

# What does industry need?

## Clear guidance

- ✓ What is CUI and associated CUI categories
  - ✓ What will be CMMC Level
  - ✓ Gov't not marking/over marking everything CUI (understand the rules)
  - ✓ When will contracts be modified
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# Vendor/Subcontractor Impact

Flow down clauses must be done

Large impacts to vendors & subcontractors

Potential large number will not be able or choose not to comply.

- Will not be able to use them
- At locations with limited subs, may mean no option available
- Impact projects & small business goals
- Will limit/exclude small businesses
- How many could actually bid

Large impact to UP provider to track & verify compliance

# Impacts to UP Provider

## Overall cost

- Amazon Web Services (AWS) & Virtual Desktop Infrastructure (VDI)
- Microsoft Government Community Cloud High (GCC H)
- Implementation, Continuous Evaluation of Information System & Certifications
- Subcontractor implementation/compliance

## Our example of two systems for company – GCC H and Commercial requirements

- Impacts to additional support/business functions
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# Recommendations

Based on NARA and DoW CUI registries

- Full compliance
    - 32 CFR Part 170 and 48 CFR
    - DFARS 252.204-7012, 252.204.7021, 252.240.7997
    - CMMC Level 2
    - Recommend – self certification
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