



2026 insurance regulatory outlook

Message from the Deloitte Center for Regulatory Strategy

Insurance regulators move toward formalization of key frameworks in 2026

This year, standard-setting bodies overseeing the US insurance market will be prioritizing, solidifying, and finalizing a group of robust frameworks and real-time models to help state regulators assess risks, set solvency and capital requirements, and close coverage gaps.

We invite you to explore these topics in depth in our *2026 insurance regulatory outlook*. We believe this outlook can help you prepare for the year ahead in the following ways:

- **Stay ahead of regulatory change:** The document covers major initiatives from the National Association of Insurance Commissioners (NAIC) and state regulators, including new frameworks for artificial intelligence (AI), data governance, and risk management.
- **Understand compliance expectations:** Learn about upcoming requirements for technology, capital, solvency, reinsurance, and climate resilience.
- **Prepare for industry challenges:** Gain insights into disaster mitigation programs, privacy and cybersecurity trends, and federal-state coordination.
- **Receive actionable guidance:** Find practical recommendations for strengthening governance, monitoring regulatory developments, and responding to emerging risks.

Whether you're in compliance, risk management, underwriting, or executive leadership, this outlook is designed to help you anticipate changes, adapt your strategies, and engage proactively with regulatory initiatives. As always, we are here to help you chart the course.

Sincerely,



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Four big questions, insights, and actions

	Four big questions	Four insights to know	Four actions to consider
1	How do technology and innovation reshape supervision?	<p>Regulators have a myriad of overlapping and sometimes conflicting visions for a modern supervisory framework.</p> <ul style="list-style-type: none">• The NAIC is piloting an AI Systems Evaluation Tool, and states like Colorado and New York are implementing new oversight for AI, algorithms, and third-party service providers (TPSPs).	<p>Reinforce proactive risk management.</p> <ul style="list-style-type: none">• Review and update governance frameworks for AI and external data use.• Prepare for new compliance reporting, including quantitative testing for unfair discrimination.
2	How will changes to capital requirements and the risk-based capital (RBC) framework affect insurers' solvency and investment strategies?	<p>Contemplated modifications will mandate attention and dialogue from industry stakeholders.</p> <ul style="list-style-type: none">• The NAIC is updating its RBC framework to address new risks, especially as life insurers invest in private credit and reinsurance.• Expect more scrutiny of capital adequacy, reserve credits, and transparency, with international standards, such as the Insurance Capital Standard (ICS) coming into play.	<p>Adopt a proactive and strategic approach to dynamic reframing of the capital framework.</p> <ul style="list-style-type: none">• Participate in industry discussions and respond to draft revisions in statutory accounting and capital frameworks.
3	Will climate and catastrophe challenges stay at the forefront of regulators' focus?	<p>Regulators are prioritizing market resilience and disaster preparedness, with initiatives for climate risk, catastrophe modeling, and consumer protection.</p> <ul style="list-style-type: none">• Data quality, transparency, and collaboration are key themes.• Collaboration and information-sharing among states should accelerate with the NAIC acting as a centralized hub.	<p>Climate risk programs should still demand investment.</p> <ul style="list-style-type: none">• Develop and regularly update disaster response and risk mitigation plans.• Prepare for new data calls and reporting requirements, especially around climate and catastrophe risk in a challenging environment due to potential challenges in data availability from national sources.
4	Will consumer transactions and investments spur opportunities for growth and competition?	<p>The federal government will work to align guidance to better address retirement needs.</p> <ul style="list-style-type: none">• There could be more guidance to allow some types of annuity contracts to be treated as qualified default investment alternatives.• An updated NAIC Privacy Protections Model Law could be adopted at year-end.	<p>When you have opportunities, use them to allow for expanded use of investment products.</p> <ul style="list-style-type: none">• Closely monitor evolving reporting, disclosure, and capital requirements, especially for invested assets and asset-intensive reinsurance.

Technology and innovation

Regulatory expectations

The insurance industry will need to adjust to new AI and innovation regulations, tools, and guardrails. Both the NAIC and states are changing compliance standards.

Kicking off, the NAIC is piloting its AI Systems Evaluation Tools.¹ Through 2026, it will tailor and update the tools based on use and stakeholder input assessments. The tools aim to evaluate financial and consumer risks for insurers arising from their use of AI systems. Pennsylvania Insurance Commissioner Mike Humphreys, who heads the NAIC’s Big Data and AI Working Group through 2025, has said Pennsylvania is piloting them already. Commissioners have noted that tools for AI oversight are already finding their way into current insurance company market conduct examinations.² The process is intended to be evolutionary and part of efforts to better understand what companies are doing and what controls are in place.

In development with potentially new and extensive compliance regulations, the NAIC plans to create a framework for TPSP oversight, including the establishment of a registration process for TPSPs.³ The next step will focus on evaluating high-risk insurance practices, with an initial emphasis on property/casualty insurers’ rate making.

