# **CMMC**

FACTS, FICTION, AND WHAT YOU NEED TO KNOW NOW.



### **WEBINAR**

**SEPTEMBER 30** 

Get actionable steps and your important questions answered







SR. VICE PRESIDENT HUMANTOUCH, LLC.

Head of the Cybersecurity Consulting Business at HumanTouch (RPO & Candidate C3PAO)

Former Principal at Booz Allen Hamilton

Computer Engineer, PMP, RP

BS and MBA from Johns Hopkins University

**Published** in National Defense News, and is a frequent contributor to AFCEA, Washington Business Journal, and G2Xchange

Led several cyber panel discussions for Federal News Radio





CYBER COMPLIANCE

EXPERIENCE

#### **NIST PARAMETERS**

Rick's hands-on experience with NIST parameters includes leading the contractor team that generated the initial 800 series guidance.

#### **SPECIALTIES**

Cyber Risk
Surface Area Threat
Vulnerability Management
Federal Civil & Financial
Services Sector





JAMES NORRIS, RP

CYBER RISK ADVISOR
HUMANTOUCH, LLC.

Cyber Risk Advisor and Registered Practitioner at HumanTouch (RPO & Candidate

**Published on CMMC** in American Security Today

Cybersecurity **Mentor** 

**Certified** in Sophos and Fortinet

Past performance with SIEMs - AlienVault, LogRhythm, Wazuh, Splunk

**EDR** – Carbon Black, Sophos, Fortinet





#### SPECIALTIES

24/7/365 Network Security Monitoring, vSOC, mSOC, SIEM | Phishing Awareness Training | Professional Consulting Services - VMaaS, Vulnerability Assessments, Penetration Testing, Incident Response, PCI, HIPAA, Hitrust, GDPR, NIST, CMMC



How many of you have **started** your CMMC Certification or entered your **800-171 results** into SPRS?





**RECENT NEWS** 

Defense Industry Waits on Costly Trump-Era Cyber Rule Update

Not Just CMMC: New DoD Rule Creates Two Cybersecurity Assessment Frameworks

With CMMC certification, slow and steady wins the race

The Pitfalls of Factoring in Security and CMMC Costs



Will CMMC **really** be a requirement?





**RECENT NEWS** 

Pentagon Official Says CMMC Changes Will be Finalized 'Very Soon'

Link

DoD Wants Industry to Continue With CMMC Prep Amid Program Review

Link

### **Reputable Source:**

Christine Michienzi, Chief Technology Officer, The Office of the Secretary of Defense



### DFARS requirements

**DEFENSE FEDERAL ACQUISITION REGULATION SUPPLEMENT** 

**Purpose is to shore up lax cybersecurity across the US DIB.** The challenge has been that, under DFARS 7012, a high percentage of suppliers have been selfattesting to DFARS compliance without verifiably bringing their systems and processes into compliance.

The **DFARS 7020 clause informs suppliers** that the DoD has the right to access "facilities, systems and personnel" that manage, process, store, or transmit controlled unclassified information.

**DFARS 252.204-7020** (DFAR 7020)

**DFARS 252.204-7012** (DFAR 7012)



## What it means for you

IF YOU ARE CMMC COMPLIANT



Awarded DoD contracts



Maintain your business



**Safeguard** your organization



**Protect** national security



### What is **CMMC**

CYBERSECURITY MATURITY MODEL CERTIFICATION



**A unifying standard** for the implementation of cybersecurity across the Defense Industry Base (DIB)

CMMC is designed to provide increased assurance to the DoD that a DIB company can adequately protect CUI



WHAT IS IT?

**CUI is information the Government** creates or possesses, or that a contractor creates or possesses for or on behalf of the Government, that a law, regulation, or Government-wide policy **requires an agency to handle using safeguarding controls** 

- Information that is marked or identified as requiring protection under the CUI program.
- Minimum Security Requirements in a non-federal information system: NIST SP 800-171



Do you currently have **CUI** in your IT infrastructure?





NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA)

**EXAMPLES OF CATEGORIES IN THE DOD THAT CAN APPLY TO YOU:** 

#### **PROVISIONAL:**

**Homeland Security** Agreement Information **Homeland Security Enforcement Information** Information Systems Vulnerability Information – Homeland International Agreement Information - Homeland Operations Security Information Personnel Security Information Physical Security -Homeland **Privacy Information** Sensitive Personally Identifiable Information

#### **DEFENSE:**

Controlled Technical
Information
DoD Critical Infrastructure
Security Information
Naval Nuclear Propulsion
Information
Unclassified Controlled
Nuclear Information –
Defense

#### **INTELLIGENCE:**

Agriculture
Foreign Intelligence
Surveillance Act
Foreign Intelligence
Surveillance Act Business
Records
General Intelligence
Geodetic Product
Information
Intelligence Financial
Records
Internal Data
Operations Security

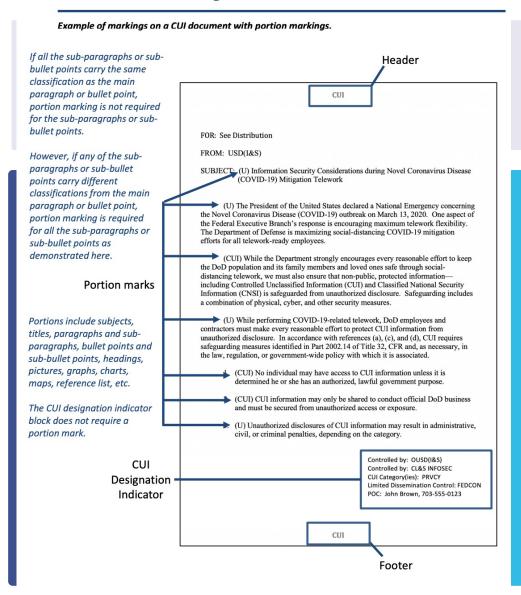
# PROCUREMENT & ACQUISITION:

General Procurement and Acquisition Small Business Research and Technology Source Selection



#### Markings are for training purposes only

#### **CUI Markings for Unclassified Documents**



Reference: DoDI 5200.48, Controlled Unclassified Information (CUI), para. 3.4

#### Markings are for training purposes only

#### **CUI Markings for Unclassified Documents**

#### Minimum markings

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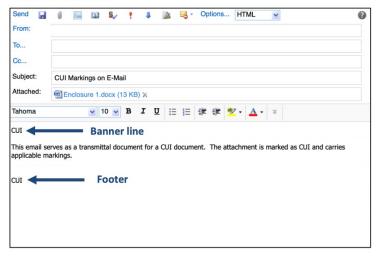
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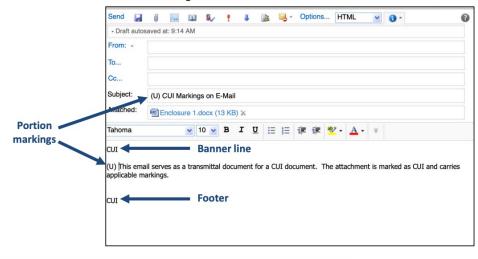
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The CUI designation indicator block does not need to be placed on an unclassified e-mail that serves as a transmittal document for a CUI document. As an option, the banner and footer lines can read:

CUI (with attachment)

#### Portion markings included

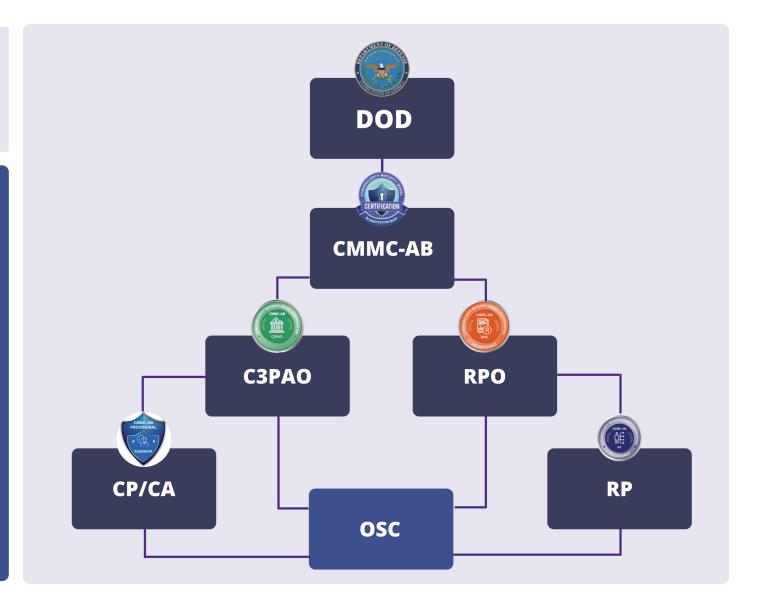


Reference: DoDI 5200.48, Controlled Unclassified Information (CUI), para. 3.4

# Who are the players?

# As an Organization Seeking Certification (OSC), you'll directly interact with:

- Registered Practitioners
- Registered Provider Organization
- Third-party Assessment Organization
- Certified CMMC Professionals





How many of you understand the **scope** of the CMMC?





