December 2, 2022

Cybersecurity – Government Contracts

DFARS CYBERSECURITY REQUIREMENTS

Robyn Young, Government Contracting Manager
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Procurement Technical Assistance Center

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Department of Defense Office of Small Business Programs (DoD OSBP)

Formerly known as PTAC

APEX ACCELERATORS

The **Procurement Technical Assistance Program (PTAP)** was authorized by Congress in 1985 in an effort to expand the number of businesses capable of participating in the government marketplace.

Administered through the **Department of Defense**, the program provides matching funds through cooperative agreements with state and local governments and non-profit organizations for the establishment of PTACs to provide procurement assistance.

This APEX Accelerator is funded in part through a cooperative agreement with the Department of Defense.

DOD OSBP APEX ACCELERATORS

97 APEX Accelerators with over 300 offices

This nationwide program has one common GOAL:
To bring Gov't Buyers together with U.S. Suppliers

Each APEXs mission is to increase government contracts in the region they serve

FREE Services:
One-on-One Counseling & Training

DoD OSBP APEX Accelerators

(formerly known as PTAC - Procurement Technical Assistance Center)

Located in every state in the United States – was authorized by congress in 1985 in effort to expand the number of businesses capable of participating in the government marketplace.

Northwest Commission APEX ACCELERATOR

- Service Region: Clarion, Crawford, Erie, Forest, Mercer, Lawrence, Warren & Venango Counties
  - All Services are **FREE** of charge
  - Assist with Federal, State and Local government markets
  - To become a client - request a Client Enrollment Form
  - Visit website for more information: https://www.northwestpa.org/government-contracting/

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- Lawrence

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Service Region:
- Forest
- Mercer
- Venango

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Securing our Nation against Cyber Criminals

NIST, CISA and Homeland Security

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FREE Resources and Guidance – for U.S. Organizations and Businesses

- NIST – National Institute of Standards & Technology
  NIST Cybersecurity Framework 2.0 - https://www.nist.gov/cyberframework

- CISA- Cybersecurity and Infrastructure Security Agency
  Official United States Website: https://www.cisa.gov/

- DHS – Department of Homeland Security
  Cybersecurity: https://www.dhs.gov/topics/cybersecurity

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NIST Cybersecurity Framework

Cybersecurity Framework Attributes

NIST

The NIST Cybersecurity Framework (CSF) helps organizations reduce their cybersecurity risks and is widely recognized as foundational to securing organizations & technology.

- Common and accessible language
- Adaptable to many technologies, lifecycle phases, sectors and uses
- Risk-based
- Based on international standards
- Guided by many perspectives – private sector, academia, public sector
- Align legal/regulatory requirements and organizational and risk management priorities

NIST Quick Start guide

https://csrc.nist.gov/Projects/cybersecurity-framework/nist-cybersecurity-framework-a-quick-start-guide

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CISA- Cybersecurity and Infrastructure Security Agency

SHIELDS UP

https://www.cisa.gov/shields-up

Due to the recent threats of malicious cyber activity from Russia, the U.S. Government has taken measures to provide resources and tools to the private sector which includes the new **Shields Up campaign**.

- **Free Cybersecurity Services and tools**
- **Technical Guidance**
- **Sign up for CISA's Free Cyber Hygiene Services**
- **And much more**

Organizations can also report anomalous cyber activity and/or cyber incidents 24/7 to report@cisa.gov or (888) 282-0870.

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DoD Cybersecurity UPDATES

- What DoD contractors need to know to be compliant
- What the heck is going on with CMMC?

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Cybersecurity for the Federal Government Contracting

- **FAR 52.204-21** Basic Safeguarding of Covered Contractors Information Systems –
  - 15 Controls - listed in the clause
  - Requires a Flow-down to subcontractors
  - Federal Contracting Information (FCI)
  - Examples – Contract Performance Reports, Proposal Responses, Email exchanges