State regulators in the NAIC’s Third-Party Data and Models Working Group will collaborate on a proposed new framework exposed December 9, 2025, that is designed to ensure that third-party data and model vendors engaged with insurers in functions with direct consumer impact such as pricing, underwriting, claims, utilization reviews, marketing, and fraud detection register with state insurance departments. The NAIC says the framework aims to enhance regulatory oversight, transparency, and accountability while safeguarding insurers’ intellectual property.⁴

At the NAIC, key state insurance commissioners are divided on whether to move forward with an AI NAIC model law. About half of US states have adopted some form of the 2023 lighter-touch AI model bulletin and some regulators believe this standard is enough for now and an AI model law is premature.⁵ However, the Big Data and AI Working Group’s chair and other members expressed interest in developing an AI model law with at least a transparency regulatory application, with some stressing that it is vital to act or risk other non-insurance regulators setting standards.⁶ NAIC work on an AI model governance initiative could go forward to be incorporated into other frameworks.

On the cybersecurity front, the development of a proposed centralized cyber portal for events in the insurance industry is under review. The goal is to streamline cybersecurity event reporting. The current “fragmented nature of current reporting methods” results in efficiency problems, and regulatory burdens for insurers. However, there is a lot of complexity to this potential streamlining effort, spurring the creation of some harmonizing system.⁷ The NAIC noted that the complexity of state-level implementation variations of its 2017 Data Security Model Act necessitates intensive legal research efforts to map different state implementations before a unifying portal plan can take shape.⁸

The Colorado Division of Insurance now regulates and can investigate governance and risk management for the use of AI, algorithms, and external consumer data.⁹ Private passenger auto insurers who submitted a progress report December 1, 2025, have annual compliance reports with specifics on responsible parties due July 1, 2026. Life insurers followed an earlier initial progress report timeline, when their annual reports were first due December 1, 2025. Insurers must show their frameworks prevent unfair discrimination, including documented policies, board oversight, management accountability, protocols for complaints, and evaluation of data quality and statistical bias.

Quantitative testing documentation and remediation will be required once these specific rules are finalized. A documented description of quantitative testing for unfair discrimination and remediation is expected *only when* quantitative testing rules are in place. A proposed quantitative testing regime for the use of AI and external data could undergo development this year.

In New York, the Department of Financial Services' (NYDFS) heavy scrutiny on firms' reliance on TPSPs and the risk of cybersecurity incidents could result in enforcement and market conduct outcomes. The NYDFS has indicated it will flag financial services firms' lack of an appropriate cybersecurity TPSP risk management program and oversight in its exams and investigations, as well as enforcement in fines.¹⁰ The NYDFS is also calling for firms to apply more robust due diligence, contractual provisions, monitoring and oversight, and risk management policies and procedures, and verification by senior officials. It has found insufficiencies warranting this demand for increased attention.¹¹

At the state legislative level, the National Council of Insurance Legislators (NCOIL) has drafted an AI model law that not only encompasses claims handling, but applies across all lines of insurance. NCOIL continued to discuss its draft model at its November 2025 conference to get clarity on next steps.¹² It is considering whether to narrow the scope to just health insurance or take on a new model approach.

Why firms should take notice

Companies will be expected to demonstrate fair and nondiscriminatory internal procedures and show consistent progress in implementing and evaluating AI technology within their governance and testing frameworks. They will also be expected to meticulously maintain sound oversight of their TPSPs and external data usage likely under a new, enforceable registration process. Governance and accountability for AI and cybersecurity are top priorities, and ability to show regulators that strong governance systems are in place and new tools and data use are not unintentionally harming consumers by violating state statutes in underwriting or in claims is vital. Enforcement can and will be used by some states to drive compliance on oversight of TPSPs and potentially AI and data use.

How firms should respond

Firms are expected to address outcomes produced by models that may be unjustified or discriminatory in a timely manner, following a clearly defined process. Companies should continue to closely monitor developments in key states, including enforcement trends, as well as follow the development of model law and guidance from the NAIC. Firms need to strengthen and extensively monitor governance controls of TPSPs on an ongoing basis. A strong risk management program and robust internal governance is now *de rigueur*.



