



April 1, 2025

Representative Susan Donovan
Chair, House Committee on Health and Human Services
Rhode Island State House
Providence, RI 02903

Re: House 5172 – An Act Relating To Insurance – The Transparency and Accountability In Artificial Intelligence Use
By Health Insurers To Manage Coverage and Claims Act

Dear Chair Donovan:

The American Property Casualty Insurance Association (APCIA)¹ and the Rhode Island Insurance Federation (RIIF) appreciate the goals of H.5172 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 all insurance companies providing health insurance coverage as defined in chapter 18.5 and 18.6 of section 27 in Rhode Island, including those subject to chapter 1 of title 27, a foreign insurance company licensed to do business in Rhode Island and subject to chapter 2 of title 27, a health insurance carrier subject to and organized pursuant to chapter 18 of title 27, a nonprofit hospital service corporation subject to and organized pursuant to chapter 19 of title 27, a nonprofit medical services corporation subject to and organized pursuant to chapter 20 of title 27, a qualified health maintenance organization subject to and organized pursuant to chapter 41 of title 27, and Medicaid managed care organizations as described in §42-7.4-2.

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,



Jonathan Schreiber
Associate Vice President, State Government
Relations
APCIA
Jonathan.schreiber@apci.org
(202) 828-7121



Christopher S. Stark
Executive Director
Rhode Island Insurance Federation
cstark@rhodeislandinsurancefederation.org
(617) 356-2644 (cell)

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.