EO on Combating Race and Sex Stereotypes


- December 22 – nationwide injunction issued
  - Renders invalid Sections 4 and 5 (federal contractors and grantees)
  - Office of Federal Contract Compliance Programs issued a notice suspending compliance and enforcement activities

- It is anticipated that the Biden administration will rescind the Executive Order
Cybersecurity Maturity Model Certification

• New DOD regulation; requires independent certification of ability to meet physical and cyber security requirements
  – Currently we are able to self certify our ability to comply. Once fully implemented (~five years for total implementation), the regulations will require us to be externally certified (there are not currently any approved certifiers available).

• Five levels of certification. As regulations are currently written, even basic/fundamental research is going to require a Level 1 certification. (COGR advocating in regards to this.)
# Cybersecurity Maturity Model Certification

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
<th>Cost of Certification: First Year (Estimated)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>15 basic safeguarding requirements</td>
<td>$3000</td>
</tr>
<tr>
<td>2</td>
<td>65 security requirements from NIST SP 800–171, 7 CMMC practices, and 2 CMMC processes</td>
<td>$28,000</td>
</tr>
<tr>
<td>3</td>
<td>All 110 security requirements from NIST SP 800–171, 20 CMMC practices, and 3 CMMC processes</td>
<td>$60,000</td>
</tr>
<tr>
<td>4</td>
<td>All 110 security requirements from NIST SP 800–171, 20 CMMC practices, and 3 CMMC processes</td>
<td>$372,000</td>
</tr>
<tr>
<td>5</td>
<td>All 110 security requirements from NIST SP 800–171, 20 CMMC practices, and 3 CMMC processes</td>
<td>$482,000</td>
</tr>
</tbody>
</table>

Does not include infrastructure costs. Can also expect annual costs.
Cybersecurity Maturity Model Certification

- Includes both cybersecurity and physical security requirements (even at level 1).
- Certification will need to be done prior to award. This is different than current practice where we typically certify that we will be compliant and have a ramp up period.
- Because of physical security requirements, the certification will likely have to be done space by space (project by project).
- This will be a mandatory flow down to subcontractors
Cybersecurity Maturity Model Certification

- Group established to begin to assess:
  - Tina Cunningham, Quinton Johnson, Annie Publow, Peter Landsman, Amy Lutero, Dan Han
- Working on initial assessment of the requirements per level
  - What VCU can already meet
  - What we can meet with additional infrastructure
  - What the units will be required to meet (definitely physical security requirements; could be more)
    - University infrastructure likely will be implemented with a charge back model