

Technological risks, Operational Resilience, DORA, and Artificial Intelligence

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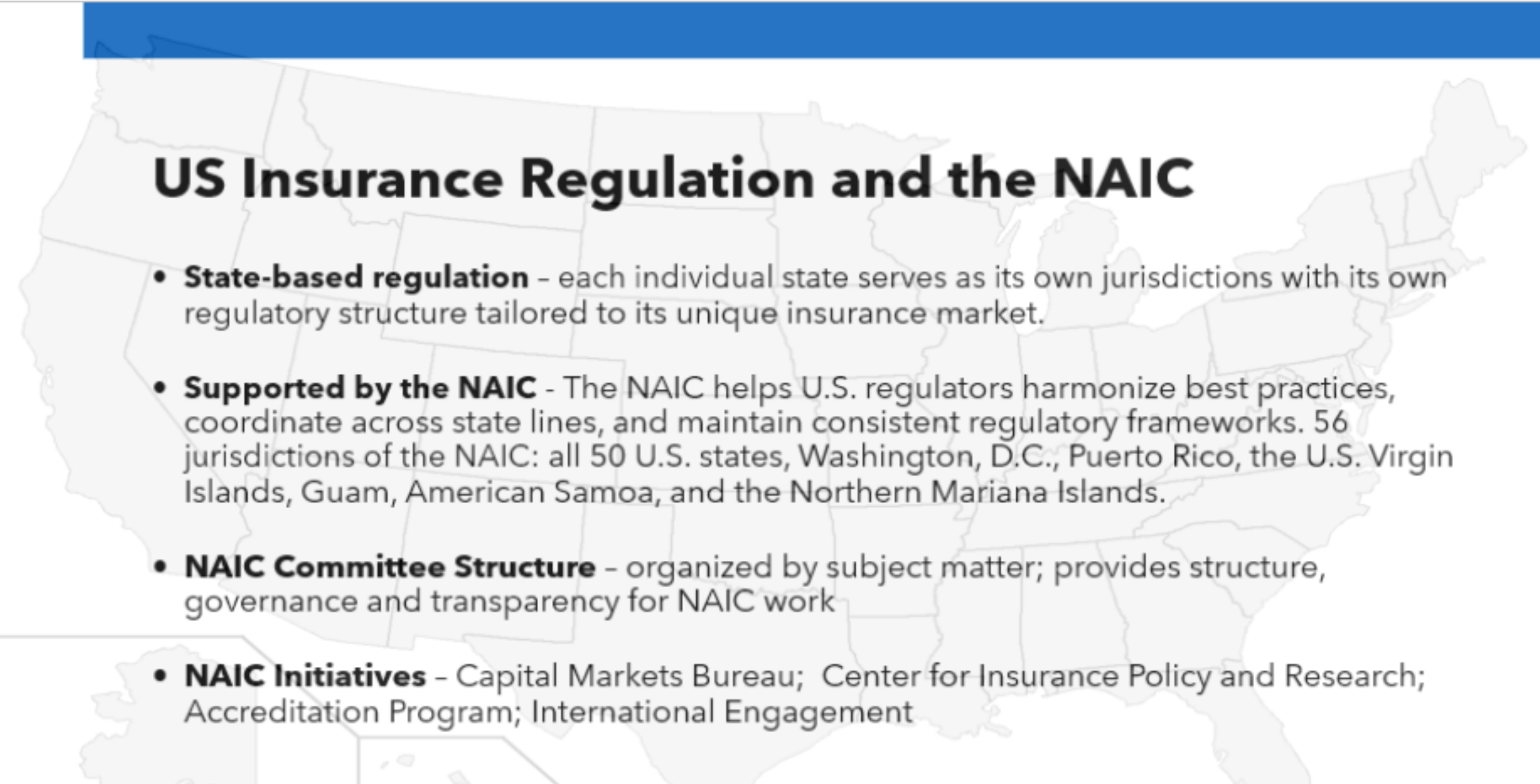
Managing Director - Insurance Research, Analytics, PC Policy

National Association of Insurance Commissioners

September 18, 2026

Disclaimer:

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US Insurance Regulation and the NAIC

- **State-based regulation** - each individual state serves as its own jurisdictions with its own regulatory structure tailored to its unique insurance market.
- **Supported by the NAIC** - The NAIC helps U.S. regulators harmonize best practices, coordinate across state lines, and maintain consistent regulatory frameworks. 56 jurisdictions of the NAIC: all 50 U.S. states, Washington, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands.
- **NAIC Committee Structure** - organized by subject matter; provides structure, governance and transparency for NAIC work
- **NAIC Initiatives** - Capital Markets Bureau; Center for Insurance Policy and Research; Accreditation Program; International Engagement

