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The Information Technology Industry Council (ITI) appreciates the opportunity to comment on DFARS Case 2019-D041, Assessing Contractor Implementation of Cybersecurity Requirements. In the attached, we make seven recommendations that we believe will further strengthen the implementation of the Rule.


Specifically, we recommend that the Department: 1) Broaden 202.7502 (c) to avoid duplications with comparable Federal assessments rather than limiting this policy to comparable DoD assessments only; 2) Harmonize incident reporting requirement with existing federal requirements; 3) Amend Section 204.7501 to outline permissibility of conditional certifications; 4) Provide additional guidance on how future updates to the underlying NIST standards will be addressed in regulatory implementation and contractor compliance; 5) Create formal waiver procedures that procurement officials can grant; 6) Provide generalized visibility into subcontractors' certification status; and 7) Clarify at what point subcontractors must be compliant.

Thank you for your consideration of our comments,
Information Technology Industry Council (ITI)

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Attachments 1

 ITI_Public Comments_DFARS 2019-D041_Final

 Download (https://downloads.regulations.gov/DARS-2020-0034-0248/attachment_1.pdf)

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