Capital concerns and the RBC framework

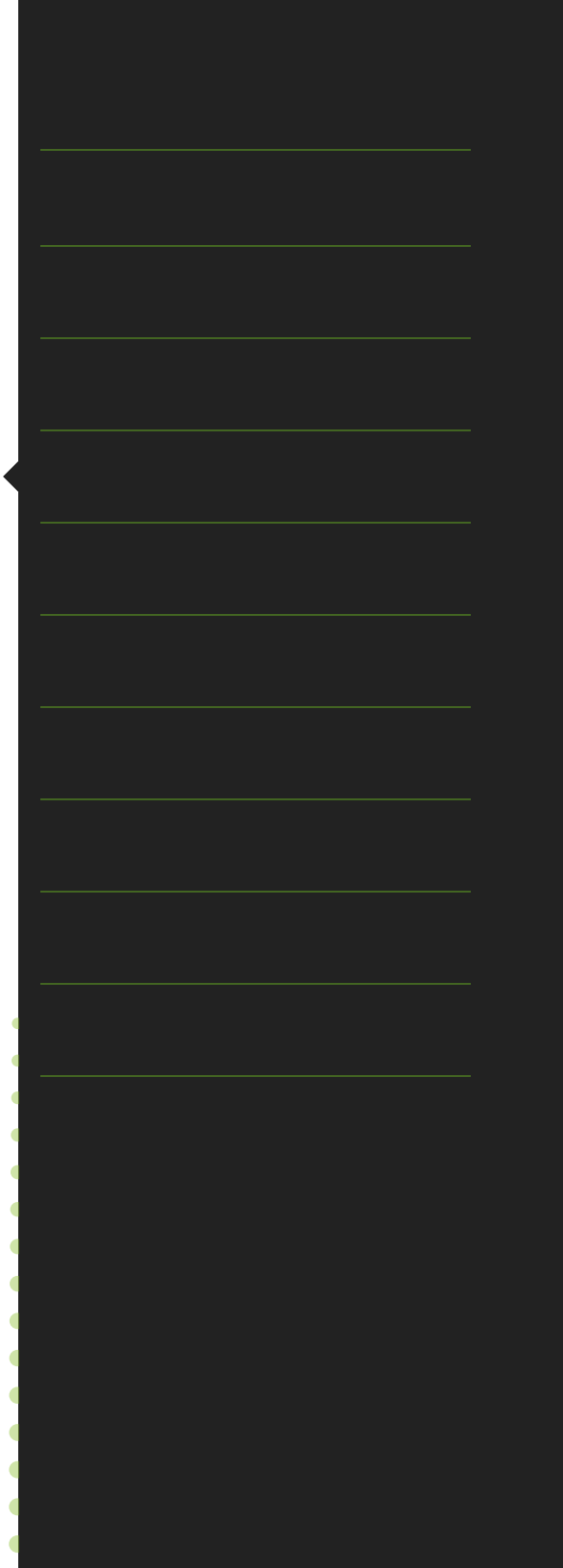
Regulatory expectations

While technology and innovation drive new opportunities and risks, insurers need to remain vigilant about capital adequacy and evolving RBC requirements.

In 2026, the NAIC will update its RBC framework to address current and emerging risks, aiming to strengthen insurer solvency and transaction transparency as life insurers invest heavily in private credit, asset-intensive, and offshore reinsurance as part of a structural shift in life insurance. Regulators are focused on private equity (PE) ownership and investment in the life industry where investments, transactions, and other vehicles are used to grow the business and hedge against losses.¹³ The industry should expect rigorous debate on RBC's role as the hallmark of solvency oversight in the state-based system of insurance. An updated RBC preamble will clarify capital requirements related to investment and macroprudential risks.¹⁴ The NAIC will consider new elements within RBC's guiding principle of "equal capital for equal risk" after establishing the tone and scope of RBC and its applications. The NAIC will scrutinize risk factors that affect solvency such as concentration, diversification, and tail risk assessment mechanisms for precision and transparency so regulators can identify weakly capitalized companies and take necessary oversight action.¹⁵

The NAIC's RBC Task Force is coordinating with Financial Condition Committee working groups to explore potential refinements to the decades-old formula and system. One point of discussion will be the use of the RBC level as a representation of capital ratios to the public. Regulators don't want to see an insurer highlighting its RBC ratio of 600% to the market, for example, as a means to erroneously imply that it is financially stronger than a company with a ratio of 400%.¹⁶ Publicizing these ratios could incentivize certain insurers to adjust reserves or hesitate to voluntarily strengthen them. While some commissioners primarily regard RBC as a means for identifying entities with insufficient capitalization, others advocate for increasing its prominence domestically and internationally. Industry representatives have noted the evolving applications of this measure and these views could prevail in 2026 as the US readies its version of the international Insurance Capital Standard (ICS) for implementation.¹⁷

This ultimate shape of RBC's role depends on the consensus of NAIC leadership and key commissioners and their synthesis of comments from stakeholders.¹⁸ NAIC President Scott White, former chair of the Financial Condition Committee, will shape the thematic principles of the NAIC's RBC framework and apply his solvency focus to the new RBC framework.¹⁹ White cautioned, in 2025, that "fostering economic growth and/or regulating the real economy...do not fall within the solitary purpose of the RBC framework...Likewise, a suggestion in the proposed principles that 'RBC calculations should secondarily acknowledge their impact on product availability that meets consumer needs' has no place in the RBC framework's model governance principles."²⁰



The NAIC is developing a new financial modeling methodology of collateralized loan obligations (CLOs) to support NAIC designations and designation categories by year-end 2026.²¹ As part of this effort, the NAIC will finalize and disclose the revised RBC C-1 bond factors to reflect the granular capital charges. The final changes are expected to be disclosed for Life RBC by April 30, 2026, and are to be adopted by the Capital Adequacy Task Force by summer 2026 for a year-end CLO model adoption by the NAIC.²² Regulatory actuaries will be looking for consistency with bond factors or deviations to provide better accuracy. The NAIC is also evaluating the use of collateral loans by certain registered entities to potentially falsely inflate RBC levels. The NAIC is expected to take action to curtail these practices.²³

The NAIC and state regulators are also considering accounting changes amid ongoing concerns that the risk some insurers transfer through reinsurance may not be properly addressed on their balance sheets. This scrutiny could result in tightened guidance to address the concern that some insurers are overstating risk transfer and reserve credit in complex reinsurance agreements. The guidance could be revised to incorporate information on deals with interdependent contract features.

