

# Life Insurance

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Because the existing systems are databases with significant limitations and limited data, Texas is concerned the recommendations may result in “exploratory” AI preparations over a lengthy period to reach some unknown and undefined concept. We anticipate significant time and resources will be expended on that exploration for both regulators and NAIC staff.

Also, the scope of these recommendations may overlap with the role and scope of the proposed, new Innovation, Technology and Cybersecurity (H) committee. Specifically, Charge C for the Big Data and Artificial Intelligence (H) Working Group states it must:

, and evaluate the use of big data and intelligent algorithms, including AI in underwriting, rating, claims and marketing practices. This assessment shall include gaining a better understanding of currently available data and tools, as well as . Based on this assessment,

(emphasis added). This charge seemingly indicates that the (H) working group should be engaging in any such AI explorations and recommend any AI tools

Any proposed AI proof-of-concept, whether it is based on existing systems/databases or is a new mechanism to improve market analysis, should be narrow and well defined to prevent unnecessary and aimless expenditure of time and resources for all states.

Again, TDI appreciates the work of the working group and task force. We hope our comments are productive in reaching precise AI goals to improve all states' regulatory efforts.

Thank you for your time, attention, and consideration.

Respectfully,



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