Cyber Friday:

CMMC: Are You Ready for a C3PAO Assessment?

February 28 | 11:00 am - Noon

Presented by:
Matt Frost, Wisconsin Procurement Institute

WPI Wisconsin Procurement Institute
An APEX Accelerator

APEX ACCELERATORS

Wisconsin Procurement Institute

An APEX Accelerator

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 and training to all of Wisconsin's 72 counties

- Individual counseling at our offices, client's facility or virtually
- Small group training – webinars and workshops including Acquisition Hours, Cyber Fridays, Evening FAR sessions, Federal Market Insights and Local Government Sales Opportunities
- Conferences the Governors Marketplace, The Contracting Academy (TCA), WEDCs Small Business Academy, Wisconsin Federal Contractor Forum [DC and in-state], Government Opportunities Business Conference GOBC) with WI military bases, End of Year Federal Contractor Update, Annual DOD Contract Management Update, and more……

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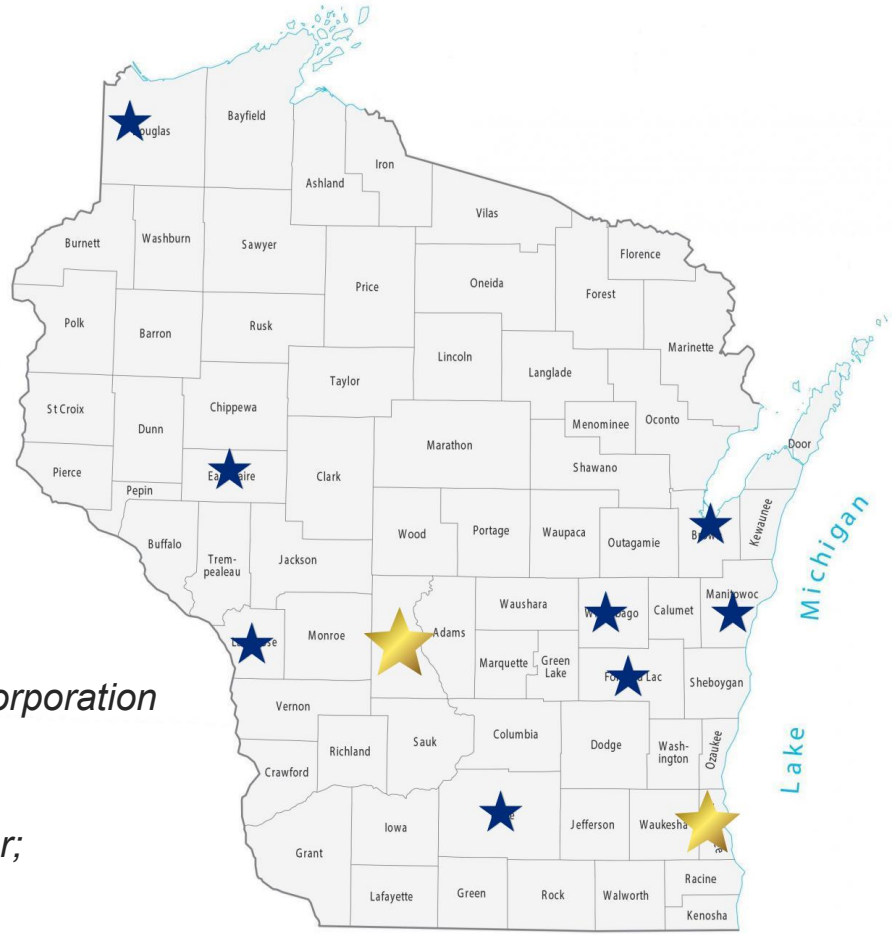
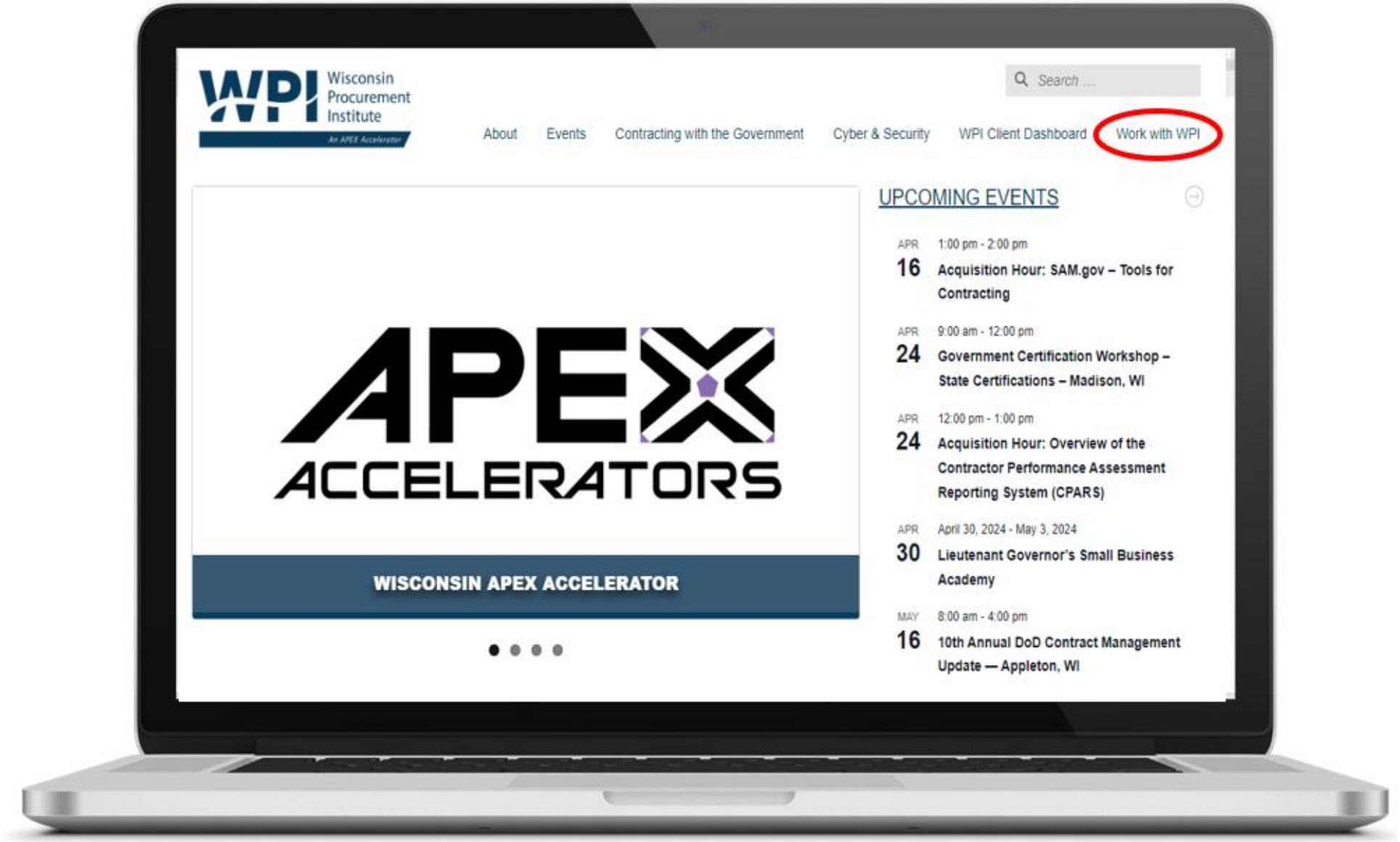
WPI OFFICE LOCATIONS

