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# The Rulebook Reloaded: Tackling Cybersecurity Compliance in a New Administration

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# Speakers



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# Discussion Topics for Today

- CISA Rulemaking/Incident Response Harmonization Legislation
- Department of Justice Data Transfer Rules to Countries of Interest
- HIPAA NPRM Rulemaking

**The Cybersecurity and Infrastructure Security Agency (CISA)** released a Notice of Proposed Rulemaking (“NPRM”) in **April 2024** seeking to impose incident reporting requirements for “critical infrastructure” entities

- Requires “substantial cyber incidents” to be reported to CISA within 72 hours of a reasonable belief that such an incident has occurred

## What must be reported

- ✓ Identifying information
- ✓ Contact information
- ✓ Description of the incident,
- ✓ Vulnerabilities, Security Defenses
- ✓ Perpetrator identity
- ✓ Mitigation & Response Information

- In **December 2024**, the Department of Justice (“**DOJ**”) approved new rules that regulate and in some cases prohibit the transfer of bulk “sensitive data” to several “countries of interest” (e.g. **North Korea, China, Russia**).
- The new rules took effect last month and **DOJ** has announced they expect to begin ramp-up enforcement efforts in **July 2025**
- All entities engaging in restricted or prohibited transactions that have been approved by **DOJ** must abide by security requirements developed by **CISA**.

# HIPAA Security Rule NPRM

- In December 2024, the Department of Health and Human Services (“HHS”) released an NPRM calling for an update to HIPAA’s Security Rule.
- Updates are a response to the 100 percent increase of “**protected health information**” breaches between 2018 and 2023.

- ✓ Compliance audits every 12 months
- ✓ Asset inventory mapping of ePHI
- ✓ New requirements for security risk assessment