



Acquisition Hour: CMMC Update – November 2024

November 22 | 1:00 – 2:00 pm

Presented by:
Matt Frost, Wisconsin Procurement Institute



Webinar Etiquette

PLEASE

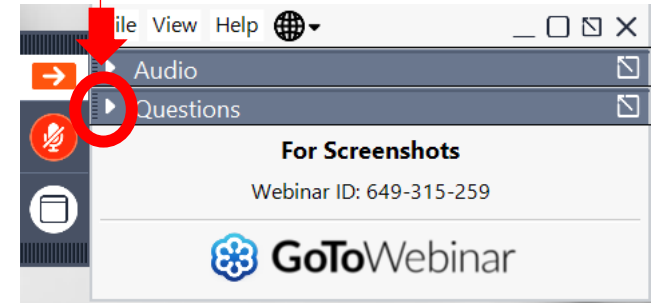
- Log into the GoToWebinar session with the name that you registered with online
- Place your phone or computer on MUTE
- Use the QUESTIONS option to ask your question(s).
 - We will share the questions with our guest speaker who will respond to the group

THANK YOU!



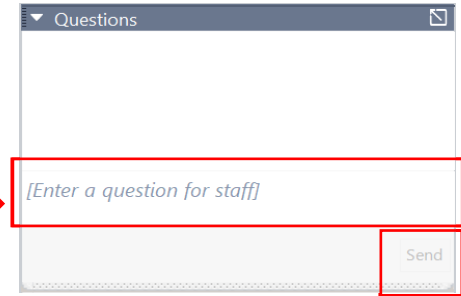
OPENING THE QUESTIONS BOX

Click here to access
within the Control Panel



USING THE QUESTIONS BOX

Type questions
here at any time
during a
presentation



Click Send when ready to submit a question





Assisting Wisconsin businesses compete in the government marketplace.

WPI is Wisconsin's APEX ACCELERATOR

The APEX Accelerators program, under management of the Department of Defense (DOD) Office of Small Business Programs (OSBP), plays a critical role in the Department's efforts to identify and engage with a wide range of businesses entering and participating in the defense supply-chain. The program provides the education and training that all businesses need to participate to become capable of participating in DOD and other government contracts.

WPI provides services to all of Wisconsin's 72 counties

- Individual counseling at our offices, client's facility or virtually
- Small group training – webinars and workshops
- Conferences including one on one buyer meetings – Marketplace, The Contracting Academy, Small Business Academy, Wisconsin Federal Contractor Forum, Acquisition Hour, Cyber Fridays, DOD Roadmap series, Government Opportunities Business Conference, End of Year Federal Contractor Update, Annual DOD Contract Management Update, Evening FAR sessions and more.....

www.wispro.org

WPI OFFICE LOCATIONS

■ MILWAUKEE

- *Technology Innovation Center*

■ MADISON

- *FEED Kitchens*
- *Dane County Latino Chamber of Commerce*
- *Wisconsin Manufacturing Extension Partnership (WMEP)*
- *Madison Area Technical College (MATC)*

