

LINTEL VANTAGE

Vantage Briefing for Ashlar Health, Inc. No. 1 • 17 May 2026

Reporting changes in monitored sources, 2026-05-11 – 2026-05-17.

Specimen issue. Ashlar Health, Inc. is a fictional company; this issue is published as a sample of what Lintel Vantage produces.

Executive summary

■ NEW

- Colorado's Governor signed SB 26-189 on May 14, 2026, repealing and reenacting with amendments the Part 17 developer-and-deployer framework for covered automated decision-making technology that SB 24-205 created, with most duties under Colorado SB 26-189 applying to decisions made on or after January 1, 2027.

■ AMENDED

- Iowa House File 2635, signed May 13, 2026, amends Iowa Code § 514F.8 to bar an artificial-intelligence-based algorithm or system from being the sole basis to deny, delay, or downgrade a medical-necessity prior-authorization request, effective July 1, 2026, with related audit provisions applying to audits initiated on or after January 1, 2027.
- The same May 14, 2026 Colorado enactment repeals and reenacts Part 17 of the Colorado Consumer Protection Act, replacing SB 24-205's duties with SB 26-189's covered-ADMT framework before SB 24-205's deferred June 30, 2026 operative date arrived.

■ DEADLINE

- Connecticut SB 1295 (Public Act 25-113) takes effect July 1, 2026, broadening the Connecticut Data Privacy Act's profiling opt-out from that date. A separate impact-assessment duty for covered profiling under Connecticut SB 1295 (Public Act 25-113) applies only to processing activities created or generated on or after August 1, 2026, not retroactively.

■ ENFORCEMENT

- On May 11, 2026, the Texas Attorney General announced a proposed Agreed Final Judgment with LG Electronics U.S.A., Inc. resolving an investigation into automatic content recognition on LG Smart TVs, with claims referencing the Texas Data Privacy and Security Act.
- On May 11, 2026, the Texas Attorney General filed suit against Netflix, Inc. in a Collin County district court alleging deceptive practices under the Texas Deceptive Trade Practices Act related to collection and disclosure of viewing and behavioral data, including from children's profiles.

■ WATCHED

- A federal court's April 27, 2026 order restrains Colorado Attorney General enforcement of SB 24-205 "or any legislation replacing or amending SB24-205 enacted during this legislative session"; SB 26-189, signed May 14, 2026, was enacted during that session and repeals and reenacts the same Part 17 framework, so on the terms of the order the restraint reads as reaching SB 26-189's covered-ADMT framework on the same basis. The court has not addressed the clause's application to SB 26-189.

What changed

■ NEW

Colorado enacts SB 26-189, repealing and reenacting its covered-ADMT framework for consequential decisions

Colorado SB 26-189, signed May 14, 2026 (2026 Colorado Session Laws, chapter 131), repeals and reenacts with amendments part 17 of article 1 of title 6 of the Colorado Revised Statutes — the framework SB 24-205 created — and in doing so restates the duties attaching to "covered ADMT" under Colorado SB 26-189, automated decision-making technology used to materially influence a consequential decision. A "developer" is a person doing business in Colorado that makes a covered ADMT commercially available or intentionally modifies one to become covered; a "deployer" is a person doing business in Colorado that deploys one. Covered domains include education, employment, financial services, housing, insurance, health care, and essential government services. Under Colorado SB 26-189, a developer must document known limitations and harmful uses for deployers; a deployer must give point-of-interaction notice before using a covered ADMT to materially influence a consequential decision. Where a covered ADMT under Colorado SB 26-189 materially influences a consequential decision under that act resulting in an adverse outcome

2026-05-14

EFFECTIVE

2026-05-14

COMPLIANCE DATE

2027-01-01

[\[leg.colorado.gov\]](https://leg.colorado.gov)

for a consumer, the deployer must provide, within 30 days after making the decision and without the consumer asking, a plain-language description of the decision and the covered ADMT's role in it, instructions for requesting further information, and an explanation of the consumer's rights. Separately, a consumer who experiences such an adverse outcome may request, and the deployer must then provide in response to that request, instructions for correcting inaccurate personal data used in the decision and an opportunity for meaningful human review and reconsideration of it, the latter to the extent commercially reasonable under Colorado SB 26-189. The Colorado Attorney General enforces exclusively under the Colorado Consumer Protection Act. Before an enforcement action, the Attorney General issues a notice of violation only where a cure is deemed possible by the Attorney General, opening a 60-day period to cure; where the Attorney General finds and can demonstrate a knowing or repeated violation, no cure period is required before penalties or other relief are sought. These cure provisions sunset January 1, 2030. Most duties apply to decisions made on or after January 1, 2027.

