DoD Cybersecurity 2024: ACRMS™ for DFARS Cybersecurity Compliance for Department of Defense (DoD) Small Business Innovation Research (SBIR) Awardees

DoD SBIR Cybersecurity Requirements for FY 2024: The most recent DoD SBIR application requirements are detailed in DoD SBIR 2024.4. Page 40 of 66 notes "Cybersecurity. Any small business concern receiving an SBIR/STTR award is required to provide adequate cybersecurity on all covered contractor information systems. Specific security requirements and cyber incident reporting requirements are listed in DFARS 252.204.7012." This requirement has been included in DoD SBIR applications since 2018.

Initial DFARS Cybersecurity Compliance: 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.

System Security Plans (SSPs) may be scored using an NIST protocol. SSPs are given scores of 1, 3 or 5 for each of the 110 requirements that is fully implemented and maintained. Scores range from a positive 110 to a negative 203.

DFARS compliance is required of SBIR awardees and any subcontractor handling Controlled Unclassified Information or CUI, typically including any drawings and specifications.

Maintaining Full DFARS Cybersecurity Compliance: Typically for a small contractor there will be about 230 daily, weekly, monthly, quarterly and annual tasks required to implement and maintain the 110 mandatory safety controls. Initial SSP scores are often in the –30 to +30 range. Achieving full 110 point compliance generally requires an additional 6-12 months. On the other hand failure to conduct daily, weekly, and monthly tasks can drop scores by 77 points. No task maintenance for 3 months will typically drop scores by 143 points.

Initial DFARS Compliance Solution: The ACR 2 Cybersecurity Risk Management System™ (ACRMS™) Video Boot Camp can bring small (<50 staff) DoD contractors into

Initial DFARS compliance in <30 hours for $999.50/site.

ACRMS™: Originally developed and demonstrated for the AFRL SBIR program, the three-day ACRMS™ Boot Camp was able to bring 44 small contractors into compliance with DFARS 252.204-7012. This program evolved into 16 hours of ACRMS™ video enhanced templates. The ACRMS™ task management software schedules and documents the hundreds of DFARS tasks.

Ongoing Compliance Monitoring and Management: A typical phase II SBIR awardee will have between one and five subcontractors subject to DFARS cybersecurity requirements. Full commercial applications may have 10 or more managed subcontractors. 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. A 10 site example is shown at right.

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. A discussion of the application of this technology is available here.

TABA Supplemental Funding for Cybersecurity and Other Admin Costs: Technical and Business Assistance (TABA) funding is available for about 40% of SBIR awards. Supplemental TABA funds are available for administrative functions such as project accounting and cybersecurity program management. Typically phase I TABA funds range from $5,500 to $6,500, while phase II TABA funds are generally $50,000 over 1-2 years.

Price List July 2024

Costs and Ordering Information: Extensive information on our programs is available on our CUI website at

https://CUIcybersecurityCompliance.com

A current pricelist for CUI program services is duplicated below.

Qty	Part #	Product Name	MSRP Price/Disc
0	CUI- Startup - 1 Site 1to50- 1 Month	ACRMS DFARS 252.204-7012 /CMMC Level 2 Initial Compliance package - Video Boot Camp augmented Policy package, SSP creation, POAM, implementation and maintenance Task Management setup and scheduling - End with SSP and DOD Assessment score- 1 month license - requires NDA. Credit card or check.	$ 999.50
0	ACRMS MEP/APEX SSP Support	Discounted Video Boot Camp price for clients with a MEP or APEX Accelerator support contract. Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/Apex participation in SSP creation.	30%
0	ACRMS MEP/APEX SSP Support, Pilot study participation	Discounted price for clients with MEP or Apex Accelerator support contract and full MEP/APEX participation in 2024 ACRMS pilot study. Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in SSP creation.	50%
0	ACRMS-CUI-Ongoing Support-1to50-1month	ACRMS Ongoing Policy, SSP & POAM Updating, Task Management System, updates and Technical Support - month by month license - credit card only.	$ 99.50
0	ACRMS MEP/APEX monthly monitoring Support	Discounted price for clients with MEP or APEX Accelerator support contract. Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in monthly monitoring and quarterly meetings.	30%
0	ACRMS MEP/APEX monthly monitoring Support Pilot Study	Discounted price for clients with MEP or Apex Accelerator support contract and full MEP/APEX participation in 2024 ACRMS pilot study. Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in monthly monitoring and quarterly meetings,	50%
0	FCI- Startup - 1 Site 1to50- 1 Month	ACRMS FAR 52.204-21 /CMMC Level 1 Initial Compliance package - Video Boot Camp augmented Policy package, SSP creation, POAM, implementation and maintenance Task Management setup and scheduling - End with Annual Assessment Report- 1 month license - requires NDA. Credit card or check.	$ 399.50
0	ACRMS MEP/APEX FCI Support	Discounted Video Boot Camp price for clients with a MEP or APEX Accelerator support contract. Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in annual report creation.	30%
0	ACRMS MEP/APEX FCI Support, Pilot study participation	Discounted price for clients with MEP or Apex Accelerator support contract and full MEP/APEX participation in 2024 ACRMS pilot study. Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in annual report creation.	50%
0	ACRMS-FCI-Ongoing Support-1to50-1month	ACRMS Ongoing Policy, SSP & POAM Updating, Task Management System, updates and Technical Support - month by month license - credit card only.	$ 39.95
0	ACRMS MEP/APEX monthly FCI monitoring Support	Discounted price for clients with MEP or APEX Accelerator support contract. Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in monthly monitoring and quarterly meetings.	30%
0	ACRMS MEP/APEX monthly FCI monitoring Support Pilot Study	Discounted price for clients with MEP or Apex Accelerator support contract and full MEP/APEX participation in 2024 ACRMS pilot study. Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in monthly monitoring and quarterly meetings,	50%
0	ACRMS-CUI-Quarterly Review-1to50-1month	ACRMS Month by Month data analysis, Quarterly Policy and Performance Overview Online Review Meeting - quarterly license - one required for initial SSP or updated account, recommended every 90 days - credit card only.	$ 180.00