NAIC Committee Structure

Life Insurance and
Annuities

Health Insurance
and Managed
Care

Property and
Casualty

Market Regulation
and Consumer
Affairs

Financial
Condition

Financial
Regulation
Standards and
Accreditation

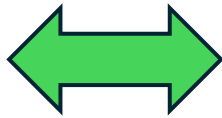
International
Insurance
Relations

Innovation,
Cybersecurity,
and Technology

Innovation Cybersecurity and Technology (H) Committee

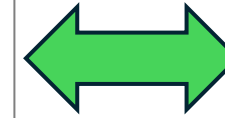
Innovation, Cybersecurity, and Technology (H) Committee
Big Data and Artificial Intelligence (H) Working Group
Cybersecurity (H) Working Group
Privacy Protections (H) Working Group
SupTech/GovTech (H) Subgroup
Third-Party Data and Models (H) Working Group

Market Data & Research Insights



Research Center (CIPR)

Consumer Participation Program



P&C Technical Advisory Services

CAT COE

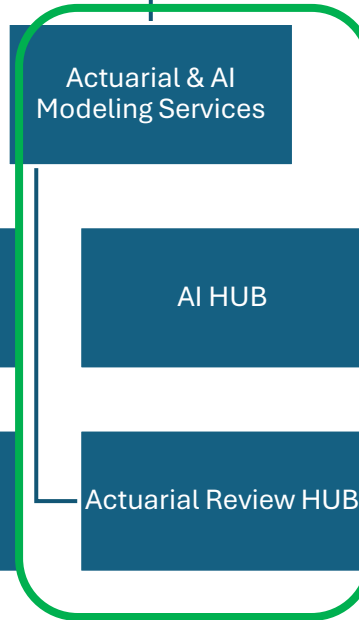
CAT Modeling HUB

Resilience HUB

Actuarial & AI Modeling Services

AI HUB

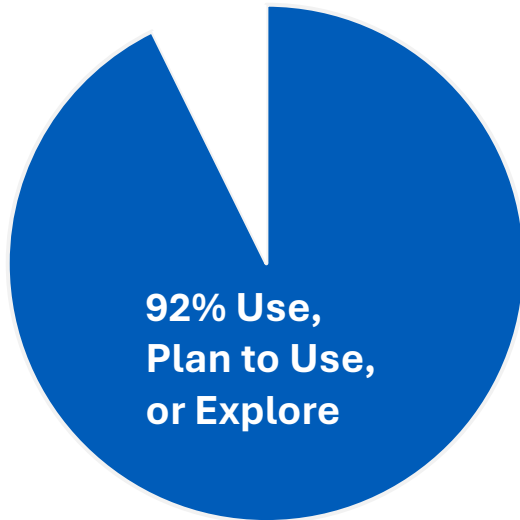
Actuarial Review HUB



Use of AI in Insurance – NAIC Survey Data

