



| STRATEGY & GOVERNANCE | |
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| Is there a state agency or taskforce responsible for AI regulation or development? | Yes. The Illinois Department of Innovation and Technology is the primary agency responsible for AI policy in state government, setting standards for responsible use. ¹⁸³ |
| Is there an enacted AI law or regulation that applies to health insurance? | No. However, H.B. 1806 (2025) makes it illegal for AI systems to independently provide therapy, psychotherapy, or clinical recommendations without review and approval by a licensed professional. ¹⁸⁴ S.B. 1297 (2026) requires an operator to not knowingly and intentionally cause or program a conversational AI service to make any representation or statement that explicitly indicates that the conversational AI service is designed to provide professional mental or behavioral health care. ¹⁸⁵ |
| Is there an official state strategy on AI? | Yes. AI is included in the Governor's five-year plan launched in 2024. ¹⁸⁶ |
| CONSUMER PROTECTIONS | |
| Is there a state data protection law that applies to AI use of personal data? | No. The Illinois Personal Information Protection Act focuses on notification requirements for data breaches rather than providing consumers with rights to their data. ¹⁸⁷ |
| Is human oversight of AI required? | Yes. The Wellness and Oversight Psychological Resources Act prohibits the use of AI to independently provide therapy without the review and approval by a licensed professional. The law also prohibits licensed professionals from using AI to (1) make independent therapeutic decisions; (2) directly interact with clients; (3) generate therapeutic or treatment recommendations without review and approval of a licensed professional; or (4) detect emotions or mental states. ¹⁸⁸ |
| Is there a consumer complaint mechanism available? | No. However, consumers can file a complaint with the Illinois Department of Insurance if they believe AI has been used improperly within their health insurance. ¹⁸⁹ |
| Has the state insurance commissioner adopted the NAIC Model Bulletin or a similar bulletin? | Yes. The Illinois Department of Insurance issued Bulletin 2024-08 adopting the NAIC Model Bulletin. ¹⁹⁰ |
| FUTURE READINESS | |
| Are there state-based advocacy groups related to AI in health insurance or health care? | Yes. The AI.Health4All Center for Health Equity at the University of Illinois College of Medicine focuses on improving fairness and reducing bias in healthcare through the utilization of innovative technologies. ¹⁹¹ Illinois State Medical Society advocates for legislation that would limit how insurers use AI systems to make or support adverse determinations that affect patients. ¹⁹² |
| Are there state-funded training opportunities on AI? | No. |