The NAIC is considering language to clarify criteria for assessing whether a reinsurance contract effectively transfers risk.²⁴ Regulators intend to review cases where some insurers transferring risk through reinsurance evaluate each reinsurance component and claim full proportional reserve credits for each, despite the fact that aggregate risk may not be fully transferred.

ICS-level adjustments are also in play. The NAIC aims to have a group capital ratio derived by the Aggregation Method (AM), that serves US financial markets, is reflective of its RBC regime, and is implementable with comparable outcomes to the ICS. Its Aggregation Method Implementation Working Group (AMIWG) will refine aspects of its group capital calculation. The AM will undergo a baseline self-assessment in 2026.²⁵

Areas of focus will include the AM's sensitivity to changes in interest rates and supervisory intervention points on the basis of group capital levels, as well as on reporting and disclosure requirements.²⁶ The NAIC is exploring ways to manage sensitivity to interest rates within the AM, potentially through refining of the scalar design to align different jurisdictions' capital positions with US RBC outcomes while preserving each entity's excess capital and standardized interest rate shock testing.²⁷ Key work underway includes development of a scaling methodology that effectively monitors for financial soundness. State regulators under the auspices of the NAIC are also developing tools to convert non-US insurance group capital ratios to US RBC equivalents for aggregation.²⁸ The preparation for in-depth targeted jurisdictional assessment of its ICS implementation in 2027 will require attention from NAIC leadership.²⁹

The NAIC and state regulators are also considering accounting changes amid ongoing concerns that some insurers transferring risk through reinsurance may not be fully showing up on their balance sheets.

Why firms should take notice

In 2026, firms in alternative and international investments will face increased regulatory scrutiny over reserves and transparency. Regulators may require higher capital and reserves based on risk assessments and will demand more disclosures. Even without new levels of capital delineated or expected in 2026, state regulators may intervene if insurers claim reserve credits for actuarial risks not fully transferred—continuing to clarify and tighten rules around risk transfer.

How firms should respond

Firms should participate in discussions with key working groups, framing the use of capital and its levels for investments and lines of business. Further, they should respond to revisions in statutory accounting procedure drafts. Firms should be able to adjust their accounting, actuarial, and reserving, as required, when new frameworks or expectations for statutory prudence take hold. Insurers should have a clear picture of their investment risks and be able to explain them to their state regulators.



Climate and catastrophe challenges

Regulatory expectations

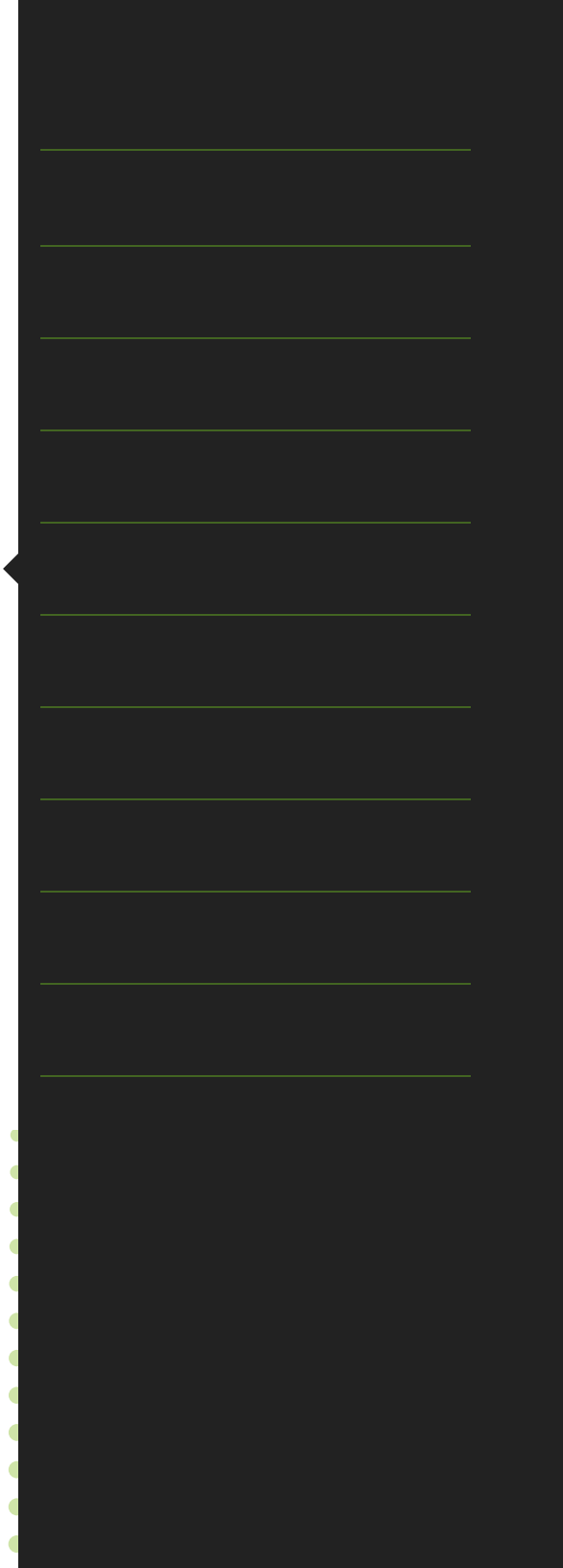
Insurers face mounting challenges from climate and other catastrophic events, prompting regulators to prioritize market resilience and disaster preparedness regionally, nationally, and globally.

