

Cyber Thursdays

# CMMC 2.0 What is 48 CFR and why it matters?

September 25 | 11:00 am - Noon

Presented by:  
Matt Frost, Wisconsin Procurement Institute





*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.....

[www.wispro.org](http://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*

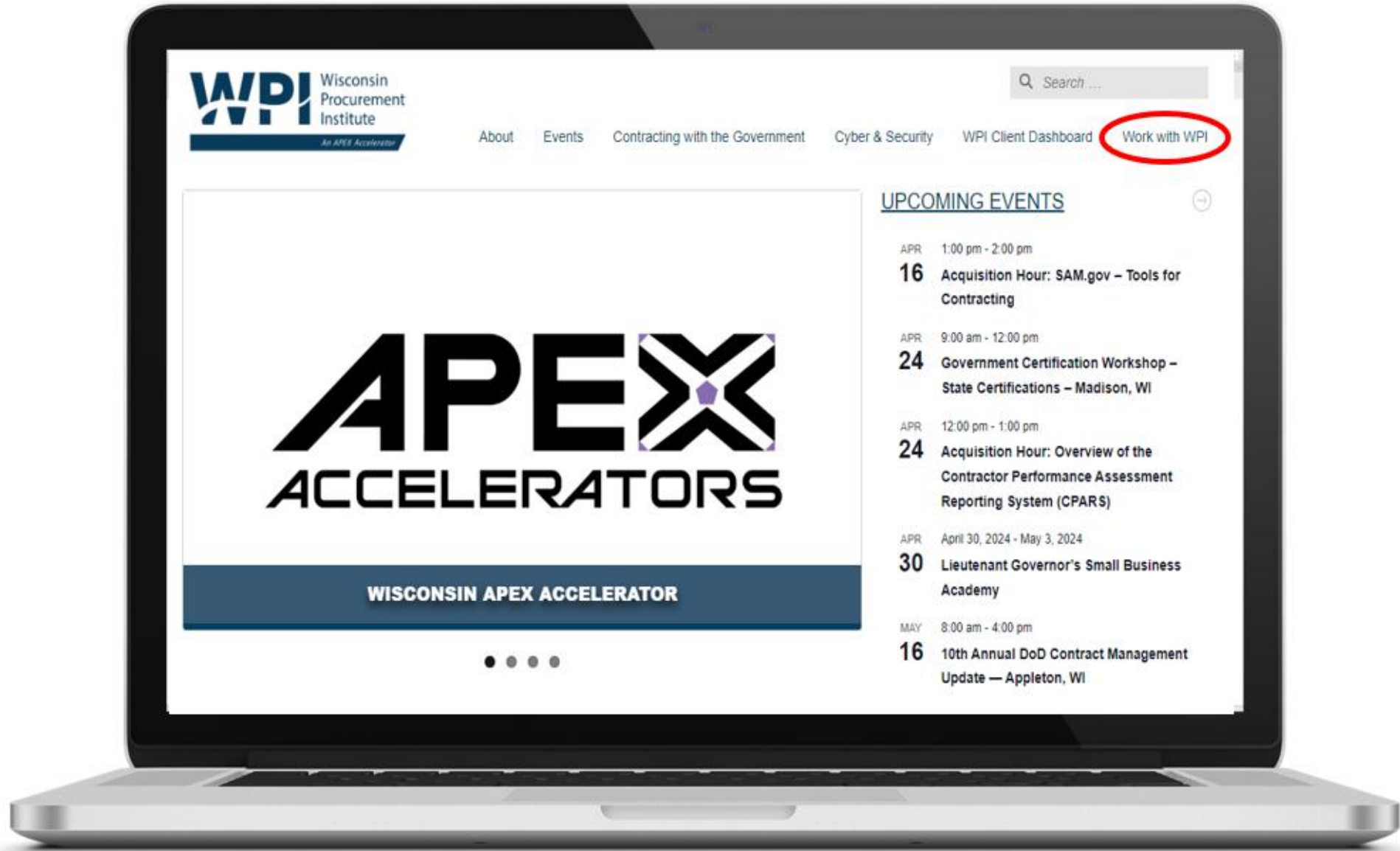