- **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*

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

Are You Ready for a C3PAO Assessment?

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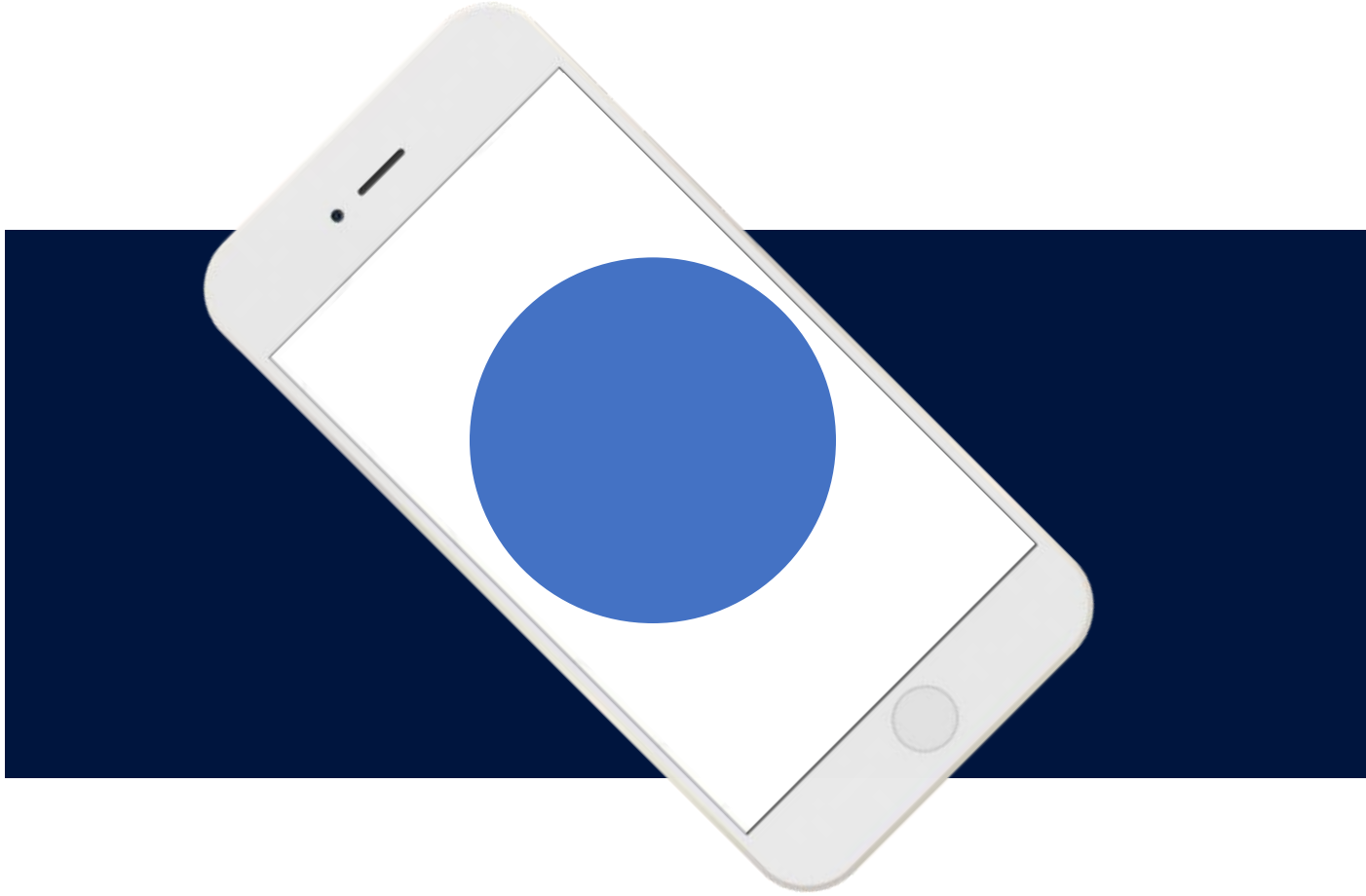

CYBER FRIDAY SESSIONS – February 28th, 2025

DFARS 252.204-7012

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.

