

Cyber Thursday:

# CMMC and ITAR – Navigating the differences between the requirements and understanding where they overlap

October 30 | 11:00 am - Noon

Presented by:

**Matt Frost, 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.....

[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*

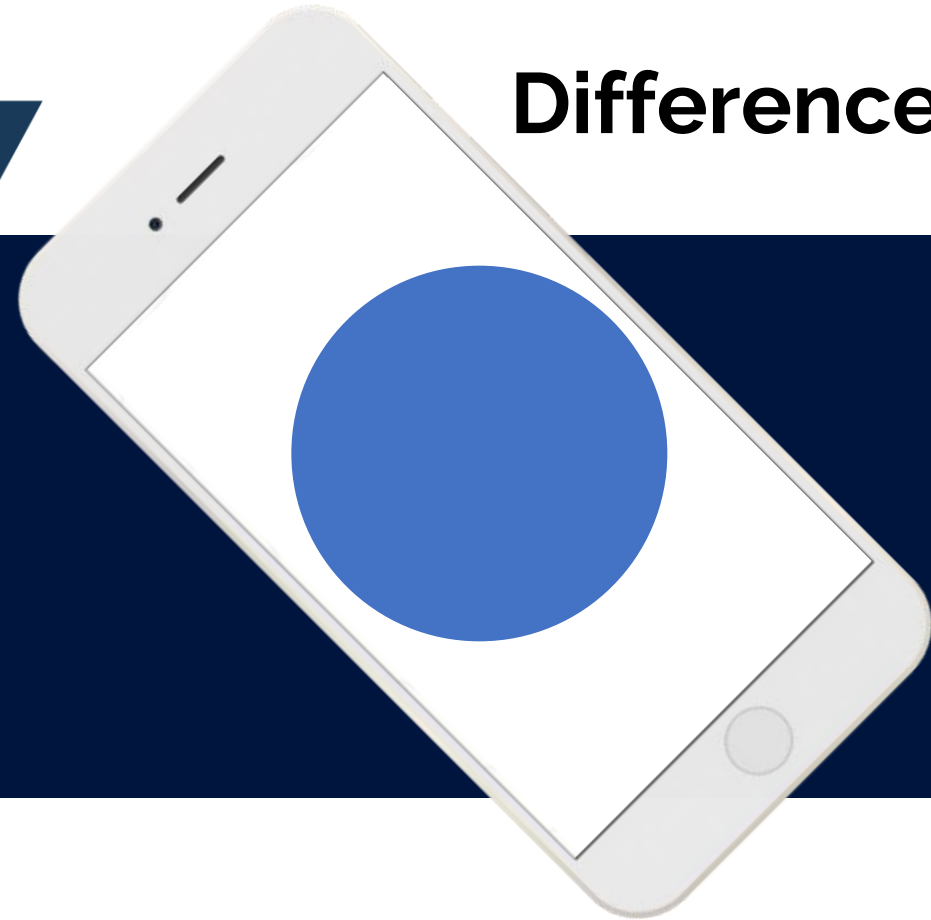






*An APEX Accelerator*

# **CMMC and ITAR: Navigating the Differences**



October 30th, 2025

# Agenda

01 CMMC and ITAR: What Are They?

02 The Differences

03 When and Where Compliance Programs Overlap



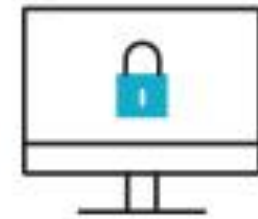
# What is CMMC?



Department of Defense  
certification process that...



measures the ability  
of members of the  
Defense industrial  
base (DIB) to  
protect...

