



The Honorable Victoria Gu, Chair  
Senate Artificial Intelligence and Emerging Technologies Committee  
State of Rhode Island General Assembly

March 24, 2026

Re: Senate Bill 2010 – Transparency and Accountability in Artificial Intelligence Use by Health Insurers to Manage Coverage and Claims Act

Dear Senator Gu and Distinguished Committee Members:

On behalf of the American Council of Life Insurers, thank you for the opportunity to provide comments in opposition to Senate Bill 2010, which would regulate the use of artificial intelligence by insurers for claims and coverage management.

ACLI appreciates that this legislation was amended last session to significantly narrow its scope. However, the bill would still apply broadly to any insurance company licensed to do business in Rhode Island, including ACLI member companies that provide life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision, and other supplemental benefits. It would require such companies to disclose to the Office of the Health Insurance Commissioner and the Department of Business Regulation how they use artificial intelligence to manage healthcare claims and coverage and all documents and software used in connection therewith.

The Insurance Division of the Department of Business Regulation provides robust oversight of life insurers in accordance with rigorous statutory and regulatory requirements based on NAIC model laws that prohibit unfair discrimination based on protected classes. Specifically, section 27-29-4 (7) of the insurance code expressly disallows unfair discrimination and applies to any methodology an insurer uses in delivering and servicing a product, including new technologies such as artificial intelligence.

Life insurers are not subject to regulation by the Office of the Health Insurance Commissioner. However, Senate Bill 2010 would authorize that Office to implement and enforce the provisions of the bill with respect to all insurers. This would create a parallel and inconsistent set of standards for insurers that may conflict with statutes already in place and undermine the authority of the Insurance Division.

For these reasons, ACLI respectfully requests that the Committee not advance the bill. Thank you for your consideration of our comments. Please contact me with any questions.

American Council of Life Insurers | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 275 member companies represent 91 percent of industry assets in the United States.

Sincerely,

A handwritten signature in black ink, appearing to be 'Jill Rickard', with a long horizontal line extending to the right.

Jill Rickard  
Regional Vice President—State Relations  
202-624-2046 t  
jillrickard@acli.com

American Council of Life Insurers | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

---

The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI's member companies are dedicated to protecting consumers' financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI's 275 member companies represent 91 percent of industry assets in the United States.

[acli.com](http://acli.com)