14 Families – 110 Controls – 320 Audit Objectives

- Access Control
- Awareness and Training
- Audit and Accountability
- Configuration Management
- Identification & Authentication
- Incident Response
- Maintenance
- Media Protection
- Personnel Security
- Physical Protection
- Risk Assessment
- Security Assessment
- System and Communications Protection
- System and Information Integrity

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 SP 800-30 r1 — Guide for Conducting Risk Assessments
2. NIST SP 800-171A — NIST Special Publication 800-171A Assessing Security Requirements for Controlled Unclassified Information
3. NIST SP 800-115 — Technical Guide to Information Security Testing and Assessment

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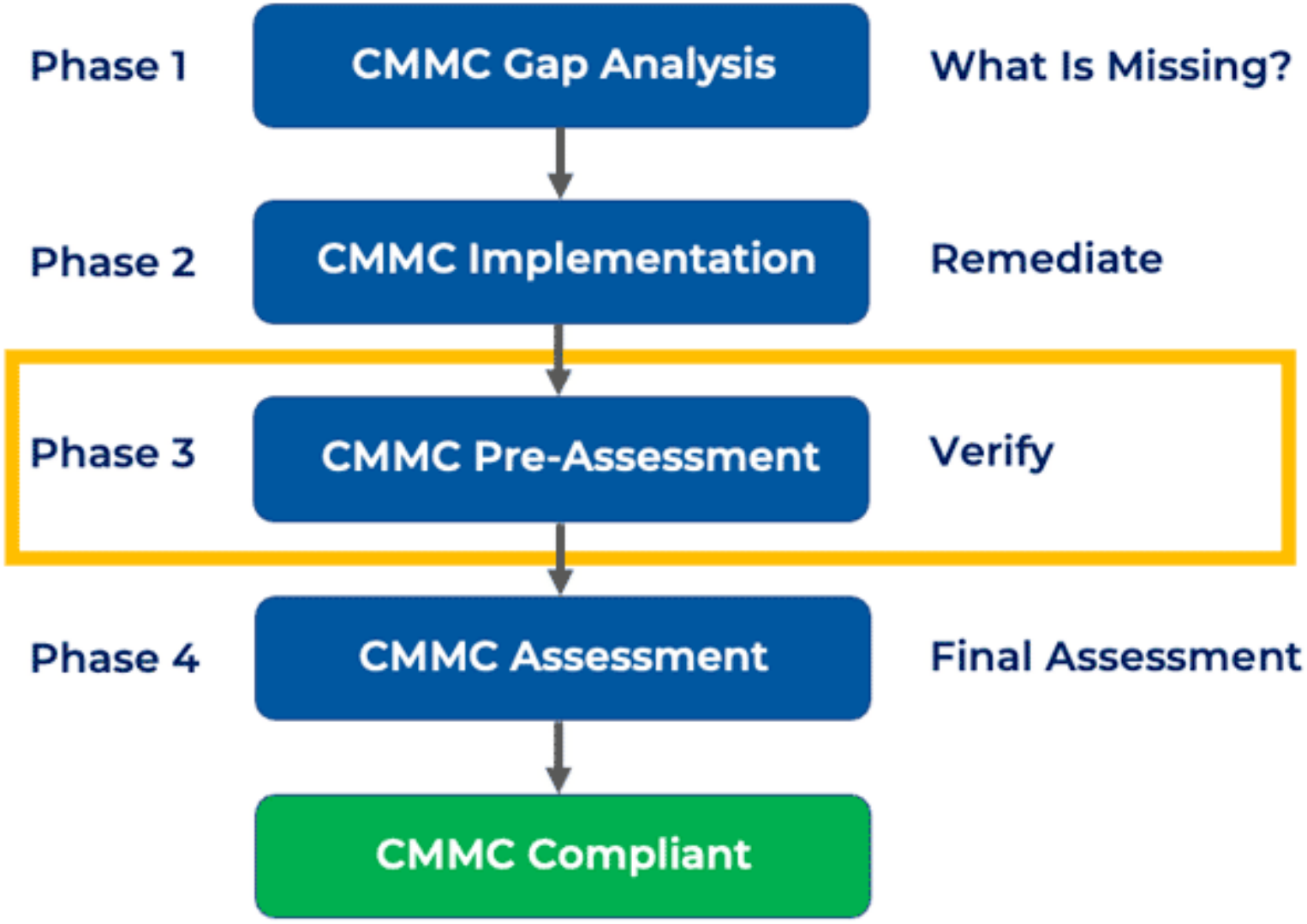
1. CMMC Assessment Guide (Level 2)
2. CMMC Assessment Scope (Level 2)
3. CMMC Model Mapping (Level 2)

CMMC Quick Check

Review for Obvious Deficiencies	Complete	Comments
Has the SSP been reviewed?		
Have data flow diagrams been reviewed?		
Have network diagrams been reviewed?		
Has the last self-assessment report and plan been reviewed?		
Has the device inventory been reviewed?		
Has the software inventory been reviewed?		
Has personnel inventory been reviewed?		
Has each external service provider been inventoried and reviewed?		
Has the FIPS documentation been reviewed?		
Have all “N/A” and “alternate implementation” practices been reviewed?		
Are applicable practices described for each system?		
Have all in-scope external service providers been reviewed to ensure they have audit reports suitable for inheritance, or will attend assessment?		
Are all customer responsibilities met and described for in-scope external service providers?		

