

## CLIENT ALERT

### Double Whammy: NIST Unveils Draft Enhanced Security Requirements and Revisions to NIST SP 800-171

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The National Institute of Standards and Technology (NIST) has released drafts of NIST SP 800-171 Revision 2 and a companion standard NIST SP 800-171B, designed to protect Controlled Unclassified Information (CUI) from advanced persistent threats (APTs). 800-171B details 33 “enhanced” controls, reflecting core principles of penetration resistance, damage-limiting operations, and resiliency. Specific controls include those related to segregation, hunt teams, AI-enabled tools, IoT security, and supply chain – some of which arguably do not have firm industry definitions.

Unlike the non-substantive updates to Revision 2, 800-171B will apply only to contractors handling CUI that the government determines is part of a “critical program” or is a “high value asset.” A cost estimate from the Department of Defense – expected to quickly implement 800-171B – anticipates that less than one percent of its contractors will be impacted but that (allowable) costs could exceed \$1 million.

Comments for all three documents are due July 19, 2019.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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