



DoD Cybersecurity FY 2024 Pilot Study DFARS Cybersecurity Compliance for NIST Manufacturing Extension Partnership (MEP) and DoD APEX Accelerator (APEX) Clients

Pilot Study Objectives: This pilot study is designed to answer 4 questions.

1. Can MEPs and/or APEX Accelerators help small contractors achieve FCI/DFARS compliance?
2. Will small contractors choose to become FCI compliant or just leave the DoD market?
3. Will small contractors choose to become DFARS compliant or just leave the DoD market?
4. With MEP/APEX help, how many small contractors can achieve 110 scores in 6 months?

The pilot study is seeking 10 initial sites with up to 40 small contractors, up to 50 staff/site.

DFARS Cybersecurity Requirements for FY 2024: Since 2015 DoD contractors and subcontractors have been required under DFARS 252.204-7012 to implement all of the NIST SP 800-171 requirements and have a plan of action and milestones for each requirement not yet implemented.

The 2023 [Merrill Report](#) notes that while 70% of 300 contractors surveyed were required under their contracts to write and score a System Security Plan (SSP) and file their NIST 800-171 compliance score in the SPRS database, only 36% actually did so. Average scores for the ones who did file were –15, well below the desired score of 110.

Causes of DFARS Cybersecurity non-Compliance: The 2022 [Merrill Report](#) noted that cost and comprehension issues were cited by contractors as reasons for non-compliance. While NIST cybersecurity references are voluminous and well written, they are typically done in 18th grade English. A partial set of NIST references is shown at right.



The 2022 report cited “acceptable” cybersecurity costs ranging from \$1,000 to \$4,000 depending on the size of the company. Most consultant SSP programs cost from \$5,000 to \$30,000.

Pilot Study SSP Creation: The pilot study will initially use the ACR 2 Solutions Cybersecurity Risk Management System or ACRMS™. This self-paced Video Boot Camp and task management system was developed to cybersecure AFRL SBIR awardees. The original 10 awardee contract was later expanded to 44 sites. Sites had from 2 to 49 staff, with average staffing of 9.6 persons/site.

All 44 awardees successfully created valid SSPs. The Miltech Project Manager, August Uhl, stated that “In our role as an Air Force Partnership Intermediary, we were tasked with working with industry partners to provide technology transition assistance to multiple vendors in the Air Force SBIR program...we found that the ACR 2 Cybersecurity Risk Management System™ suits our needs and the needs of the AF SBIR companies we support...”

Special pricing for the pilot study: ACRMS™ costs for a typical 5 person contractor will be less than \$1,000 over six months. Details are shown on the back of this page.

MEP/APEX Commitment: The commitments of the MEP or APEX partner are modest. An APEX or MEP region will identify small contractors using the SBA.gov website or other means. A joint webinar will be held with ACR 2 Solutions. The first 40 contractors to apply will be enrolled.

Training for MEP/APEX staff was developed with the kind help of the Puerto Rico MEP Primex. The 4 hour training session is free for MEP/APEX, and includes all necessary software and materials. As PRIMEX noted, “This tool includes everything needed to make a company compliant in a short amount of time and at a cost that is accessible to even the smallest size businesses”

For more information contact project manager Robert Peterson at 770 381-9229, rpeter@acr2solutions.com, or visit our website at <https://CUIcybersecurityCompliance.com>

ACRMS™ Pilot Study Pricing

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 <u>and full MEP/APEX participation in 2024 ACRMS pilot study</u> . 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 <u>and full MEP/APEX participation in 2024 ACRMS pilot study</u> . 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 <u>and full MEP/APEX participation in 2024 ACRMS pilot study</u> . Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in annual report creation.	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
0	ACRMS MEP/APEX quarterly review 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 quarterly review Support	Discounted price for clients with MEP or APEX Accelerator support contract <u>and full MEP/APEX participation in 2024 ACRMS pilot study</u> . Requires NDA confirmation, MEP/APEX ACRMS monitoring software and training, MEP/APEX participation in monthly monitoring and quarterly meetings,	50%
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
0	Consulting	Consulting - per hour - credit card or check	\$ 180.00