



Education and Compliance CCPA Member Support				
Project Plan Updated	6/15/2021			
Target Completion Date:	11/30/21			
Owner:	Jo Ann Del Gatto			
Support Personnel	<ul style="list-style-type: none"> <li>• E&amp;C Team</li> <li>• Digital Communications</li> <li>• Communications</li> </ul>			
Scope:	<p>Effective January 1, 2020, the California Consumer Privacy Act (CCPA) imposed strict requirements on businesses that collect personal data. Enforcement began on July 1, 2020. The CCPA applies to personal information that “identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.”</p> <p>The CCPA covers any for-profit legal entity — that collects and sells consumer “personal information”. A company has to meet one of the following for the CCPA to apply:</p> <ul style="list-style-type: none"> <li>• Have \$25 million or more in annual revenue; or</li> <li>• Possess the personal data of more than 50,000 “consumers, households, or devices” or</li> <li>• Earn more than half of its annual revenue selling consumers’ personal data.</li> </ul> <p>The CCPA doesn’t apply to:</p> <ul style="list-style-type: none"> <li>• Health providers and insurers already under HIPAA</li> <li>• Banks and financial companies covered by Gramm-Leach-Bliley</li> <li>• Credit reporting agencies (Equifax, TransUnion, etc.) that are under the Fair Credit Reporting Act</li> </ul> <p>ELANY offered a solution to approximately 800 members in implementing a plan to comply with 23 NYCRR 500 (New York State Department of Financial Services cybersecurity). Approximately 100 members enrolled in the program. Based on the data compiled from the 2018 Annual Meeting, E&amp;C estimates similar results.</p> <p>The SLA Program would provide a one-year subscription to brokers who meet the CCPA requirements by Tier.</p>			
Vendor (Y/N):	Y Vendor TBD			
Budget:	\$125,000			
Budget Line Item(s) Where Funding Exists:	???			
Benchmark:	The ability to provide new value-added services that reinforce CDI requirements will also benefit the membership, thereby increasing customer satisfaction.			
Review Dates:	<ul style="list-style-type: none"> <li>• Project will be reviewed in alignment with the benchmarks. Phases are dependent on enrollment and budget.</li> </ul>			
Benchmark	Dependency	Status	Start	Finish
- Review vendors and select program	Policy Team	Not Started	12/01/20	01/31/21
- Create and distribute marketing	Digital Communications			



materials	Communications			
<b>Comments:</b>				
<b>Benchmark</b>	<b>Dependency</b>	<b>Status</b>	<b>Start</b>	<b>Finish</b>
Phase 1 - Target Tier 1 brokers	Policy Team Digital Communications Communications	Not Started	02/01/21	05/31/21
<b>Comments:</b>				
<b>Benchmark</b>	<b>Dependency</b>	<b>Status</b>	<b>Start</b>	<b>Finish</b>
Phase 2 - Review enrollment and track to budget - Target Tier 2 brokers	Policy Team Digital Communications Communications	Not Started	06/01/21	07/30/21
<b>Comments:</b>				
<b>Benchmark</b>	<b>Dependency</b>	<b>Status</b>	<b>Start</b>	<b>Finish</b>
Phase 3 - Review enrollment and track to budget - Extend program to Tier 3 brokers	Policy Team Digital Communications Communications	Not Started	08/01/21	09/30/21
<b>Comments:</b>				
<b>Benchmark</b>	<b>Dependency</b>	<b>Status</b>	<b>Start</b>	<b>Finish</b>
Control Plan - Analyze success - Work with vendor to transition costs - Identify future-state opportunity to extend program	Internal Staff and Vendor	Not Started	10/01/21	11/30/21
<b>Comments:</b>				
<b>Accounting:</b>	<b>Date Paid</b>	<b>Funds Paid To</b>	<b>Amount Paid</b>	
<b>Total Paid on this Project:</b>				
<b>General Comments:</b>				