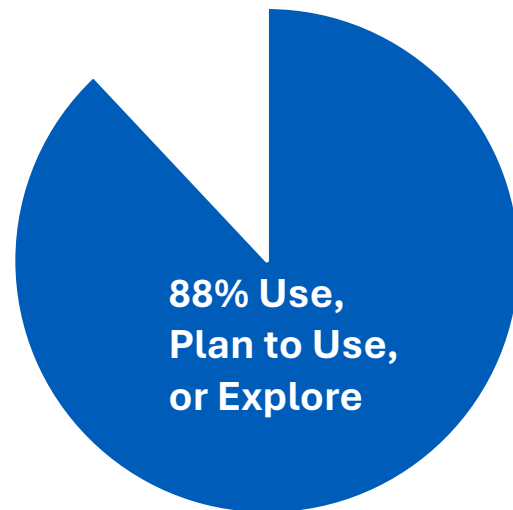
Health Insurers

March 2025



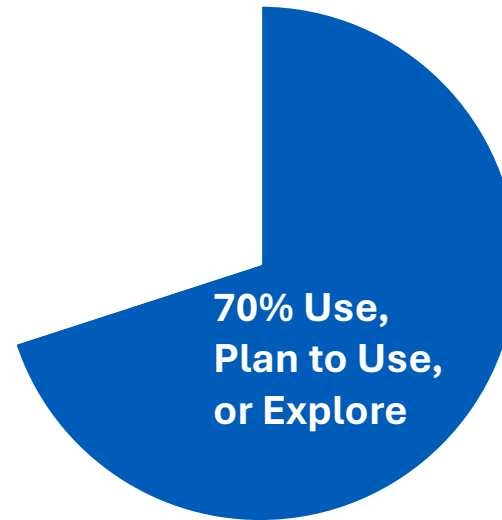
Auto Insurers

December 2022



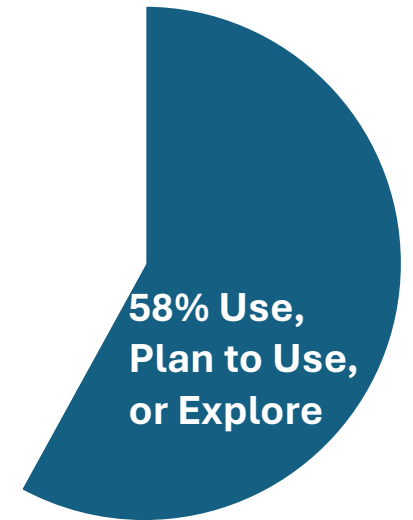
Home Insurers

August 2023

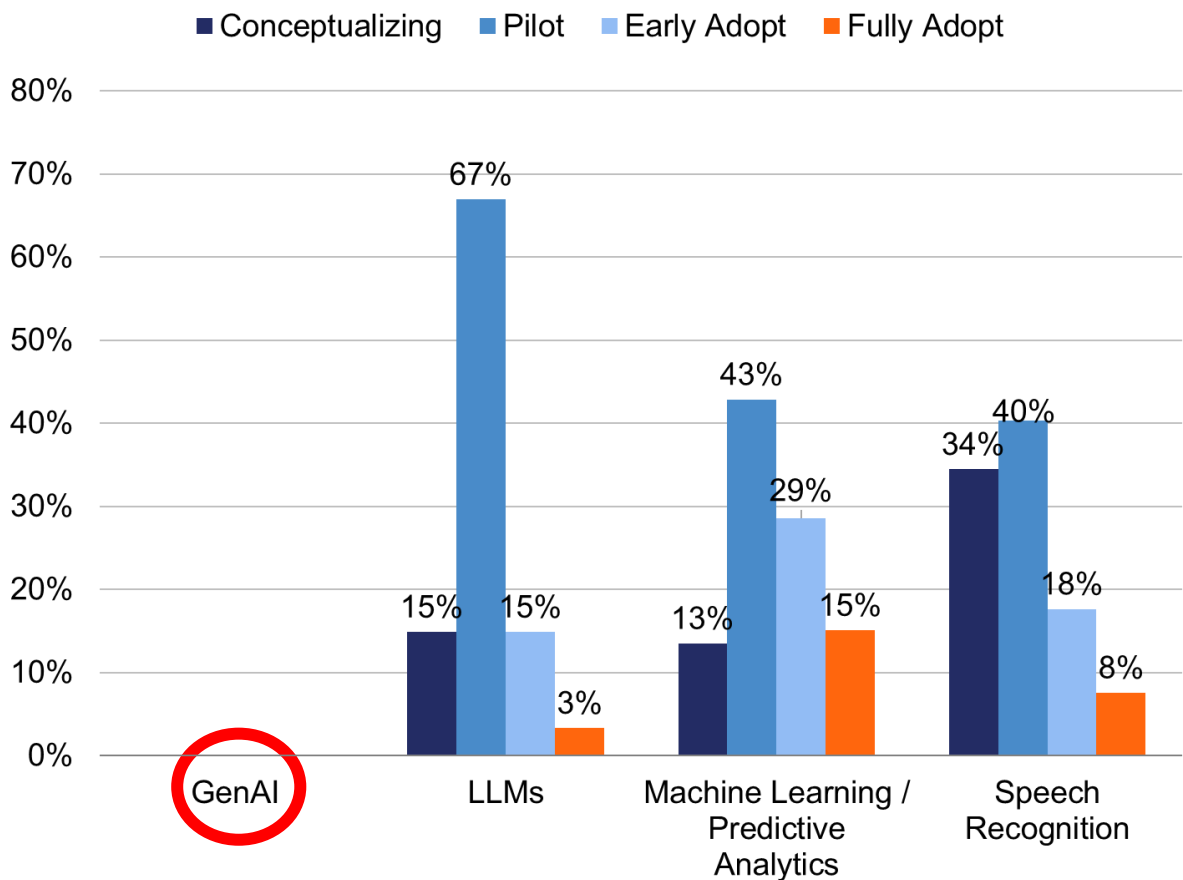


Life Insurers

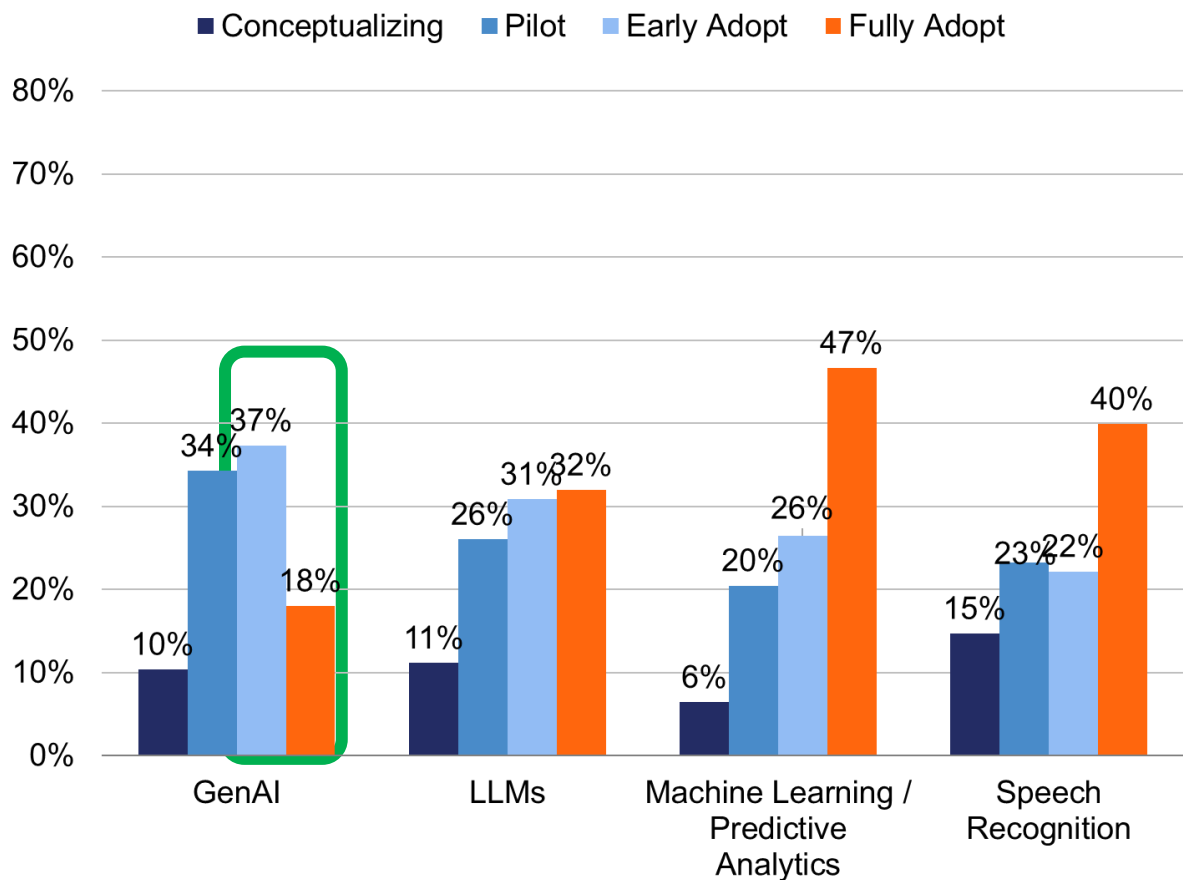
December 2023



• Overall AI Adoption, 2024



• Overall AI Adoption, 2025



• Prepared by Conning, Inc. Source: ©2025 Conning, Inc., Conning’s Insurance Technology Surveys, 2024 and 2025



NAIC's *Principles of Artificial Intelligence*

In **2020**, the NAIC adopted the *Principles of Artificial Intelligence* to guide insurers in their development and use of AI, emphasizing the importance of:

- 1. Fairness and ethical use of AI**
- 2. Accountability**
- 3. Compliance with state laws and regulations**
- 4. Transparency**
- 5. Safe, secure, fair, and robust system**

NAIC Model Bulletin: *Use of Artificial Intelligence Systems by Insurers*

- Adopted **December 2023**
- Principles-based interpretive Bulletin that establishes guidelines and expectations to ensure that responsible innovation, development, and use of AI by insurance companies aligns with the NAIC's *Principles of Artificial Intelligence*
- 3 main purposes:
 1. Reminds insurers that the use of AI must comply with insurance laws and regulations
 2. Sets forth State Department expectations as to how insurers will govern the use of AI
 3. Advises insurers of the type of information requested during an investigation or examination

[Status as of July 7, 2026 – See page 2 for citations]

Adopted (25-Jurisdictions)

Insurance Specific Regulation/Guidance (4-Jurisdictions)

No Regulation/Guidance (25-Jurisdictions)

Guam, Northern Mariana Islands, Puerto Rico, American Samoa, United States Virgin Islands

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Adopting States Requesting Training on How to Operationalize AI Model Bulletin

AI Based Examination Support

Goal:

- To provide value to regulators as an efficient, standardized data collection tool to aid review in an investigation or examination.

