



DFARS Cybersecurity Mgt. for Very Small and Small to Medium Federal Contractors

The ACR 2 Solutions Cybersecurity Risk Management System or ACRMS™ is a cybersecurity management solution tailored for small Federal contractors to meet DFARS (Defense Federal Acquisition Regulation Supplement) requirements at an affordable cost. In a 44-site Air Force SBIR contractors project, half of the contractors had all, or most, of the required technical safeguards. None of the SBIR awardees had more than 1/3 of the administrative controls. Under the NIST cybersecurity point scoring system, technical controls count for less than a quarter of the total points.

DFARS Cybersecurity Compliance: DFARS 252.204-7012 is part of most DoD contracts involving Controlled Unclassified Information or CUI. DoD estimates that 59,659 small contractors handle CUI. In January 2025, GSA [proposed](#) extending the 110 NIST 800-171 cybersecurity requirements to all federal contractors who handle CUI.

There are approximately 400,000 Federal contractors, with about 32% or 130,500 having only 1 employee. Another 199,000% have 2 to 25 staff. Some large contractors have setup CUI enclaves with 1-2 staff.

DFARS 252.204-7012 requires a System Security Plan (SSP) and a Plan Of Actions And Milestones (POAM) addressing the 110 safety controls listed in NIST 800-171, now in rev. 2. A partial set of the applicable NIST guidance documents is shown at right.



ACRMS™ Program Documents: The ACRMS™ order form and required mutual Non-Disclosure Agreement are available on the ACRMS™ project page at <https://cuicybersecuritycompliance.com/documents>. The order form is summarized on the next page.

Liability and Subcontractor Management: In 2025, Cybersecurity requirements must be “flowed down” to all suppliers and subcontractors handling CUI, including any drawings and specifications.

Contractors always remain liable for data security by subcontractors.

The ACRMS™ Enterprise console can provide near real-time monitoring of subcontractor cybersecurity status. It is always better to know than to guess about legal liabilities.

Ongoing Compliance Monitoring and Management: A typical small DoD contractor may have between one and five subcontractors subject to FCI or DFARS cybersecurity requirements. The ACRMS™ Enterprise Edition console allows near real time management of subcontractor cybersecurity using the NIST 800-30 protocol required in CUI 3.11.1.

The ACRMS™ Enterprise Edition is based on an expert system AI implementation combining the NIST 800-30 risk assessment protocol and a selection of NIST 800-53 cybersecurity safety controls appropriate for either FCI or CUI. A discussion of the application of this AI technology is available on the videos page of the ACRMS™ project website, <https://cuicybersecuritycompliance.com/>.

SSP Scoring and Monthly Updating: DFARS compliance requires writing policies for the 110 NIST 800-171 requirements. Each policy requirement has a point score between 1 and 5. Total scores can range from +110 to -203. Initial SSP scores are often in the -30 to +30 range. Achieving full 110-point compliance often requires an additional 6-12 months. On the other hand, failure to conduct daily, weekly, and monthly tasks drops scores by 77 points. No task maintenance for 3 months drops scores by 143 points. ACRMS™ risk assessments auto-update every 30 days.

Monthly Online Review Meetings: ACRMS™ support contracts include a 20-minute monthly review. Auto-updated SSP scores are reviewed, and recommendations are made for improvements or updates.

The ACRMS™ program for Very Small Sites (VSS) and Small to Medium Businesses (SMB) include templates containing applicable NIST guidance and recommended policies for very small sites— typically one computer with 1 or 2 users— and small to medium sites with one network and up to 25 users. About 82% of federal contractors have from 1-25 staff. Templates and recommendations are updated as needed to match the frequent changes published by the NIST. As noted on our website,

WE read this “stuff” so YOU don’t have to!