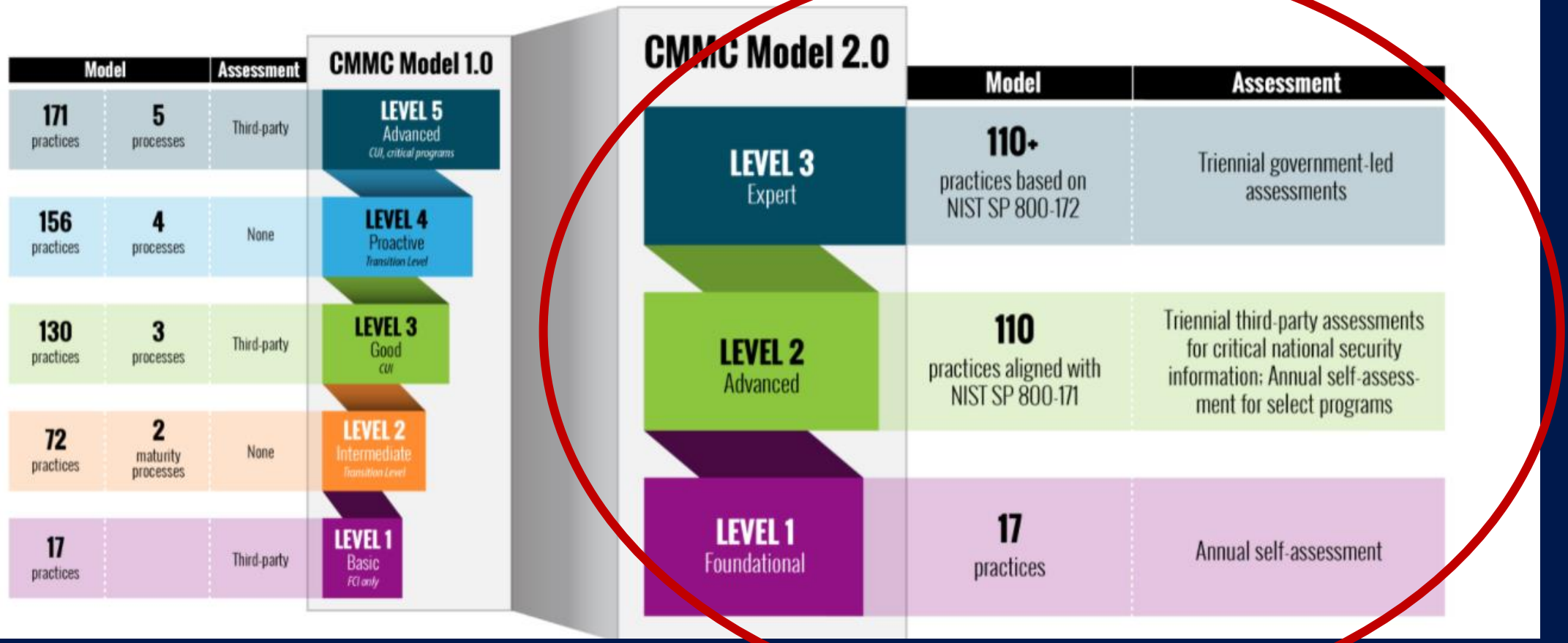
- **DFARS 252.204-7012** Safeguard Covered Defense Information (CDI or CUI)
  - 110 Controls – NIST SP800-171
  - Requires a Flow-down to subcontractors handling CUI
  - Controlled Unclassified Information (CUI)
  - Examples – technical drawings, intellectual property, anything that would be beneficial to our adversaries.

- **DFARS 252.204-7019/7020** – includes the above clause and requires contractors to Self-Assessment using the NIST 800-171 Self-Assessment
  - Must enter assessment score in the Supplier Performance Risk System (SPRS)
  - Requires a Flow-down to subcontractors handling CUI
  - Could be required to go through an Assessment from the DIBCAC/DCMA

- **DFARS 252.204-7021** – Cybersecurity Maturity Model Certification (CMMC)
  - Requires Contractors to become certified using an approved CMMC Assessor (Level 1, 2 or 3)

DFARS Cybersecurity UPDATES – What Contractors need to know

KEY FEATURES OF CMMC 2.0



Office of the Under Secretary of Defense - Acquisition & Sustainment
https://www.acq.osd.mil/cmmc/about-us.html

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DFARS Cybersecurity UPDATES – What Contractors need to know

CMMC is currently **NOT** required and NOT in contracts. (Only a select few Pilot Contracts)

The change to CMMC from 5 levels to 3 levels was due mostly to industry feedback.

On November 5, 2021 CMMC 2.0 was published and once codified through rulemaking, DoD will require companies to follow the revised CMMC framework.

The Rulemaking process (including public comment) can take anywhere from **9-24 months** to become a contract requirement.

Costs to implement CMMC – DoD will publish a comprehensive cost analysis associated with each level as a part of the rulemaking.