CMMC Assessment Timeline



Select C3PAO and Schedule

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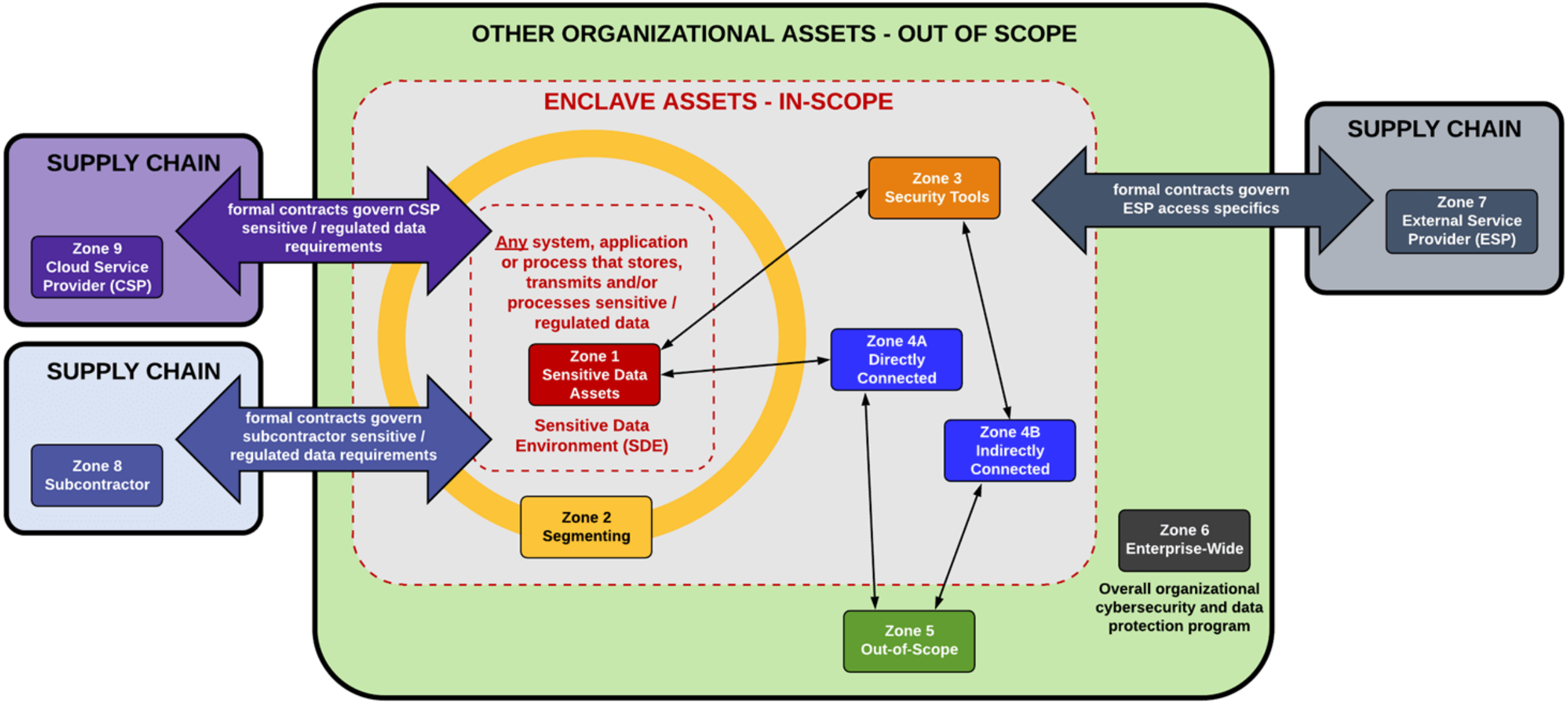
CMMC L2 Assessment Phases

1. Plan and Prepare the Assessment
2. Conduct the Assessment
3. Report Assessment Results
4. Close-Out POA&Ms and Assessment

