



ACRMS™: Affordable DFARS 252.204-7012 Compliance for Very Small CUI Enclaves

Federal Cybersecurity: Since 2013, Federal regulators have been attempting to tighten cybersecurity for Controlled Unclassified Information or CUI. In 2015, the first edition of NIST 800-171 was published as “Protecting Controlled Unclassified Information in Nonfederal Information Systems and Organizations”.

Compliance self-assessments were not effective. Audits by the Defense Contract Management Agency (DCMA) found most contractors badly overstated their level of compliance. CMMC seeks to replace self-assessment with outside expert audits or “assessments” repeated every 3 years or when significant network changes are made. DoD states that a “level 2 certification assessment is projected to cost nearly \$105,000 for small entities” with “small” typically defined as fewer than 500 staff.

Small and Very Small Contractors and Subcontractors: Of federal contractors with current CAGE codes, 45.0% or 180,602 reported doing less than \$250,000 in federal business in 2025. This probably overlaps the 49.5% of contractors with CAGE codes and 1-3 staff.

ACRMS™ DFARS Cybersecurity for Very Small CUI Enclaves: Using Expert System Model technology first demonstrated in community banks, small enclaves up to 25 staff can be initially cybersecured to DFARS 252.204-7012 standards for less than \$1,500 (see back of this page). This dramatic drop in costs reflects the power of automating the assessment process for groups of similar enclaves.

ACRMS™ Technology: The ACR 2 Cybersecurity Risk Management System or ACRMS™ has 3 interlocking elements; An NIST 800-53 based policy template system written in 10th grade English, a policy-coordinated task management and documentation system, and additionally an NIST 800-30 expert system computer model risk assessment and monitoring system.

In 2005, ACR 2 process engineers wrote and validated the ACR 2 Cybersecurity Risk Calculation Engine, involving over 8,000 calculations combining the NIST 800-53 controls with the 800-30 risk assessment protocol. A partial set of the 800-53 controls and supporting documentation is shown at right.



Economic Advantages of Automated Risk Assessment: The ACRMS™ expert system computer model reduces the time required for NIST 800-30 risk assessment from days to minutes and introduced a degree of uniformity that allowed direct comparison of risks at different sites. In competitive bids the automated ACRMS™ program costs were more than 90% lower than expert-led manual programs.