■ CAMP DOUGLAS

- *Juneau County Economic Development Corporation (JCEDC)*

■ EAU CLAIRE

- *Western Dairyland*

■ FOND DU LAC

- *Envision Greater Fond du Lac*

■ GREEN BAY

- *NWTC Startup Hub*

■ LACROSSE

- *Veterans in Professions*

■ MANITOWOC

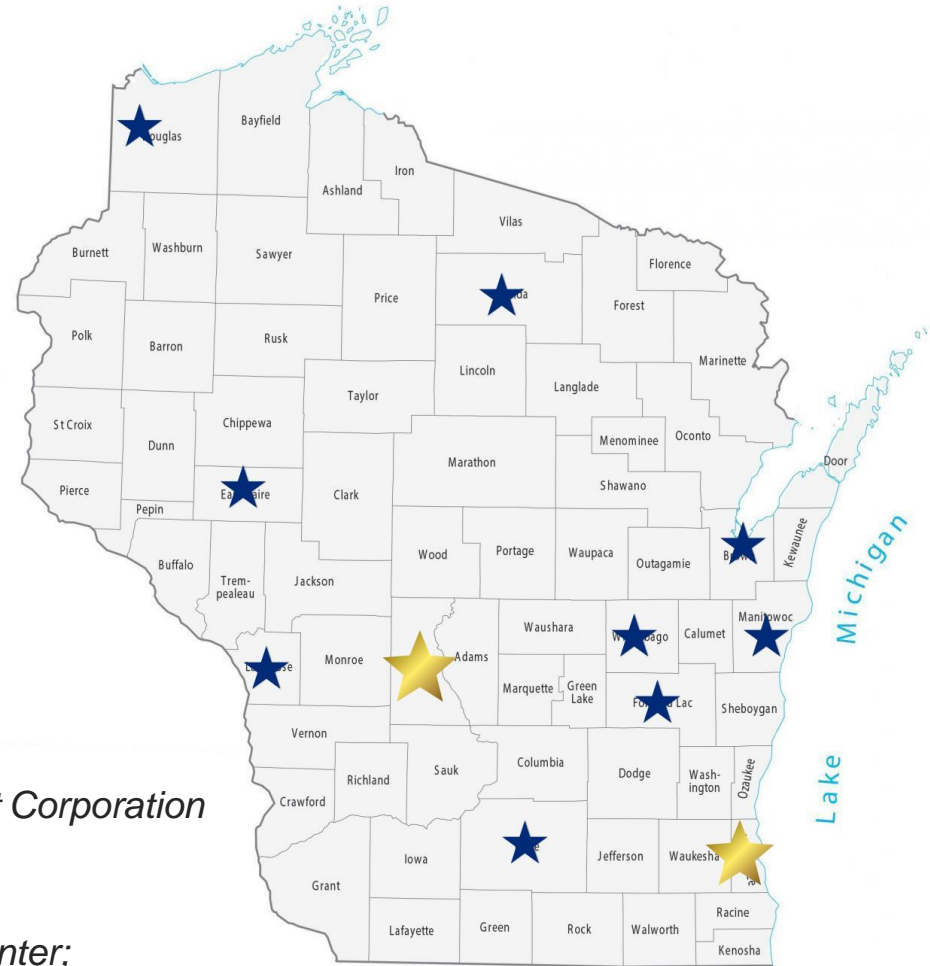
- *Progress Lakeshore*

■ OSHKOSH

- *Greater Oshkosh Economic Development Corporation*

■ SUPERIOR

- *Small Business Dev Center; UW Superior*



APEX ACCELERATORS

WISCONSIN APEX ACCELERATOR

UPCOMING EVENTS

- APR 1:00 pm - 2:00 pm
16 Acquisition Hour: SAM.gov – Tools for Contracting
- APR 9:00 am - 12:00 pm
24 Government Certification Workshop – State Certifications – Madison, WI
- APR 12:00 pm - 1:00 pm
24 Acquisition Hour: Overview of the Contractor Performance Assessment Reporting System (CPARS)
- APR April 30, 2024 - May 3, 2024
30 Lieutenant Governor's Small Business Academy
- MAY 8:00 am - 4:00 pm
16 10th Annual DoD Contract Management Update — Appleton, WI

CMMC Update



November 22nd, 2024

NIST **National Institute of Standards and Technology**

The Contractor shall implement NIST SP 800-171, as soon as practical, but not later than December 31, 2017.

The Contractor shall notify the prime Contractor (or next higher-tier subcontractor) when submitting a request to vary from a NIST SP 800-171 security requirement.

When the Contractor discovers a cyber incident that affects a covered contractor information system or the covered defense information residing therein, or that affects the contractor's ability to perform the requirements of the contract... the Contractor shall rapidly report cyber incidents to DoD.

DFARS 252.204-7021

The Cybersecurity Maturity Model Certification (CMMC) is a framework that measures a contractor's cybersecurity maturity to include the implementation of cybersecurity practices...



(b) Requirements. The Contractor shall have a current (i.e. not older than 3 years) CMMC certificate at the CMMC level required by this contract and maintain the CMMC certificate at the required level for the duration of the contract.



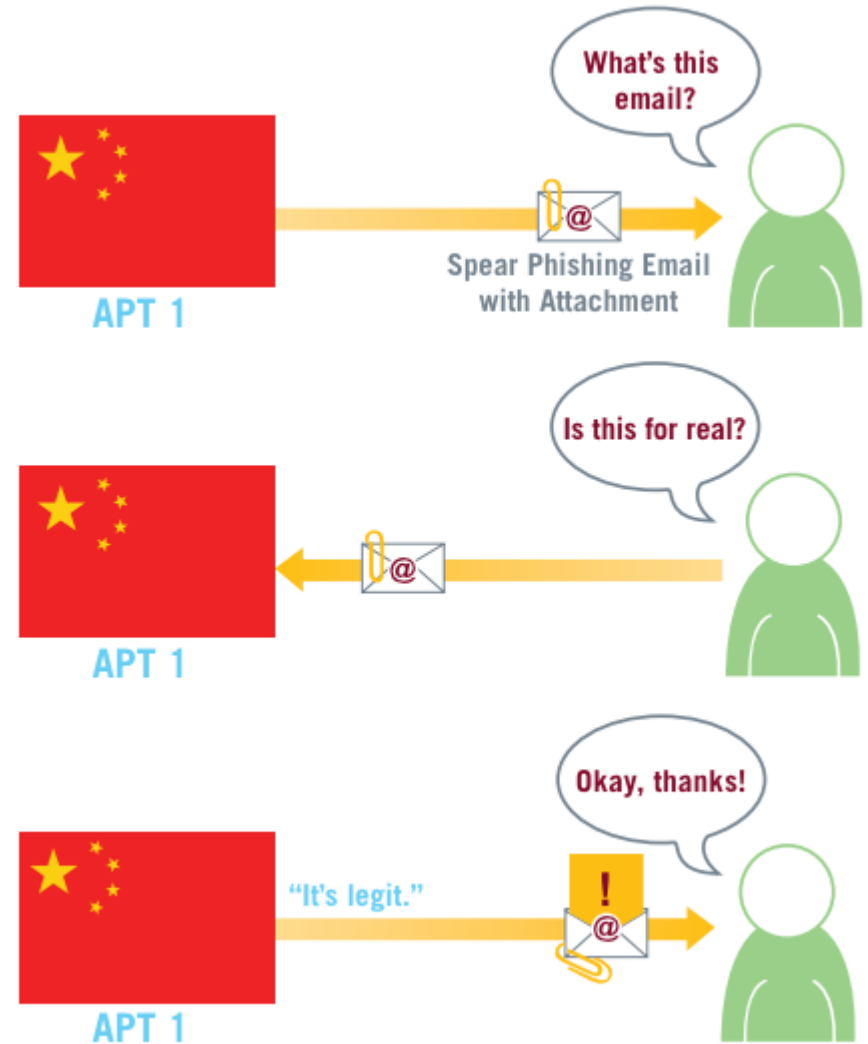
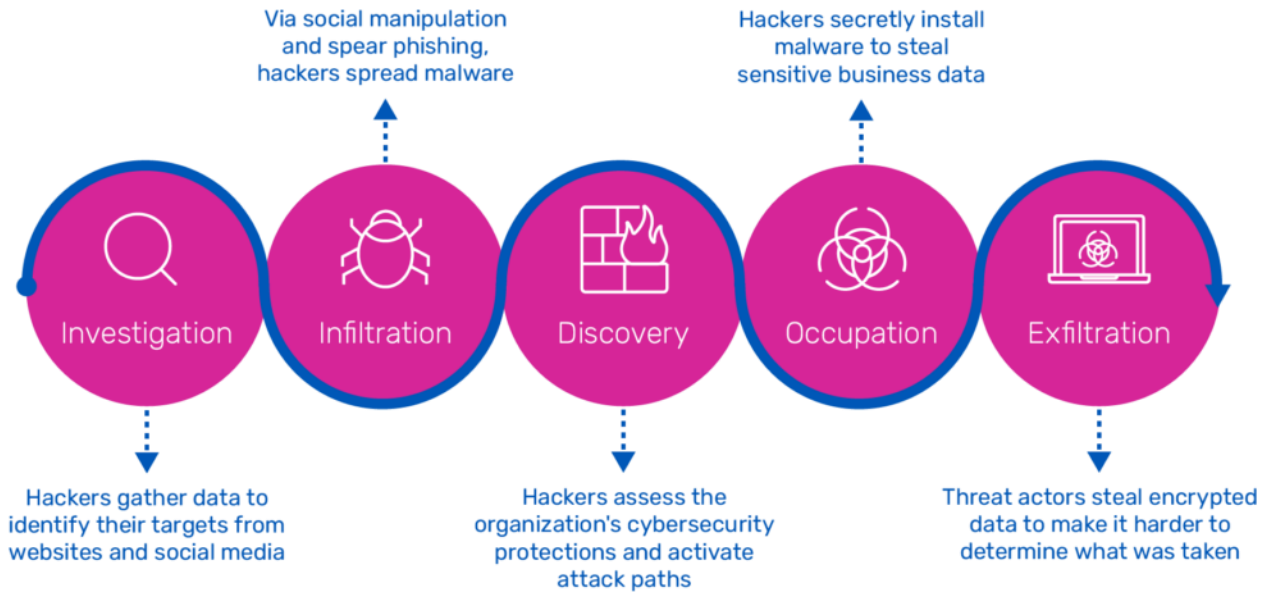
Confirmed in 2013, the theft of data from the F-35 Lightning II represented one of the most significant data breaches in world history.

