

The Supply Chain Security Constellation

Topic	Cognizant Agency	Last Major Action	Next Action	Impact
Section 889(a)(1)(A) Interim Rule (focusing on USG agency procurements)	FAR Council, with significant lead from DoD	Interim rule issued (and effective) Aug. 13, 2019	Response to comments (from Oct. 15)	The final rule issued for (a)(1)(A) will inform the definitions and processes for (a)(1)(A) & (a)(1)(B).
Section 889(a)(1)(B) Rules (covering broader scope of USG contractors' supply chains)	FAR Council, with significant lead from DoD	Enacted in FY2019 National Defense Authorization Act (Aug. 2018)	Statute takes effect Aug. 13, 2020; interim rule expected late Spring 2020	Definitions from the topics in this chart will inform the implementation of (a)(1)(B), which will emerge later.
Executive Order 13873 ("Supply Chain EO")	Commerce, with input from other national security stakeholders	EO issued May 15, 2019; proposed rule issued Nov. 27, 2019	Commerce response to comments (period closed on Jan. 10)	The regulations will affect which alternative suppliers are off limits for purposes of replacing equipment prohibited by 889.
FIRRMA Regulations (CFIUS reform)	Treasury	Final regulations issued Jan. 14, 2020	Revised regulations take effect February 2020	Key definitions in FIRRMA regulations will inform the definitions in Section 889.
"Emerging and Foundational Technology" Definitions (per Export Control Reform Act of 2018)	Commerce	Advance Notice of Proposed Rulemaking issued Nov. 19, 2018	Final list expected in 2020	The definition of "emerging and foundational technology" will inform the definition of "critical technologies" for FIRRMA and 889.
Cybersecurity Maturity Model Certification (CMMC)	Defense	Release of Version 1.0 January 2020	Accreditation standards in Spring 2020 / Implementation Fall 2020	All DoD contractors and subcontractors will need to be certified.
Source Code Disclosure (FY19 NDAA Sections 1654 and 1655)	Defense	FY19 NDAA	Regulations are late (should have been issued no later than August 2019)	DoD may not purchase certain products, services or systems where source code has been disclosed to certain foreign governments and foreign persons.