Office of the Under Secretary of Defense - Acquisition & Sustainment
https://www.acq.osd.mil/cmmc/about-us.html

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When will CMMC appear in contracts?

Stacy Bostjanick, CMMC Director – Chief of Implementation & Policy for the Department of Defense (DoD)

March 2023
Interim Rule

May 2023
CMMC in
Contracts

U.S. Department of Defense:
https://dodcio.defense.gov/CMMC/

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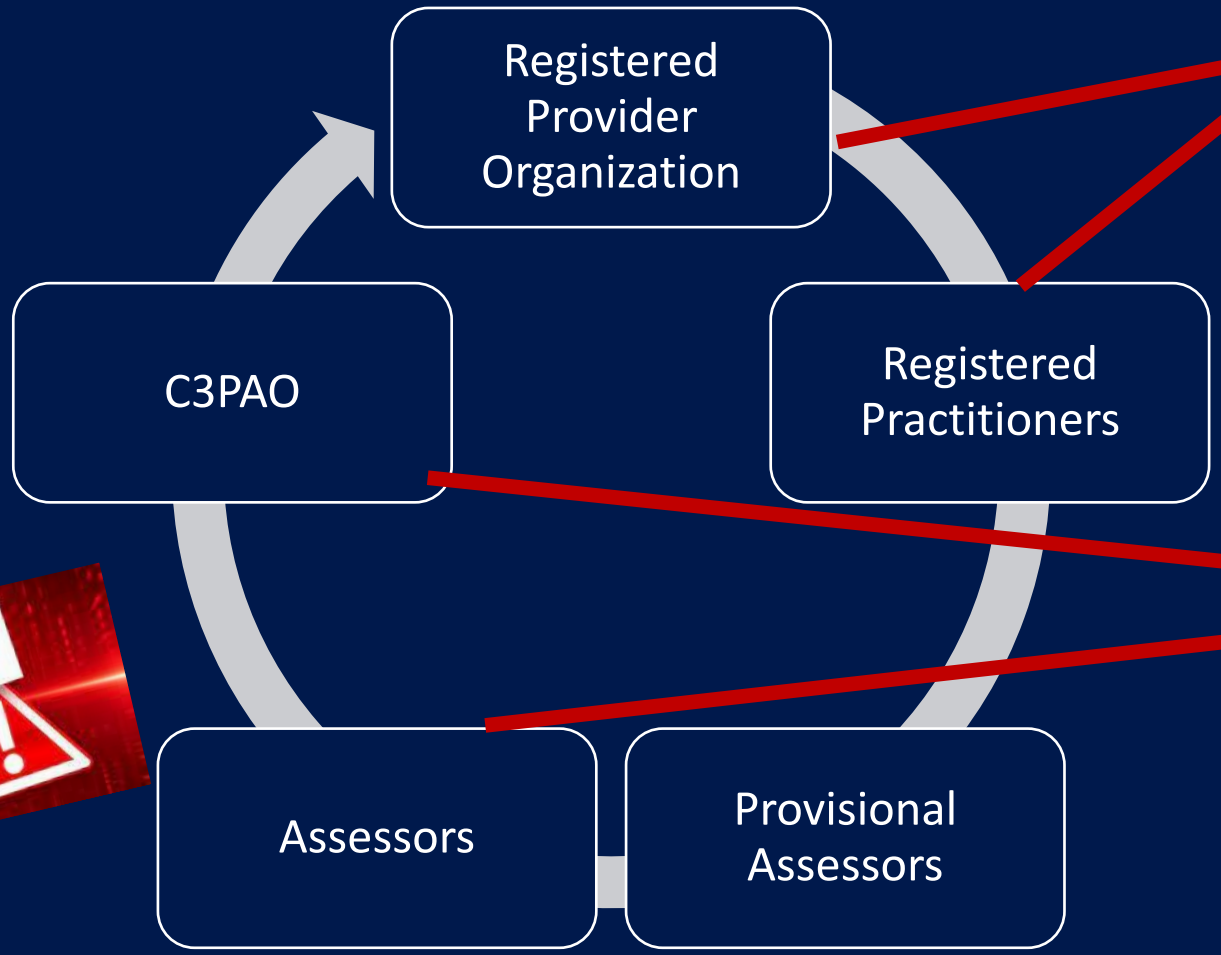
CMMC ACCREDITATION BODY
Cybersecurity Maturity Model Certification

https://cmmcab.org/marketplace/



Consultant – Pre-assessments
- You have access to certified firms NOW
- Must go through a RPO to hire a RP.

