific lines of insurance (health, life, property & casualty, etc.) that NCOIL seeks to mitigate which are not otherwise addressed in existing federal and state laws and regulations.

We also request that the Committee further consider whether it is appropriate to regulate the use of AI instead of focusing on regulating a risk or adverse outcome that is not already governed by current law or regulation.

Thank you for the opportunity to provide input on the Model Act and we look forward to working with you for all stakeholders – consumers, employers, businesses, regulators, and industry – on this matter.