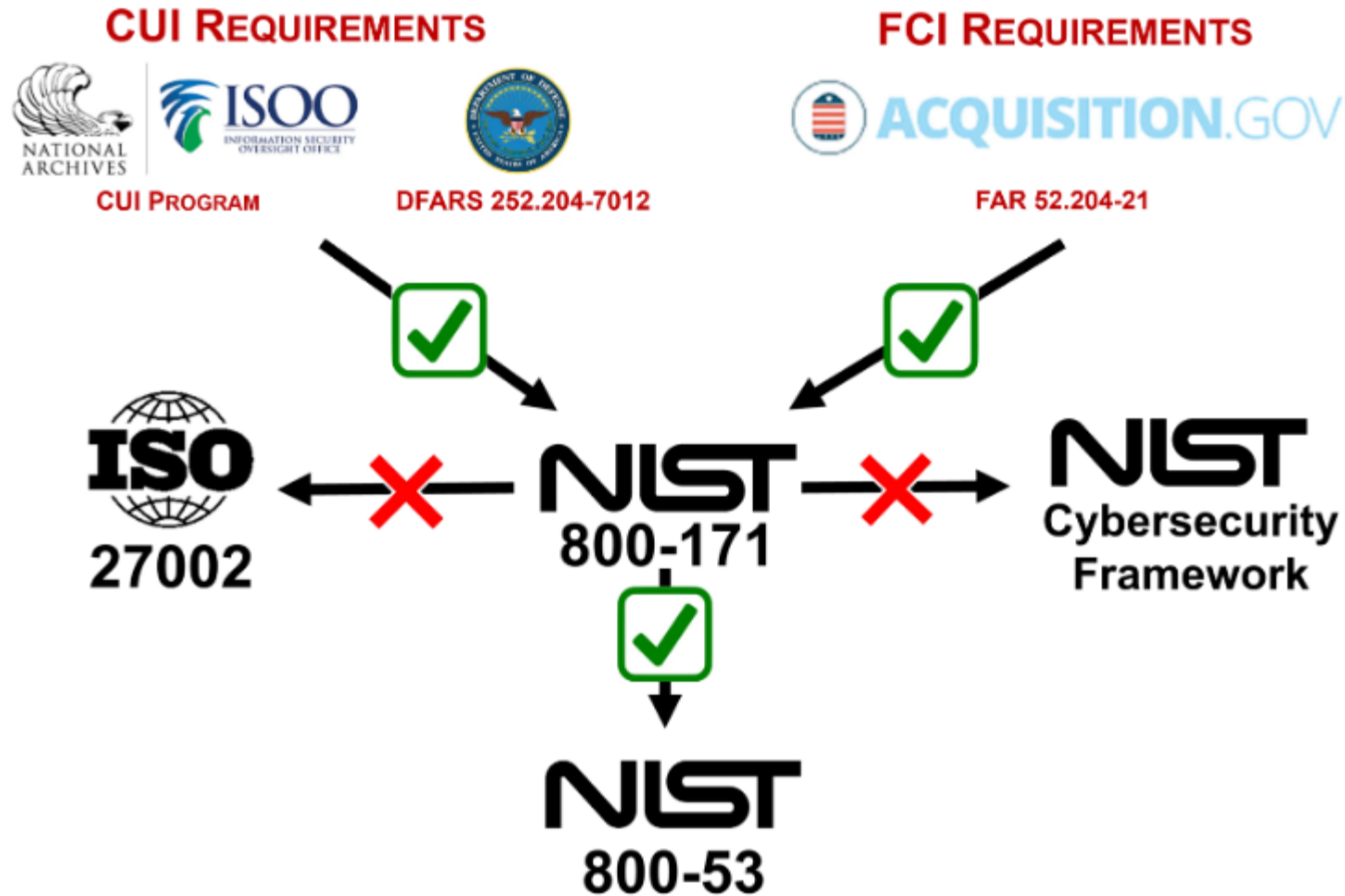


Federal Contract  
Information (FCI)



Controlled  
Unclassified  
Information (CUI)

# FAR 52.204-21, DFARS, NIST and CMMC



An Evolution – Not a Departure



1

Definition

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

2

Categories

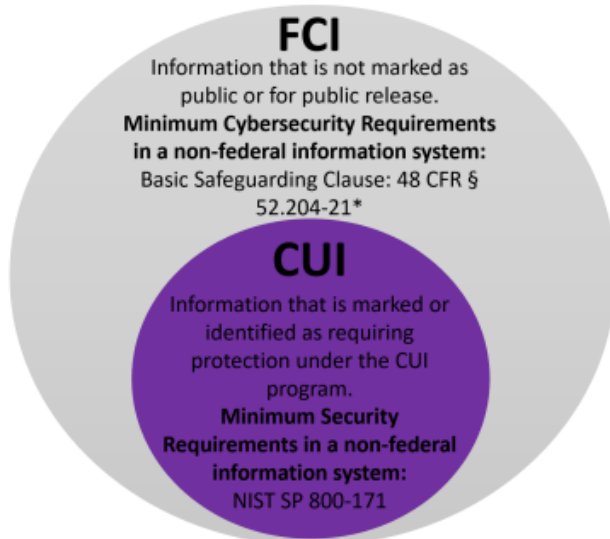
**[Archives.gov/cui/registry/category-list](https://www.archives.gov/cui/registry/category-list)**

3

Executive Agent

**The National Archives and Records Administration.**

**Information that is collected, created, or received pursuant to a government contract**



\*also excludes simple transactional information.

