ScalePad ControlMap

Compliance Framework Changes in 2025–2026:

Quick Reference Chart for MSPs

Framework	Key Change	Effective Date	MSP Action Item
UK Data Act 2025	Expanded lawful bases, stricter marketing/cookie rules, higher fines	**June 2025**	Review UK data handling, marketing workflows, and cookie banners
EU Data Act	Customer access/portability for IoT and cloud data	**Sept 12, 2025**	Prep for data portability requests; update data-sharing policies
ISO/IEC 27001:2022	All certs must be transitioned to 2022 standard with updated controls	**Oct 31, 2025**	Migrate controls; revise ISMS policies; conduct transition audits
NYDFS Cybersecurity Rule	MFA for all users, asset inventory, breach reporting clarified	**Nov 1, 2025**	Implement MFA; create asset inventory; update incident response
CMMC 2.0 - Phase 1 (Department of War)	Phase 1 begins in November; required in government contracts; rollout of Level 1 & 2 assessments	**Nov 10, 2025**	Control implementation and documentation for client CUI
SEC Reg S-P (Large Firms)	30-day breach notification, mandatory written security program	**Dec 2025**	Review breach response plans; update data privacy policies
HIPAA Security Rule	Stronger encryption, MFA, explicit risk analysis, vendor oversight	**Expected 2026**	Begin HIPAA gap analysis; prep for stricter technical safeguards

Framework	Key Change	Effective Date	MSP Action Item
CIRCIA (US Critical Infra)	72-hour breach & 24-hour ransomware reporting to CISA	**May 2026**	Implement incident tracking/reporting workflows
SEC Reg S-P (Small Firms)	Same as above (30-day breach, security programs)	**June 2026**	Formalize policies; document breach detection/reporting systems
EU DORA (Finance)	ICT risk requirements for financial entities; technical testing & reporting	**July 17, 2026**	Update client DR/BCP, ICT vendor controls, and incident logs
EU AI Act	Rules for high-risk AI systems; transparency obligations	**Aug 2, 2026**	Identify AI use cases; review model documentation & governance
EU NIS2 Directive	24-hour reporting, stricter governance, larger fines, broader scope	**Mid–2026 audits start**	Assess in-scope clients; build compliance plans for essential sectors
GTIA Cybersecurity Trustmark	Third-party cybersecurity validation for MSPs (based on CIS)	**Launched in 2024, uptake in 2025–26**	MSPs should start mapping controls and pursue certification