



Highlighted sections indicate parts of the regulation that ALL ENTITIES must follow

\*\* Indicates that requirement does NOT apply to Covered Entities qualifying for the Limited Exemption Section 500.19(a)

| August 28, 2017<br>180 days  | October 30, 2017<br>(extended from 09.30)  | February 15, 2018  | March 1, 2018<br>One year  | September 3, 2018<br>18 months   | ANNUALLY: Must file between January 1 and February 15  | March 1, 2019<br>Two years   |
|--|--|--|--|--|--|--|
| <b>Section 500.02</b><br>Maintain <b>cybersecurity program</b>   | Initial 30 day period for filing Notices of Exemption under 23 NYCRR 500.19(e) ends. | <b>Section 500.17(b)</b><br>Submit annual <b>certification of compliance</b> to Superintendent | <b>Section 500.04(b) **</b><br>CISO must provide <b>annual report to board</b> or governing body of agency | <b>Section 500.06 **</b><br>Establish <b>audit trails</b>  | <b>Section 500.17(b)</b><br>Submit annual <b>certification of compliance</b> to Superintendent | <b>Section 500.11</b><br>Implement written policies and procedures to ensure security of nonpublic information that is accessible to, or held by, <b>third party service providers</b> |
| <b>Section 500.03</b><br>Implement & maintain <b>cybersecurity policy</b>  |  |  | <b>Section 500.05(a)(1) **</b><br>Conduct annual <b>penetration testing</b>                                | <b>Section 500.08 **</b><br>Establish procedures, guidelines and standards for development of <b>in-house developed applications</b> |  |  |
| <b>Section 500.04(a) **</b><br>Designate Chief Information Security Officer ( <b>CISO</b> )  |  |  | <b>Section 500.05(a)(2) **</b><br>Conduct bi-annual <b>vulnerability assessments</b>                       | <b>Section 500.13</b><br>Establish policies and procedures for <b>data retention &amp; disposal</b>                                  |  |  |
| <b>Section 500.07</b><br>Limit <b>user access privileges</b> as part of cybersecurity program  |  |  | <b>Section 500.09</b><br>Conduct periodic <b>risk assessment</b>   | <b>Section 500.14(a) **</b><br>Monitor <b>authorized users</b>   |  |  |
| <b>Section 500.10 **</b><br>Utilize qualified <b>cybersecurity personnel</b>   |  |  | <b>Section 500.12 **</b><br><b>Multi-factor authentication</b> if needed                                   | <b>Section 500.15 **</b><br><b>Encryption</b> of data both in transit over external networks and at rest                             |  |  |
| <b>Section 500.16 **</b><br>Establish a written <b>incident response plan</b>  |  |  | <b>Section 500.14(b) **</b><br>Provide regular <b>cybersecurity awareness training</b> for all personnel   |  |  |  |
| <b>Section 500.17(a)</b><br>Notify Superintendent of <b>cybersecurity events</b> as required   |  |  |  |  |  |  |
| <b>Section 500.19(d)</b><br>File <b>Notice of Exemption</b> with Superintendent (Reg allows for 30 days from time entity determines it is exempt to Sept 27, 2017) |  |  |  |  |  |  |