CUI CONTRACTUAL CONSIDERATIONS FOR INDUSTRY VERSION 1.0

TO SAFEGUARD CUI ACCORDING TO DOD CONTRACTUAL REQUIREMENTS

This document provides Industry with five essential considerations when safeguarding CUI while performing on DOD contracts. These considerations include:

1 Identify Person(s) Responsible for Implementing the Safeguarding and CUI Contractual Requirements. In addition, these individuals must:

- Have a lawful government purpose and that is not otherwise restricted from accessing CUI.
- Complete initial CUI training, and annually thereafter.
- Ensure all personnel supporting contracts with CUI requirements complete mandatory CUI training in accordance with contractual requirements.
- Ensure resources are in place to adequately safeguard CUI and implement requirements.

2 Review and Identify Existing Contracts to Include Contracts Covered Under the NISP for CUI Requirements (i.e., DFARS clause 252.204-7012)

- Review existing contracts and engage with Government customers to determine which, if any, CUI requirements are applicable to current contracts.
- Identify and inventory current legacy unclassified information and materials.

3 Comply with CUI Training

- Ensure all authorized holders of CUI are familiar with the DOD CUI Registry categories and subcategories.
- Ensure all personnel supporting classified contracts with CUI requirements are aware of such requirements for marking, safeguarding, digital and physical storage, and dissemination.
- Administer initial CUI training to all authorized holders and CUI refresher training annually thereafter.
- Maintain all CUI training records.

4 Safeguard and Mark CUI

- Establish and provide CUI handling procedures and adhere to CUI marking standards and guidance for all authorized holders of CUI.

5 Meet Supplier Performance Risk System (SPRS) Requirements

- Upload contractually required information into SPRS.
- Maintain System Security Plan (SSP), Plan of Action and Milestones (POAM), and any other required information.
- Identify and document all challenges and vulnerabilities; and develop corrective actions to mitigate findings.