



March 24, 2026

Senator Victoria Gu
Chair, Senate Committee On Artificial Intelligence and Emerging Technologies
Rhode Island State House
Providence, RI 02903

Re: Senate 2010 – An Act Relating To Insurance – The Transparency and Accountability In Artificial Intelligence Use By Health Insurers To Manage Coverage and Claims Act

Dear Chair Gu:

The American Property Casualty Insurance Association (APCIA)¹ and the Rhode Island Insurance Federation (RIIF) appreciate the goals of S.2010 to assure transparency and accountability in AI use by health insurers. However, we are concerned that the bill's drafting is overbroad and may accidentally also loop in other insurers such as property and casualty insurance providers. To assure that the bill accomplishes its intended outcomes, we urge the Committee to consider revising the proposed definition in 27-83-2(4) to cover all Rhode Island insurers providing health insurance coverage as shown below. Without this change, the definition seems to apply to insurers of all types, creating significant confusion in application of the requirements section.

(4) "Insurer" means an insurance company providing health insurance coverage as defined in chapter 185 and 18.6 of section 27 licensed, or required to be licensed, by the State 21 of Rhode Island or other entity subject to the jurisdiction of the commissioner or the jurisdiction of 22 the department of business regulation pursuant to chapter 62 of title 42, that contracts or offers to 23 contract, or enters into an agreement to provide, deliver, arrange for, pay for, or reimburse any of 24 the costs of healthcare services, including, without limitation: a for-profit or nonprofit hospital, 25 medical or dental service corporation or plan, a health maintenance organization, a health insurance 26 company, or any other entity providing a plan of health insurance, accident and sickness insurance, 27 health benefits, or healthcare services including, but not limited to, pharmacy benefit managers.

APCIA and RIIF appreciate the opportunity to comment on this proposal and look forward to working with the Committee to clarify this bill.

Very truly yours,



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¹ Representing 67% of the U.S. property casualty insurance market, APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers. APCIA members represent all sizes, structures, and regions, which protect families, communities, and businesses in the U.S. and across the globe. Several APCIA members are located in Rhode Island and many more do business here. APCIA members are integral to the state of Rhode Island. They write 76% of the property casualty insurance sold in this state. The P&C insurance industry employs over 3,200 Rhode Islanders, provides annual assistance of \$1.5 billion in claim payments to help customers in the state, and contributes over \$160 million annually to the state in premium taxes.