AI GOVERNANCE POLICY TEMPLATE

One-page AI policy summary for insurance agencies

Condensed from the free AI governance policy template for insurance agencies and benefits brokerages. An agency can adopt the full document as its AI governance policy or as its AI acceptable use policy for an insurance agency. Each rule comes from that policy. The full policy is the document to copy and adopt. Replace everything in [brackets], and have an attorney or compliance lead review it before adopting it. This template is not legal advice.

1. Under Section 4, staff may use only the AI tools listed in Appendix A for agency work, and that work must be done in agency-controlled business accounts, never in personal or free consumer accounts. Approved tools must be configured so that agency data is not used to improve the vendor's models.
2. Under Section 5, public information, agency marketing content, general insurance and benefits questions, and internal documents that contain no client data may go into approved tools. Client business names, plan designs, rate exhibits, census files, loss runs, schedules of insurance and carrier quotes may go into approved tools only after individual identifiers have been removed or replaced with placeholders.
3. Under Section 5, Social Security numbers, protected health information, payment data, passwords, and anything a client or carrier contract says may not be shared with third parties may not be entered into any AI tool, including approved tools, unless the Policy Owner has approved a specific workflow in writing and a business associate agreement or equivalent contract is in place. When in doubt, treat the data as Red and ask the Policy Owner.
4. Under Section 6, a qualified staff member must review and approve every output before it is sent to a client, prospect, carrier or regulator, or used to make a coverage, eligibility, pricing or claims recommendation. Staff must check figures, plan details, coverage terms and dates against the source documents, and AI may not make final decisions about coverage, underwriting, claims, eligibility or employment. The person who sends a document is responsible for its content, whether or not AI helped draft it.
5. Under Section 7, the agency will tell clients that it uses AI tools to support its work when they ask, and in its privacy notice or engagement letter, and it will honor a request that their information not be processed with AI tools.
6. Under Section 4, the retention setting for each approved tool is recorded in Appendix A. Meeting note-takers may be used only with the consent of every participant, and recordings that contain restricted data must be stored and deleted under the agency's records policy.
7. Under Section 8, before a tool is approved, the Policy Owner records where data is stored and how long it is kept, whether customer data is used to improve the vendor's models and how to turn that off, whether the vendor will sign a business associate agreement (required for any workflow that touches protected health information) and a data processing agreement, security certifications, admin controls, and how the vendor reports a security incident.
8. The policy names a Policy Owner. Under Section 4, staff may request a new tool from the Policy Owner, and a tool is not approved until it has passed the vendor review in Section 8 and been added to Appendix A.
9. Under Section 10, staff must report suspected misuse, including Red data entered into any AI tool or agency data entered into an unapproved tool, to the Policy Owner within [24] hours. The Policy Owner assesses the incident, contacts the vendor to request deletion where possible, and follows the agency's incident response plan, including any required client, carrier or regulator notice. Reporting a mistake promptly will not by itself result in discipline.
10. Under Section 13, the Policy Owner reviews this policy at least every six months, and whenever the agency adds a tool, changes vendors, or a relevant law changes.
11. Under Section 11, every staff member reviews this policy with their manager before receiving access to an approved tool, and annually after that, and signs the acknowledgment in Appendix B.