Deloitte.

Together makes progress



Update on the NAIC's draft Regulatory Framework for Third-Party Data and Model Vendors

September 2026

Center *for* Regulatory Strategy US

Background

Center *for* Regulatory Strategy US

Background
Framework
Chief components
Open items
Next Steps

The National Association of Insurance Commissioners' (NAIC) Third-Party Data and Models Working Group (the Working Group) is expected to review stakeholder comments and consider next step and potential adoption of the **risk-based regulatory framework for Third-Party Data and Model Vendors.**[1] Adoption is an intended milestone, not an assured outcome.

- The Working Group is reviewing stakeholder comments submitted during the August exposure.
- The Working Group will discuss voluntary registration, disclosure requirements, and the registry's oversight role.
- Stakeholders are seeking stronger confidentiality protections, and clearer thresholds and procedures, before restricting model use.
- The Working Group will consider how to avoid duplicating existing insurer filings. In addition, it will consider aligning the registry with the Big Data and AI Working Group's **AI Systems Evaluation Tool.**

Framework

Center *for* Regulatory Strategy US

Background
Framework
Chief components
Open items
Next Steps

The draft framework would accomplish the following:

- The proposed framework is designed to preserve insurer accountability: **insurers remain fully responsible for compliance,** and third-party vendors **do not assume any insurance risk.**
- The proposed structure is an NAIC-hosted, multi-state registration repository that **will be filed alongside insurer** filings**.**
- **Vendors would be required to provide documentation** on corporate governance, model documentation, data documentation, and consumer disclosure.
- Vendors would also provide **annual attestation from a senior leader with relevant technical expertise and organizational authority,** and have to notify the registry of significant model or dataset changes, including decommissioning.

Chief components

Center *for* Regulatory Strategy US

Background
Framework
Chief components
Open items
Next Steps

The draft framework has four main pillars:

- **A shared NAIC vendor registry:** Vendors would be "encouraged" to register and disclose their ownership, officers, governance programs, covered products, and which insurers have purchased their data or models.
- **Regulatory access through filings:** A third-party vendor's data and/or model must be filed in either the insurer's own filing or as a separate filing submitted directly to the regulator. This is similar to what is required of an insurer filing its own data and/or model. Insurers will continue to be required to file its rates and underwriting rules in accordance with each state's rules.
- **Annual vendor attestations:** A senior technical leader must annually attest through the shared multi-state registry that governance is effective and that the vendor's covered data and models comply with the laws of every state in which insurers use them.
- **Material-change reporting:** Vendors would notify the registry of material dataset or model changes, including model decommissioning.

Open items

Center *for* Regulatory Strategy US

Background
Framework
Chief components
Open items
Next Steps

The NAIC and interested parties, including industry stakeholders, continue to debate four main issues that may shape the next draft and implementation approach:

- **Attestation and accountability:** How does the framework distinguish vendor-controlled governance, data, and model development from insurer-controlled configuration, implementation, and legal compliance? There is concern of when vendors may have limited visibility into how their products are used.
- **Confidentiality and information sharing:** How does the framework protect proprietary methodologies, validation materials, customer lists, and vendor-insurer relationships as information is shared between the registry and state regulatory processes?
- **Governance review vs. detailed model filing:** How does the framework maintain high-level oversight without asking for duplicative paperwork or expanding beyond its intended use?
- **Voluntary registration:** How does the framework ensure registration remains voluntary in practice? There is concern of when insurers use products from vendors that are not registered or do not provide requested information.

Next steps

Center *for* Regulatory Strategy US

The NAIC will likely:

1. **Assess the comment record:** Identify commenters' core concerns such as scope, voluntary registration, confidentiality and trade-secret protection, state review procedures, and the line between vendor and insurer responsibilities.
2. **Decide whether to re-expose:** The Working Group could revise and re-expose the framework for public comment before targeted adoption at the Fall National Meeting
3. **Stay in scope (for now):** Any planned expansion beyond P/C has not begun. Commenters urged that any expansion be separately justified and exposed.

Key questions

Will regulators reshape this into a narrowly targeted, confidential multi-state information tool? Will they retain features that stakeholders view as creating a parallel supervisory regime for vendors?

Adoption will depend on the pace of any revisions to resolve stakeholder concerns. The Working Group's charge remains to develop and propose a framework for the regulatory oversight of third-party data and predictive models.

Endnotes

1. National Association of Insurance Commissioners (NAIC), "Regulatory Framework for Third-Party Data and Model Vendors Property and Casualty Pricing and Underwriting Data and Models," August 5, 2026; NAIC, "Third-Party Data and Models (H) Working Group," August 12, 2026.

Connect with us

Courtney Parry
Principal
Deloitte & Touche LLP
cparry@deloitte.com

Andrew N Mais
Independent Senior Advisor to
Deloitte & Touche LLP
amais@deloitte.com

Special thanks and appreciation to Parker Thompson and Emily Scarborough for their insights and contributions.

Deloitte Center for Regulatory Strategy, US

Irena Gecas-McCarthy
FSI Director, Deloitte Center for Regulatory Strategy, US
Principal
Deloitte & Touche LLP
igecasmccarthy@deloitte.com

Lananh Nguyen
R&I Director, Deloitte Center for Regulatory Strategy, US
Managing Director
Deloitte Services LP
lananhnguyen@deloitte.com

Liz Festa
Specialist
Deloitte Services LP
lfesta@deloitte.com

This document includes notes on common themes expressed by participants during an interim meeting call of the NAIC. These notes were taken informally based on discussions heard and were not validated or confirmed by Deloitte. Deloitte is not, by means of this document, rendering accounting, business, financial, investment, legal, tax, or other professional advice or services. This document is not a substitute for such professional advice or services, nor should it be used as a basis for any decision or action that may affect your business. Before making any decision or taking any action that may affect your business, you should consult a qualified professional advisor. Deloitte shall not be responsible for any loss sustained by any person who relies on this document.

As used in this document, "Deloitte" means Deloitte & Touche LLP, a subsidiary of Deloitte LLP. Please see www.deloitte.com/us/about for a description of our legal structure. Certain services may not be available to attest clients under the rules and regulations of public accounting.

Copyright© 2026 Deloitte Development LLC. All rights reserved.