Breach involved a series of units, funded and operated by the PLA, identified as Advanced Persistent Threats (APT).

Targets were companies within Lockheed Martin's supply chain.

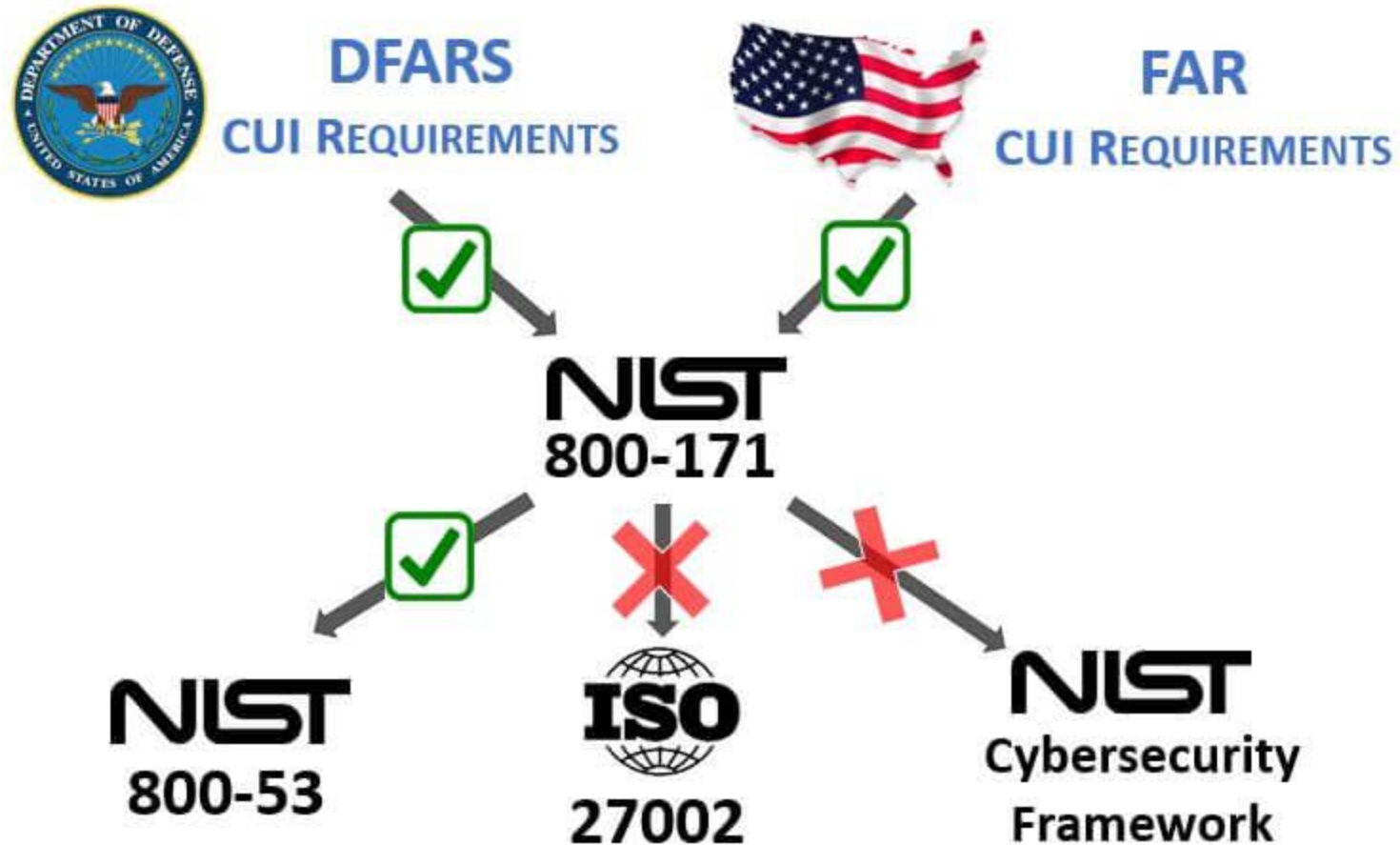
Data was primarily unclassified, but controlled, information.

