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**HII.com**

Dear Valued Supplier:

September 30, 2024

As the U.S. Government and the Department of Defense (DoD) continue to mature cybersecurity requirements, Huntington Ingalls Industries (HII) remains committed to protecting sensitive information that is entrusted to us, most commonly referred to as **Federal Contract Information (FCI)** and **Controlled Unclassified Information (CUI)**. This commitment to protection extends to our suppliers with whom we share this type of information. The purpose of this letter is to provide an overview and update of these requirements.

**[FAR 52.204-21. Basic Safeguarding of Covered Contractor Information Systems](#)**, is a prime contract mandatory flow-down to our subcontractors which defines and prescribes the basic safeguarding requirements and procedures for covered contractor information systems that process, store, or transmit FCI. If your company has a HII purchase order supporting a DoD prime contract, it contains at a minimum FAR 52.204- 21 and subjects your company to the requirements of the 15 Basic Safeguarding Controls identified within the clause.

**[DFARS 252.204-7012. Safeguarding Covered Defense Information and Cyber Incident Reporting](#)**, is a mandatory flow-down included in the prime contract to our subcontractors to provide adequate security on all covered contractor information systems where Covered Defense Information (CDI) or DoD CUI is transmitted electronically to the subcontractor. The clause contains a number of minimum security protections as well as requirements for the reporting of cybersecurity incidents.

**[DFARS 252.204-7020. NIST SP 800-171 DoD Assessment Requirements](#)**, is a prime contract mandatory flow-down to our subcontractors which contains requirements for the protection of DoD CUI that is applicable to suppliers at every level even before the award during the RFP phase.

As you are aware, DFARS 252.204-7020 requires that prior to awarding a contract that involves DoD CUI, the contractor and all of its subcontractors that will handle CUI must have a current assessment score in the DoD Supplier Performance Risk System (SPRS). DFARS 252.204-7020 are required flow-downs in all requests for proposals, subcontracts, purchase orders, or other contractual instruments, including for DoD-commercial items.



## PREPARATION FOR CMMC 2.0

The DoD implemented the Cybersecurity Maturity Model Certification (CMMC) program in 2019, which is now being updated to the 2.0 version. The CMMC program is designed to enforce protection of sensitive unclassified information that is shared by the Department with its contractors and subcontractors. Once CMMC is fully implemented, certain DoD subcontractors that handle sensitive unclassified DoD information will be required to achieve a particular CMMC level as a condition of contract award.

The DoD assessment methodology (NIST SP 800-171) serves as the basis for an interim certification process to confirm compliance with DFARS 252.204-7012 requirements until a formal CMMC review is conducted by a designated and certified CMMC Third Party Assessment Organization (C3PAO) under the CMMC 2.0 model. The interim DFARS rule established a five-year phase-in period, during which CMMC compliance is only required in select pilot contracts, as approved by the Office of the Under Secretary of Defense for Acquisition and Sustainment. Once CMMC 2.0 is codified through rulemaking, the Department will require companies to adhere to the revised CMMC framework according to requirements set forth in regulation.

Companies will be required to comply once the forthcoming rules go into effect. HII encourages our suppliers to continue to enhance their cybersecurity posture during the interim period while the rulemaking is underway.

Please visit our HII Supplier website at <https://hii.com/Cyber> for additional resources related to these requirements.

Thank you in advance for your cooperation, and we will continue to update you as implementation of these regulations evolves. Stay tuned for future communications regarding an upcoming HII Supplier Webinar on CMMC implementation.

Sincerely,

**Cullen Glass**

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