



Securing the DoD Supply Chain

Cybersecurity Maturity Model Certification

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Interim Rule



NIST SP 800-171 DoD Assessment Methodology DFARS Clause 252.204-7020

- Companies subject to DFARS clause 252.204-7012 must have a current NIST SP 800-171 assessment (Basic, Medium, or High) to be considered for award
- **Basic:** Self-assessment identifies how many NIST SP 800-171 security requirements a contractor has implemented and not implemented and results in a score; requirement to have Basic self-assessment to be phased in over three years
- **Medium/High:** DoD may perform at its discretion post-award, based on criticality of program, nature of information; finite number of assessments each year
- Results will be documented in DoD Supplier Performance Risk System (SPRS); prior to award, contractors will verify that offerors have current assessment in place

CMMC DFARS Clause 252.204-7021

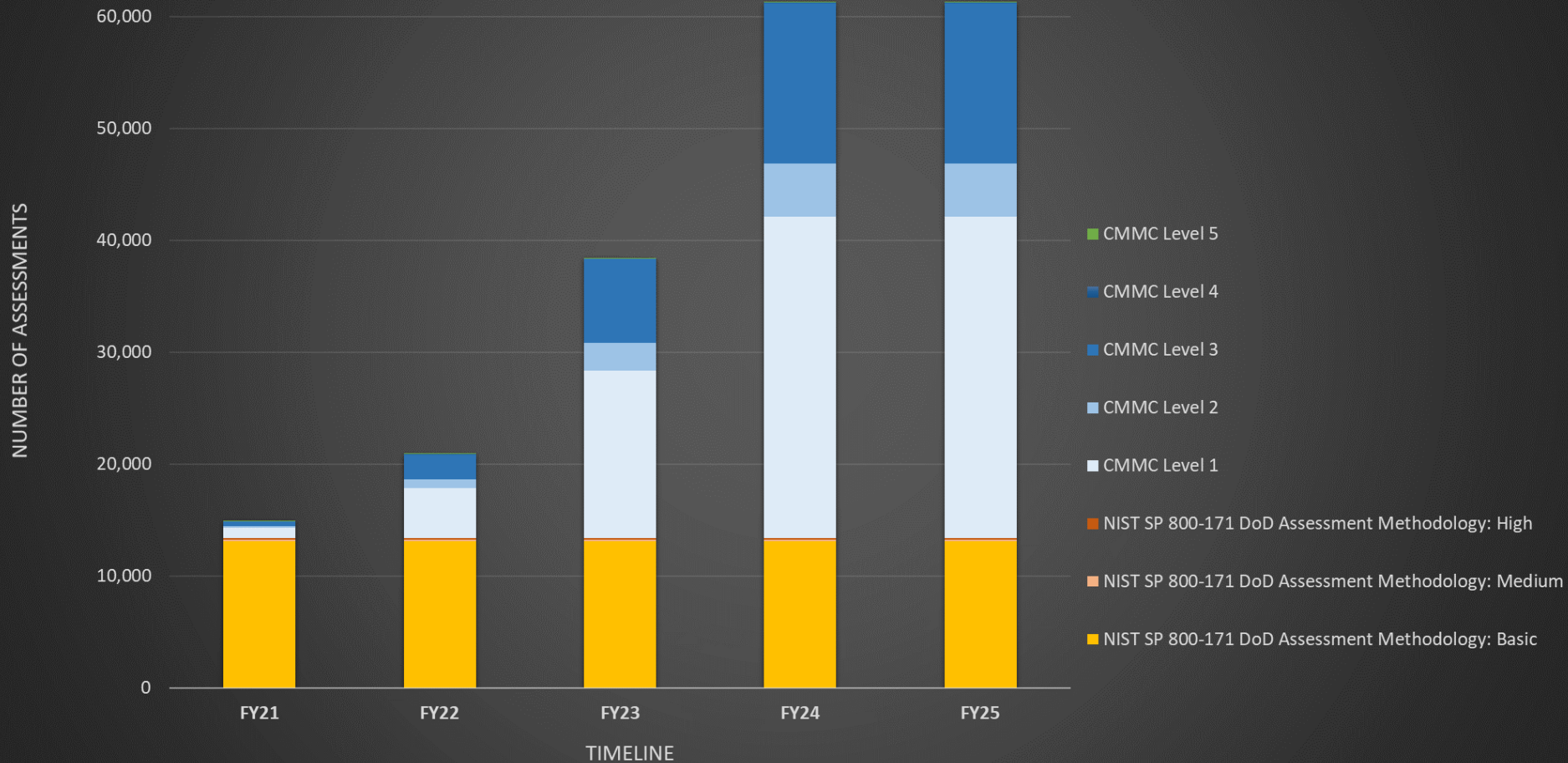
- OUSD(A&S) must approve the use of clause for new acquisitions until October 2025; over 220K contractors expected to achieve CMMC certification during that time
- After October 2025, required for all DoD contracts above micro-purchase threshold, excluding COTS
- For solicitations with the DFARS clause on CMMC, contractor must be certified at required CMMC level at time of award and must maintain certificate for duration of contract
- New clause must be flowed down; primes must ensure subs are certified at required CMMC level prior to awarding subcontract

