



A ROADMAP TO CUI COMPLIANCE VERSION 3.0

Developing the Foundation to Safeguard CUI

This roadmap will assist industry with implementation of safeguards for Controlled Unclassified Information (CUI). It covers the 11 key areas where industry should focus for compliance with CUI protection requirements.



BUILDING THE FOUNDATION TO SAFEGUARD CUI

1. Identifying Key Personnel

Examples include:

- Senior Management
- Facility Security Officer
- Information Technology (IT) Manager/ISSM
- Insider Threat Program Senior Official
- Network Engineers
- Program Managers
- Contracting and Acquisition Professionals

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4. Contract Identification

- Review Contract Clauses
- DD Form 254 review
- Review contract languages
- Review legacy information

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6. Safeguarding & Access

- How is it stored?
- Who has access?
- Long term storage
- Access requirements
- Encryption requirements
- Decontrol and destruction
- Leveraging resources

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8. Conduct Initial Self-Assessment

- Review results
- Correct findings
- Identify opportunities for improvement
- Make improvements

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10. CMMC 2.0 Implementation (<https://dodcio.defense.gov/CMMC/Model/>)

- Implemented through the acquisition and contracting process.
- Requires compliance with CMMC as a condition of contract award.
- CMMC level will be specified in the solicitation & RFIs, if utilized.

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2. CUI Training

- 11 CUI training requirements
- Consider the CDSE CUI course
- Annual requirement for DOD

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3. DOD Policy

- DODI 5200.48
- DFARS 252.204-7012
- Agency Specific Requirements

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5. Customer Engagement

- Identify CUI safeguarding requirements
- Identify CUI DFARS clauses within contract documentation

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7. Standard Practice Procedures (SPP) Development

- Facility security procedures
- Facility CUI contacts
- Information system security policies
- Contractual-specific guidance
- Safeguarding and Marking
- Reporting

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9. IS Controls

- NIST SP 800-171
- NIST SP 800-172

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11. Conduct Full Assessment

- Report findings to management
- Mitigate findings
- Identify program improvements
- Enhance program

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