WHY THIS MATTERS

Where automated decision-making tools are used to make or substantially replace significant decisions about individuals, several state regimes — notably the CPPA regulations and Colorado's SB 26-189 — attach notice, opt-out, and assessment duties.

Where AI systems make or materially influence consequential decisions — employment, credit, housing, insurance, healthcare, or education — the Colorado-model developer-and-deployer regimes (SB 26-189) allocate documentation, notice, and review duties.

■ AMENDED

Iowa restricts AI-based denial of medical-necessity prior authorizations

Iowa House File 2635, signed May 13, 2026, is a broader health-carrier and utilization-review act whose Section 2 substantively amends existing Iowa Code § 514F.8, a sectoral AI-in-healthcare provision. Under the amendment, a utilization review organization may use an artificial-intelligence-based algorithm or system to conduct an initial review of a prior-authorization request, but that AI-based algorithm or system may not be the sole basis to deny, delay, or downgrade a request for a health-care service based on medical necessity — a use-restriction model under Iowa Code § 514F.8, distinct from the disclosure-oriented sectoral AI statutes in Texas and Illinois. Neither "artificial intelligence-based algorithm or system" nor "utilization review organization" is newly defined in the amendment; the latter carries its existing statutory meaning. The Iowa Insurance Commissioner retains rulemaking and enforcement authority for the amended chapter; the

2026-05-13

EFFECTIVE

2026-07-01

[\[legis.iowa.gov\]](https://legis.iowa.gov)

amendment imposes no AI-specific penalty and creates no private right of action. The act takes effect July 1, 2026, while separate audit-timing provisions in the same act apply to audits initiated on or after January 1, 2027.

WHY THIS MATTERS

Where artificial intelligence is used in a health-care context, sectoral statutes impose duties that differ by model: Texas's SB 1188 follows a disclosure approach, while Iowa's amendment to Iowa Code § 514F.8 restricts an AI-based algorithm or system from being the sole basis to deny, delay, or downgrade a medical-necessity prior-authorization request.

■ AMENDED

Colorado SB 26-189 repeals and reenacts the SB 24-205 covered-ADMT framework

Colorado SB 26-189, signed May 14, 2026, repeals and reenacts, with amendments, Part 17 of Article 1 of Title 6 — the developer-and-deployer framework for consequential decisions originally created by SB 24-205. SB 24-205's own duties, including reasonable care against algorithmic discrimination, a deployer risk-management program, and annual impact assessments, had already been deferred by SB 25B-004 to a June 30, 2026 operative date and never took effect before the repeal and reenactment superseded them. SB 26-189 replaces those duties with the covered-ADMT documentation, notice, and meaningful-human-review framework described in the accompanying new-enactment record, effective for consequential decisions on or after January 1, 2027. The former SB 24-205 term "high-risk artificial intelligence system" is replaced by "covered ADMT" under Colorado SB 26-189. Enforcement remains exclusive to the Colorado Attorney General under the Colorado Consumer Protection Act.

2026-05-14

EFFECTIVE

2026-05-14

COMPLIANCE DATE

2027-01-01

[leg.colorado.gov]

■ ENFORCEMENT

Texas announces proposed smart-TV viewing-data settlement with LG Electronics

The Texas Attorney General announced, on May 11, 2026, a proposed Agreed Final Judgment and Permanent Injunction resolving an investigation into LG Electronics U.S.A., Inc.'s collection of "Viewing Data" — household-level viewing behavior gathered through automatic content recognition on LG Smart TVs — with claims referencing the Texas Data Privacy and Security Act. As proposed, LG would be required to obtain affirmative express consent, defined as a freely given, specific, and informed indication following clear disclosure, before collecting or processing viewing data or offering services that use it; to update onboarding and disclosure materials for model-year 2025 televisions within 30 days after the judgment's Effective Date,

2026-05-11

[texasattorneygeneral.gov]

which the judgment defines as the date it is signed and entered by the court; and, for model-year 2027 and subsequent models, to provide notice of the Viewing Information Agreement in a pop-up screen that automatically appears when a consumer enters the "User Agreements" screen during onboarding, within 180 days after what that paragraph calls the judgment's "issuance date." The judgment defines "Effective Date" and uses it for its other deadlines, including a separate 180-day consent restriction; "issuance date" appears once, in the pop-up paragraph alone, and is not defined, so whether the two paragraphs run from the same date is not resolved by the judgment's own text. The supplied judgment copy carried a blank judicial signature and date block, so court entry and the resulting effective date were not independently confirmed as of May 11, 2026.

