



***DFARS Provision and Clauses (252.204-7012, 7019 & 7020) and the Cybersecurity Maturity Model Certification  
DFARS Clause (252.204-7021) Update***

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# The “Crawl – Walk – Run” of CMMC

- **“CRAWL” Now** → The “Trust” part. Notice of NIST 800-171 DoD Assessment Requirements. In the 1<sup>st</sup> phase of CMMC implementation, contractors must register by CAGE code in SPRS and upload a self-assessment based on their 800-171 controls implementation (*not “graded”, but the DFARS rule does articulate the risk of False Claims Act (FCA) litigation if not done in earnest*).
- **“Walk” Soon** → This is the “Verify” part. The DoD Assessment Methodology begins to be enforced. A two (2) year effort where inconsequential “audits” by DCMA and the DIB-CAC are part of the process.
- **“Run” Later** → This is where CMMC gets its name. The instantiation of how we’re going to ensure cybersecurity is foundational to all acquisition. This is when CMMC controls, processes, & practices become required elements for doing business with the Department.

## “Crawl” - DFARS 252.204-7019

- Contractors get their NIST SP 800-71 self-assessments uploaded into SPRS
- Clause is required in contracts now (as of Nov. 2020)

## “Walk” - DFARS 252.204-7020

- The DAM is implemented to audit applicable contractors on their implementation of security controls
- Clause is expected to be required come FY23

## “Run” - DFARS 252.204-7021

- CMMC requirements are built into all future solicitations.
- Clause is expected to be required by FY25


## *Contractor's Preparation for CMMC*

- **DIB legally bound to follow DFARS Case 2019-D041 and the provisions of DFARS clause 252.204-7012:**
  - Safeguarding DoD CUI
  - Reporting Cyber Incidents
  - Flow-down DFARS Clause to subs/vendors
- **Identify /focus efforts on deltas between DFARS 7019, 7020, and 7021**
- **From the CMMC Accreditation Board:**

“... Do not focus training on future requirements (CMMC) at the expense of current requirements ...”

## Summary

- The government (DoD and Federal) is required for each contract to stipulate the level of protection based on the sensitivity of the information and the threat
- Each Command /Procuring Activity will have to determine the risk they are willing to accept to transition to the new CMMC process
  - DFARS Case 2019-D041 compliance (7019 & 7020)
  - Maturity of CMMC (7021) support processes (certification process, C3PAO availability, pricing, etc.)
  - DFARS and CMMC training
- There are several organization(s) and program(s) available to help /aid medium to small business to implement best practices and lesson-learned to safeguard government sensitive information



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