Individual state efforts to keep markets stable, premiums from soaring, and weather-related losses from being unmanageable on both the public and private front will accelerate this year, especially with a lack of clarity at the federal level. At that level, disaster management and flood insurance programs will remain topics of discussion and education, even if a solution is not immediate. California plans to implement its “whole-of-government” approach needed for insurance stability following a September executive order (EO).³⁰ The California approach involves collaboration among a variety of state agencies to create solutions to both mitigate and fairly allocate the costs of preventing damage and recovering from natural catastrophes, as well as bringing more insurers back into the private market, a process that has been slow but could accelerate in 2026.³¹

California will continue to tackle climate-related risk: A recent wildfire fund law for survivors directs the state’s wildfire fund administrator to prepare a report by April 2026 that analyzes new approaches to catastrophe response.³² Insurers’ claims-paying accountability on behalf of wildfire survivors will be in the spotlight. The state’s new long-term solvency regulation gives the California Department of Insurance more oversight tools to confront future risks—from climate to technology to cyber—through stress testing and scenario analysis applied to future decades. Firms must disclose detailed strategies for addressing multiple risk fronts across decades, including those not just arising from extreme weather events but from long-term market transformations, and transition risks associated with new technologies (with a focus on reducing reliance on greenhouse gas-emitting technologies).³³

We expect to see importance growing for mitigation grant programs, with states preparing internal disaster response plans and educational materials for immediate deployment after disasters. States like South Carolina are expanding disaster education beyond coastal areas, building strategic communication plans and engaging stakeholders at community events.³⁴ States will continue to issue wind mitigation grants, with others expanding to wildfire mitigation. In Alabama, the Strengthen Alabama Homes program will continue to serve as a model for other states.³⁵

At the NAIC, the Climate and Resiliency Task Force is prioritizing the adoption of a *Disaster Preparedness Guide*. The guide’s purpose is to consolidate lessons learned by regulators on risk mitigation and share approaches dealing with disasters.³⁶ The guide will include an overview of disaster preparedness, case studies, and regulatory response reports. Insurers will be encouraged to develop transition plans for five, 10, and 20 years out.



The NAIC is prioritizing the development of its draft Affordability and Availability Playbook as a resource for state insurance regulators. Its goal is to address homeowners' insurance affordability and availability by exploring and synthesizing the implementation of approaches to challenges such as innovation, collaboration, and emerging risk adaptation.³⁷ One major focus of the playbook is on climate risk and severe weather events, addressing specific perils like hurricanes, severe storms, tornadoes, wildfires, earthquakes, and emerging risks related to extreme heat and atmospheric rivers. Expect regulators to discuss tools, including data use and transparency, and public-private partnerships to help expand market access.³⁸

The NAIC's Natural Catastrophe Risk Dashboard will provide national metrics on catastrophes and protection gaps, serving as a tool for regulators and a public-facing summary report. The dashboard revisions will come into effect in 2026. Reinsurance will be in the regulatory spotlight, with major education efforts on catastrophe modeling and alternative risk transfer. The NAIC is seeking to strengthen collaboration with cross-state data-sharing and joint catastrophe modeling.

The NAIC will put in motion surveys to collect housing and homeowners insurance information to acquire a detailed look at property coverage, costs, and underwriting decisions. The NAIC Homeowners Market Data Call Task Force expects the ZIP code-level data call to be sent to insurers in early 2026, with responses due in May or June. The NAIC is seeking a balance of relevant and granular data for most of the US insurance markets.³⁹ Specific data such as square footage of dwellings might be added later. The NAIC is also interested in residual and surplus lines data. The data call will be fine-tuned in future years as assessments are made and data is analyzed. Expect some facets of the data call report to be made public.⁴⁰

At the federal level, the US Department of Housing and Urban Development (HUD) has shifted to a continuous data collection model for the American Housing Survey to provide more up-to-date estimates and enhance comparability with other annual data sources. Data collection was delayed until early 2026; it will include disaster risk and insurance categories.⁴¹

The NAIC will continue to meet with federal disaster and flood relief officials to discuss mitigation strategies for private flood insurance coverage. The state-based group is seeking long-term reauthorization of the National Flood Insurance Program (NFIP) from Congress and support for premium discounts for resilient construction, tax-preferred savings for mitigation, parity for state mitigation grants, and underwriting tools such as accurate flood mapping.⁴² Multiple proposals for some reform are under consideration, with some congressional efforts expected to gather momentum by fall 2026.⁴³ It's likely there will be more delegations to Washington in response to regulators' multi-state experiences in addressing disasters and mitigating losses.