WHY THIS MATTERS

State attorneys general bring investigations, cure notices, lawsuits, and settlements addressing privacy and AI-related practices under consumer-protection and state privacy statutes. Coverage in this product is bounded to a named subset of the most active offices; an enforcement item reflects activity in a monitored jurisdiction, not a finding about any particular company's practices.

■ ENFORCEMENT

Texas sues Netflix over children's viewing-data practices

The Texas Attorney General filed an Original Petition against Netflix, Inc. on May 11, 2026, in a Collin County district court, invoking the Texas Deceptive Trade Practices–Consumer Protection Act, Tex. Bus. & Com. Code §§ 17.46 and 17.47. The petition alleges false, misleading, or deceptive collection, use, sharing, sale, and disclosure of subscriber viewing and behavioral data, including conduct involving children's profiles, targeted advertising, autoplay defaults, and data-sharing arrangements with other companies. Relief sought includes a data purge, express informed consent before targeted-advertising-related data collection or disclosure, parental consent for children's behavioral data, disabling autoplay by default on kids' profiles, and civil penalties of up to \$10,000 per violation, with an additional penalty of up to \$250,000 for conduct affecting a consumer aged 65 or older. As of May 11, 2026, the matter remained pending, with no merits ruling or settlement in the retrieved court record; the petition's assigned cause number and judicial district were left blank on the filed copy.

2026-05-11

[\[texasattorneygeneral.gov\]](https://texasattorneygeneral.gov)

■ WATCHED

A federal stay order's restraint clause reaches session legislation replacing SB 24-205; the court has not addressed its application to SB 26-189

The April 27, 2026 minute order in *X.AI LLC v. Weiser*, No. 1:26-cv-01515 (D. Colo.) (ECF 24), restrains the Colorado Attorney General from initiating enforcement or an investigation for alleged violations of SB 24-205, "or any legislation replacing or amending SB24-205 enacted during this legislative session," for conduct occurring through 14 days after the court rules on a forthcoming preliminary-injunction motion. Colorado SB 26-189, signed May 14, 2026, repeals and reenacts the same Part 17 framework SB 24-205 created, replacing it with the covered-ADMT documentation, notice, and human-review duties described under Colorado SB 26-189, and was enacted within the same legislative session the order's restraint clause addresses. On the terms of the order, the restraint on Attorney General enforcement reaches SB 26-189's covered-ADMT framework on the same basis as SB 24-205's, notwithstanding SB 26-189's own January 1, 2027 date for those duties to begin applying. The restraint continues through 14 days after a ruling on xAI's preliminary-injunction motion; as of the evidence cutoff of May 17, 2026, that motion had not yet been filed, and no ruling had issued.

2026-05-14
[\[courtlistener.com\]](#)

WHY THIS MATTERS

Executive Order 14365, the Department of Justice's AI Litigation Task Force, and related federal litigation may destabilize — without themselves creating — state AI-governance obligations, including through challenges to specific state statutes. This item does not itself impose or remove a duty; it flags that an affected framework's status may change and is worth continued attention.

Upcoming deadlines

DATE	WHAT ARRIVES	SOURCE
2026-07-01	■ DEADLINE Connecticut Public Act 25-113 privacy amendments take effect Effective 2026-07-01 Compliance date 2026-08-01	[cga.ct.gov]

Watched — unchanged

Matched areas monitored this period with no change in scope.

- State Comprehensive Privacy Laws
- Applicability Thresholds

- Data-Level Exemptions
- Shifting Definitions
- Consumer Rights
- Consent Mechanics
- Universal Opt-Out Signals
- Controller / Processor Duties
- Data Protection / Risk Assessments
- Privacy Notice Content
- Enforcement Mechanics (cure / penalties / rulemaking)
- Breach-Notification Duties
- Consumer Health Data Laws
- FTC Act Section 5
- Health Breach Notification Rule
- Developer vs Deployer Duties
- AI Interaction Disclosure
- Prohibited AI Uses
- ADMT Risk / Impact Assessment
- CPPA / California AG Enforcement
- FTC Enforcement

Coverage & methodology

THE LANDSCAPE

20 comprehensive state privacy laws in effect as of 2026-05-17 (counting laws enforceable statewide; 19 excluding narrower-scope statutes such as Florida's). Computed from the registry.

RELEVANCE

Items appear in this Briefing because your Company Profile indicates a matching condition. This is relevance-routing, not a determination of applicability.

COVERAGE

This Briefing draws on our monitored sources. It does not claim to reflect all changes affecting your organization.

SOURCING

Citations link to the specific document supporting a claim wherever a stable public copy of it exists; otherwise they link to the official government page for that instrument.

Lintel Vantage is a regulatory-change monitoring product for US software companies, published by Lintel Standard.