What is an Advanced Persistent Threat?





FAR 52.204-21, DFARS, NIST, and Beyond



An Evolution – Not a Departure



FEDERAL REGISTER

The Daily Journal of the United States Government



DOCUMENT HEADINGS

Department of Defense
Office of the Secretary

32 CFR Part 170

[Docket ID: DoD-2023-OS-0063]

RIN 0790-AL49

1

CMMC Program

For verifying contractors have implemented security measures for FCI and CUI.

2

Tiered Implementation

Year 1: 135 Assessments

Year 2: 673 Assessments

Year 3: 2,252 Assessments

Year 4: 4,452 Assessments

3

Final Requirements

Level 1

Level 2 (Self)

Level 2 (C3PAO)

Level 3 (DIBCAC)

CMMC Level Selection

An OSA will select the CMMC level it desires to attain. Once the CMMC Program is implemented, a DoD solicitation will specify the minimum CMMC Status required to be eligible for award. One of four CMMC Statuses will be specified:

OSA – Organization Seeking Assessment

CMMC Levels and Requirements

TABLE 1—CMMC LEVEL AND ASSESSMENT REQUIREMENTS

CMMC status	Source & number of security reqts.	Assessment reqts.	Plan of action & milestones (POA&M) reqts.	Affirmation reqts.
Level 1 (Self) ...	<ul style="list-style-type: none"> 15 required by FAR clause 52.204–21. 	<ul style="list-style-type: none"> Conducted by Organization Seeking Assessment (OSA) annually. Results entered into SPRS (or its successor capability). 	<ul style="list-style-type: none"> Not permitted 	<ul style="list-style-type: none"> After each assessment. Entered into SPRS.
Level 2 (Self) ...	<ul style="list-style-type: none"> 110 NIST SP 800–171 R2 required by DFARS clause 252.204–7012. 	<ul style="list-style-type: none"> Conducted by OSA every 3 years Results entered into SPRS (or its successor capability). CMMC Status will be valid for three years from the CMMC Status Date as defined in § 170.4. 	<ul style="list-style-type: none"> Permitted as defined in § 170.21(a)(2) and must be closed out within 180 days. Final CMMC Status will be valid for three years from the Conditional CMMC Status Date. 	<ul style="list-style-type: none"> After each assessment and annually thereafter. Assessment will lapse upon failure to annually affirm. Entered into SPRS (or its successor capability).
Level 2 (C3PAO).	<ul style="list-style-type: none"> 110 NIST SP 800–171 R2 required by DFARS clause 252.204–7012. 	<ul style="list-style-type: none"> Conducted by C3PAO every 3 years Results entered into CMMC Enterprise Mission Assurance Support Service (eMASS) (or its successor capability). CMMC Status will be valid for three years from the CMMC Status Date as defined in § 170.4. 	<ul style="list-style-type: none"> Permitted as defined in § 170.21(a)(2) and must be closed out within 180 days. Final CMMC Status will be valid for three years from the Conditional CMMC Status Date. 	<ul style="list-style-type: none"> After each assessment and annually thereafter. Assessment will lapse upon failure to annually affirm. Entered into SPRS (or its successor capability).
Level 3 (DIBCAC).	<ul style="list-style-type: none"> 110 NIST SP 800–171 R2 required by DFARS clause 252.204–7012. 24 selected from NIST SP 800–172 Feb2021, as detailed in table 1 to § 170.14(c)(4). 	<ul style="list-style-type: none"> Pre-requisite CMMC Status of Level 2 (C3PAO) for the same CMMC Assessment Scope, for each Level 3 certification assessment. Conducted by Defense Contract Management Agency (DCMA) Defense Industrial Base Cybersecurity Assessment Center (DIBCAC) every 3 years. Results entered into CMMC eMASS (or its successor capability). CMMC Status will be valid for three years from the CMMC Status Date as defined in § 170.4. 	<ul style="list-style-type: none"> Permitted as defined in § 170.21(a)(3) and must be closed out within 180 days. Final CMMC Status will be valid for three years from the Conditional CMMC Status Date. 	<ul style="list-style-type: none"> After each assessment and annually thereafter. Assessment will lapse upon failure to annually affirm. Level 2 (C3PAO) affirmation must also continue to be completed annually. Entered into SPRS (or its successor capability).

Supplier Performance Risk System

Level 1

Level 2 (Self)

Level 2 (C3PAO)

Level 3



What is FCI?

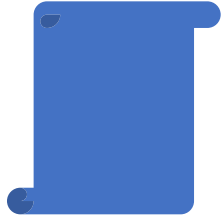
Federal contract information (from 48 CFR 52.204-21) means information, not intended for public release, that is **provided by or generated for the Government under a contract to develop or deliver a product or service to the Government**, but not including information provided by the Government to the public (such as on public websites) or simple transactional information, such as necessary to process payments.

