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What an insurance examiner will ask about your AI — and whether you can produce it.

29 questions built from the NAIC Model Bulletin on the Use of Artificial Intelligence Systems by Insurers (adopted 2023-12-04; adopted by 27 states plus the District of Columbia and Puerto Rico as of 8 October 2026 — Florida has not adopted it) and the NAIC AI Risk Evaluation Supplement (piloted in 12 states since March 2026; earlier drafts were called the AI Systems Evaluation Tool). For P&C and life carriers, new entrants and reciprocals, MGAs, brokers and the vendors that sell to them.

How to use it. Twenty minutes with your COO, head of claims and compliance lead. Mark each line Have / Partial / No. "Have" means the document exists and someone can hand it over in ten business days.

What counts as AI here. Any system — yours or a vendor's — that generates predictions, scores, recommendations or decisions used in underwriting, pricing, claims, fraud, marketing or service. Claims-triage and fraud models from vendors count as yours.

Why the bulletin matters where it isn't adopted. The questions reach you anyway — through market-conduct exams, reinsurer and carrier-partner diligence, and D&O/E&O renewals. The inventory takes the same three weeks whoever asks first.

A · The written AI Systems (AIS) Program

Bulletin §1 · AI Risk Evaluation Supplement: Governance

	QUESTION	WHAT THE EXAMINER ASKS TO SEE	HAVE · PARTIAL · NO
1	**Is there a written AIS Program**, adopted by the board or a board committee?	The program document and the minute or resolution adopting it.	☐ ☐ ☐
2	Does it state its **scope** — which AI systems are in, which are out, and why?	The scope section, including excluded systems and the reason.	☐ ☐ ☐
3	Is it **proportionate** — tiered by the degree of potential harm to consumers?	The risk-tier rule and how a system is assigned a tier.	☐ ☐ ☐
4	Does it cover the **whole life cycle** — design, build or buy, test, deploy, monitor, retire?	Policies and procedures per stage; training materials.	☐ ☐ ☐
5	Does it reflect **current practice** — reviewed in the last 12 months?	Version history; evidence of the last review.	☐ ☐ ☐

B · Governance and accountability

Bulletin §2.1–2.4

6	**Who is accountable** for AI, by name, with a line of authority to the executive team?	Org chart or charter naming the person or committee and their reporting line.	☐ ☐ ☐
7	Is there a **cross-functional body** (claims, underwriting, IT, compliance, legal, actuarial) that approves AI use?	Membership, scope of authority, decision hierarchy, meeting records.	☐ ☐ ☐
8	Are approvers **independent** of the people who build or buy the system (lines of defense)?	Role separation written down; who can overrule whom.	☐ ☐ ☐
9	Are there **monitoring, escalation and reporting** routes when a system misbehaves?	The escalation path; reports that reached leadership; incident log.	☐ ☐ ☐
10	Are staff who use or oversee AI **trained and supervised** for it?	Training materials, attendance, supervision rules.	☐ ☐ ☐
11	Is there a documented way to **detect and fix** model errors, outliers, performance decay and unfair discrimination?	The procedure; examples of it being used.	☐ ☐ ☐

C · Risk management and internal controls

Bulletin §3.1–3.7 · AI Risk Evaluation Supplement: Risk assessment, Ongoing monitoring

12	Is there an **inventory** of every AI system and predictive model that can produce an adverse consumer outcome — vendors' included?	The register: system, vendor, purpose, decision impact, data, owner, governance lead, tier, last test.	☐ ☐ ☐
13	Is there an **approval gate** before a system is built, bought or put into use — and a rule on how much is automated vs. human-reviewed?	The intake form; approval records; the automation rule.	☐ ☐ ☐
14	Can you show the **data** behind each model — source, lineage, currency, quality, suitability, bias analysis?	Data documentation per model; the bias analysis.	☐ ☐ ☐
15	Does each model have a **written narrative** — goals, how it was developed, how it was validated?	The model document (§3.7).	☐ ☐ ☐
16	Was each model **validated and tested** before use — and re-tested after — to confirm outputs still generalize?	Test plan, results, sign-off; thresholds and measurements used.	☐ ☐ ☐
17	Is each model assessed for **interpretability, robustness, reproducibility and drift**, on a schedule?	The assessment record; the monitoring log; drift evaluation.	☐ ☐ ☐

18	Is **non-public information** protected — including access to the models themselves?	Access controls, who can change a model, information-security sign-off.	☐ ☐ ☐
19	Are **records retained** — data, model versions, decisions — long enough to reconstruct a decision?	The retention rule; a reconstructed decision as proof.	☐ ☐ ☐
20	Can you tie **consumer complaints** to AI-influenced decisions and show how they were handled?	Complaint log with an AI flag; adverse-action explanations given.	☐ ☐ ☐

D · Third-party AI systems and data

Bulletin §4.1–4.3 · AI Risk Evaluation Supplement: Vendor management

21	Did you run **due diligence** on each vendor's AI or data before use — against your legal standards, not theirs?	The diligence file per vendor; questions asked; answers received.	☐ ☐ ☐
22	Do vendor **contracts** require an AIS program of their own, audit rights or qualified audit reports, and cooperation with regulators?	The clauses, in the signed contract.	☐ ☐ ☐
23	Have you **exercised** those rights — audits, confirmations, performance reviews?	Audit reports received; your review of them; follow-ups.	☐ ☐ ☐
24	Do you **monitor vendor models in production** — drift, error rates, incidents — rather than rely on the vendor's word?	Monitoring records; incident notices from vendors.	☐ ☐ ☐

E · The request list — can you produce each in ten business days?

Bulletin Section 4 · Regulatory oversight and examination

25	**The AIS Program** and evidence of adoption, scope, proportionality, policies and training materials.	One folder, current version, with the adoption record.	☐ ☐ ☐
26	**Governance records** — the coordinating body, its decisions, data practices.	Charters, minutes, approvals.	☐ ☐ ☐
27	**The inventory** plus, for any named model: policy compliance, data provenance and quality, techniques, measurements and thresholds.	The register and one complete model file.	☐ ☐ ☐
28	**Validation, testing, audit and drift** records for the systems in scope.	Test reports and monitoring logs, dated.	☐ ☐ ☐
29	**Third-party files** — diligence, contracts, compliance audits, validation and drift testing of vendor systems.	Per vendor: diligence, contract, audits, test evidence.	☐ ☐ ☐

Boxes, left to right: Have · Partial · No

Score it

Count your "Have" answers out of 29. The bands below are a planning aid, not a compliance rating.

0–9 · Start at the inventory

Nothing else can be evidenced until someone lists the systems and names the owners. Three weeks of work, mostly interviews and contracts.

10–19 · The gap is documentation

The practice exists; the paper trail doesn't. Write the program from what you already do; fix the vendor clauses at the next renewal.

20–29 · The gap is evidence and monitoring

Testing, drift and complaint-linkage records are the usual holes. Automate the log; rehearse the ten-day request.

Three weeks to a "Have" on A–D. The AI Governance Review installs the inventory, the owners, the intake rule and the vendor clauses once — mapped into the GRC and model-risk process you already run, not a new committee. Then one process rebuilt as a governed workflow in 30 days proves it works. Details and a 30-minute call: **piotrklek.com/insurers**.

This checklist paraphrases the NAIC Model Bulletin (2023-12-04) and the NAIC AI Risk Evaluation Supplement (piloted in 12 states since March 2026; earlier drafts were called the AI Systems Evaluation Tool) for planning purposes. Adoption count per the NAIC adoption map as of 8 October 2026. It is not legal advice; your compliance counsel confirms what applies to your domicile and lines of business.

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