KATHY HOCHUL
Governor

KAITLIN ASROW
Acting Superintendent

July 23, 2026

Petra Wallace
Senior Market Regulation Specialist
Via Email at PWallace@naic.org

Re: Cybersecurity Event Response Coordination Framework Comment Letter

Dear Petra Wallace,

The New York State Department of Financial Services (the "Department") is pleased to submit this comment letter on the draft Cybersecurity Event Response Coordination Framework ("Coordination Framework"). The Department understands that there are benefits to the NAIC facilitating a coordinated response to incidents, including reducing the burden on entities required to notify Insurance Departments in multiple states. Despite this and other potential benefits of the approach outlined in the Coordination Framework, the Department is concerned that such an approach would impede the Department's ability to quickly gather pertinent information regarding cybersecurity incidents, thereby hindering the Department's ability to identify and respond to emerging threats.

As you may be aware, the Department has a Cybersecurity Division that works with investigators to gather critical facts about incidents reported via a cybersecurity portal. Currently, the Department generally conducts investigations within days (sometimes within hours) of receiving incident notifications. This expedited timeline allows the Department to issue industry alerts and take other appropriate steps to warn our regulated entities about cybersecurity vulnerabilities and trends. The Department is concerned that the approach outlined in the Coordination Framework would unnecessarily delay the timely gathering of pertinent information about the technical aspects of cybersecurity incidents. For example, the NAIC's proposed approach requires participating states to first meet to determine whether an event response should be coordinated and, if so, which state should lead the response effort.

In addition, the Department is concerned that the framework's approach may conflict with the Department's Cybersecurity Regulation ("Part 500"), which was amended in 2023 and therefore differs from the Insurance Data Security Model Law ("Model Law"). Moreover, it is our understanding that the Department would not be able to use the NAIC-hosted portal referenced in the Coordination Framework as use of the portal appears to be limited to states that passed a version of the Model Law. Finally, there is no guarantee that the lead state would employ cybersecurity experts who understand the cyber landscape and tactics used by threat actors, and who are able to ask pertinent technical questions.

The Department is interested in coordinating with other states regarding significant cybersecurity incidents and open to providing periodic updates to other state Insurance Departments about trends the Department observes in investigations. To that end, the Department encourages the NAIC to consider allowing states to opt in to certain provisions of the Coordination Framework without participating in all aspects of the framework.

The Department hopes the NAIC will consider ways to address the concerns outlined above if it decides to proceed with this project. Please do not hesitate to reach out to me at Sarah.Rugnetta@dfs.ny.gov to discuss any questions you have about this comment letter.

Sincerely,

Sarah L. Rugnetta

Sarah L. Rugnetta
Executive Deputy Superintendent for Cybersecurity