- **OSHKOSH**

- *Greater Oshkosh Economic Development Corporation*

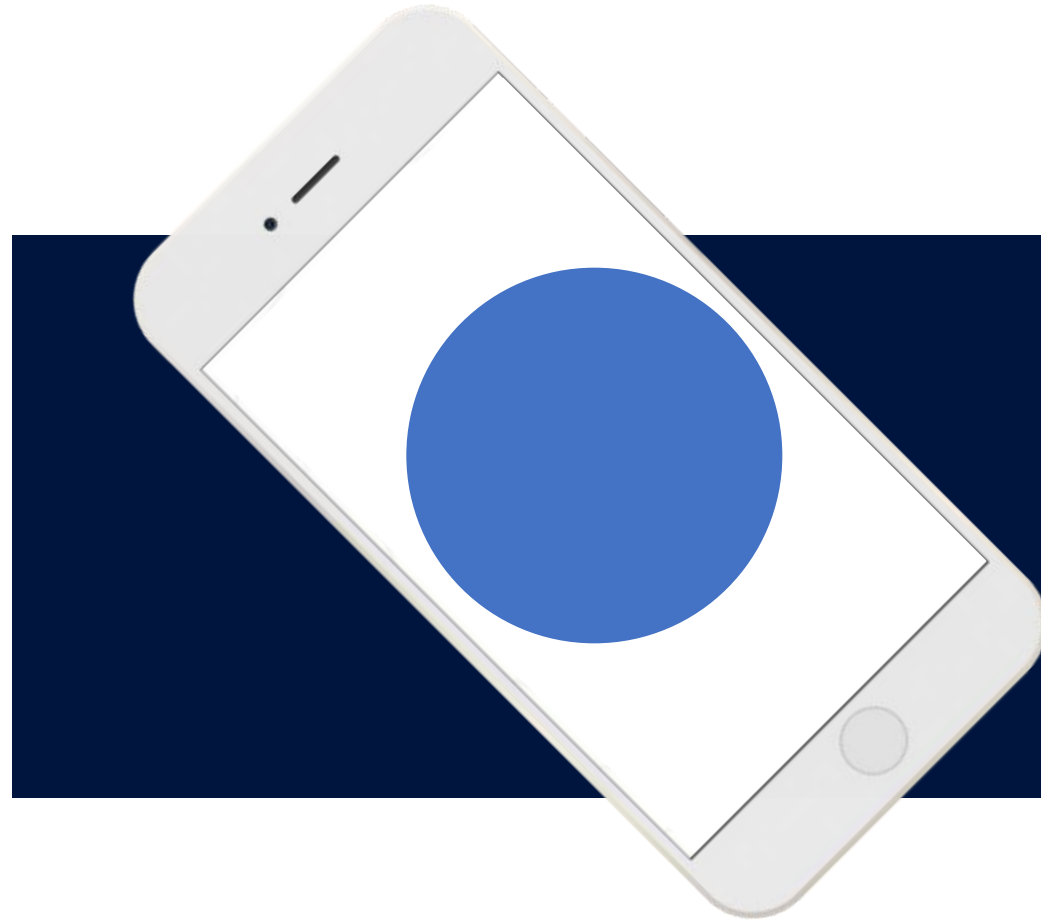
- **SUPERIOR**

- *Small Business Dev Center; UW Superior*





# What is 48 CFR and why does it matter?



September 25th, 2025

# Agenda

01

**WHY IS THIS HAPPENING?!**

02

Recapping the 32 CFR (Also, what is a CFR?!)

