

AI Compliance Deadlines & Required Documents

2026

Five frameworks. Three upcoming deadlines. One reference sheet.

June 30, 2026

Colorado SB 24-205

August 2, 2026

EU AI Act (Annex III)

January 1, 2027

CPRA ADMT (California)

NYC LL144 and Illinois AIVIA/HB 3773 — already enforced

Colorado SB 24-205

JUNE 30, 2026

Status: Active law. Repeal-and-replace draft released March 17, 2026 — not yet introduced in legislature. Prepare for the existing law.

WHO'S AFFECTED

Developers and deployers of high-risk AI systems used in consequential decisions (employment, housing, lending, healthcare, education, legal services, essential government services, insurance) affecting Colorado consumers.

REQUIRED ARTIFACTS

- Risk management policy and program (NIST AI RMF or ISO 42001 aligned)
- Impact assessment per high-risk system (within 90 days of effective date, then annually)
- Consumer pre-decision notice (AI involvement disclosed before consequential decision)
- Consumer adverse-action notice (with explanation and appeal option)
- Public website statement (types of high-risk systems deployed and discrimination risk management)
- AG discrimination discovery notice (within 90 days of discovering algorithmic discrimination)
- Annual impact assessment review and update

PENALTIES

\$20,000 per violation (counted per consumer/transaction). AG has exclusive enforcement with 60-day cure period.

Affirmative Defense: Compliance with NIST AI RMF or ISO 42001 creates rebuttable presumption.

EU AI Act — Annex III High-Risk Systems

AUGUST 2, 2026

Status: Active regulation (entered into force August 1, 2024). Digital Omnibus proposal could delay to December 2027 — not yet adopted. Treat August 2 as binding.

WHO'S AFFECTED

Providers and deployers of AI systems in Annex III domains (biometrics, critical infrastructure, education, employment, essential services/credit scoring, law enforcement, migration, justice/democracy) serving EU users — regardless of where your company is headquartered.

REQUIRED ARTIFACTS

- Annex IV technical documentation (9 sections: system description, design specs, data requirements, human oversight, predetermined changes, validation/testing, risk management, standards mapping, post-market monitoring)
- Risk management system (Article 9)
- Data governance procedures (Article 10)
- Conformity assessment (self-assessment or third-party per Annex VI/VII)
- EU database registration (Annex VIII fields)
- Post-market monitoring plan (Article 72)
- Serious incident reporting protocol (Article 73)
- CE marking and EU declaration of conformity
- Transparency disclosures (Article 50 — applies to all AI, not just high-risk)

PENALTIES

Up to €35M or 7% of global turnover for prohibited practices. Up to €15M or 3% for high-risk non-compliance.

CPRA ADMT (California)

JANUARY 1, 2027

Status: Regulations effective January 1, 2026. Risk assessment submissions due April 1, 2028.

WHO'S AFFECTED

Any CCPA "business" (for-profit, doing business in CA, meeting revenue/data volume thresholds) using automated decision-making technology for "significant decisions" (financial/lending, housing, education, employment, healthcare) affecting California consumers.

REQUIRED ARTIFACTS

- Pre-use consumer notice (purpose, how ADMT works, outputs, alternative process)
- Opt-out mechanism (or documented exception: human appeal, admission/hiring, work allocation)
- Consumer access rights response procedures
- Risk assessment report (purpose, impacts, safeguards, governance signoff)
- Risk assessment 3-year review cycle with 45-day material change updates
- Annual metrics compilation and disclosure (if processing PI of 10M+ consumers)
- Anti-dark pattern UI testing documentation
- Executive management attestation for risk assessment submissions

PENALTIES

Standard CCPA enforcement — up to \$7,500 per intentional violation.

Key Nuance: ADMT = computation + personal information + replaces or substantially replaces human decision-making. Advertising is explicitly excluded. Human involvement (3-part AND test) can take you out of scope.

NYC Local Law 144

ALREADY ENFORCED

Status: Active DCWP enforcement. Effective July 5, 2023.

WHO'S AFFECTED

Employers and employment agencies using automated employment decision tools (AEDTs) for hiring or promotion decisions in New York City.

REQUIRED ARTIFACTS

- Annual independent bias audit (selection rate and impact ratio by race/ethnicity and sex)
- Published bias audit summary on employer's website
- Candidate notice (at least 10 business days before AEDT use)
- Data type disclosure (what data the AEDT collects and analyzes)
- Alternative process disclosure (how candidates can request alternative selection)
- Records retention for bias audits (minimum 4 years under DCWP rules)

PENALTIES

\$375–\$1,500 per violation (first offense: \$500). Each day of non-compliance with notice = separate violation. Each person not notified = separate violation.

Illinois AI Employment Laws (AIVIA + HB 3773)

ALREADY ENFORCED

Status: Both laws active. AIVIA: January 1, 2020. HB 3773: January 1, 2026.

WHO'S AFFECTED

AIVIA — any employer using AI to analyze video interviews in Illinois. HB 3773 — any employer using AI for employment decisions (screening, evaluation, discipline, termination) in Illinois.

REQUIRED ARTIFACTS

- Pre-interview notice — AI analysis disclosed before interview (AIVIA)
- Applicant consent — affirmative consent required before AI analysis (AIVIA)
- Video deletion process — within 30 days of applicant request (AIVIA)
- AI provider certification records (AIVIA)
- Pre-decision worker notice — before AI is used in employment decisions (HB 3773)
- Protected characteristics disclosure — which characteristics AI could factor into decisions (HB 3773)
- Human review process documentation (HB 3773)
- Adverse action notice and appeal process (HB 3773)
- Demographic data collection and reporting to IDCEO (Both)
- Bias monitoring measures (Both)

PENALTIES

Enforced through Illinois Human Rights Act and Illinois Department of Labor. Civil penalties vary.

CROSS-FRAMEWORK INSIGHT

Many of these frameworks require overlapping documentation. A single AI system used in hiring could trigger all five frameworks simultaneously. The core artifacts — system description, risk assessment, notice mechanisms, bias controls — overlap significantly. The challenge is mapping one set of documentation to five different legal frameworks with different terminology and citation requirements.

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