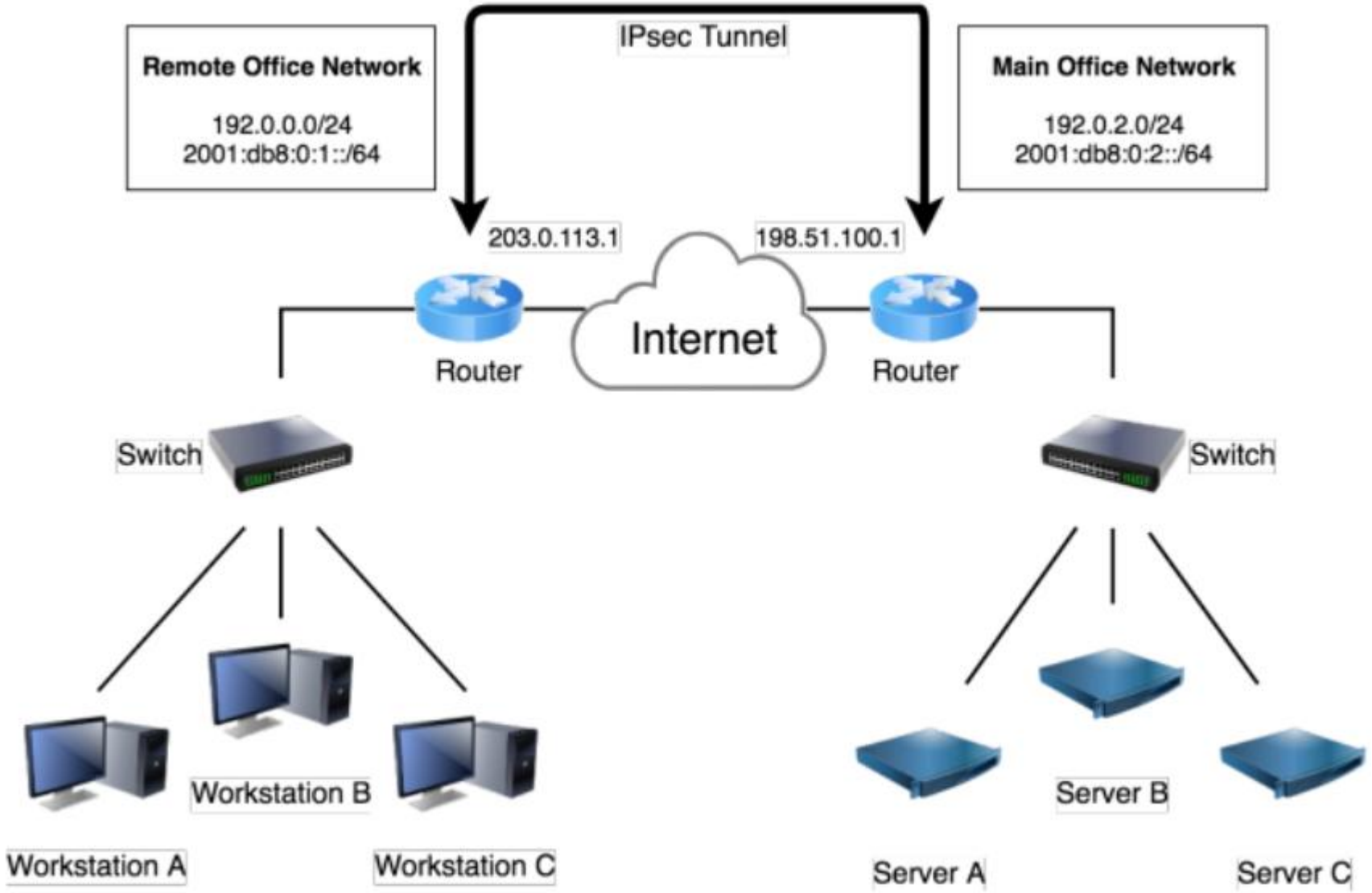
1. Pre-Assessment

1. What is the CUI you are handling and storing?
2. CUI Scoping Diagram
   Asset Inventory
3. System Security Plan

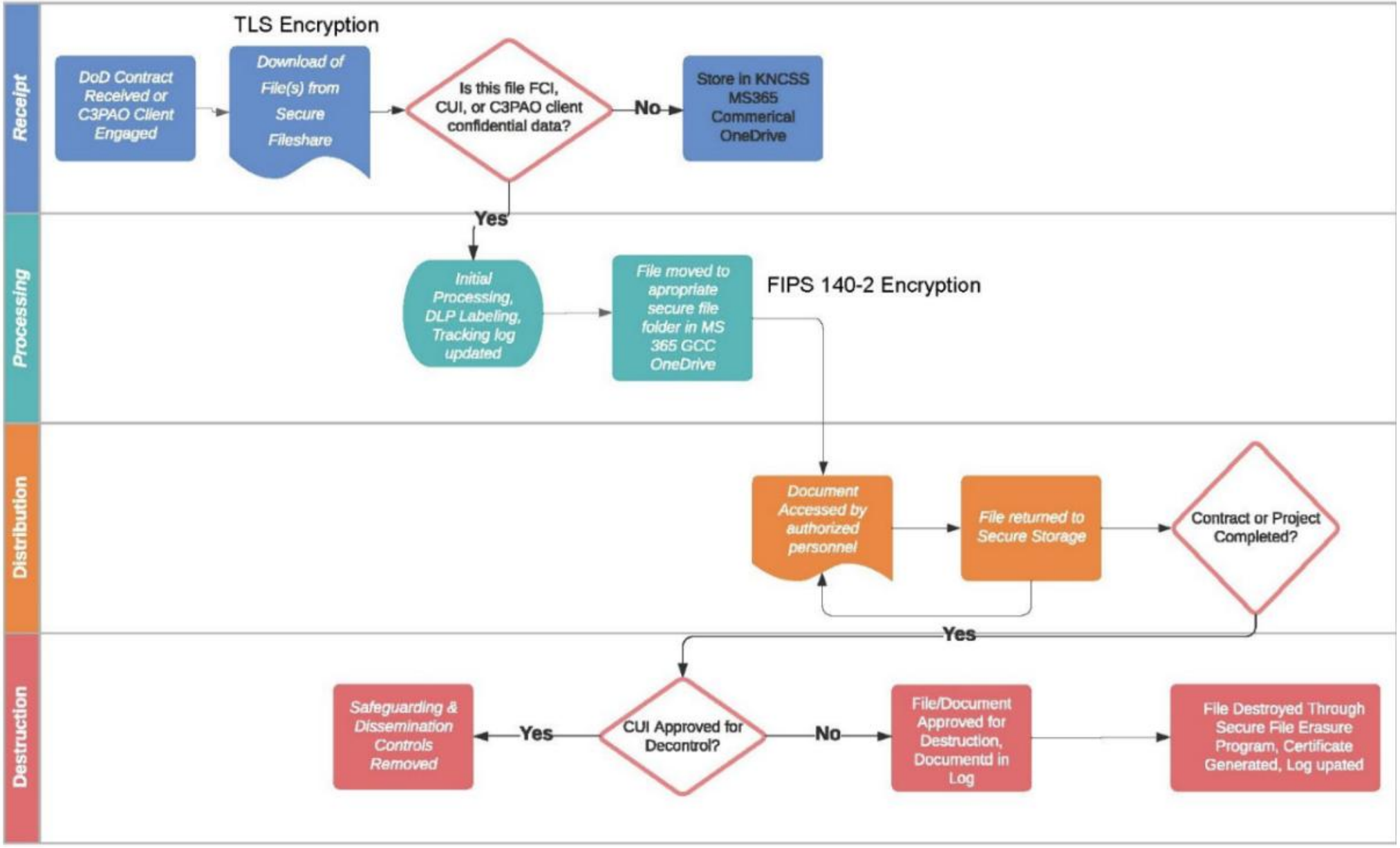
Define Scope of Assessment



Network Diagram



CUI Data/Process Flow



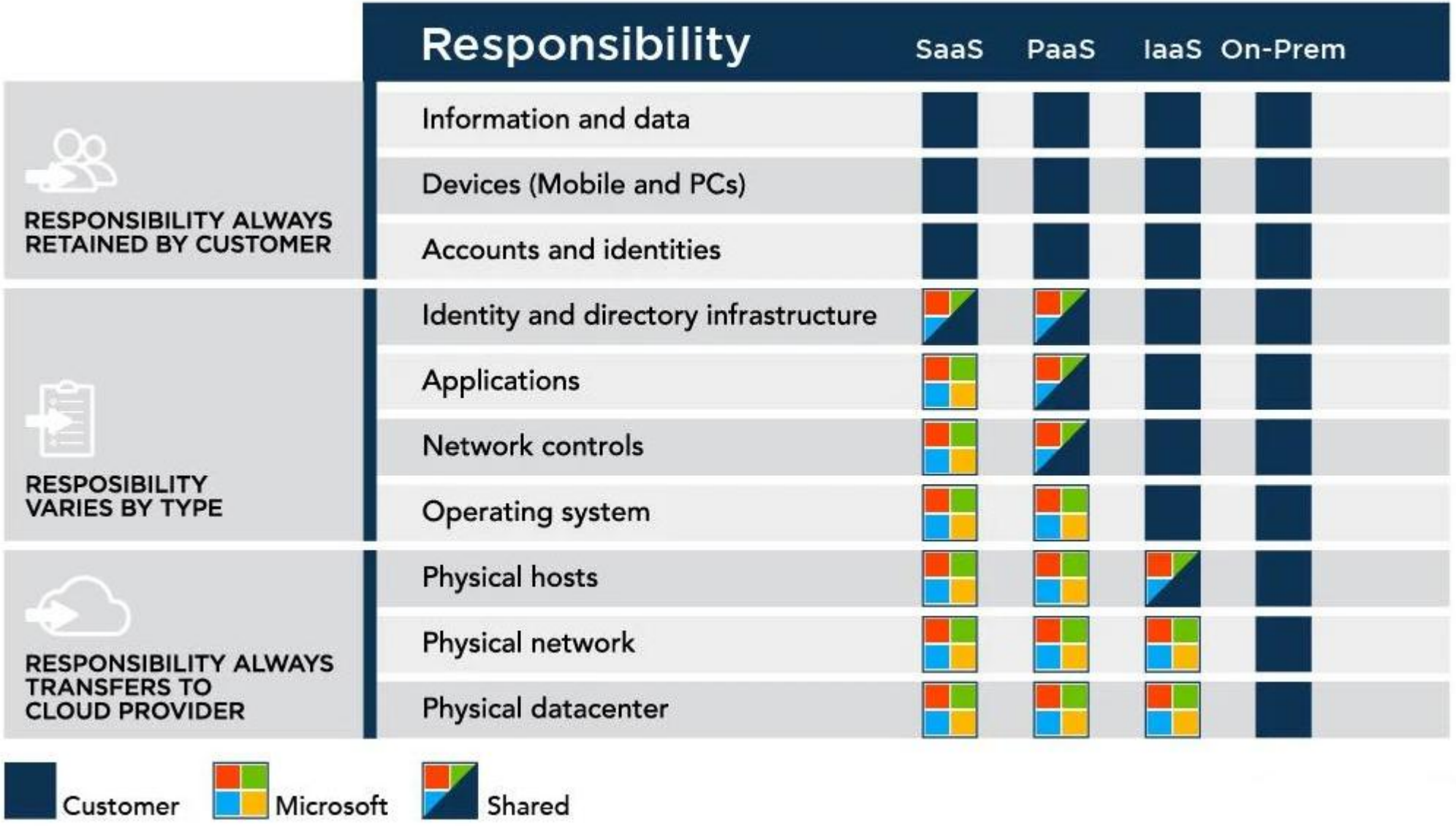
1. Assessment

1. Schedule the Assessment

2. Receive Assessment Plan
   Typically, 5 Days
   End of Day Hotwash of Day's Findings

3. Will Likely Have OnSite Component

Cloud Service Provider and Managed Service Provider



Provide Previous Assessments

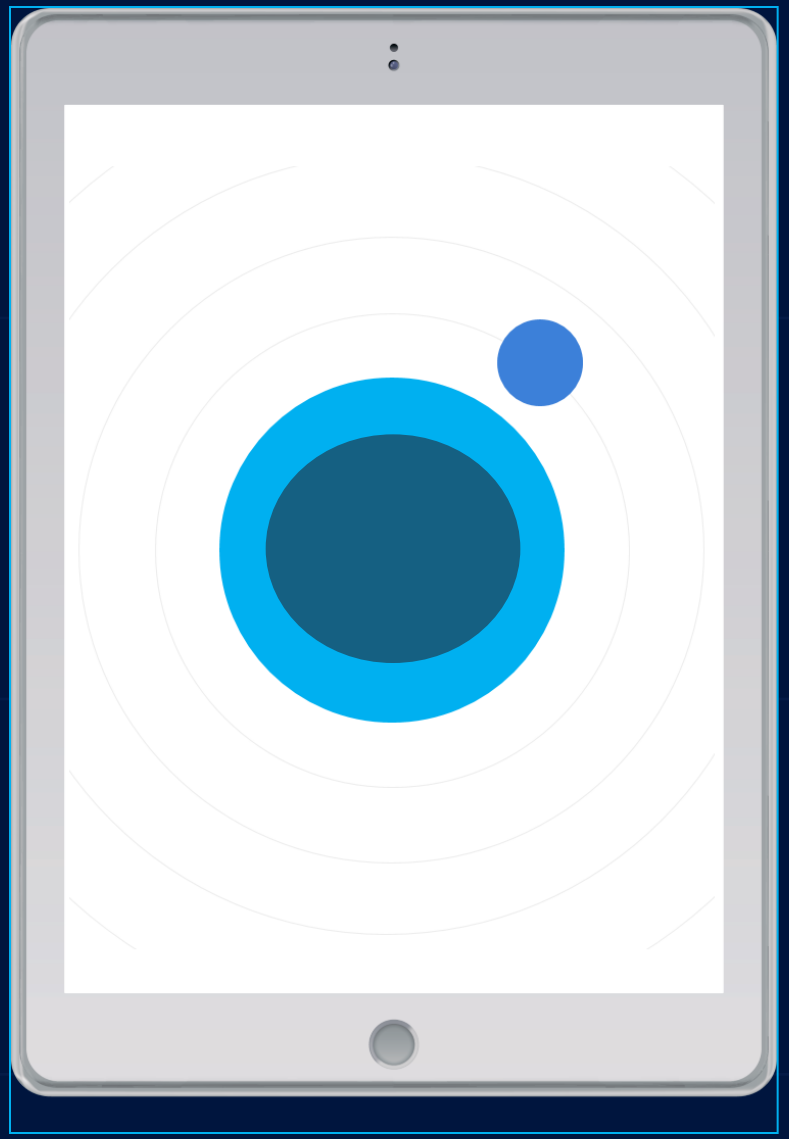
3.12.1	**SECURITY REQUIREMENT** Periodically assess the security controls in organizational systems to determine if the controls are effective in their application.	
	ASSESSMENT OBJECTIVE *Determine if:*	
	3.12.1[a]	*the frequency of security control assessments is defined.*
	3.12.1[b]	*security controls are assessed with the defined frequency to determine if the controls are effective in their application.*
	POTENTIAL ASSESSMENT METHODS AND OBJECTS Examine: [*SELECT FROM:* Security assessment and authorization policy; procedures addressing security assessment planning; procedures addressing security assessments; security assessment plan; system security plan; other relevant documents or records]. Interview: [*SELECT FROM:* Personnel with security assessment responsibilities; personnel with information security responsibilities]. Test: [*SELECT FROM:* Mechanisms supporting security assessment, security assessment plan development, and security assessment reporting].	

