

The past 18 months have been chaotic for businesses and everyone affected by the pandemic. It has also been chaotic from a cybersecurity perspective. CMMC V1.0 was published in January 2020 and just a couple of months later these requirements were updated. CMMC continued to receive significant attention through the summer months. In September 2020, an Interim DFAR rule was published which contained three new DFAR clauses which address cybersecurity. All became active on November 30, 2020. Two of these clauses, DFARS clauses 252.204-7019 and 252.204-7020, immediately impacted all members of the Defense Industrial Base as it required companies to complete and upload the results of the DoD Basic Assessment to the SPRS portal as a condition of being eligible for a DoD award. In addition, to directly impacting DoD Primes, these clauses impacted all members of DoD's Supply Chain as any business in the DoD Supply Chain were required to complete the basic assessment as a condition of being eligible for award at a sub-tier level.

It is important to note that while these new clauses have been added to the DFAR, DFAR 252.204-7012 remains in effect and establishes requirements that extend beyond the requirements of the DoD Basic Assessment.

CMMC remains on the horizon and the requirements of DFARS 252.204-7021 will soon be added to a select number of solicitations/awards. While the CMMC program is being phased in over the next several years, the expectation is that all DoD solicitations will include DFARS 252.240-7021 which will require CMMC certification by 2026.

The need for solid cybersecurity continues to be underscored by the variety of stories covered by the nightly news and articles published in any number of print and online publications. Cybersecurity is no longer something to be viewed as ephemeral or only needed by that "other business." Unfortunately, it is plainly evident that all businesses new and old - large, medium and small - even the one-person business needs to become more familiar with cybersecurity or risk losing their business or at a minimum having their business operations severely disrupted.

For most, cybersecurity is not their primary interest. They want safe, secure and reliable computer systems but do not have an interest in spending vast amount of time to learn what is needed. An alternative to taking time and effort to learn about IT and Cybersecurity is to outsource the effort by hiring a consultant, an IT firm or a firm offering cybersecurity services. All are valid paths. However, how does a business actively participate to create a functional and tailored scope of work which is also affordable?

One option is to totally rely upon the third party. Depending on the company selected, some may see \$\$\$\$ and others may be more inclined to offer a reasonable solution. Nevertheless, without basic cybersecurity knowledge, the business is totally reliant that the third-party will have the customer's best interests at heart.

Prior to taking an interest in the Federal Marketplace most companies never heard about or knew about either the FAR or DFAR. Even though these regulations are not aligned with the company's principle products or services, knowledge of and compliance with these requirements in a necessary part of federal contracting and a company's knowledge of these requirements evolves and develops. The same is true for developing a knowledge of cybersecurity and being able to comply with all cybersecurity requirements. It evolves.

To assist businesses which are interested in developing a solid foundation of cybersecurity knowledge, WPI is offering the following classes which are aligned with the basic requirements of DFARS 252.204-7012 -

- **July 29, 2021** [Fundamental of Cybersecurity for Federal Contractors](#)
- **August 5, 2021** [NIST's Cybersecurity Framework and the FAR/DFARS](#)
- **August 26, 2021** [NIST's Tips and Tactics for Ransomware Protection](#)
- **September 2, 2021** [Computer Security Incidents](#)

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