The Contractor **shall** apply the following basic safeguarding requirements and procedures to protect covered contractor information systems.

Covered contractor information system means an information system that is owned or operated by a contractor that processes, stores, or transmits Federal contract information.

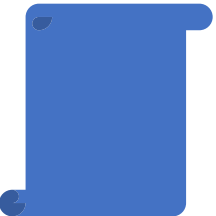
Federal contract information means information, not intended for public release, that is provided by or generated for the Government under a contract to develop or deliver a product or service to the Government, but not including information provided by the Government to the public.

Key Points



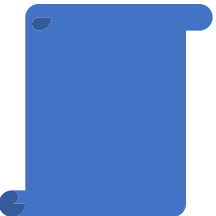
15 Controls

That cover “an inch deep but mile wide” through the information protection landscape.



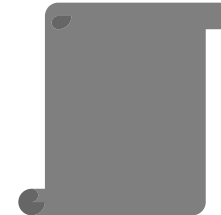
Are Echoed within NIST SP 800-171 Requirements

Complying with FAR 52.204-21 will always contribute to an attempt to comply with DFARS 252.204-7012



Considered Introductory

These controls represent minimal efforts, expense, and expertise to apply. “Common Sense” security.



They Are Maturing

CMMC Level 1 requirements will introduce a more formal approach to compliance with these controls.

Supplier Performance Risk System

- Level 1
- Level 2 (Self)**
- Level 2 (C3PAO)
- Level 3





CONTROLLED
UNCLASSIFIED
INFORMATION

1

Definition

Controlled Unclassified Information (CUI) is information that requires safeguarding or dissemination controls.

2

Categories

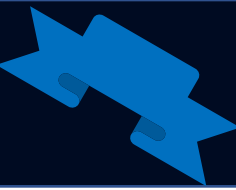
[Archives.gov/cui/registry/category-list](https://www.archives.gov/cui/registry/category-list)

3

Executive Agent

The National Archives and Records Administration.

Level 2 (Self) is a **self-assessment** to secure CUI processed, stored, or transmitted in the course of fulfilling the contract. The OSA must comply with the 110 Level 2 security requirements derived from **NIST SP 800-171 R2**.



NIST

National Institute of Standards and Technology

The Contractor shall implement NIST SP 800-171, as soon as practical, but not later than December 31, 2017.

The Contractor shall notify the prime Contractor (or next higher-tier subcontractor) when submitting a request to vary from a NIST SP 800-171 security requirement.

When the Contractor discovers a cyber incident that affects a covered contractor information system or the covered defense information residing therein, or that affects the contractor's ability to perform the requirements of the contract... the Contractor shall rapidly report cyber incidents to DoD.

Who Performs the Assessment?



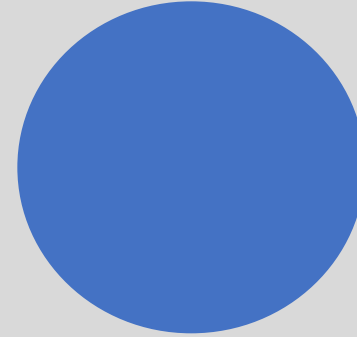
System Owner

- Ensures Cooperation
- Identifying Key Individuals
- Identifying Delegated Responsibilities
- Identifying Business Priorities



IT Manager

- Technical Expertise
- Defines Implementation
- Identifies Technical Shortfalls
- Explains Cyber Risks



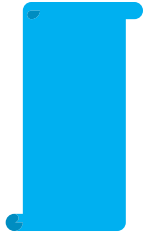
Security Officer

- Determines whether Control is adequately met
- Defines Control Requirements
- Identifies Procedural Shortfalls



Operations Manager

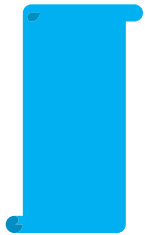
- Defines work flow.
- Highlights use of applications.
- Explains operational needs and challenges



ASSESSMENT OBJECTIVES

Includes a determination statement related to the CUI security requirement that is the subject of the assessment.

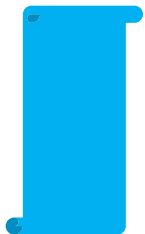
Ex. 3.1.3 Control the flow of CUI in accordance with approved authorizations



ASSESSMENT METHODS

Define the nature and the extent of the assessor's actions. They include **examine**, **interview**, and **test**.

Ex. 3.1.3 Examine architectural solutions to control flow of system data.

