

	LAW EFF. DATE	COMPLIANCE DEADLINES	ENTITIES EXEMPT FROM INFORMATION SECURITY PROGRAM REQUIREMENT	NOTICE OF EXEMPTION REQUIRED?	AGENT/BROKER CERTIFICATION OF COMPLIANCE REQUIRED?
Alabama	May 2, 2019	<ul style="list-style-type: none"> May 2, 2020 for ISP May 2, 2021 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 25 employees, less than \$5 million gross revenue, or less than \$10 million year-end total assets HIPAA compliant entities Entity affiliated with bank that has an ISP and that is covered by bank's ISP Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA compliance
Connecticut	Oct. 1, 2020	<ul style="list-style-type: none"> Oct. 1, 2021 for ISP Oct. 1, 2022 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Fewer than 20 employees (until Sept. 30, 2022) Fewer than 10 employees (eff. Oct. 1, 2022) HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP Entities in compliance with New York cybersecurity regulation 	No	Yes, if claiming exception due to compliance with New York requirements
Delaware	July 31, 2019	<ul style="list-style-type: none"> Aug. 1, 2020 for ISP Aug. 1, 2021 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Fewer than 15 employees HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA compliance

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Hawaii	July 1, 2021	<ul style="list-style-type: none"> July 1, 2022 for ISP July 1, 2023 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Fewer than 10 employees HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA compliance
Indiana	July 1, 2020	<ul style="list-style-type: none"> July 1, 2021 	<ul style="list-style-type: none"> Entity with fewer than 50 employees, less than \$5 million gross revenue, or less than \$10 million year-end total assets HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP Entity affiliated with bank that has an ISP and that is covered by bank's ISP 	No	No
Iowa	Jan. 1, 2022	<ul style="list-style-type: none"> Jan. 1, 2023 for ISP Jan. 1, 2024 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 20 employees, less than \$5 million gross revenue, or less than \$10 million year-end total assets Employee, agent, representative, or designee of entity that has an ISP HIPAA compliant entities Entity affiliated with bank that has an ISP and that is covered by bank's ISP 	No	Yes, if claiming exemption due to HIPAA compliance

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Kentucky	Jan. 1, 2023	<ul style="list-style-type: none"> Jan. 1, 2024 for ISP Jan. 1, 2025 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA compliance
Louisiana	Aug. 1, 2020	<ul style="list-style-type: none"> Aug. 1, 2021 for ISP Aug. 1, 2022 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 25 employees, less than \$5 million gross revenue, or less than \$10 million year-end total assets HIPAA compliant entities Entity affiliated with bank that has an ISP and that is covered by bank's ISP Employee, agent, representative, or designee of entity that has an ISP Entity in compliance with cybersecurity requirements of another jurisdiction approved by the Louisiana insurance commissioner 	No	Yes, if claiming exemption due to HIPAA compliance or due to compliance with an approved jurisdiction's requirements
Maine	Jan. 1, 2022	<ul style="list-style-type: none"> Jan. 1, 2022 for ISP Jan. 1, 2023 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Fewer than 10 employees HIPAA compliant entities Entity affiliated with bank that has an ISP and that is covered by bank's ISP Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA compliance or due to being affiliated with bank that has an ISP and covered by bank's ISP

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Maryland	Oct. 1, 2022	<ul style="list-style-type: none"> Oct. 1, 2023 for ISP Oct. 1, 2024 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Insurance producers 	Not applicable	Not applicable
Michigan	Jan. 20, 2021	<ul style="list-style-type: none"> Jan. 20, 2022 for ISP Jan. 20, 2023 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 25 employees HIPAA compliant entities except for notices of cybersecurity events Employee, agent, representative, or designee of entity that has an ISP 	No	No
Minnesota	Aug. 1, 2021	<ul style="list-style-type: none"> Aug. 1, 2022 for ISP Aug. 1, 2023 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 25 employees HIPAA compliant entities except for notices of cybersecurity events Entity affiliated with bank that has an ISP and that is covered by bank's ISP Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA compliance
Mississippi	July 1, 2019	<ul style="list-style-type: none"> July 1, 2020 for ISP July 1, 2021 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 50 employees, less than \$5 million gross revenue, or less than \$10 million year-end total assets Insurance producers and adjusters HIPAA compliant entities Entity affiliated with bank that has an ISP and that is covered by bank's ISP Employee, agent, representative, or designee of entity that has an ISP 	No	No

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New Hampshire	Jan. 1, 2020	<ul style="list-style-type: none"> Jan. 1, 2021 for ISP Jan. 1, 2022 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 20 employees Employee, agent, representative, or designee of entity that has an ISP HIPAA compliant entities Entities in compliance with New York cybersecurity regulation 	No	Yes, if claiming exception due to HIPAA compliance or compliance with New York requirements
North Dakota	Aug. 1, 2021	<ul style="list-style-type: none"> Aug. 1, 2022 for ISP Aug. 1, 2023 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with less than \$5 million gross revenue or less than \$10 million year-end total assets Entity with fewer than 50 employees (until July 31, 2023) Entity with fewer than 25 employees (after July 31, 2023) HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP 	No	No
Ohio	March 20, 2019	<ul style="list-style-type: none"> Mar. 20, 2020 for ISP Mar. 20, 2021 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 20 employees, less than \$5 million gross revenue, or less than \$10 million year-end total assets HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA compliance
South Carolina	Jan. 1, 2019	<ul style="list-style-type: none"> July 1, 2019 for ISP July 1, 2020 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 10 employees HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA compliance

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Tennessee	July 1, 2021	<ul style="list-style-type: none"> July 1, 2022 for ISP July 1, 2023 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 25 employees, less than \$5 million gross revenue, or less than \$10 million year-end total assets HIPAA compliant entities Entity that has an information security policy that complies with the federal Gramm-Leach-Bliley Act Employee, agent, representative, or designee of entity that has an ISP 	No	Yes, if claiming exemption due to HIPAA or Gramm-Leach-Bliley compliance
Vermont	Jan. 1, 2023	<ul style="list-style-type: none"> Jan. 1, 2024 for ISP Jan. 1, 2025 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity in compliance with New York cybersecurity regulation Entity with fewer than 20 employees HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP Entity affiliated with bank that has an ISP and that is covered by bank's ISP 	No	Yes, if claiming exception due to HIPAA compliance or compliance with New York requirements
Virginia	July 1, 2020	<ul style="list-style-type: none"> July 1, 2020 for ISP July 1, 2022 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> HIPAA compliant entities Employee, agent, representative, or designee of entity that has an ISP Entity affiliated with bank that has an ISP and that is covered by bank's ISP 	No	Yes, if claiming exemption due to HIPAA compliance

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Wisconsin	Nov. 1, 2021	<ul style="list-style-type: none"> Nov. 1, 2022 for ISP Nov. 1, 2023 for oversight of third-party service provider arrangements 	<ul style="list-style-type: none"> Entity with fewer than 50 employees, less than \$5 million gross revenue, or less than \$10 million year-end total assets Employee, agent, representative, or designee of entity that has an ISP Entity affiliated with bank that has an ISP and that is covered by bank's ISP Broker-dealers with ISPs that meet federal regulatory requirements HIPAA compliant entities 	No	No