

## CLIENT ALERT

### Just in Time for Spring: Revision 2 to NIST SP 800-171 Comes into Full Bloom

Mar.12.2020

The National Institute of Standards and Technology (NIST) recently released its final version of Revision 2 to the cybersecurity standard NIST Special Publication (SP) 800-171. While the security controls remain unchanged, Revision 2 now incorporates implementation guidance into each control. Importantly though, such guidance remains non-binding and is not intended to extend the scope of the controls' requirements.

For future solicitations, Revision 2 will replace Revision 1 as the applicable standard under DFARS 252.204-7012. It remains to be seen how the finalization of Revision 2 will impact the Department of Defense's Cybersecurity Maturity Model Certification (CMMC). Currently, many CMMC practices cite to Revision 1, while "Discussion" sections cite to the draft version of Revision 2.

Lastly, although introduced in draft form at the same time as Revision 2, the separate standard NIST SP 800-171**B** – describing enhanced security controls intended to mitigate the risks of Advanced Persistent Threats (APTs) – remains unfinalized.

---

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

**Evan D. Wolff**

Partner – Washington, D.C.

Phone: +1 202.624.2615

Email: [ewolff@crowell.com](mailto:ewolff@crowell.com)

**Kate M. Growley, CIPP/G, CIPP/US**

Partner – Washington, D.C.

Phone: +1 202.624.2698

Email: [kgrowley@crowell.com](mailto:kgrowley@crowell.com)

**Maida Oringher Lerner**

Senior Counsel – Washington, D.C.

Phone: +1 202.624.2596

Email: [mlerner@crowell.com](mailto:mlerner@crowell.com)

**Michael G. Gruden, CIPP/G**

Associate – Washington, D.C.

Phone: +1 202.624.2545

Email: [mgruden@crowell.com](mailto:mgruden@crowell.com)

**Christopher R. Hebdon**

Associate – Washington, D.C.

Phone: +1 202.624.2645

Email: [chebdon@crowell.com](mailto:chebdon@crowell.com)