Provide Plan of Action and Milestones

3.12.2	**SECURITY REQUIREMENT** Develop and implement plans of action designed to correct deficiencies and reduce or eliminate vulnerabilities in organizational systems.	
	ASSESSMENT OBJECTIVE *Determine if:*	
	3.12.2[a]	*deficiencies and vulnerabilities to be addressed by the plan of action are identified.*
	3.12.2[b]	*a plan of action is developed to correct identified deficiencies and reduce or eliminate identified vulnerabilities.*
	3.12.2[c]	*the plan of action is implemented to correct identified deficiencies and reduce or eliminate identified vulnerabilities.*
	POTENTIAL ASSESSMENT METHODS AND OBJECTS Examine: [*SELECT FROM:* Security assessment and authorization policy; procedures addressing plan of action; system security plan; security assessment plan; security assessment report; security assessment evidence; plan of action; other relevant documents or records]. Interview: [*SELECT FROM:* Personnel with plan of action development and implementation responsibilities; personnel with information security responsibilities]. Test: [*SELECT FROM:* Mechanisms for developing, implementing, and maintaining plan of action].	

Access Control Policy
Security Training Policy
Audit and Accountability Policy
Configuration Management Policy
Identification and Authentication Policy
Incident Response Policy
System Maintenance Policy
System Media Protection Policy
Personnel Security Policy
Physical Protection Policy
Risk Assessment Policy
Security Assessment Policy
System Communications and Integrity Policy

Policy Documents



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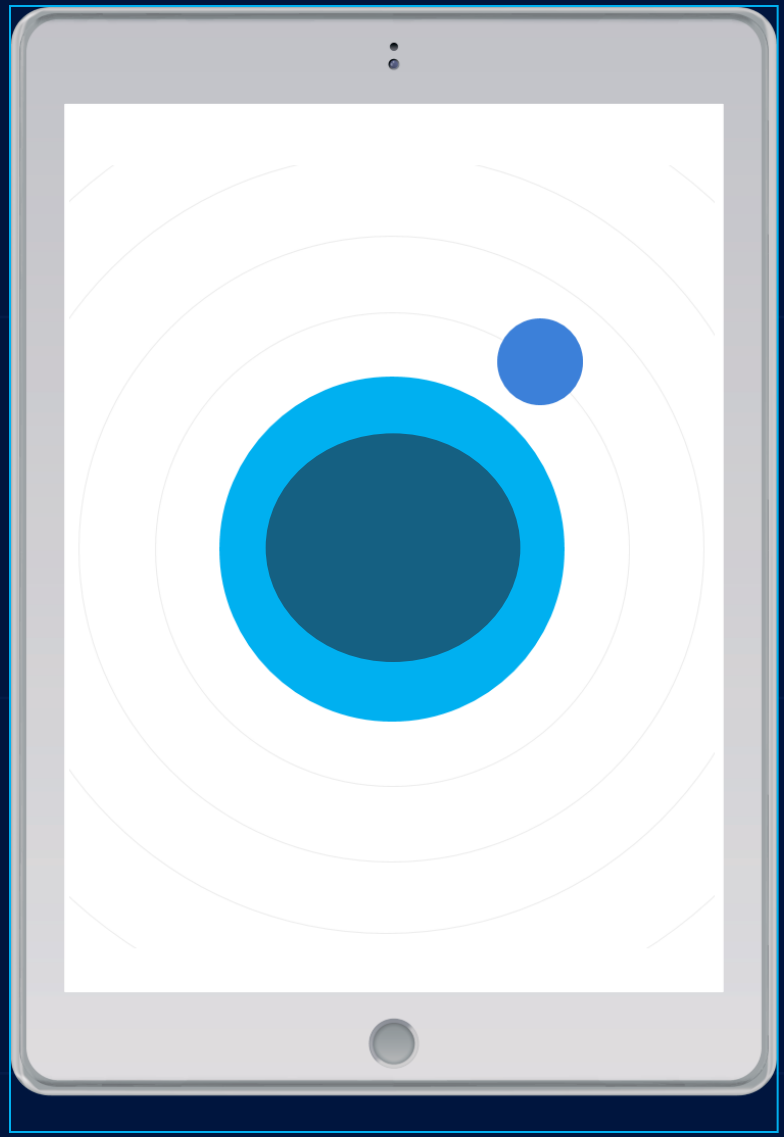
Account Request/Approval Process
Change Request Form/Process
Service Level Agreements with CSP/MSP
Information Release Approval Process
Incident Response/Reporting Process
Security Training Records/Briefings
Log Review Process/Notes/Form
System Baseline Documentation
Security Review Process/Approval
Vulnerability Scan Review/Mitigation Process

