

PSC Defense & Intelligence Council Spotlight

August 2024 Spotlight; Published on Wednesday, August 28, 2024

All -

Good afternoon! See below for PSC's August 2024 D&IC Spotlight offerings! As you may know, Lauren C. Ayers, PSC Vice President for Defense and Intelligence has departed PSC for a career opportunity.

If you have any defense policy-related questions, inquiries, or issues, please contact Stephanie Kostro, PSC Executive Vice President for Policy (kostro@pscouncil.org); if you have any logistical or administrative questions, please contact Christian Larsen, PSC Senior Associate for Public Policy (larsen@pscouncil.org). Thank you!

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Register and Send Inputs for PSC's CMMC Data Collection Call (Sept 4)

On August 15, 2024, DoD <u>published</u> "Assessing Contractor Implementation of Cybersecurity Requirements" (<u>DFARS Case 2019-D041</u>).

With this proposed rule, "DoD is proposing to revise the DFARS to <u>implement the contractual requirements</u> related to the Cybersecurity Maturity Model Certification (CMMC) 2.0 program, published in the Federal Register as a proposed rule affecting 32 CFR part 170 on December 26, 2023, at 88 FR 89058." You can access the proposed rule **here**.

PSC will submit comments on this proposed rule and will hold a September 4, 2024, <u>data</u> <u>collection call</u> to discuss the rule with PSC members. If you are interested in providing input or data points to a PSC comments package, or wish to join that data collection call, please email me at <u>larsen@pscouncil.org</u> or register <u>here</u>.

PSC Seeks Member Input on AUKUS ITAR Rule

On August 20, 2024, the Department of State released an <u>interim final rule</u> and request for comments on AUKUS-related ITAR changes, which takes effect on September 1, 2024. PSC will submit comments and welcomes member companies' insights, including but not limited to processes for authorized users, Excluded Technologies List, and retransfers / reexports. Please send inputs directly to Stephanie Kostro, PSC Executive Vice President for Policy (kostro@pscouncil.org) by October 25, 2024.

PSC Requests Input to DoD RFI on Loans and Loan Guarantees for Critical Tech and Supply Chain Components

On July 24, 2024, DoD's <u>Office of Strategic Capital</u> (OSC) released an RFI (<u>DoD-2024-OS-0073</u>) for public comment on the issue of loans and loan guarantees for critical tech and supply chain components (a program authorized in the FY24 NDAA).

The focus of the RFI is on market activity, capital requirements, and best areas for OSC loans and loan guarantees. OSC is particularly interested in responses from companies and lenders operating in industries aligned with the 31 covered technology categories identified in <u>Section 903</u> of the FY24 NDAA. Comments are due October 22, 2024.

Please **send any inputs** to Christian Larsen, PSC Senior Associate for Public Policy (larsen@pscouncil.org) by COB September 18, 2024.

PSC Comments on DFARS "Material Weakness" Proposed Rule

On August 26, 2024, PSC <u>submitted comments</u> on "DFARS: Definition of Material Weakness" Proposed Rule (DFARS Case 2021-D006). PSC supported the amended clauses, which align with generally accepted auditing standards. PSC also encouraged DoD to promulgate PGI companion guidance to help incorporate these clauses, as appropriate. Read PSC's comments <u>here</u>.

2024 Defense Conference & Upcoming PSC Events

Click <u>here</u> to register for the 2024 Defense Conference to be held on October 8, 2024, at the Westin Arlington Gateway in Arlington, VA. Click <u>here</u> to access the agenda. You can also access all upcoming PSC events and conferences <u>here</u>.

If you have any questions, contact PSC's Events team at events@pscouncil.org.