

OSP Federal Contract Security Guidelines

Vocabulary:

CMMC – Cybersecurity Maturity Model Certification

CISO – Chief Information Security Officer

CUI – Controlled Unclassified Information

CTI – Controlled Technical Information (a form of CUI)

DD-254 – For classified projects. If received, send to the Research Security Officer

FCI – Federal Contracting Information

FGTRP – Foreign Government Talent Recruitment Program

NSPM – National Security Presidential Memorandum (NSPM 33)

SPRS – Supplier Performance Risk Score – sponsor might ask if we have a score. The answer is yes, HPC does. If this is asked copy the Information Security Manager and the Senior Security and Compliance Officer to answer any further questions from the sponsor

Contact Information:

HPC:

Kendall Blaylock: Information Security Manager / kendallb@hpc.msstate.edu / 325.2114

Mike Navicky: Director, HPC / 325-8278

ITS:

Becky Shannon: IT Risk & Compliance Analyst / rs2587@msstate.edu / 325.9311

Tom Ritter: Senior Security and Compliance Officer / ritter@its.msstate.edu / 325.3709

ORC&S:

Chris Jenkins: Research Security Officer / cjenkins@ors.msstate.edu / 325-0400

Niko Pittore: Export Control Officer / niko.pittore@msstate.edu / 325-8682

ORED:

Julie Jordan: Vice President for Research / julie.jordan@research.msstate.edu / 325-3570

FAR/DFARS Clauses in Question:

ALL DoD awards must have approval from ORC&S before it is awarded. This also applies to any other federal contracts with the following FAR/DFAR clauses:

FAR 52.204-21: Basic Safeguarding of Contractor Information Systems (FCI) – send to ORC&S, ITS and HPC contacts **(MUST BE UNDER HPC ORG ONLY)**

DFARS 252.204-7000: Disclosure of Information – send to ORC&S

DFARS 252.225-7008: Export Controlled Items – send to ORC&S

252.204-7009: Limitations on the Use or Disclosure of Third-Party Contractor Reported Cyber Incident Information (JAN 2023) – send to ORC&S

DFARS 252.204-7012: Safeguarding of Unclassified Controlled Technical Information (CUI) – send to ORC&S, ITS and HPC contacts

DFARS 252.204-7019: Notice of NIST SP 800-171 DoD assessment Requirements – send to ORC&S, ITS and HPC contacts

DFARS 252.204-7020 NIST SP 800-171 DoD Assessment Requirements - send to ORC&S, ITS and HPC contacts

DFARS 252.204-7021 Contractor Compliance with the Cybersecurity Maturity Model Certification Level Requirements (CMMC) - send to ORC&S, ITS and HPC contacts

Copy the OSP Director and your OSP Associate Director on any tickets that include the above mentioned clauses as well as the correct contacts for those clauses (See contact information above) . This process will likely change when a CISO is hired.

How to process an award that contains these clauses:

1. When the award is received, review the award as usual and determine if any of the above clauses apply.
2. Check to make sure that all contracts with the FAR 52.204-21 have an HPC org.
3. Copy the appropriate people, listed above, in the ticket and ask them to review the contract.
4. The OSP Administrator should be working on legal negotiations/contract changes at this time as well.

5. OSP will ask the sponsor to remove any of the clauses that are listed above along with any other language in the contract. If ORC&S needs to step in after the initial requests to the sponsor they will do so.
6. Send the CUI determination form to the sponsor.
7. If the sponsor (contracting officer) determines that these clauses do not apply but they will not remove them, get an email, etc...from the sponsor that says they do not apply and put a note in the award (right after the face page) that says "It has been determined by the sponsor that there is no CUI, etc...associated with this project at this time. However, if this determination changes, immediately notify ORC&S, ITS and OSP by commenting in ticket # _____ in the OSP service portal." This will be a stand alone document inserted after the face page.
8. Award the contract as normal making sure that the appropriate subjects are chosen under User Defined Data in FRAGRNT.
9. Include all security paperwork (TCP, etc...) before the budget in the award package.

Information to better understand the above clauses:

In order to say we are CMMC compliant, the sponsor looks in a system called Supplier Performance Risk Score (SPRS) to see our assessment. So you will see requirements for us to have a score/assessment in SPRS. There can only be one person that does this for the entire university and that is the Senior Security & Compliance Officer (Tom Ritter). This is important because HPCC is the only org that has a real score. So depending on what the sponsor requires-it could mean the PI has to apply through a HPCC/CAVS org just to meet the cybersecurity requirements.

The FCI clause, 52.204.21, has 15 requirements the university has to meet in order to be in compliance. MSU's ITS cannot handle all 15 points in the clause. Therefore, this clause needs to be removed. If the sponsor says there will be no FCI in the award with this clause then MSU does not have to put the security measures in place. OSP can ask if MSU will receive or store any FCI, then ITS can determine the proper way forward.

FGTRP has been required for all DOE projects but now it has started being required for DoD projects as well. PIs must have the training before the project is awarded and it must be marked on the award sheet.

CUI is becoming more prevalent in federal contracts. Please be aware and look for emails marked CUI. Alert Chris, Kendall, and Niko if you receive an email marked CUI. If the email is not marked and you open attachments that are marked CUI, close them immediately and contact Chris, Kendall, and Niko. Do not forward the emails.

ORGs Automatically Sent to Export Control/Security

010300 – Ag and Bio Engineering

031900 – Chemistry

036900 – Math and Stats

038400 – Physics and Astronomy

038814 – Center for Computational Sciences

06XXX – all engineering orgs EXCEPT 068800 – Dean of Engineering

191000 – GRI

191001 – NGI

191400 – IGBB

193000 – HPC2

193002 - Center for Battlefield Innovation

193200 – Energy Institute

193500 – DASI

193600 – ICRES

193700 – ASSURE

194000 – Raspet

194100 – Advanced Composites Institute (ACI)

464500 – Center for Environmental Health Science

***Also any proposal marked as “yes” on either of the two export control checkboxes