Process Documents



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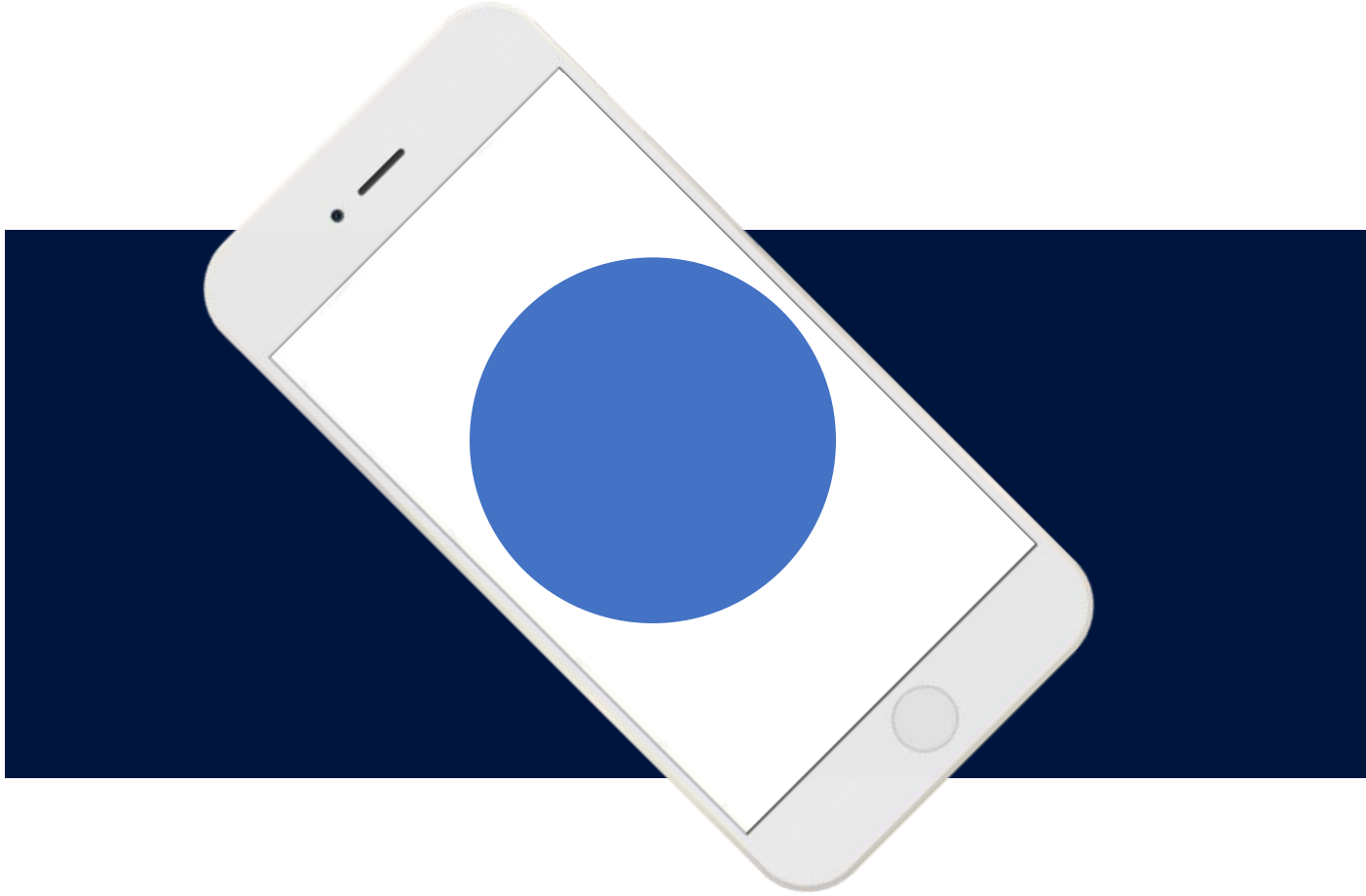

Upcoming Events

Acquisition Hour

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.

- **March 5** – Marketing Materials for One-on-One Buyer Meetings
- **March 19** – Acquisition Hour: Navigating AI: Practical Tips for Federal Contractors

…More information and registrations at wispro.org/events

Cyber Friday

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.

- **February 28** – CMMC: Are You Ready for a C3PAO Assessment?
- **March 28** – CMMC: Federal Cybersecurity Requirements – Who Must Comply?
- **April 25** – CMMC: Maintaining Your CMMC Certification

…More information and registrations at wispro.org/events

Federal Market Insights

Federal Market Insights is an informal podcast designed to provide valuable information about the government marketplace for businesses interested in government contracting. Each episode is a concise 30-minute session, scheduled at the end of the week. We review noteworthy items published during the week, delve into key topics, and offer background information and perspectives relevant to the government contracting landscape. Stop by, settle in and take-in the conversation.

- ~~February 14 – Starting Your Federal Contracting Journey: Registering in SAM~~
- ~~February 21 – Getting Started with DoD Contracts: Essential Tips and Information~~
- February 28 – Navigating DoD Sales: From Regulations to Strategic Planning
- March 7 – Federal Certifications: Beyond Titles to Strategic Value
- March 14 – The Language of Government Contracting: Why Definitions Matter
- March 21 – Federal Information Security: Programs Every Contractor Should Know

…More information and registrations at wispro.org/events

Upcoming Events

May 14

Winning Government Business: Navigating Compliance Risks to Drive Strategic Advantage

Milwaukee, WI

May 15

11th Annual DOD Contract Management Update

Milwaukee, WI

…More information and registrations at wispro.org/events

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