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## Comment on FR Doc # 2024-18110

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Hello!

I have a concern related to the following reporting requirement in DFARS 252.204-7021:

"(3) Report to the Contracting Officer any changes to the list of DoD UIDs applicable to each of the contractor information systems that process, store, or transmit FCI or CUI and that are used in performance of the contract."

Source: <https://www.federalregister.gov/d/2024-18110/p-230>

"Any changes" needs to be further defined. If "any changes" are a reportable requirement, there will be an enormous amount of unnecessary noise sent to contracting officers.

What type of changes do we want to report here? As an example, would Windows security updates to a CUI asset be a change that is reportable for example? I don't think that is what you are interested in.

I'd recommend changing this language to capture the intent. Perhaps changes to the CMMC assessment scope (which could invalidate a CMMC certification), significant compliance posture changes, etc.

V/R

Jacob Hill | Founder of GRC Academy (<https://grcademy.io>)

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