NIST SP 800-171 DoD and CMMC assessments will not duplicate efforts or any other DoD assessments except for rare circumstances



NIST SP 800-171 DoD Standard Assessments & CMMC Assessments

NIST SP 800-171 DoD Standard Assessments and CMMC Assessments





Supplier Performance Risk System (SPRS)



Process for Offerors/Contractors to submit Basic NIST SP 800-171 DoD Assessment scores for posting in SPRS

- The interim rule ([DFARS clause 252.204-7019](#) and [252.204-7020](#)) currently states that the Offeror/Contractor may submit, via encrypted email, summary level scores of Basic Assessments conducted in accordance with the NIST SP 800-171 DoD Assessment Methodology to webptsmh@navy.mil (email address) for posting to the Supplier Performance Risk System (SPRS)
- SPRS now has increased functionality for Offerors/Contractors to enter scores directly
 - The NIST SP 800-171 DoD Assessment Methodology, posted at <https://www.acq.osd.mil/dpap/pdi/cyber/index.html>, states that “A contractor may post the results of their Basic Assessments... in SPRS (via the Procurement Integrated Enterprise Environment (PIEE)).”
 - A link to a Quick Entry Guide for entering assessment scores can be found at the SPRS homepage

DoD Assessment Methodology – Basic Assessment Requirement



- **To comply with NIST SP 800–171 a company must:**
 - Implement 110 security requirements on their covered contractor information systems; or
 - Document in a “system security plan” and “plans of action” those requirements that are not yet implemented and when the requirements will be implemented
- **Basic Assessment is a self-assessment done by the contractor using a specific scoring methodology**
 - Tells the DoD how many security requirements have not yet been implemented
 - Is valid for three years
- **All offerors that are required to implement NIST SP 800–171 per DFARS clause 252.204–7012, will be required to complete a Basic Assessment and upload the resulting score into SPRS**
- **To submit the Basic Assessment, contractors must complete 6 fields:**
 - System security plan name (if more than one system is involved)
 - CAGE code associated with the plan
 - Brief description of the plan architecture
 - Date of the assessment
 - Total score
 - Date a score of 110 will be achieved



CMMC Pilot Programs

- **USD(A&S) memo, dated August 4, 2020, *Implementing the Cybersecurity Maturity Model Certification within the Department of Defense***
 - Provides guidance to Service and Component Acquisition Executives
 - Limits the number of solicitations specifying a CMMC requirement for FY 2021 to no more than 15 prime contracts, which will serve as CMMC pilot programs
 - Directs all PMs and Contracting Officers to avoid including CMMC as a requirement in RFIs and RFPs unless coordinated through OUSD(A&S)
- **Each Service Acquisition Executive nominate three acquisitions with an expected contract award date in FY 2021**
- **Each Component Acquisition Executive nominate a single acquisition with an expected contract award date in FY 2021**
- **Each nomination should be for a mid-sized program that require the contractor to process or store basic CUI. This requirement aligns to CMMC level three.**
- **Do not nominate acquisitions that are solely for provision of COTS products, or for operational technology systems supporting industrial or manufacturing operations**