Usage:

- This tool and each exhibit is optional, offered to help regulators assess risk as they see fit.
- Regulators may tailor the questions as needed.
- Currently going through a 12-state pilot

Four Exhibit questionnaires:

- 1) Exhibit A: Quantify Regulated Entity's Use of AI Systems
- 2) Exhibit B: AI Systems Governance Risk Assessment Framework (Narrative or Checklist)
- 3) Exhibit C: High-Risk AI Systems Details
- 4) Exhibit D: AI Systems Model Data Details

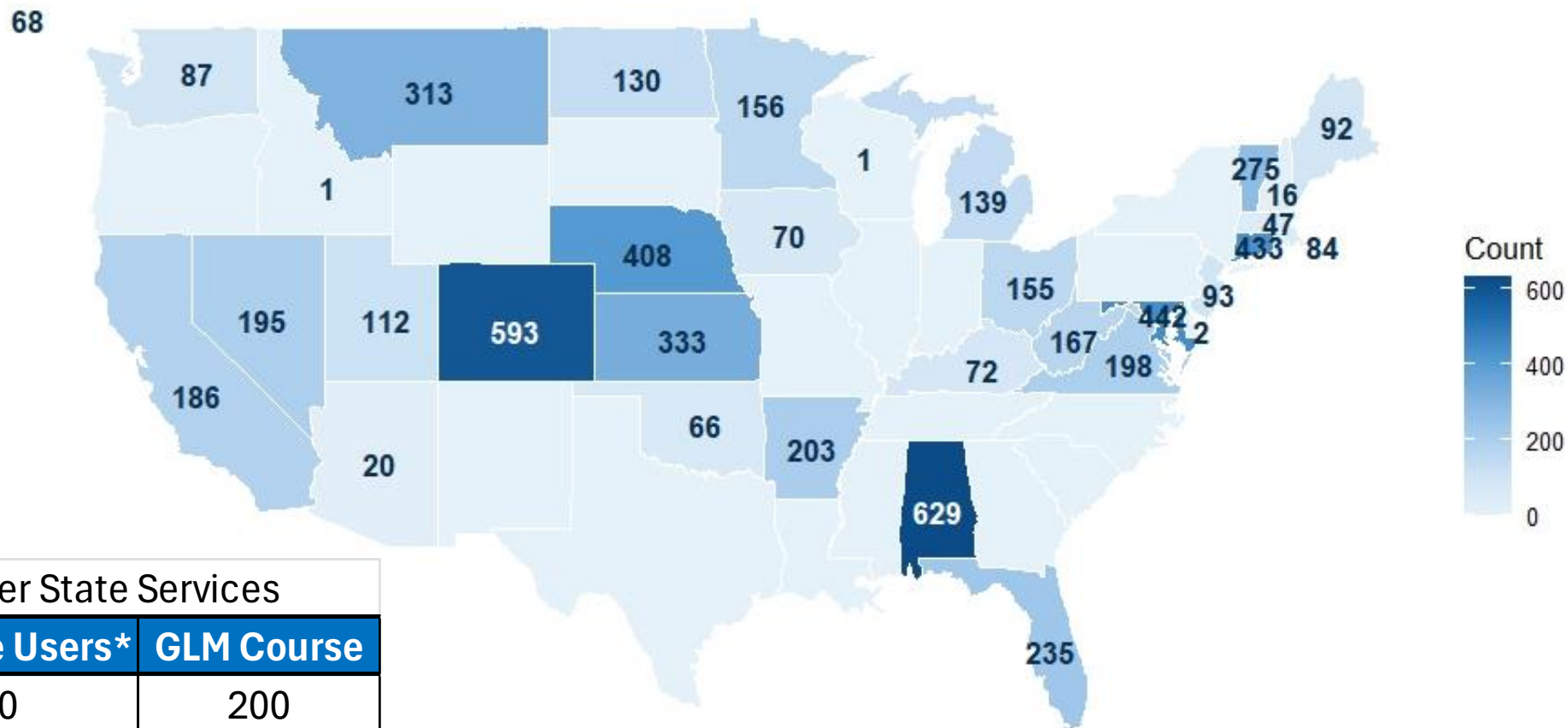
NAIC AI Based Model Rate Reviews

April 2025 - March 2026 Reports			
Reports	Filings	New Models	States
201	85	71	15



NAIC P/C Shared Model Database Usage

Data range: Jan 01, 2025 – Dec 31, 2025. Note: Gap with no events: Jun 12, 2025–Jul 27, 2025 (46 days).



Other State Services	
Database Users*	GLM Course
240	200

*Over 6,000 hits in 2025

Other Ongoing Regulatory Discussions

Privacy

- What rights do consumers have related to their data?

