

CLIENT ALERT

DoD Previews New Third-Party Cyber Certification Requirements

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The Department of Defense is moving closer to a third-party certification to ensure compliance with its standard cybersecurity requirements – what is being called the “Cybersecurity Maturity Model Certification” (CMMC). While still in the early stages of development, the CMMC would likely require all contractors subject to DFARS 252.204-7012 to obtain a certification issued by an independent third party stating that the contractor has sufficiently implemented its required cybersecurity controls. Holding this certification would be a “go/no-go” condition to compete for relevant DoD work. Although NIST SP 800-171 is the default cybersecurity standard currently required under -7012, DoD is also exploring the creation of a new standard that would govern the certification. DoD is projecting that the CMMC will start appearing in solicitations as early as Fall 2020, but much work remains to be done – including potential revisions to -7012 – and will no doubt be informed by extensive industry engagement.

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

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