Projected CMMC Roll-Out

- **OUSD(A&S) is working with Services and Agencies to identify candidate programs that will have the CMMC requirement during FY21-FY25 phased roll-out**

Total Number of New Prime Contracts Awarded Each Year with CMMC Requirement				
FY21	FY22	FY23	FY24	FY25
15	75	250	479	479

Total Number of Prime Contractors and Sub-Contractors with CMMC Requirement					
	FY21	FY22	FY23	FY24	FY25
Level 1	899	4,490	14,981	28,714	28,709
Level 2	149	749	2,497	4,786	4,785
Level 3	452	2,245	7,490	14,357	14,355
Level 4	0	8	16	24	28
Level 5	0	8	16	24	28
Total	1,500	7,500	25,000	47,905	47,905

- **All new DoD contracts will contain the CMMC requirement starting in FY26**
- **Assumes for every unique prime contractor, there are ~ 100 unique subcontractors**



CMMC Rollout - Breakout

- **Total number of unique DoD contractors and subcontractors is 220,966**
 - The total number of unique DoD contractors and subcontractors with a new CMMC certification requirement achieves a steady state of 47,905 by Year 4
 - Completed CMMC assessments on all total 220, 966 unique DoD contractors and subcontractors is achieved in Year 7; as a result, the number of unique DoD contractors and subcontractors that require a new CMMC certification is only 43,251 for Year 7
- **Phased rollout assumes the following percentages of DoD contractors and subcontractors require a CMMC certificate at each level:**
 - Level 1: approximately 60%
 - Level 2: approximately 10%
 - Level 3: approximately 30%
 - Level 4: approximately 0.06%
 - Level 5: approximately 0.06%



Projected CMMC Roll-Out

- **OUSD(A&S) will work with Services and Agencies to identify candidate programs that will have the CMMC requirement during FY21-FY25 phased roll-out**

CMMC Level	Total Number of Unique DoD Contractors and Subcontractors*						
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
1	899	4,490	14,981	28,714	28,709	28,709	25,919
2	149	749	2,497	4,786	4,785	4,785	4,320
3	452	2,245	7,490	14,357	14,355	14,355	12,960
4	0	8	16	24	28	28	26
5	0	8	16	24	28	28	26
Totals	1,500	7,500	25,000	47,905	47,905	47,905	43,251

IAW Public Released Regulatory Impact Analysis which are part of DFARS Case 2019-D041

- **Assumes for every unique prime contractor, there are ~ 100 unique subcontractors**
- **Assumes 220,966 unique DoD contractors and subcontractors**
- **All new DoD contracts will contain the CMMC requirement starting in Year 6**



CMMC Rollout by Entity Size

Total Number of CMMC Initial Certifications Per Year (Years 1 – 7)								
Year	Size	Level 1	Level 2	Level 3	Level 4	Level 5	Total by Size	Total All
1	Small	665	110	335	0	0	1,110	1,500
	Other than Small	234	39	117	0	0	390	
2	Small	3,323	555	1,661	2	2	5,543	7,500
	Other than Small	1,167	194	584	6	6	1,957	
3	Small	11,086	1,848	5,543	4	4	18,485	25,000
	Other than Small	3,895	649	1,947	12	12	6,515	
4	Small	21,248	3,542	10,624	6	6	35,426	47,905
	Other than Small	7,466	1,244	3,733	18	18	12,479	
5	Small	21,245	3,541	10,623	7	7	35,423	47,905
	Other than Small	7,464	1,244	3,732	21	21	12,482	
6	Small	21,245	3,541	10,623	7	7	35,423	47,905
	Other than Small	7,464	1,244	3,732	21	21	12,482	
7	Small	19,180	3,197	9,590	7	7	31,981	43,251
	Other than Small	6,739	1,123	3,370	19	19	11,270	
1-7	Small	97,992	16,334	48,999	33	33	163,391	220,966
	Other than Small	34,429	5,737	17,215	97	97	57,575	
1-7	All	134,421	22,017	33,214	130	130	220,966	220,966

IAW Public Released Regulatory Impact Analysis which are part of DFARS Case 2019-D041

Assumes 74% of the unique DoD contractors are small entities