



2025 SUMMER NATIONAL MEETING MINNEAPOLIS, MN

*2025 Summer National Meeting
Minneapolis, Minnesota*

CYBERSECURITY (H) WORKING GROUP

Monday, August 11, 2025

2:30 p.m. – 3:30 p.m.

Meeting Summary Report

The Cybersecurity (H) Working Group met Aug. 11, 2025. During this meeting, the Working Group:

1. Adopted its July 15 and March 13 minutes. During these meetings, the Working Group took the following action:
 - A. Discussed the 2025 cybersecurity work plan.
 - B. Discussed the Cybersecurity Event Notification Portal project.
 - C. Discussed the Chief Financial Regulator Forum referral response by introducing the *Insurance Data Security Model Law* (#668) compliance and enforcement guide.
 - D. Heard a presentation from Coalition on the cyber threat actor Scattered Spider.
2. Heard comments from Members and interested parties on their response to the Model #668 compliance and enforcement guide, which was exposed July 17 for a 20-day comment period ending Aug. 6. The Working Group received six written responses from state departments of insurance (DOIs), trade organizations, and the Center for Internet Security (CIS). Three organizations provided verbal comments on whether they are in support of an effort to avoid duplication across and within departments while promoting regulatory convergence and standardization. Based on the comments received, the Working Group plans to re-expose the guide for an additional public comment period.
3. Discussed next steps for the development of a cybersecurity event notification portal, which would streamline cybersecurity event reporting and address the one-to-many problem in the industry. The fragmented nature of current reporting methods has caused inefficiencies, delayed responses, and regulatory burdens for licensees. Early planning underestimated the complexity of state-level implementations of Model #668. These disparities will require substantial legal research to ensure the portal accommodates each state's requirements while maintaining confidentiality and security. Legal research will continue to map state-specific implementations and identify opportunities for harmonization.



4. Discussed the changes made to the *Property & Casualty Annual Statement Cybersecurity and Identity Theft Supplement* (Cyber Supplement). The Cyber Supplement underwent significant revision for the 2024 data year, eliminating the requirement for identity theft-related reporting and the historic two-way split of reporting policies as either stand-alone or packaged. The supplement now requires a three-way split for cyber policies such as primary, excess, and endorsement coverage. The change was introduced to provide a more granular view of how cybersecurity insurance is structured and sold to improve the analytical clarity of the data collected, allowing regulators and stakeholders to better understand the nature and layering of cybersecurity coverage. However, the change also introduces complexity in data analysis and may impact comparisons with prior years.