Internationally, the IAIS is cautioning that widening natural catastrophe (NatCat) protection gaps could increase financial stability risks by shifting risk to the banking sector, and it underscored that insurance is critical in mitigating economic and societal impacts of weather events.⁴⁴



Why firms should take notice

As regulators intensify their focus on climate and catastrophe risks, firms should understand and plan for the implications for market stability and disaster preparedness. Heightened catastrophic disaster risk, coupled with inflation, is driving insurance underwriting and risk; thus, involvement with officials at the state and federal levels on mitigation strategies, mapping, catastrophe modeling, and other use of data and shared information could help reduce losses and strengthen the industry as a whole.⁴⁵ Firms will need to be ready to respond to heightened climate and emerging risk disclosures and reporting requirements from states such as California.

How firms should respond

Regulators are pushing to improve the data quality and data elements by working with companies, so it is important for firms to be at the forefront of the process. Ensure that necessary data can be furnished to regulators when requested in an accurate and comprehensive manner while protecting the confidential nature of the information. This is a good time for reinsurers to assert their role in mitigating risk and for catastrophe modelers using weather balloons and other instruments and data to gain footing with state regulators in communicating risk.



Consumer transactions and investments

Regulatory expectations

Evolving consumer protection and investment regulations will influence how insurers manage data, privacy, and product offerings.

A modernized NAIC Privacy Protections Model Law could see adoption (or preparation for pending adoption) at year-end 2026, as NAIC leadership moves systematically to address each section of the draft *Privacy of Consumer Financial and Health Information Regulation* through public exposure and periodic meetings. At the end of 2025, the NAIC was working on Article VI, dealing with exceptions to limits on disclosures of nonpublic personal information. The draft of the privacy protections model currently has eight articles.⁴⁶ The NAIC embarked on a new privacy model law before scrapping it and beginning a new revision to an existing model as part of a multi-year process to address current methods and oversight of collection, data ownership, and use rights, as well as disclosure of information insurers gather in their transactions.

Expect robust discussion among all facets of industry, consumer advocates, and state regulators on the development of disclosure requirements, opt-out provisions for disclosure of certain types of personal information, and harmonizing provisions with existing state and federal privacy laws.

Illustrations, or insurers’ documents for projecting performance over time and key elements for the investor and future retiree for annuity products, will be in the spotlight in 2026 as the NAIC has recently created a working group to improve marketing illustrations and disclosures for life insurance and annuities. The work of state regulators here could result in revisions to existing model laws to make sure consumers understand the range of risks and outcomes for an annuity’s performance in the market.⁴⁷

At the federal level, insurers’ deployment of variable annuities in retirement plans is finding a warm welcome from the Department of Labor’s (DOL) Employee Benefits Security Administration (EBSA) as well as through an EO issued in August 2025 on democratizing access to alternative assets for 401(k) retirement plan investors.⁴⁸ Based on an advisory opinion issued in September 2025, the DOL emphasized its approach to be “sufficiently flexible to accommodate future innovation and developments in retirement products.”⁴⁹ The DOL will continue to take the stance that features common to variable annuity contracts will be accepted as a qualified default investment alternative as long as other conditions of the regulation are satisfied.⁵⁰

The NAIC embarked on a new privacy model law before scrapping it and beginning a new revision to an existing model as part of a multi-year process to address current methods and oversight of collection, data ownership, and use rights, as well as disclosure of information insurers gather in their transactions.

Expect coordination on investments with the SEC as well based on the August 2025 EO that states the SEC, in consultation with the Treasury secretary, will coordinate to help participants in retirement savings plans get access to investments in so-called alternative assets through potential revisions to SEC regulations and guidance.

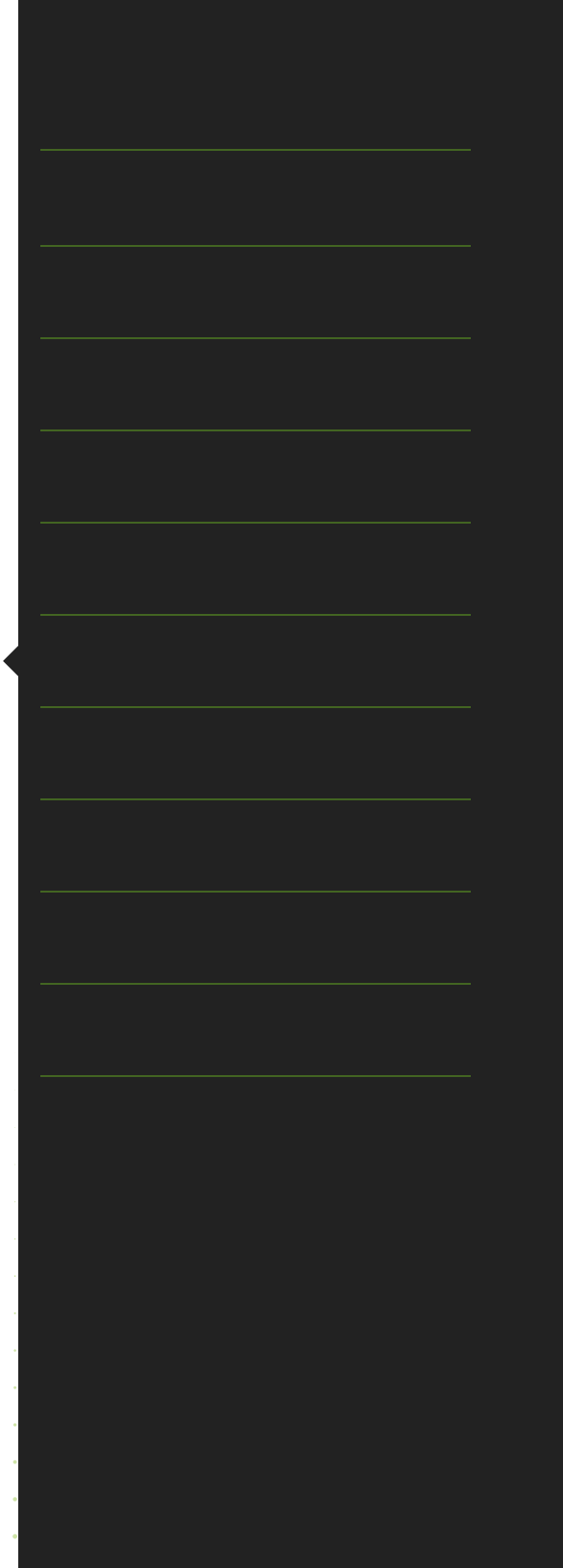
Enforcement of the SEC’s best interest standard and oversight of annuity sales practices will continue at the state and federal levels. The SEC will continue to focus its attention on recommended products that it says are complex or tax advantaged, such as variable and registered index-linked annuities in exams, according to its 2026 examination priorities. Fiduciary standards of conduct and relationships in the broker-dealer community will be scrutinized under the SEC’s watch this year.⁵¹

