

## AI Compliance Deadlines & Required Documents – 2026

Five frameworks. Three upcoming deadlines. One reference guide.

*Not legal advice*

A concise reference for compliance consultants, legal teams, and operators working across the EU AI Act, Colorado SB 24-205, CPRA ADMT, NYC Local Law 144, and Illinois AI employment laws.

### Deadline Snapshot

Framework	Status / Date	Practical Takeaway
Colorado SB 24-205	<b>June 30, 2026</b>	High-risk AI developers and deployers making consequential decisions about Colorado residents need documentation, risk management, and impact assessment readiness.
EU AI Act Annex III	<b>August 2, 2026</b>	High-risk AI providers, and certain deployers, need Annex IV technical documentation and core high-risk compliance controls.
CPRA ADMT	<b>January 1, 2027</b>	ADMT-specific notice, opt-out, and access obligations begin then; separate risk assessment timelines may also apply.
NYC Local Law 144	<b>Already enforced</b>	Covered AEDTs used for hiring or promotion in New York City require an annual bias audit and required notices.
Illinois AIVIA + HB 3773	<b>Already enforced / 2026</b>	Video interview consent duties are already active; broader employment-decision AI notice duties take effect January 1, 2026.

Use this guide to identify which regimes are most likely to apply, what documentation artifacts recur across them, and which deadlines are already active. It is a planning reference, not legal advice.

### Framework Details

#### EU AI Act

European Union

Status: *Likely in scope when Annex III high-risk categories apply*

Enforcement / timing: **2 August 2026**

- Technical documentation per Annex IV / Article 11
- Risk management system — Article 9
- Data governance measures — Article 10
- Transparency and user information — Article 13
- Human oversight measures — Article 14
- EU database registration — Article 49 (EU database in Article 71)

*Practical takeaway: if your system supports hiring, education, access to services, law enforcement, migration, or other Annex III uses, you likely need a formal documentation package rather than ad hoc notes.*

## Colorado SB 24-205

Colorado, USA

Status: Likely in scope for high-risk AI systems used in consequential decisions

Enforcement / timing: June 30, 2026

- Disclose foreseeable uses, known limitations, and relevant system information to deployers
- Provide documentation needed for deployer impact assessments
- Make a public statement about high-risk AI use
- Report discovered algorithmic discrimination to the Colorado Attorney General
- Implement a risk management program
- Complete an impact assessment
- Notify consumers before consequential decisions
- Allow consumer correction and appeal
- Review deployed high-risk AI systems at least annually

*Small deployer exemptions may apply in limited cases, but only if statutory conditions are met. The safer planning assumption is to prepare the full documentation set unless counsel confirms an exemption.*

## NYC Local Law 144

New York City, USA

Status: In scope when an AEDT is used to screen candidates for employment or employees for promotion. Enforced since July 5, 2023

- Annual independent bias audit
- Public posting of bias audit summary
- Candidate / employee notice at least 10 business days before use
- Data type, source, and retention-policy disclosure on written request

*This law is already live. If you use AI-supported hiring or promotion tooling touching New York City, treat compliance as an operational requirement now, not a future project.*

## CPRA ADMT

California, USA

Status: Likely in scope when your business is subject to the CCPA and uses ADMT for significant ADMT investigations: January 1, 2027

- Pre-use consumer notice

- Opt-out mechanism
- Consumer access rights
- Risk assessment requirements may apply on a separate timeline
- CCPA submission deadlines are phased beginning April 1, 2028

*The key nuance: ADMT-specific compliance timing and risk assessment timing are not identical. Do not collapse them into a single date in your planning documents.*

## Illinois AI Employment Laws

Illinois, USA

Status: *In scope for certain video interview AI uses and broad employment-decision AI use, 2026, HB 3773 effective January 1, 2026*

- AIVIA: obtain candidate consent before using AI to analyze video interviews
- AIVIA: disclose AI use and delete requested videos within 30 days
- HB 3773: notify employees and job applicants when AI is used in employment decisions
- Demographic reporting may be required in limited cases involving sole reliance on AI analysis of video interviews

*Illinois obligations vary by use case. Video interview analysis and general employment-decision AI are related but not identical compliance buckets.*

### Cross-Framework Planning Insight

Across all five frameworks, the recurring operational pattern is the same: define the use case, document the system and its limits, preserve evidence, establish review or oversight steps, and maintain a defensible record of what was assessed and why.

Berly is designed to help teams organize those materials into a reusable documentation workflow across frameworks, rather than rebuilding the same evidence package from scratch every time.

**Free classifier:** <https://berly.app/classifier>

Support: [support@berly.app](mailto:support@berly.app)