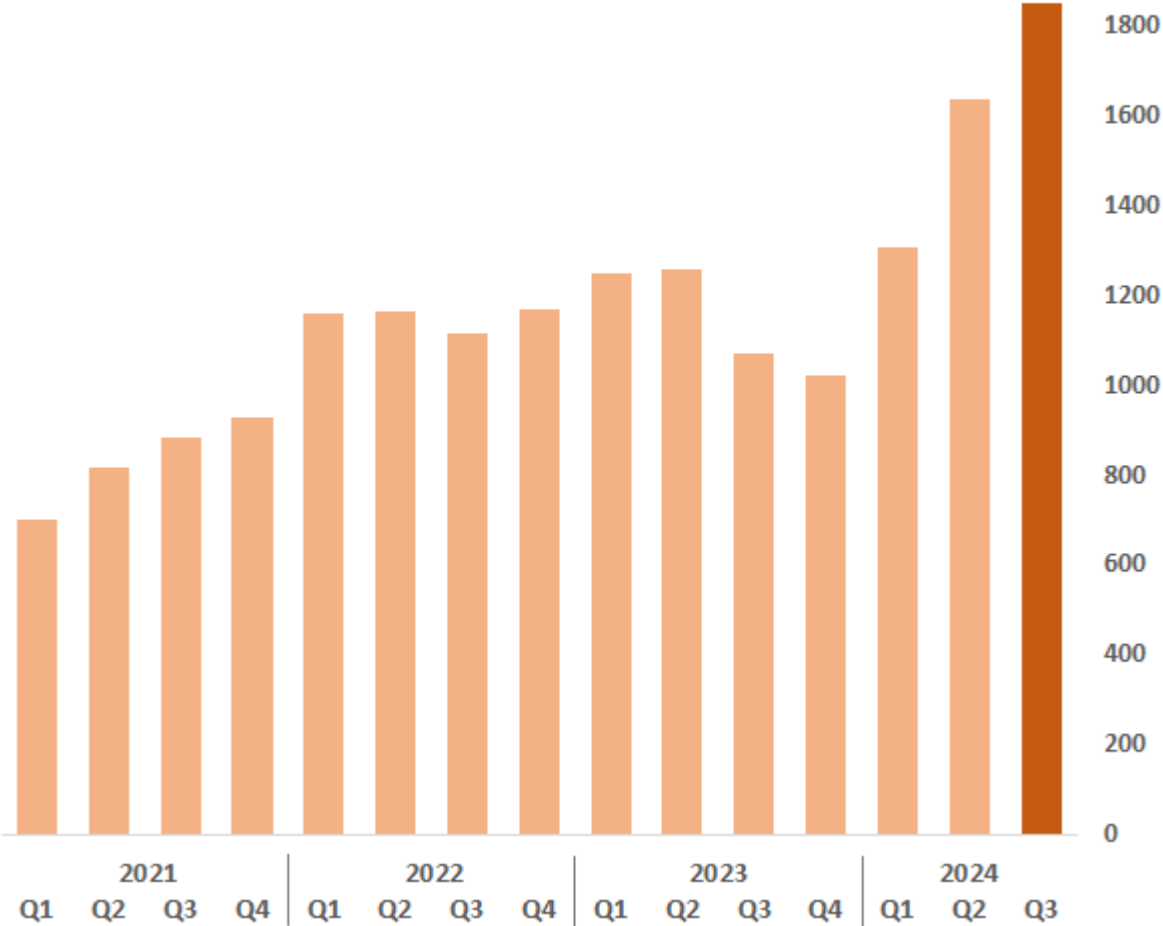
03

The 48 CFR Today

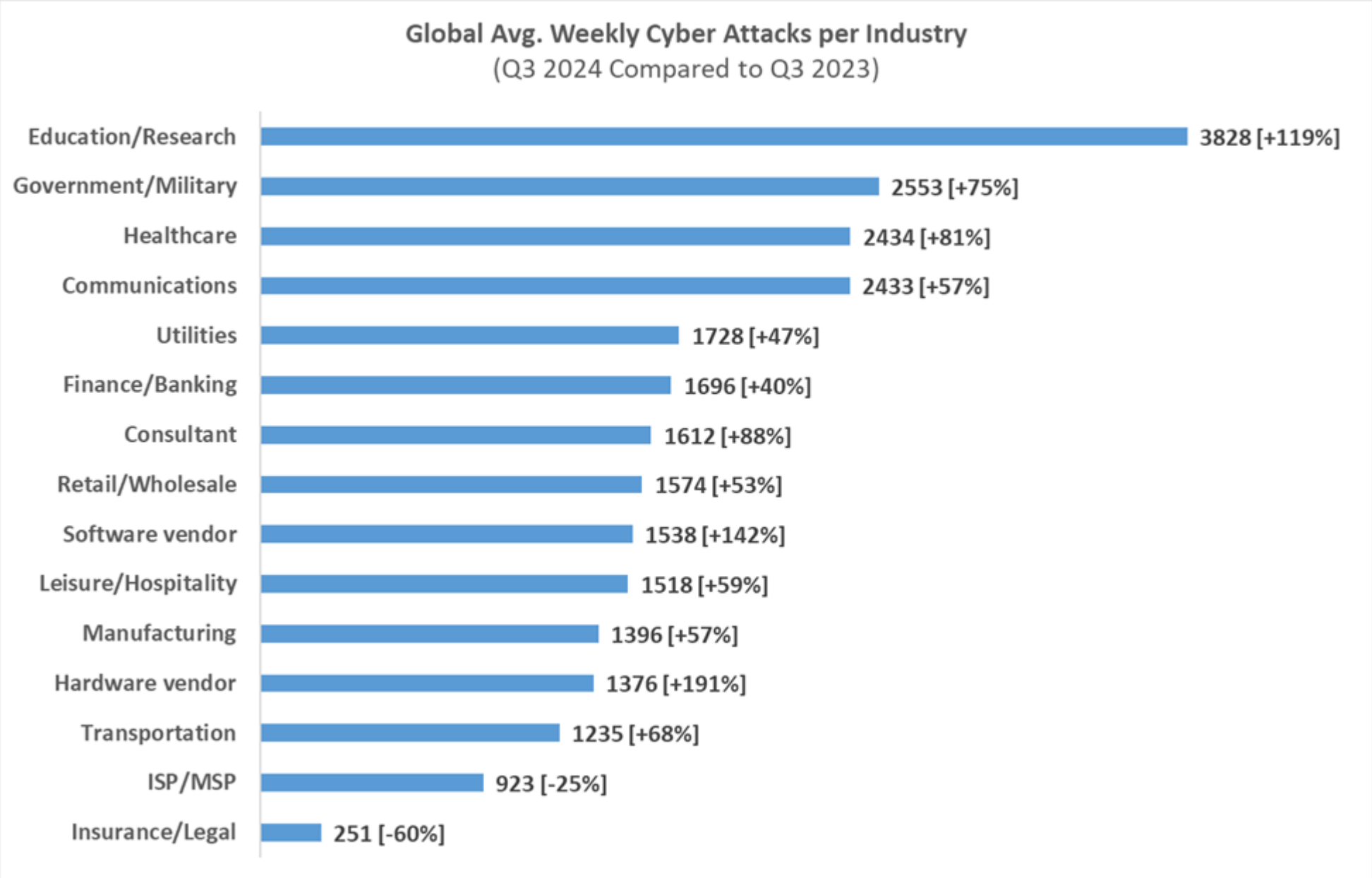


# Wow. That escalated quickly! (From Checkpoint)

Avg. Weekly Cyber Attacks per Organization  
(Global 2021-2024)



# Wow. That escalated quickly! (From Checkpoint)



**☐ 10.5 Trillion in Cybercrime Costs in 2025**

**☐ Costs growing by 15% every year.**

**☐ Cyberattacks linked to China rose by  
150% overall in 2024 (!!!!!!!).**

Wow. That escalated quickly! (From Checkpoint)

# Cyber Threats Rising Rapidly

Cybersecurity threats like ransomware and crypto-based attacks are surging, putting thousands of websites at risk every day.