Site	A	B	C	D	E	F	G	H	I	J
RMK	100	100	100	100	100	100	1	1	1	1
E1	50	50	50	50	50	50	1	1	1	50
E2	25	50	50	50	50	25	1	1	1	25
E3	25	25	50	50	50	25	1	1	1	25
E4	50	50	50	50	50	50	1	1	1	50
E5	50	50	50	50	50	50	1	1	1	50
E6	50	100	100	100	100	100	1	1	1	100
HE1	100	100	100	100	100	100	1	1	1	100
HE2	100	100	100	100	100	100	1	1	1	100
HE3	100	100	100	100	100	100	1	1	1	100
HE4	100	100	100	100	100	100	1	1	1	100
HE5	100	100	100	100	100	100	1	1	1	100
HE6	100	100	100	100	100	100	1	1	1	100
HE7	100	100	100	100	100	100	1	1	1	100
HE8	100	100	100	100	100	100	1	1	1	100
HE9	100	100	100	100	100	100	1	1	1	100
HE10	100	100	100	100	100	100	1	1	1	100
HE11	100	100	100	100	100	100	1	1	1	100
HE12	100	100	100	100	100	100	1	1	1	100
HE13	100	100	100	100	100	100	1	1	1	100
HE14	100	100	100	100	100	100	1	1	1	100
HE15	100	100	100	100	100	100	1	1	1	100
HE16	100	100	100	100	100	100	1	1	1	100
HE17	100	100	100	100	100	100	1	1	1	100
HE18	100	100	100	100	100	100	1	1	1	100
HE19	100	100	100	100	100	100	1	1	1	100
HE20	100	100	100	100	100	100	1	1	1	100
HE21	100	100	100	100	100	100	1	1	1	100
HE22	100	100	100	100	100	100	1	1	1	100
HE23	100	100	100	100	100	100	1	1	1	100
HE24	100	100	100	100	100	100	1	1	1	100
HE25	100	100	100	100	100	100	1	1	1	100
HE26	100	100	100	100	100	100	1	1	1	100
HE27	100	100	100	100	100	100	1	1	1	100
HE28	100	100	100	100	100	100	1	1	1	100
HE29	100	100	100	100	100	100	1	1	1	100
HE30	100	100	100	100	100	100	1	1	1	100
HE31	100	100	100	100	100	100	1	1	1	100
HE32	100	100	100	100	100	100	1	1	1	100
HE33	100	100	100	100	100	100	1	1	1	100
HE34	100	100	100	100	100	100	1	1	1	100
HE35	100	100	100	100	100	100	1	1	1	100
HE36	100	100	100	100	100	100	1	1	1	100
HE37	100	100	100	100	100	100	1	1	1	100
HE38	100	100	100	100	100	100	1	1	1	100
HE39	100	100	100	100	100	100	1	1	1	100
HE40	100	100	100	100	100	100	1	1	1	100
HE41	100	100	100	100	100	100	1	1	1	100
HE42	100	100	100	100	100	100	1	1	1	100
HE43	100	100	100	100	100	100	1	1	1	100
HE44	100	100	100	100	100	100	1	1	1	100
HE45	100	100	100	100	100	100	1	1	1	100
HE46	100	100	100	100	100	100	1	1	1	100
HE47	100	100	100	100	100	100	1	1	1	100
HE48	100	100	100	100	100	100	1	1	1	100
HE49	100	100	100	100	100	100	1	1	1	100
HE50	100	100	100	100	100	100	1	1	1	100
HE51	100	100	100	100	100	100	1	1	1	100
HE52	100	100	100	100	100	100	1	1	1	100
HE53	100	100	100	100	100	100	1	1	1	100
HE54	100	100	100	100	100	100	1	1	1	100
HE55	100	100	100	100	100	100	1	1	1	100
HE56	100	100	100	100	100	100	1	1	1	100
HE57	100	100	100	100	100	100	1	1	1	100
HE58	100	100	100	100	100	100	1	1	1	100
HE59	100	100	100	100	100	100	1	1	1	100
HE60	100	100	100	100	100	100	1	1	1	100
HE61	100	100	100	100	100	100	1	1	1	100
HE62	100	100	100	100	100	100	1	1	1	100
HE63	100	100	100	100	100	100	1	1	1	100
HE64	100	100	100	100	100	100	1	1	1	100
HE65	100	100	100	100	100	100	1	1	1	100
HE66	100	100	100	100	100	100	1	1	1	100
HE67	100	100	100	100	100	100	1	1	1	100
HE68	100	100	100	100	100	100	1	1	1	100
HE69	100	100	100	100	100	100	1	1	1	100
HE70	100	100	100	100	100	100	1	1	1	100
HE71	100	100	100	100	100	100	1	1	1	100
HE72	100	100	100	100	100	100	1	1	1	100
HE73	100	100	100	100	100	100	1	1	1	100
HE74	100	100	100	100	100	100	1	1	1	100
HE75	100	100	100	100	100	100	1	1	1	100
HE76	100	100	100	100	100	100	1	1	1	100
HE77	100	100	100	100	100	100	1	1	1	100
HE78	100	100	100	100	100	100	1	1	1	100
HE79	100	100	100	100	100	100	1	1	1	100
HE80	100	100	100	100	100	100	1	1	1	100
HE81	100	100	100	100	100	100	1	1	1	100
HE82	100	100	100	100	100	100	1	1	1	100
HE83	100	100	100	100	100	100	1	1	1	100
HE84	100	100	100	100	100	100	1	1	1	100
HE85	100	100	100	100	100	100	1	1	1	100
HE86	100	100	100	100	100	100	1	1	1	100
HE87	100	100	100	100	100	100	1	1	1	100
HE88	100	100	100	100	100	100	1	1	1	100
HE89	100	100	100	100	100	100	1	1	1	100
HE90	100	100	100	100	100	100	1	1	1	100
HE91	100	100	100	100	100	100	1	1	1	100
HE92	100	100	100	100	100	100	1	1	1	100
HE93	100	100	100	100	100	100	1	1	1	100
HE94	100	100	100	100	100	100	1	1	1	100
HE95	100	100	100	100	100	100	1	1	1	100
HE96	100	100	100	100	100	100	1	1	1	100
HE97	100	100	100	100	100	100	1	1	1	100
HE98	100	100	100	100	100	100	1	1	1	100
HE99	100	100	100	100	100	100	1	1	1	100
HE100	100	100	100	100	100	100	1	1	1	100

