



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. 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 (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 ALL this “stuff” so YOU don’t have to!

Part #	Short Description	Product Description	MSRP Price
ACRMS™-DFARS 252.204-7012 and 7019 Compliance - Single User			
DFARS One Initial	DFARS 252.204-7012 One User	One user. One computer. Initial ACRMS Portal access and Account Provisioning and Task Management System Deliver Custom Tailored 250 page Policy Package. SSP and POAM upon completion. Initial Kickoff meeting – ACRMS Portal training and role configurations - up to 1 hour Two hours of consultation (15-minute increments) included in base price Additional Scheduled Consulting available for \$100/hr.	\$ 995.00
DFARS One Monthly	DFARS 252.204-7012 One User Monthly Support	Monthly on going customer service, technical support and updates. Up to 2 hrs/month. 2 Months free if monthly fee is paid in full year increments	\$ 99.50
ACRMS™ - DFARS 252.204-7012 and 7019 Compliance - From 2 to 25 Users with CUI Access			
Initial SSP	Initial System Security Plan (SSP)	Online safeguards inventory Initial NIST 800-30 risk assessment System Security Plan DoDAM score calculation. Requires completed Site Data Form and signed Non-Disclosure Agreement	\$ 360.00
Initial SSP Monthly	Initial Monthly Support	Monthly on going customer service, technical support and updates. Upto 2 hrs/month. 2 Months free if monthly fee is paid in full year increments. Includes ACRMS Risk Assessment update and 10 minuted phone updates.	\$ 36.00
Enclave review	Enclave review and FIPS 140 UTM Integration	Enclave review: Up to 3 hours of technical support to assist in enclave design, UTM selection, and UTM data integration into the ACRMS risk management system.	\$ 540.00
DFARS Basic Initial	DFARS 252.204-7012 Basic	Initial ACRMS Portal access and Account Provisioning and Task Management System Deliver 550 page Policy Package with video walk through. SSP and POAM upon completion Initial Kickoff meeting – ACRMS Portal training and roll configurations - up to 2 hours Two hours of consultation (15-minute increments)	\$ 1,495
DFARS Basic Monthly	DFARS 252.204-7012 Basic Monthly Support	Monthly on going customer service, technical support and updates. Upto 2 hrs/month. 2 Months free if monthly fee is paid in full year increments	\$ 149.50