



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

On July 13, 2026, **CMMC 2.0 was put on hold**, apparently due to cost and logistic issues.

However,

DFARS 252.204-7012 remains fully in effect.

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”.

DFARS and CMMC: Since at least 2017, DFARS 252.204-7012 has required compliance with the requirements of NIST 800-171, currently in revision 2 with 110 safety controls. Several attempts to upgrade these controls have been made under the title of “Cybersecurity Maturity Model Certification” or “CMMC”.

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 Encaves: 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 continuous compliance guides for artifact documentation. Additionally, a 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 the 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.



ID	A	B	C	D	E	F	G	H	I	J
Date	10/26/22	10/27/22	09/23/22	08/19/22	07/28/22	07/05/22	11/02/22	11/02/22	11/02/22	11/02/22
Risk	[GO]	[GO]	[GO]	[GO]	[GO]	[GO]	[GO]	[GO]	[GO]	[GO]
E1	50	50	50	50	50	50	1	1	1	50
E2	25	50	50	50	50	25	1	1	1	25
E3	25	50	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	50	1	1	1	100
HE1	100	100	100	50	100	100	1	25	25	25
HE2	100	100	100	50	100	100	1	50	50	25
HE3	100	100	100	50	100	100	1	50	50	25
HE4	100	100	100	50	100	100	1	50	50	25
HE5	100	100	100	100	100	100	1	50	50	25
HE6	25	50	50	50	50	25	1	1	1	25
HE7	100	100	100	100	100	100	1	25	25	25
HE8	50	50	100	50	100	50	1	25	25	25
ME1	100	100	100	100	100	100	1	25	25	100
ME2	100	100	100	100	100	100	1	25	25	100
ME3	100	100	100	100	100	100	1	25	25	100
ME4	100	100	100	100	100	100	1	25	25	100
ME5	100	100	100	100	100	100	1	25	25	100
ME6	100	25	100	25	25	50	1	1	1	100
ME7	50	25	100	25	25	50	1	1	1	100
ME8	50	25	100	25	25	50	1	1	1	100
MO1	25	25	25	25	25	25	1	25	25	100
MO2	25	25	25	25	25	25	1	25	25	100
MO3	25	25	25	25	25	25	1	25	25	100
MO4	50	50	50	50	50	50	1	25	25	100
MO5	50	25	50	25	50	25	1	25	25	100
MO6	100	5	100	5	100	5	1	1	1	100
MO7	100	5	100	5	100	5	1	1	1	100
MO8	100	5	100	5	100	5	1	1	1	100
DS	-105	-44	-124	-39	-180	-66	110	15	15	-175

Management of Multiple Sites: Prime Contractors and multi-site contractors can have significant liability for any protected information given to all subcontractors. 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. Details are available 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. 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 that:

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