Why firms should take notice

How information is shared and what investment vehicles are permitted or welcomed is crucial to insurers’ future business plans and internal governance frameworks. Federal-state overlaps in potential requirements loom as a major issue, especially on the consumer data privacy regulatory front. Although a model act would still require state-by-state adoption, the updated requirements could impact the balance sheets of every insurer doing business nationally. Enforcement issues with annuities at the federal level could negatively impact firms and the products they sell, as well as their relationships with the investment community.⁵² At the state level, heightened scrutiny of annuity illustrations could result in adjustments to guidance or state regulations governing disclosures and perhaps expanding their use.

How firms should respond

Firms should ascertain whether their internal networks can adapt to future changes in privacy laws and maintain compliance with existing federal regulations. Life insurers should follow the NAIC working group’s review of annuity investment illustration rules and prepare for possible stricter model guidance, with chances to join discussions in 2026. Investment professionals in the variable annuity business can gear up for growth of these investments in retirement plans but should scrupulously adhere to all state and federal securities and fiduciary rules. Ongoing engagement with state and federal initiatives will be essential to navigate evolving compliance requirements and industry expectations. Maintaining a strong, vigilant compliance program and adhering to federal and state rules on disclosures and conflicts of interests is paramount. These will require extra attention when business models change or acquisitions occur.



Looking forward

As regulatory frameworks evolve in 2026, compliance teams in the insurance sector should remain vigilant and adaptive. These teams face a rapidly evolving regulatory landscape shaped by new frameworks for AI, data governance, capital risk management, capital adequacy, climate resilience, and consumer privacy.

- **Monitor regulatory developments:** Stay informed on initiatives from the NAIC and state regulators, including new AI oversight tools, updates to risk-based capital requirements, and revisions to privacy model laws. The IAIS activity will continue full steam ahead and will affect reporting and disclosures for all internationally active insurers, with a trickle-down effect on the rest of the industry.
- **Strengthen governance and controls:** Enhance frameworks for AI and external data use, reinforce oversight of TPSPs, and strengthen and upgrade cybersecurity risk management, which will be held to rigorous standards.

- **Prepare for enhanced reporting:** Anticipate new compliance obligations, such as quantitative testing for unfair discrimination, climate risk disclosures, and detailed data calls.
- **Engage proactively:** Participate in industry discussions, respond to draft regulatory revisions, and collaborate with regulators to shape practical compliance strategies. By prioritizing agility, transparency, and proactive engagement, compliance teams can help their organizations navigate regulatory change, mitigate emerging risks, and scrupulously maintain trust with regulators and stakeholders.