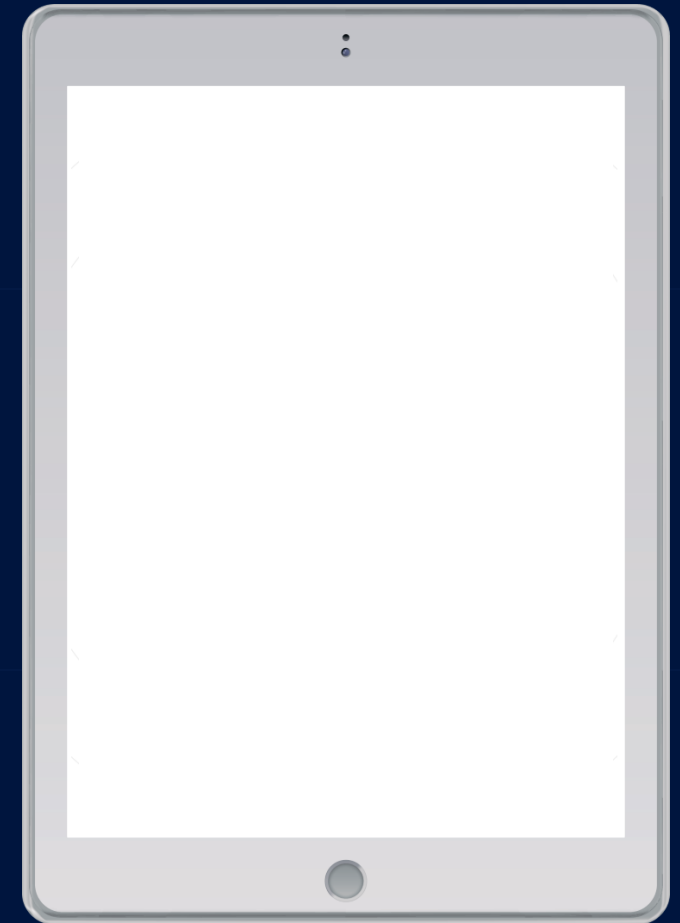


ASSESSMENT OBJECTS

Identify specific items being assessed and can include specifications, mechanisms, activities, and individuals.

Ex. 3.1.3 Network Diagrams, Business Process Flow Diagrams

Assessment Process



Assess each of the NIST SP 800-171 controls using the NIST SP 800-171A to ensure all audit points are covered.

NIST Handbook 162

NIST MEP Cybersecurity Self-Assessment Handbook For Assessing NIST SP 800-171 Security Requirements in Response to DFARS Cybersecurity Requirements

1

NIST Handbook 162

NIST MEP Cybersecurity Self-Assessment Handbook for Assessing NIST SP 800-171 Security Requirements in Response to DFARS Cybersecurity Requirements

2

NIST SP 800-171A

NIST Special Publication 800-171A Assessing Security Requirements for Controlled Unclassified Information

3

DoD Memo

DoD Memo
DoD Guidance for Reviewing System Security Plans and the NIST SP 800-171 Security Requirements

Supplier Performance Risk System

- Level 1
- Level 2 (Self)
- Level 2 (C3PAO)**
- Level 3



Level 2 (C3PAO) differs from Level 2 (Self) in the method of verifying compliance. **OSAs must hire a C3PAO** to conduct an assessment of the OSA's compliance with the 110 security requirements of **NIST SP 800-171 R2**. OSAs can shop for C3PAOs on the CMMC Accreditation Body (AB) Marketplace.



ABOUT US ▼

ACCREDITATION ▼

RESOURCES ▼

CMMC ECOSYSTEM ▼

NEWS & EVENTS ▼

MARKETPLACE

CAICO

www.cyberab.org

CMMC Assessment

Pre-Assessment:

- Hire a C3PAO
- Provide SSP and Supporting Documentation
- Schedule Assessment



Assessment:

Interview
Examine
Test

Post Assessment:

Submits report to Cyber-AB.
CMMC-AB performs quality check.
CMMC-AB issues report that confirms certification..
May allow limited use of POAM.

If the overall scoring of the Assessment after placing eligible items on the Limited Practice Deficiency Correction program results in **less than 80%** (88/110 practices “MET”), the OSC will receive a final finding of “Not Achieved” for CMMC Level 2 Certification. The OSC will be required to correct deficiencies and reapply for CMMC L2 Certification.

If the overall scoring of the Assessment after placing items on the Limited Practice Deficiency Correction program results in **greater than or equal to 80%** (88/110 practices “MET”), the OSC will be required to correct deficiencies.

The CMMC Final Rule was published on **October 15, 2024**. It will become effective on **Dec 16, 2024**, and enter contracts in **mid-2025** (Q2, March-April anticipated).

CONGRESS.GOV

H.J.Res.221 - Providing for congressional disapproval under chapter 8 of title 5, United States Code, of the rule submitted by the Department of Defense relating to "Cybersecurity Maturity Model Certification (CMMC) Program"

Sponsor: [Rep. Palmer, Gary J. \[R-AL-6\]](#) (Introduced 11/15/2024)

Committees: House - Armed Services

Latest Action: House - 11/15/2024 Referred to the House Committee on Armed Services.

Tracker: 

Introduced

Passed House

Passed Senate

To President

Chances it Passes?

Prognosis

8% chance of being enacted or passed ([details](#))

Too close to fail?

Govtrack.us

OPINION & ANALYSIS

CONGRESS, NETWORKS & DIGITAL WARFARE, PENTAGON

DoD and Congress should walk away from CMMC

In this op-ed, William Greenwalt of the American Enterprise Institute lays out reasons why the DoD and Congress should move away from CMMC 2.0.

Continuation of Cybersecurity Regulations

In his previous administration, former President Trump accelerated regulations aimed at protecting information from cyber criminals and foreign adversaries. The centerpiece of those regulations, the Cybersecurity Maturity Model Certification (CMMC), will probably continue in its current form. The CMMC began under former President Trump and continued under President Joe Biden and is **about to launch**. In his agenda, former President Trump noted that: "Republicans will use all tools of National Power to protect our Nation's Critical Infrastructure and Industrial Base from malicious cyber actors. This will be a National Priority, and we will both raise the Security Standards for our Critical Systems and Networks and defend them against bad actors."