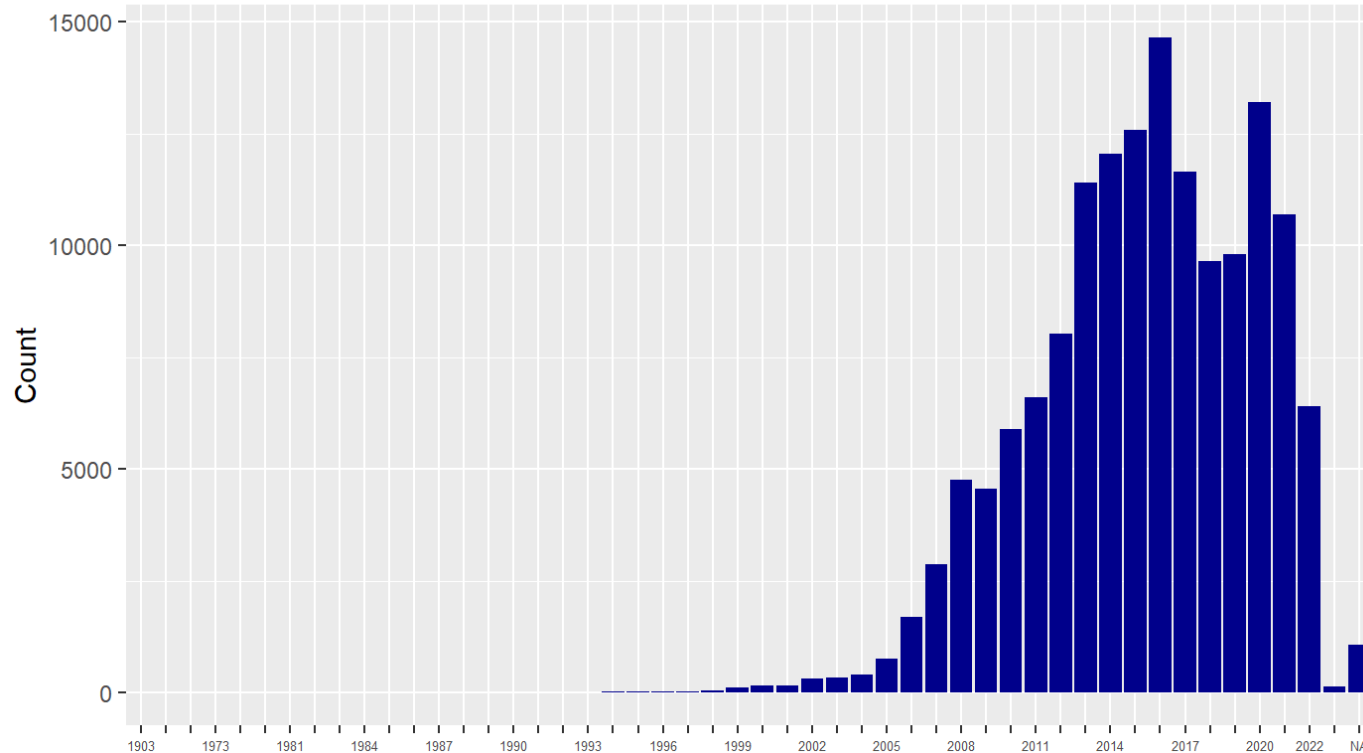
Third Party

- What information do regulators need from third parties?

