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Connecticut Insurance Department Issues Bulletin IC-43, Repealing and Replacing Earlier Guidance on Information Data Security Law Compliance

In an earlier alert, we noted that the date for compliance with Connecticut's new Insurance Data Security Law (the IDSL) was uncertain as a result of the pandemic-shortened 2020 General Assembly session. In its Bulletin IC-42, dated July 20, 2020, the Connecticut Insurance Department (CID) provided extensive guidance on the IDSL's security program and cyber event provisions. Recently, in light of the effects of the COVID-19 pandemic and Governor Lamont's Executive Order No. 9E, CID has issued a replacement Bulletin IC-43, dated February 10.

The new Bulletin updates the Information Security Plan compliance date (which had been October 1, 2020) **to April 19, 2021.** Connecticut licensees are being advised by the Department that, notwithstanding the stated February 15 date for the first annual certification of security program compliance with the ISDL, the effective filing date is now considered to be **June 15, 2021.** (Note, however, that such date could be extended further under a bill proposed by the Department and currently under consideration in the General Assembly.) Additionally, the Bulletin now makes clear that the State of New York has been identified by the Commissioner as a "safe harbor" under the IDSL, meaning that certification of compliance with 23 NYCRR Part 500 will suffice for IDSL purposes.

The new Bulletin may be found here.

For more Day Pitney alerts and articles related to the impact of COVID-19, as well as information from other reliable sources, please visit our COVID-19 Resource Center.

COVID-19 DISCLAIMER: As you are aware, as a result of the COVID-19 pandemic, things are changing quickly and the effect, enforceability and interpretation of laws may be affected by future events. The material set forth in this document is not an unequivocal statement of law, but instead represents our best interpretation of where things stand as of the date of first publication. We have not attempted to address the potential impacts of all local, state and federal orders that may have been issued in response to the COVID-19 pandemic.

Authors



Elizabeth P. Retersdorf

Partner

Hartford, CT | (860) 275-0656

eretersdorf@daypitney.com