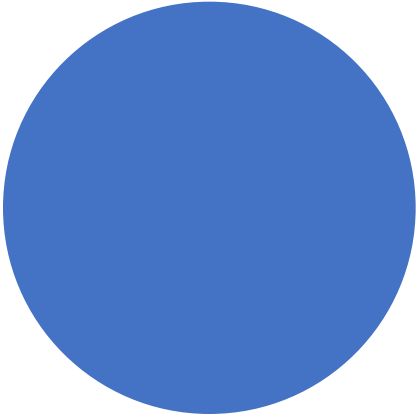
Holland & Knight

System Security Plan

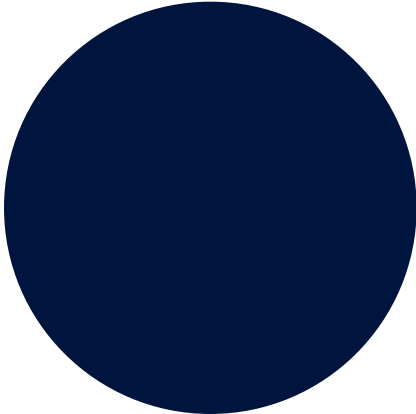
- Living Document
- Plan of Actions and Milestones (POAM)
- Defines Categorization for the Information System
- Provides an Overview of the Security Requirements for the information system
- Describes the Security Controls in place for those requirements

Plan of Action and Milestones

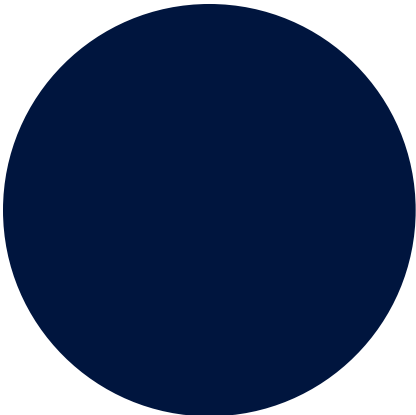
Tasks that need to be accomplished



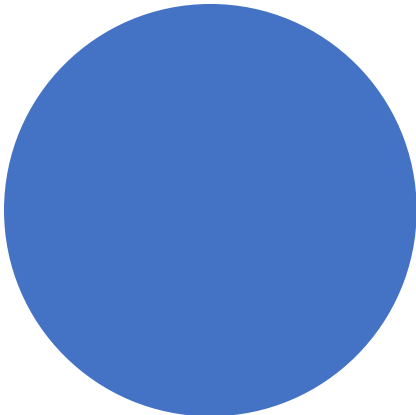
Milestones for meeting the tasks



Resources required to accomplish the elements of the plan

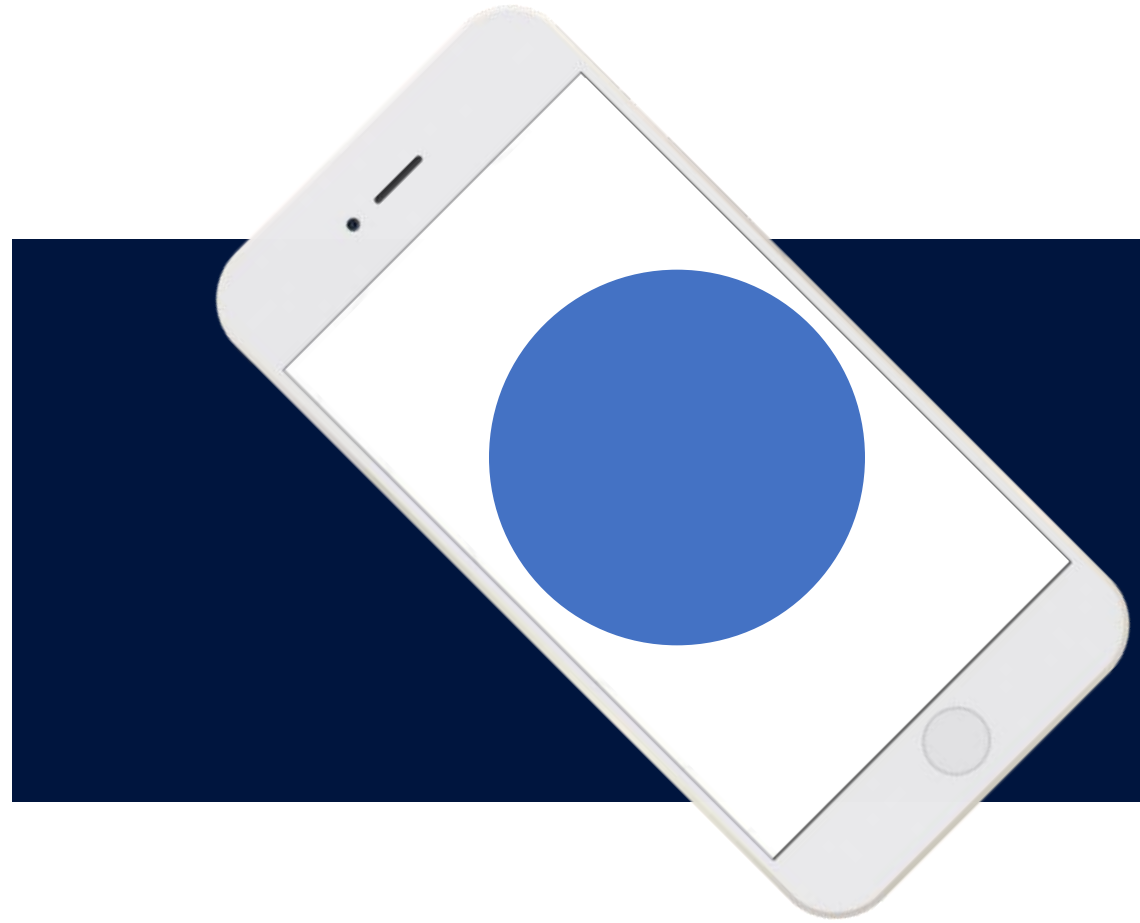


Scheduled completion dates for the milestones



Matthew Frost

mattf@wispro.org

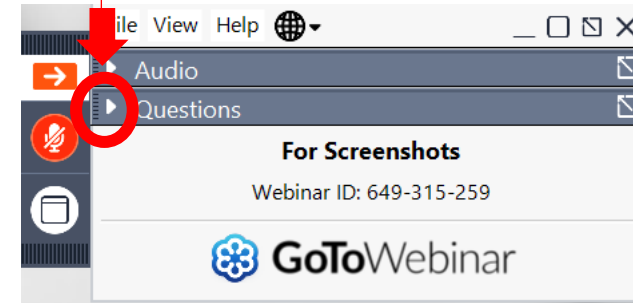


QUESTIONS?