| Qty | Part # | Product Name | MSRP Price | TOTAL |
|---|--|---|------------|-----------|
| ACRMS™-VSS: DFARS Support for Very Small (1-2 staff with access to CUI) Sites | | | | |
| 0 | ACRMS VSS-RA-1month. Webinar special. | ACRMS Initial Risk Assessment for Very Small (1-2 Staff) sites. Includes 1.5 hour initial risk assessment, System Security Plan, and SPRS Score calculation meeting. Requires signed Non-Disclosure Agreement and registered attendance at ACRMS small site cybersecurity management webinar, either live or recorded. - Credit card only. | \$ 75.00 | \$ - |
| | | I hereby certify that I have observed and reviewed the instructional video at https://attendee.gotowebinar.com/register/4979546772958288217 | | |
| | | My Site Owner's name is | | |
| 0 | ACRMS Provisioning - 1 very small (1-2 staff) Site | ACRMS Provisioning - DFARS 252.204-7012 Initial Compliance policy package setup with Initial Site Manager Training for Very Small (1-2 Staff) sites - One time price. Credit card or check. | \$ 175.00 | \$ - |
| 0 | ACRMS-CUI- Ongoing Support-per month, 36 month contract | ACRMS Ongoing Policy, SSP & POAM Updating, Task Management System, updates, and Technical Support for Very Small (1-2 Staff) sites. Includes 20 minute monthly review and assesment update meetng. - month by month license , one month cancellation notice required- credit card required. | \$ 100.00 | \$ - |
| 0 | CUI Training-1yr | Basic CUI Security Awareness online, on-demand, Training in local policies, Testing and Exam for all users - On Demand - 1 Year License - per trainee per year - credit card preferred. | \$ 25.00 | \$ - |
| 1 | Consulting | Consulting - per hour, billed in 15 minute increments, online phone and video support - credit card preferred. | \$ 180.00 | \$ 180.00 |
| ACRMS™-SMB: DFARS Support for Small to Medium (3-25 staff with access to CUI) Businesses | | | | |
| 0 | ACRMS Med-RA-1month. | ACRMS Initial Risk Assessment for Medium (3-25 Staff) sites. Includes 1.5 hour monthly initial risk assessment, System Security Plan, and SPRS Score calculation meeting. Requires signed Non-Disclosure Agreement and registered attendance at ACRMS small site cybersecurity management webinar, either live or recorded. - Credit card only. | \$ 225.00 | |
| 0 | ACRMS Provisioning - 1 medium (3-25 staff) Site | ACRMS Provisioning - DFARS 252.204-7012 Initial Compliance policy package setup with Initial Site Manager Training for Medium (3-25 Staff) sites - One time price. Credit card or check. | \$ 350.00 | |
| 1 | ACRMS-CUI- Ongoing Support-per month, 36 month contract | ACRMS Ongoing Policy, SSP & POAM Updating, Task Management System, updates, and Technical Support for Medium (3-25 Staff) sites. Includes 20 minute monthly review and assesment update meetng. - month by month license - credit card required. | \$ 175.00 | |
| 0 | CUI SWAT-1yr | Basic CUI Security Awareness online, on-demand, Training in local policies, Testing, and Exam for all users - On Demand - 1 Year License - per trainee per year - credit card preferred. | \$ 25.00 | \$ - |
| 1 | Consulting | Consulting - per hour, billed in 15 minute increments, online, phone, and video support - credit card preferred. | \$ 180.00 | \$ 180.00 |
| Optional Additional Multi-Site Services | | | | |
| 0 | CUI _ Site_Cybersecurity monitoring- up to 100 sites. 1 to 50 staff/site | ACRMS DFARS 252.204-7012 Cybersecurity Compliance manager. One time setup cost. Enterprise license for near real-time monitoring of project cybersecurity. Reques monthly review and support contract for each site/project to be monitored. Proven capacity for more than 100 projects. Credit card or check. | \$ 250.00 | \$ - |
| 0 | CUI_Site_Cybersecurity site attachment | One time attachment fee to link ACRMS DFARS -7012 compliance management package to oversight program. | \$ 150.00 | \$ - |

Note: Pricing Valid June 16, 2025 Contractors with more than 25 staff are requested to call for pricing.