**30,000**

Websites are Compromized Daily Worldwide

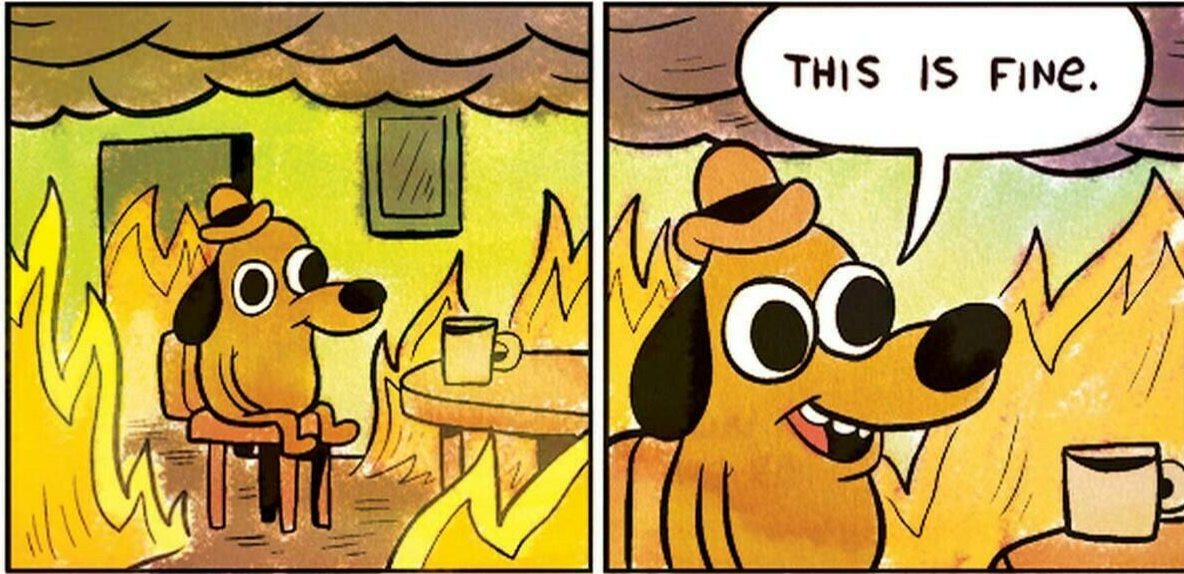
**659%**

Increase in Cryptojacking Incidents

**20%**

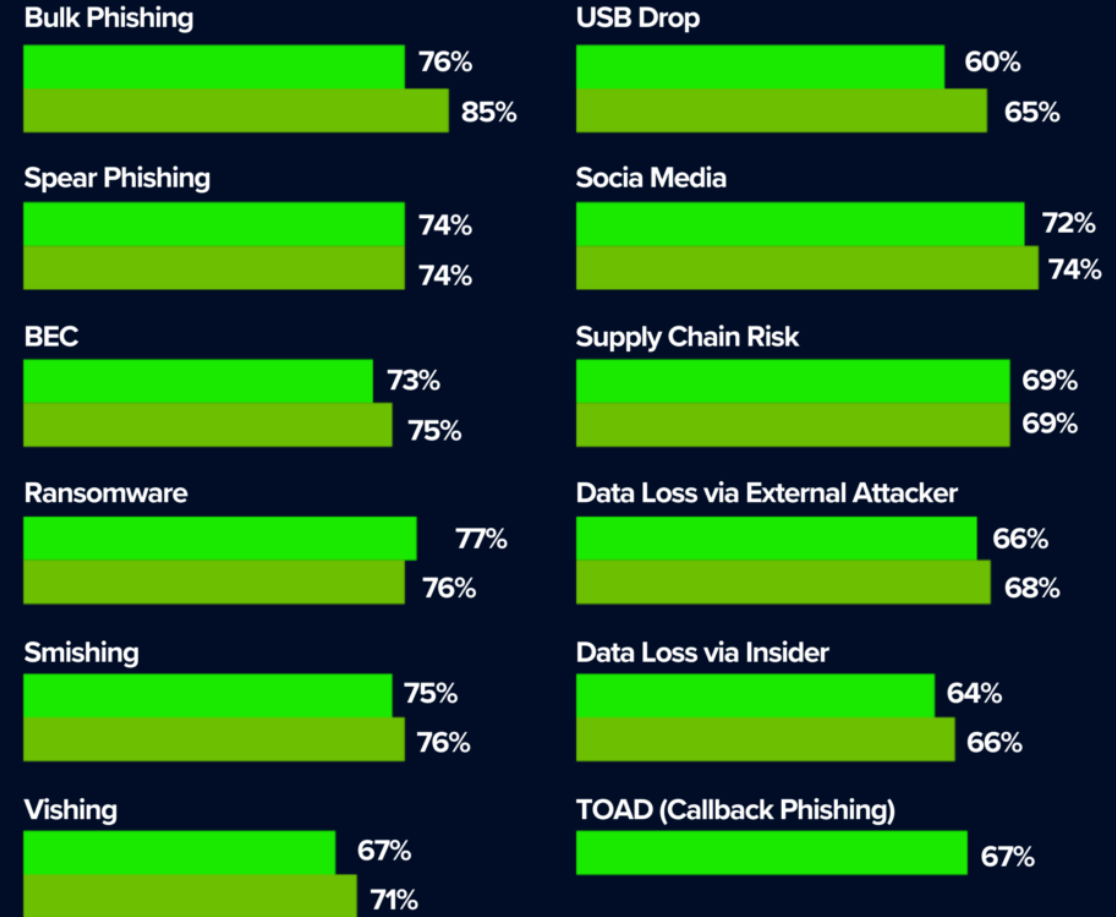
Increase in Ransomware Attacks Targeting ICS

# Wow. That escalated quickly! (From Checkpoint)



bright defense

## Frequency of Attacks



2023 2022

CYBER CRIME IS MORE PROFITABLE **THAN THE GLOBAL DRUG TRADE...**

at least  
**\$1.5T**  
more profitable



**DRUG TRADE**  
*(including Marijuana, Cocaine and Heroin Combined)*

CYBER CRIME



# IF CYBER CRIME WERE A COUNTRY...

Gross Domestic Product Per Country





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The 48 CFR Today



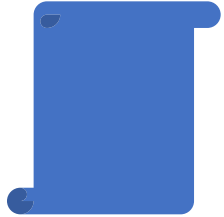
## Ok, but what is a CFR?

**□ CFR (Code of Federal Regulations) is a collection of all the general and permanent rules and regulations issued by the U.S. federal departments and agencies.**

## And why mention the 32 CFR?

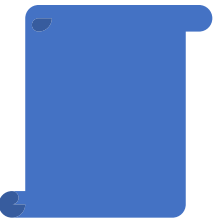
- ❑ **The 32 CFR deals specifically with National Defense.**
- ❑ **32 CFR Part 170 was published October 15, 2024 and formally established the CMMC Program.**
- ❑ **Defined roles and requirements.**

# Key Points: 32 CFR Part 170



## Purpose and Scope

You must meet specified cybersecurity standards if handling FCI and CUI.



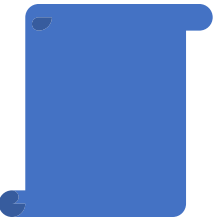
## Specified Standards and FCI/CUI Requirements

The specified standards are NIST SP 800-171 Rev 2 and NIST SP 800-172.