### **CMMC Compliance Levels**

SOURCE: OFFICE OF THE UNDERSECRETARY OF DEFENSE, UNCLASSIFIED

LEVEL 2

**INTERMEDIATE** CYBER HYGIENE

**72 PRACTICES** 

CUI

LEVEL 3

**GOOD** CYBER HYGIENE

**130 PRACTICES** 

CUI

LEVEL 4

**PROACTIVE** CYBER HYGIENE

**156 PRACTICES** 

CTI

LEVEL 5

ADVANCED/ **PROGRESSIVE** CYBER HYGIENE

**171** PRACTICES

CTI

LEVEL 1

**BASIC** CYBER HYGIENE 17 PRACTICES FCI



### **CMMC Model Structure**

SOURCE: CYBERSECURITY MATURITY MODEL CERTIFICATION ACCREDITATION BODY

## LEVEL 2

**DOCUMENTED** 

Establish and document practices to guide implementation of CMMC efforts

### LEVEL 3

MANAGED

Establish, maintain, and resource a plan demonstrating the management of activities for practice implementation

### LEVEL 4

**REVIEWED** 

Review and measure practices for effectiveness

### LEVEL 5

**OPTIMIZING** 

Standardize and optimize process implementation across the organization



**PERFORMED**No processes, no documentation



### **10 Steps** to CMMC

SOURCE: CYBERSECURITY MATURITY MODEL CERTIFICATION ACCREDITATION BODY

NIST 800-171: This is where NIST fits into CMMC, it's the true first step - the baseline assessment of your security posture.

1

**Understand** CMMC requirements

2

Identify your scope.
Enterprise, Organization Unit or Program Enclave

3

**Identify** the desired Maturity
Level

4

**Baseline** organization against the practices & processes for the CMMC level 5

**Close** any identified gaps to satisfy POA&M and finalize SSP

6

**Find** a C3PAO on the CMMC-AB Marketplace

7

**Conduct** the Assessment with C3PAO's Certified Assessment team

8

**Allowance** of up to 90 days to resolve findings (if any)

9

**CMMC-AB** reviews submitted assessment

10

**Upon** approval: 3-year certification is issued



# **Projected** CMMC Roll-out

TOTAL NUMBER OF CONTRACTS WITH CMMC REQUIREMENT, PER FISCAL YEAR

SOURCE: OFFICE OF THE UNDERSECRETARY OF DEFENSE, UNCLASSIFIED





What **CMMC requirements** do you see showing up in Federal procurements?





### **Summary**

**WE'VE COVERED A LOT** 

Do **not** wait.

It's **going** to happen It's not a question as to **IF** It's a question as to **WHEN** 

### **Protect yourself, ask RPOs:**

Are they registered with the CMMC-AB? (Check the CMMC-AB Marketplace) Do they have Registered Practitioners (RPs) on their staff?

**Please** talk to multiple RPOs and compare. Make sure your advisor **understands the CMMC process.** 



### **OPEN DISCUSSION**

How many of you have been approached by somebody **trying to sell you CMMC services** – how do you know how to pick the right service provider?



Anyone willing to share? So, others can learn.



### Resources

FOR MORE INFO, CLICK THE LINK

CMMC Insight/Articles

CMMC Marketplace - search RPOs for reputable consult

CMMC Model & Assessment Guides

Office of the Under Secretary of Defense for Acquisition & Sustainment Cybersecurity Maturity Model Certification - CMMC FAQs

<u>The U.S. National Archives and Records Administration - Controlled Unclassified Information</u>

<u>DoD initiated program called "Project Spectrum" to address Cybersecurity</u> threats

**CUI Quick Reference Guide** 

**CUI Info Sheet** 

**CUI Handbook** 

<u>CUI</u>

Maryland MEP

<u>Funding and assistance for Defense Contractors to comply with the DFARS and NIST 800-171 Standards for cybersecurity</u>

<u>Manufacturing Extension Partnership – SMBs that manufacture or procure parts and supplies</u>

Microsoft Product Placement for CMMC – understand what MS offerings (e.g., O365, Azure, GCC) cover what aspects of CMMC

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