

Cybersecurity and AI Certification

May 09, 2024

CYBERSECURITY CERTIFICATION – TIME CUTS

A “time cut” is a ruling within cycling to ensure that riders keep pace. Similarly, regulators have placed time cuts, or deadlines, for insurers to certify compliance with cybersecurity regulations. Some of the time cuts are listed below.



STAGE 1

February 15, 2024
(and annually thereafter)
OHIO (domestic life insurer)
Multistate domestic insurers to file certification or exemption notices

STAGE 2

March 1, 2024
(and annually thereafter)
WISCONSIN
(domestic life insurer)
Annual certification filing

STAGE 3

April 15, 2024
(and annually thereafter)
ILLINOIS (licensed life insurer)
Exemption filing*
NEW YORK (licensed life insurer)
Annual certification filing**
MARYLAND (licensed life insurer)
Annual certification filing
MAINE (licensed life insurer)
Annual certification filing

STAGE 4

June 1, 2024
(and annually thereafter)
OHIO (domestic life insurer)
Single-state domestic insurers are required to file their certification or exemption notices

*Illinois certification filing to be due April 15, 2025, and annually thereafter.

**This filing is separate from the notice of exemption filing required within 30 days of determining that the insurer is exempt.

AI CERTIFICATION – GEAR CHECK

Both the Colorado Division of Insurance and the Connecticut Insurance Department have implemented gear checks to ensure that insurers are in compliance with their artificial intelligence regulations and guidance. Below are the dates of the gear checks.



June 1, 2024 (and annually thereafter)
COLORADO (licensed life insurer)
Insurers that are using external consumer data and information sources (ECDIS), as well as algorithms and/or predictive models that use ECDIS, must submit a narrative report summarizing the progress made toward complying with the requirements, including identifying the areas still under development, any difficulties encountered, and expected completion date.

September 1, 2024
(and annually thereafter)
CONNECTICUT
(domestic life insurer)
Annual certification filing

December 1, 2024
(and annually thereafter)

COLORADO (licensed life insurer)
Insurers that are using ECDIS, as well as algorithms and/or predictive models that use ECDIS, must submit a narrative report summarizing compliance with the requirements and the title and qualifications of each individual responsible for ensuring compliance along with the specific requirement(s) for which that individual is responsible.

Insurers that do not use ECDIS or algorithms and/or predictive models that use ECDIS are exempt from the requirements and must submit an attestation signed by an officer indicating that the insurer does not use ECDIS or algorithms and/or predictive models that use ECDIS.

All components of the governance structure and risk management framework required must be available upon request.

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