



Cybersecurity Training



FAR v DFARS Safeguarding

	FAR 4.19/52.204-21	DFARS 4.73/52.204-7012
Applicability	All Agencies	DoD Only
	All contracts except COTS	All contracts except COTS
	Federal Contract Information	Covered Defense Information
	Focused on Systems	Focused on Information
Effective Date	Now (no Safe Harbor)	December 31, 2017
Requirements	15/17 of NIST 800-171	All 110 of NIST 800-171



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Marking	No requirement for government to mark	Marked or otherwise indicate if Covered Defense Information
Reporting	No explicit reporting requirement	Mandatory – 72 hours, DoD Subcontractors report / provide incident number to prime
Certification	No Certification Requirements	Required by 252.204-7008



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Subcontract	Mandatory if subcontractor “may have Federal contract information residing in or transiting through its information system”	Mandatory for “subcontracts, or similar contractual instruments, for operationally critical support, or for which subcontract performance will involve covered defense information, including subcontracts for commercial items, without alteration, except to identify the parties”
	No guidance for how to assess or monitor	Prime is responsible for cyber enforcement
		Prime - determine if Subcontractor can comply, Request deviations
		Subcontractors must notify Primes if unable to comply



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