CMMC Level 1 - FCI

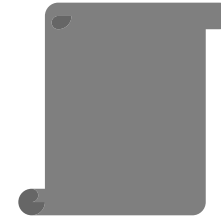
CMMC Level 2 - CUI

CMMC Level 3 - CUI with Advanced Protections



## Annual Affirmations and Tiered Implementation

Despite CMMC C3PAO Validations being good for 3 years – companies must still submit annual self-attestations. The C3PAO Assessments will be ramped up, escalating each year, until complete coverage of the DIB at Level 2 is achieved.



## ESP

External Service Providers are no longer required to be independently certified – but their systems must be accounted for.

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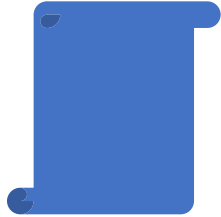
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The 48 CFR Today





# Key Points: 48 CFR 204, 212, 217 and 252



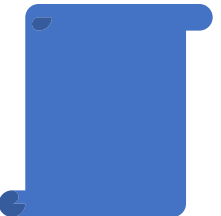
## The New DFARS rule

The final DFARS rule titled “Assessing Contractor Implementation of Cybersecurity Requirements (DFARS Case 2019-D041)” was published.



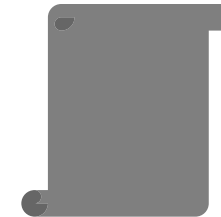
## Contractual Clauses Added

The key contractual clause DFARS 252.204-7021 was added.



## Phased Rollout of CMMC Begins November 10, 2025

Phase I: Level 1 and 2 self-assessments (November 2025)  
Phase II: Level 2 (C3PAO) requirements (November 2026)  
Phase III: Level 3 (DIBCAC) requirements (November 2027)



## Flow Down Requirements

Prime contractors must ensure their subcontractors are also appropriately certified.

# DFARS 252.204-7025 (Notice of Cybersecurity Maturity Model Certification Level Requirements)

*The CMMC level required by this solicitation is: \_\_\_\_\_. This CMMC level or higher (see 32 CFR part 170) is required prior to award for each contractor information system that will process, store, or transmit Federal contract information (FCI) or controlled unclassified information (CUI) during performance of the contract.*

# Phased Rollout Roadmap

- **Phase I:** Beginning on November 10, 2025 and applies to contracts that will include Level 1 and Level 2 Self-Assessment Levels
- **Phase II:** 12 Months from Phase I, applies to NEW contracts that will include Level 2 C3PAO Requirements
- **Goal:** The DoD wants all DIB Contractors to be certified at their appropriate CMMC Level by End of 2028.

# Ahhhhh, What Do I Do?!

- ❑ **Review Existing Contracts:** If your existing contracts have DFARS 252.204-7012, 252.204-7019, or 252.204-7020 – CMMC Level 2 is likely your goal.
- ❑ **Talk to your buyers:** If you haven't heard from your primes about CMMC already – you need to start this conversation about what they anticipate you requiring.
- ❑ **Get Help and Make a Plan:** You are likely not prepared.

Get yourself prepared.

# Get Moving



CMMC will be a  
**MANDATORY**  
requirement.

This represents the  
transition from Self-  
Attestation to 3<sup>rd</sup> Party  
Validation.

- Map out a Plan
- Review your Documentation
- What about Your Suppliers?!

# WAKE UP

- Self-Attestation does not mean you have more time.
- Buyers are likely to begin to prioritize certifications.
- Get to work!