HISTORICAL VIEW OF CYBER LOSS EVENTS

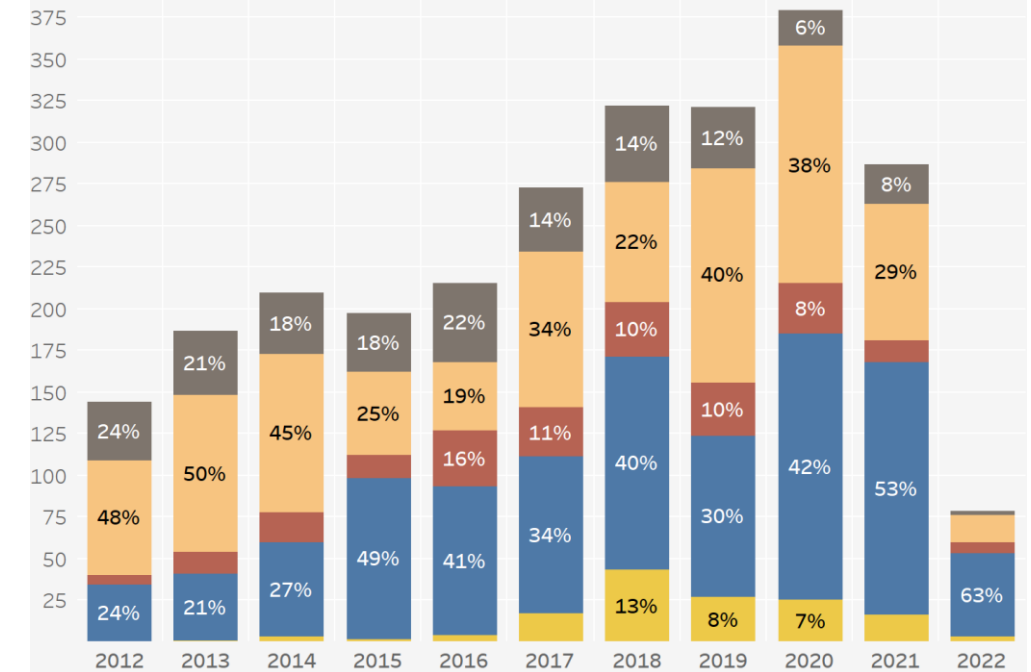
- ALL GLOBAL COMPANIES

All Event Counts, All Years

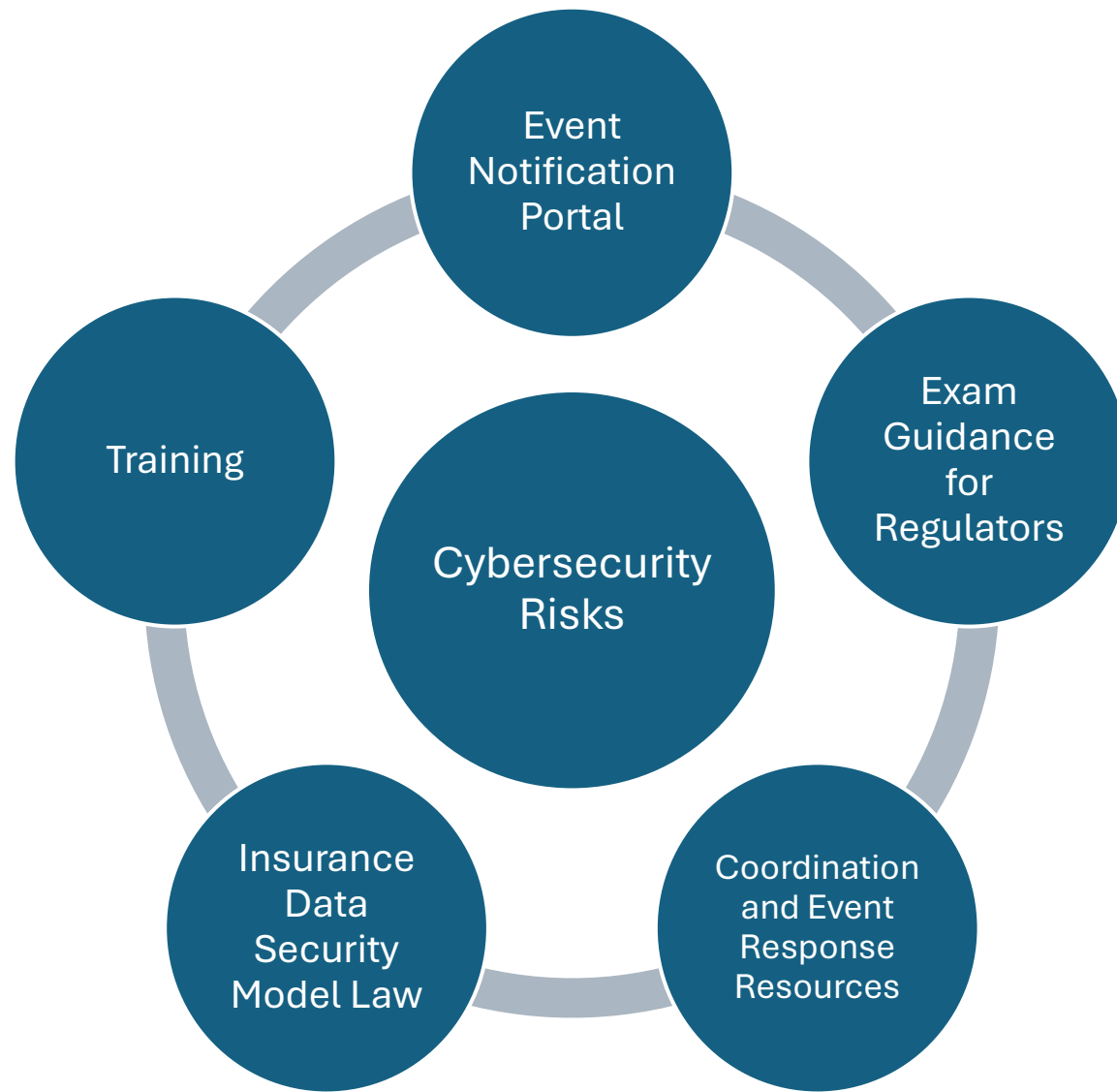


Insurer Top 4 event TYPES OVER TIME

Top 4 Case Types, Matched NAIC Insurers, 2012 - 2022



Source: Zywave data set, Jan 26, 2023



1. Cybersecurity Event Notification Portal

- Application to allow States to receive event notices via a centralized portal

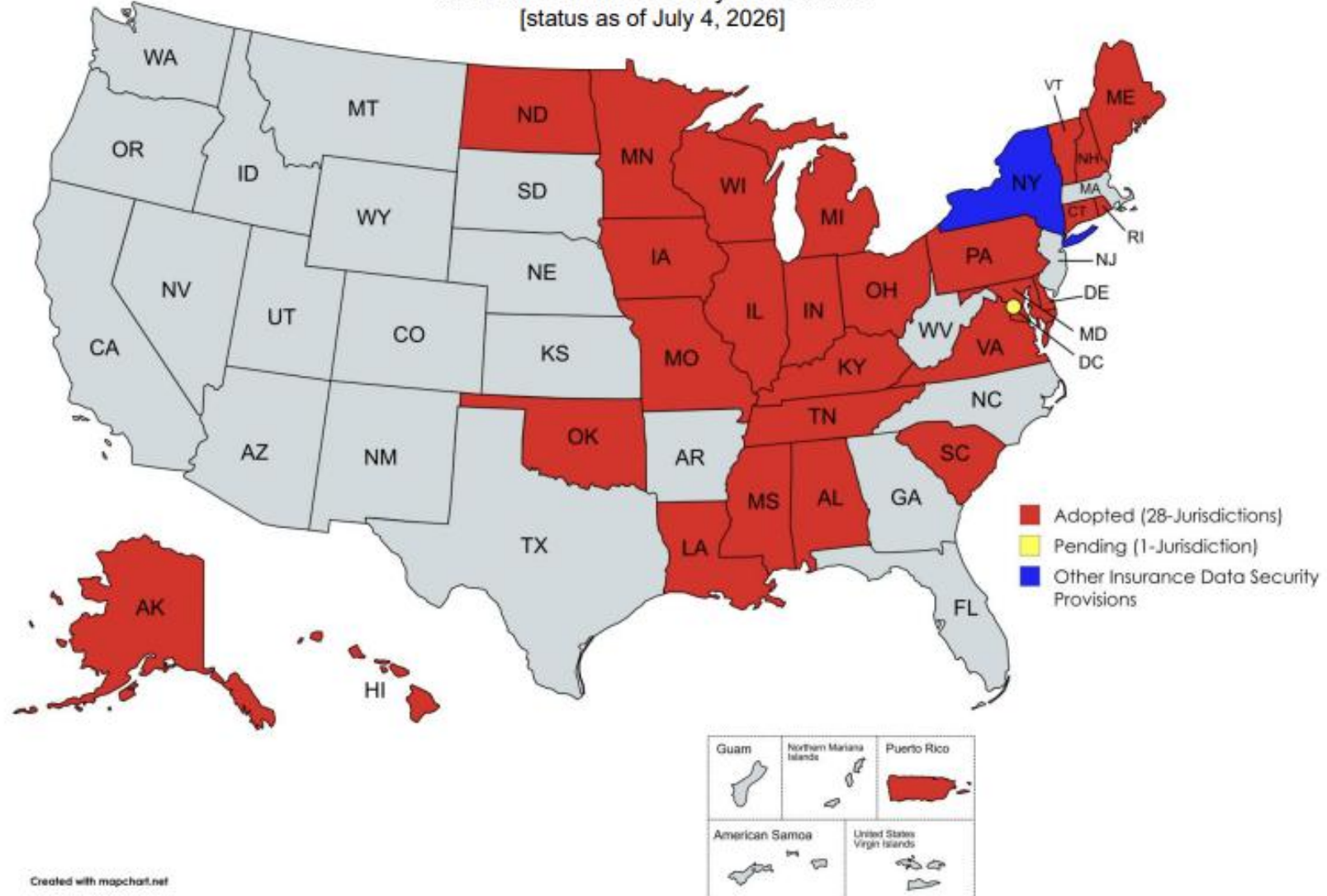
2. Cybersecurity Coordination Framework

- Guidance to support coordinated information gathering in the wake of cybersecurity events

3. Insurance Data Security Model Law

- Enables Department to require information security program
- Requires notification to Insurance Commissioner of a cybersecurity event

Implementation of Model Act #668
Insurance Data Security Model Law
[status as of July 4, 2026]



This map represents state action or pending state action addressing the topic of the model. This map does not reflect a determination as to whether the pending or enacted legislation contains all elements of the model or whether a state meets any applicable accreditation standards.

Thank you!

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