The REAL assessors
- Currently, zero assessors in PA
- Must go through a C3PAO to hire an Assessor

Current DoD Cybersecurity Requirements for

Primes and Subcontractors

DFARS 252-204-7012/7019/7020

DFARS (to review the actual clause/s): https://www.acquisition.gov/dfars

Federal Register: https://www.federalregister.gov/documents/2016/10/04/2016-23968/department-of-defense-dods-defense-industrial-base-dib-cybersecurity-cs-activities

DFARS Cybersecurity UPDATES – What Contractors need to know

Your APEX counselor will have additional resources and tools to assist your company – Feel free to schedule an in-house training with an APEX counselor to train your company's cyber team.

Schedule a meeting with APEX Counselor

Assemble a Cyber Team

Evaluate your current situation
1. **Do we handle CUI**
2. **Where is it processed, transmitted and stored?**
3. **Who has access?**

Perform a Self-Assessment using the **NIST SP800-171** Assessment

Get a PIEE account – Establish a CAM & SPRS Roles

Consider working with a local IT firm to assist with implementing controls

SPRS Role – enter your Self-Assessment Score

Continue to implement controls and stay informed with the latest information

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Resource Links to help assist with compliance

NIST 800-171r2 - https://csrc.nist.gov/publications/detail/sp/800-171/rev-2/final

NIST 800-172 (Enhanced Security Requirements)- https://csrc.nist.gov/publications/detail/sp/800-172/final

Procurement Integrated Environment Enterprise (PIEE) - https://piee.eb.mil/

Resources SPRS National Institute of Standards & Technology
https://www.sprs.csd.disa.mil/nistsp.htm

DIBNET – (Reporting Incidents) https://dibnet.dod.mil/portal/intranet/

DOD Procurement Toolbox: https://dodprocurementtoolbox.com/site-pages/cybersecurity-dod-acquisition-regulations

U.S. Department of Defense: https://www.defense.gov/News/News-Stories/Article/Article/2926539/dod-focused-on-protecting-the-defense-industrial-base-from-cyber-threats/

Department of Defense Cyber Crime Center (DC3) A FEDERAL CYBER CENTER
https://www.dc3.mil/

Controlled Unclassified Information (CUI)

- DoD Mandatory CUI Training
- Other Training and Resources
- CUI Markings
- Controlled Environments

https://www.dodcui.mil/Home/Training/

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CMMC ACCREDITATION BODY

Cybersecurity Maturity Model Certification

The primary mission of The Cyber AB is to authorize and accredit the CMMC Third-Party Assessment Organizations (C3PAOs) that conduct CMMC Assessments of companies within the Defense Industrial Base (DIB).