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ACCREDITATION ▼

RESOURCES ▼

CMMC ECOSYSTEM ▼

NEWS & EVENTS ▼

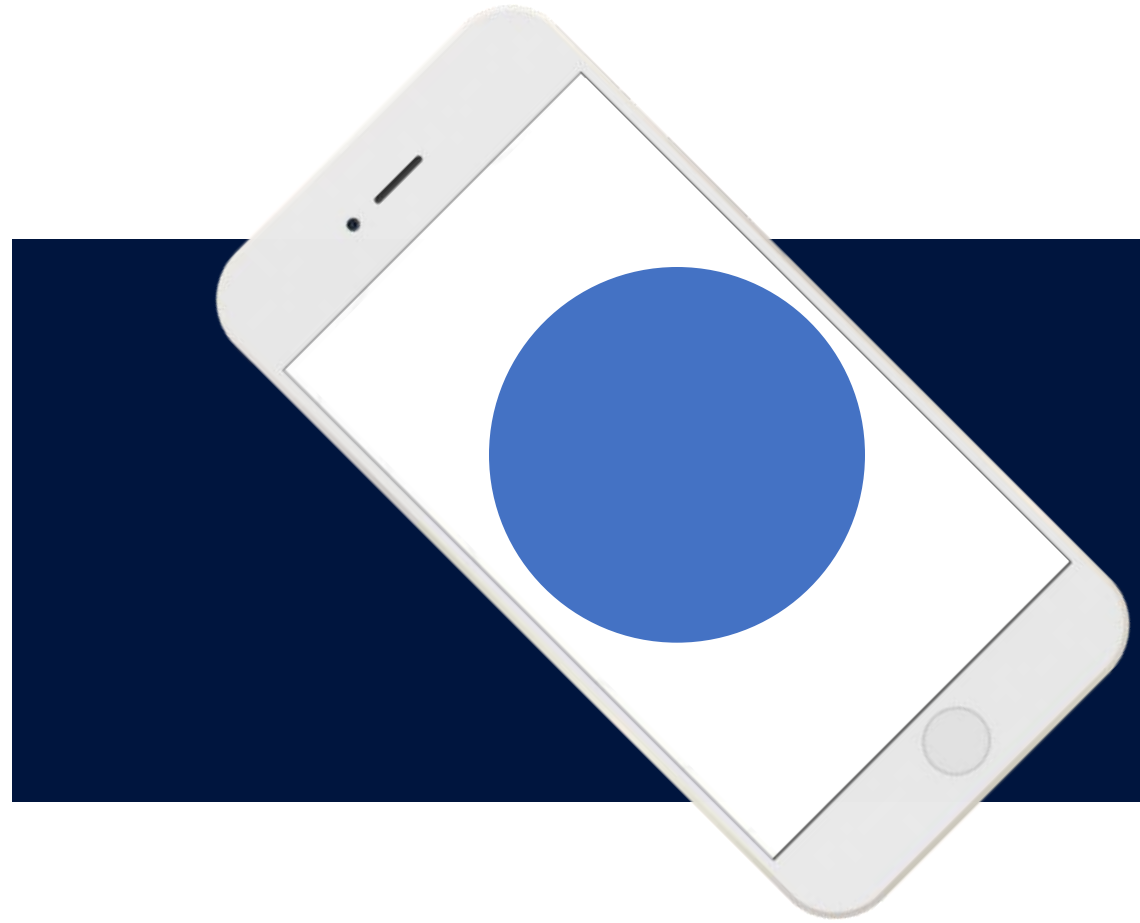
MARKETPLACE

CAICO

**[www.cyberab.org](http://www.cyberab.org)**

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# Acquisition Hour

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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.

- **October 8** – The 8(a) Business Development Program
- **October 22** – Federal Acquisition Regulations (FAR) Overview
- **November 5** – Certification Programs for Women and Veteran Owned Businesses
- **November 12** – Getting Started w DLA/DIBBS for Contractor & Subcontractors Part 1
- **November 19** – Getting Started w DLA/DIBBS for Contractor & Subcontractors Part 2
- **December 3** – DCMA Overview
- **December 17** – Understanding the US SBA and DOD Mentor Protégé Programs (MPP)

**...More information and registrations at [wispro.org/events](https://wispro.org/events)**



# Cyber Thursday

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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.

- **September 25** – CMMC 2.0: What is 48 CFR and why it matters?
- **October 30** – CMMC and ITAR – Navigating the differences
- **November 20** – Federal Cyber Update – Review of current regulations

**...More information and registrations at [wispro.org/events](https://wispro.org/events)**

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**To receive a certificate of completion, contact  
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# PRESENTED BY

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