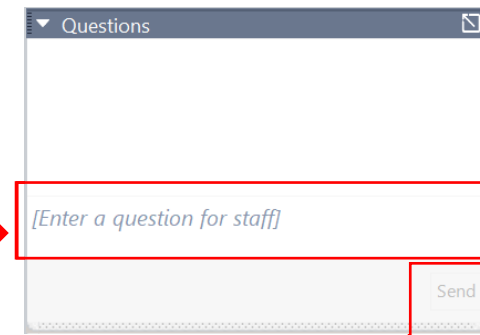
OPENING THE QUESTIONS BOX

Click here to access
within the Control Panel



USING THE QUESTIONS BOX

Type questions
here at any time
during a
presentation



Click Send when ready to submit a question



UPCOMING TRAINING - EVENTS

ACQUISITION HOUR LIVE WEBINAR SERIES

The Acquisition Hour webinar series covers a range of topics from market entry, sales growth, small business certifications, compliance, and more. Attendees receive 1 CPE credit for attending.

- **November 22** – CMMC Update – November 2024
- **December 20** - CMMC Update – December 2024

CYBER FRIDAY LIVE WEBINAR SERIES

Cyber Friday is a series of one-hour webinars focusing on critical topics for DOD contractors and subcontractors in cyber security, data security, and CMMC. Attendees receive 1 CPE credit for attending.

- ~~October 18, 3.1.7 System Maintenance Policy~~
- ~~November 22, 3.1.8 Media Control Policy, Media Destruction Policy and Personnel Security~~
- **January 24, 3.1.11 Risk Assessment Policy, Security Assessment Reports**

- Save the Date -



**The
Contracting
Academy**

*Developing and Growing
Government Contractors*

Dec 10

Virtual | 9:00 am - 4:00 pm

The Contracting Academy (TCA) is an opportunity for businesses to grow their technical knowledge of contracting with Federal Government, State/Local Government, and Government Prime Contractors. The series of workshops will benefit established businesses looking to grow and develop their government sales.

...More information and registrations at wispro.org/events



Dec 11-12

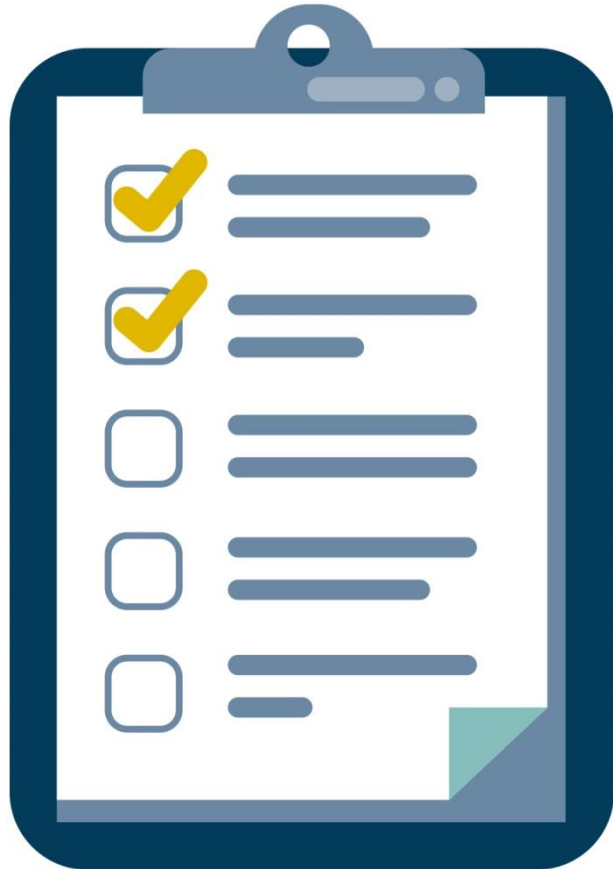
The Baird Center

400 W Wisconsin Ave. Milwaukee WI 53203

Presented by the Wisconsin Economic Development Corporation, MARKETPLACE is the Governor's Annual Conference on Diverse Business Development. This event connects business owners from across Wisconsin seeking to do business with state, federal and local governments as well as the private sector. The conference provides the opportunity for established minority-, woman-, veteran- and LGBTQ+-owned businesses and small businesses to learn from and connect with resource providers, government representatives, corporate buyers and business professionals to lay a foundation for new partnerships and business opportunities.

MarketplaceWisconsin.com

SURVEY



November 22, 2024

CONTINUING PROFESSIONAL EDUCATION



This webinar is eligible for 1 CPE credit.
For a certificate of this credit please contact:

Neelu Patil

neelagangap@wispro.org

PRESENTED BY

Wisconsin Procurement Institute (WPI)

www.wispro.org

Matt Frost

Wisconsin Procurement Institute

mattf@wispro.org | 414-270-3600

10437 Innovation Drive Suite 320
Milwaukee WI 53226