https://cmmcab.org/

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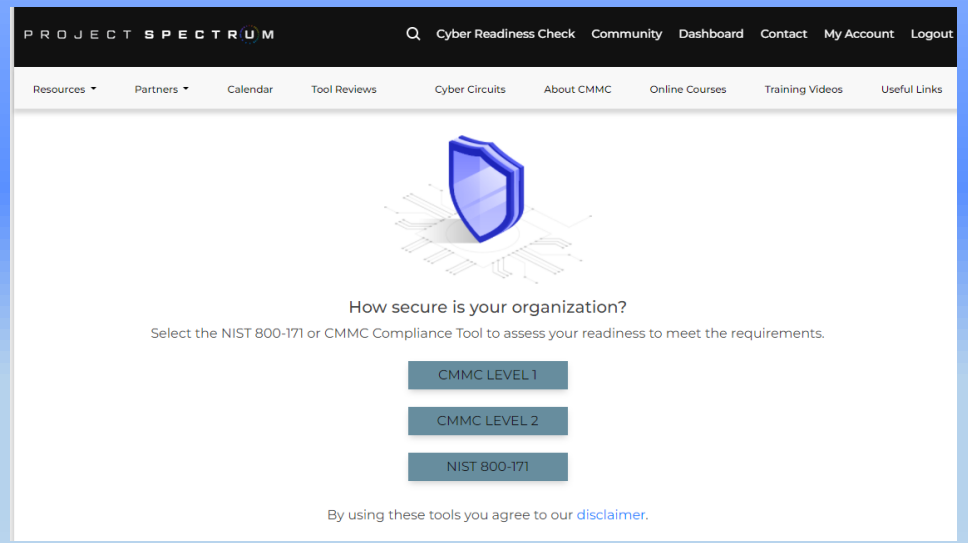
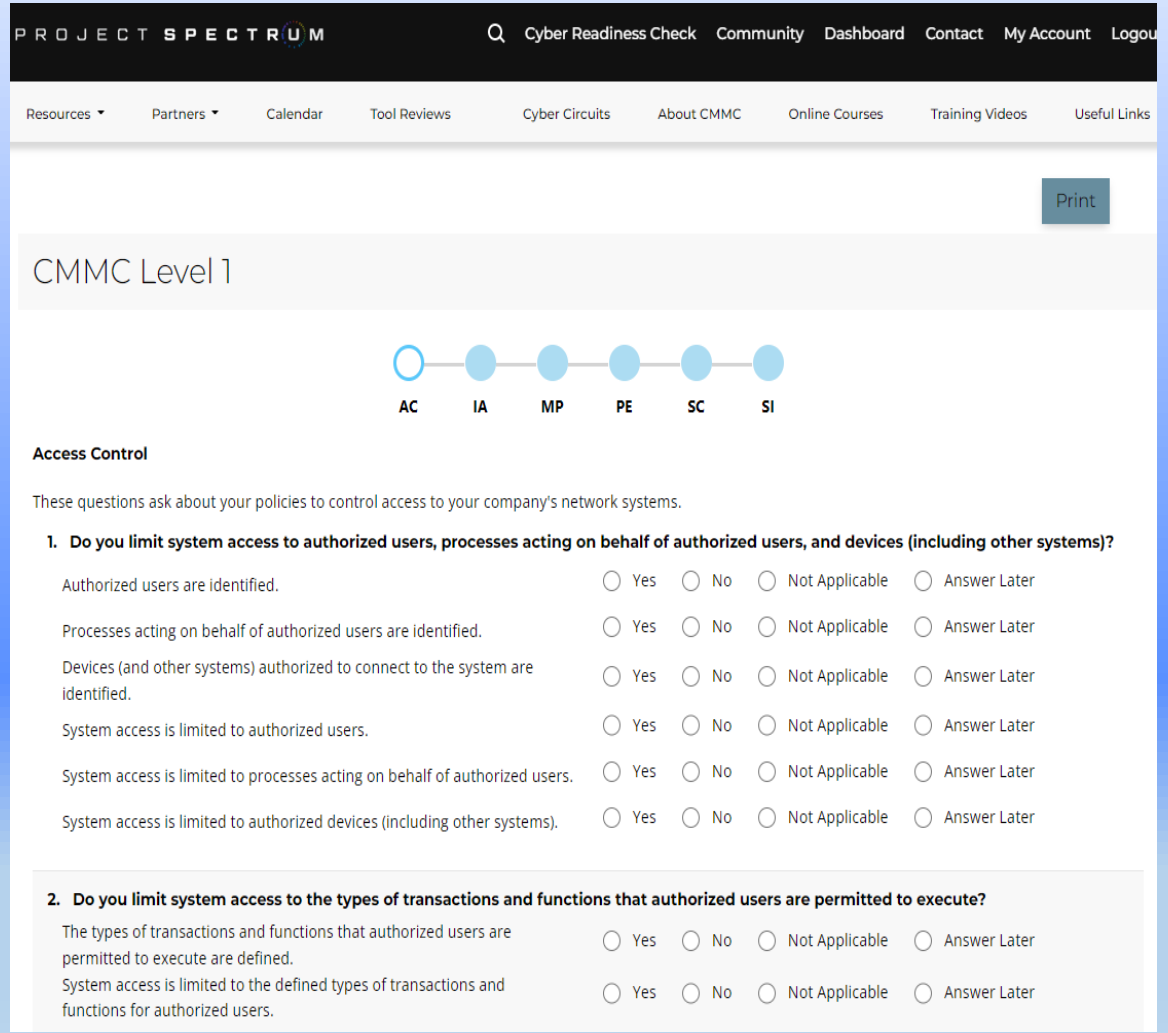
PROJECT SPECTRUM

Project Spectrum is a comprehensive, cost-effective platform that provides companies, institutions, and organizations with cybersecurity information, resources, tools, and training. Our mission is to improve cybersecurity readiness, resiliency, and compliance for small/medium-sized businesses and the federal manufacturing supply chain. – Supported by the Department of Defense.



Self-assessment tools and other resources



https://projectspectrum.io/#!/

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Thank you!

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