Regulatory insights to action

The Deloitte Center for Regulatory Strategy, US

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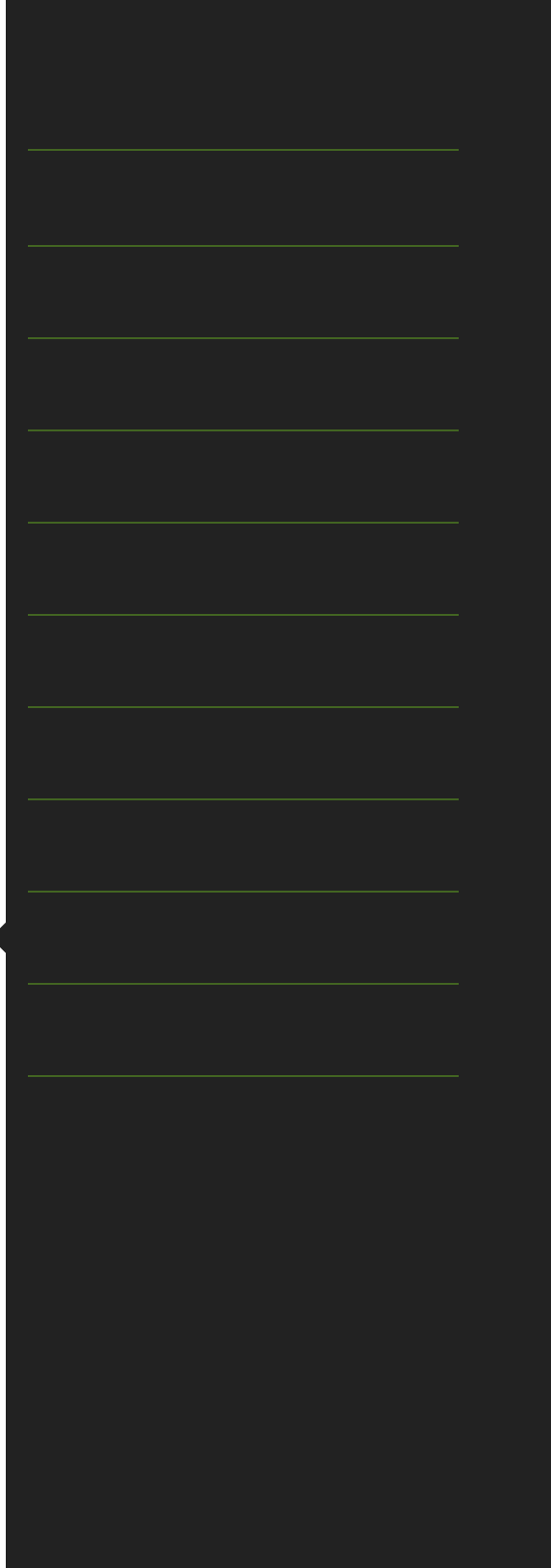
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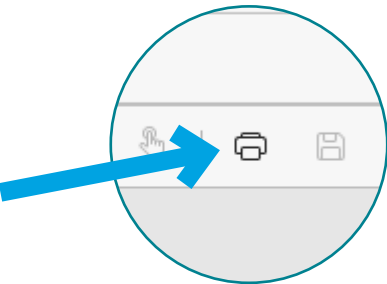
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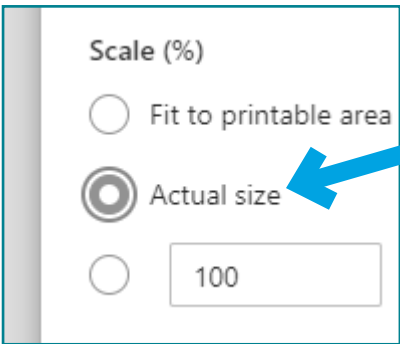
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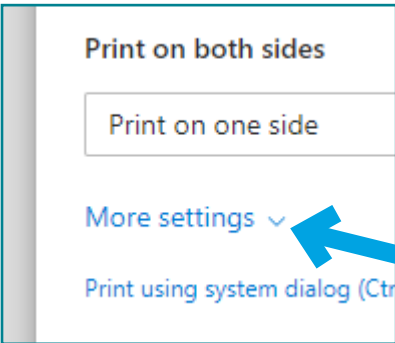
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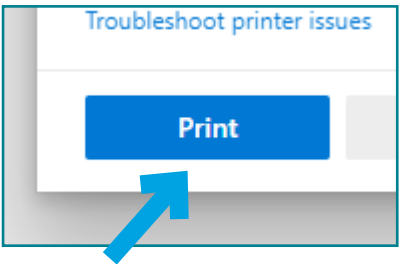
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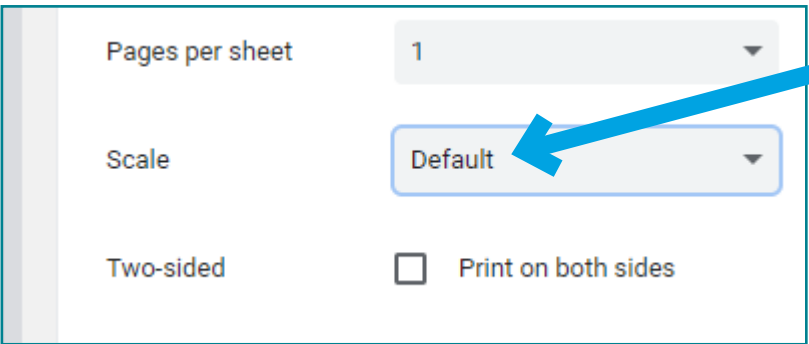


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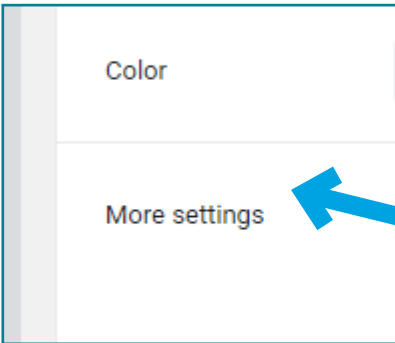
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