Management of Different Types of Sites: Any site regulated under NIST 800-30 and NIST 800-53 can be managed using ACRMS™ technology. Past projects have included financial and medical sites. Since 2006, more than 400 ACRMS clients have been audited with zero audit failures.

Management of Multiple Sites: Prime Contractors and multi-site contractors can have significant liability for any protected information given to non-secure locations. Contractors handling Controlled Unclassified Information (CUI) under DFARS 252.204-7012 must “flow down” cybersecurity requirements to any subcontractor or vendor handling CUI.

The ACRMS™ Enterprise software allows cybersecurity management of multiple sites from a central location. An example is shown at left. One medical client was able to manage 103 sites from one office.

Additional Information: Typical small site (<25 staff) ACRMS™ cybersecurity program costs are summarized on the back of this page. More details are at <https://cuicybersecuritycompliance.com/documents>.

SSP Scoring and Quarterly Updating: DFARS compliance requires writing **policies**, including implementation **tasks** and documentation **artifacts**, for the 110 NIST 800-171 rev 2 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 6-12 months. Failure to conduct daily, weekly, and monthly tasks drops scores by 77 points. No maintenance for 3 months typically drops scores by 143 points. Task completions are tracked monthly to document continuous compliance. Sites are offered monthly meetings. ACRMS™ risk assessments auto-update quarterly or on-demand.

		Price w/out Apex Support	Price with Apex Support
FAR 52.204-21 Initial Compliance Package	Initial ACRMS Portal access and Account Provisioning and Task Management System. Provides detailed introduction to ACR 2 Cybersecurity Risk Management System (ACRMS). Deliver 71 page FAR Policy Package with video walk through. Allow 10 hours for policy completion, including SSP and POAM creation. Initial Kickoff meeting – ACRMS Portal training and role configurations - up to 2 hours. One hour of additional consultation (15-minute increments) included in base price	\$ 495.00	\$ 250.00
FAR 52.204-21 monthly Support	Monthly on going customer service, documentation support and updates. Provides documentation tools to support "continuous compliance" requirements. Up to 0.5 hrs/month consultation. 2 Months free if monthly fee is paid in full year increments	\$ 49.50	\$ 24.75
Existing FAR 21 customer upgrade to DFARS -7012 Client	One time upgrade. ACRMS Portal access, Account Provisioning, and Task Management System Deliver full Policy Package with video walk through. SSP and POAM upon completion Initial Kickoff meeting – ACRMS Portal training and role configurations - up to 1 hour.	\$ 1,150.00	\$ 1,035.00
DFARS 204-7012-7012 Monthly Support	Monthly on-going customer service, technical support and updates. Provides documentation tools to support "continuous compliance" requirements. Up to 1 hr/month consultation. 2 Months free if monthly fee is paid in full year increments.	\$ 149.50	\$ 74.75
Cybersecurity monitoring- up to 100 sites. 1 to 25 staff/site	ACRMS Cybersecurity Compliance manager. One time setup cost. Enterprise license for near real-time monitoring of project cybersecurity. Can support FAR, DFARS, GLBA, FSMA, HIPAA, or any other cybersecurity program utilizing a subset of the NIST Special Publication 800-53, rev. 5. Requires monthly review and support contract for each site/project to be monitored.	\$ 250.00	\$ 250.00
Cybersecurity site attachment	One time attachment fee to link ACRMS cybersecurity compliance management package to ACRMS Enterprise multi-site management program.	\$ 150.00	\$ 150.00

Templates and recommendations are updated as needed to match the frequent changes published by the NIST. Our website CUIcybersecurityCompliance.com notes

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