1

Reports/Charts/Notes

2

Emails/Bills of Material

3

Contracts,  
Subcontracts,  
Purchase Orders

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



# ITAR Registered

International Traffic  
in Arms Regulations

## **International Traffic in Arms Regulations:**

Laws that regulate the manufacture, export, and transfer of defense-related articles, services, and technical data.

# Who needs to be ITAR Compliant?



Defense contractors and subcontractors



Aerospace companies



Military and government agencies



IT and engineering firms that provide support to defense contractors



Research and development firms that work on defense related technologies



Manufacturers and distributors of defense-related items



Satellite and space-related industries



Exporters and importers of defense-related products or services



Naval shipbuilders and repair yards



Suppliers of defense-related raw materials or components

1

## Articles

Military Equipment  
Components  
Weapons

2

## Services

Training  
Military Support

3

## Technical Data

Drawings  
Models  
Code  
Specifications

# Components of ITAR Compliance





## ITAR vs. EAR at a glance

	ITAR	EAR
<b>Regulatory body</b>	Department of State (DDTC)	Department of Commerce (BIS)
<b>Scope</b>	Defense-related articles and services	Commercial and dual-use items
<b>Controlled list</b>	United States Munitions List (USML)	Commerce Control List (CCL)
<b>License requirement</b>	Mandatory for all exports	Depends on item classification and destination
<b>Penalties for violations</b>	Up to \$1 million per violation and/or 10 years imprisonment	Up to \$1 million per violation and/or 20 years imprisonment



# Agenda

01

CMMC and ITAR: What Are They?

02

The Differences

03

When and Where Compliance Programs Overlap





**Focus:**

- Cybersecurity Controls
- How the Data is Secured



**Focus:**

- Tracking Export and Handling
- Who can access the data



## Compliance Framework

CMMC 2.0

DFARS 7012

ITAR



## Microsoft Platform



Commercial



GCC



GCC High



## Who Is a U.S. Person According to ITAR?

1. **U.S. citizens**
2. **Green Card holders**
3. **Individuals who are granted asylum or refugee status by the U.S. government**
4. **Any business or organization incorporated in the United States under U.S. law**
5. **Any part of the U.S. government**



U.S. DEPARTMENT OF STATE

## Directorate of Defense Trade Controls

### □ Title 22

#### ⊙ PART 121—THE UNITED STATES MUNITIONS LIST

**Authority:** 22 U.S.C. 2752, 2778, 2797; 22 U.S.C. 2651a; Sec. 1514, Pub. L. 105-261, 112 Stat. 2175; E.O. 13637, 78 FR 16129, 3 CFR, 2013 Comp., p. 223.

**Source:** 58 FR 39287, July 22, 1993, unless otherwise noted.

□ [pmddtc.state.gov](http://pmddtc.state.gov)



## ❑ [archives.gov/cui/registry/category-list](https://archives.gov/cui/registry/category-list)

Controlled Unclassified Information (CUI) is information that requires safeguarding or dissemination controls pursuant to and consistent with applicable law, regulations, and government-wide policies but is not classified under Executive Order 13526 or the Atomic Energy Act, as amended.

- [Executive Order 13556 "Controlled Unclassified Information"](#) (the Order), establishes a program for managing CUI across the Executive branch and designates the National Archives and Records Administration (NARA) as the Executive Agent to implement the Order and oversee agency actions to ensure compliance. The Archivist of the United States delegated these responsibilities to the Information Security Oversight Office (ISOO).
- [32 CFR Part 2002 "Controlled Unclassified Information"](#) was issued by ISOO to establish policy for agencies on designating, safeguarding, disseminating, marking, decontrolling, and disposing of CUI, self-inspection and oversight requirements, and other facets of the Program. The rule affects Federal executive branch agencies that handle CUI and all organizations (sources) that handle, possess, use, share, or receive CUI—or which operate, use, or have access to Federal information and information systems on behalf of an agency.

# Agenda

01

CMMC and ITAR: What Are They?

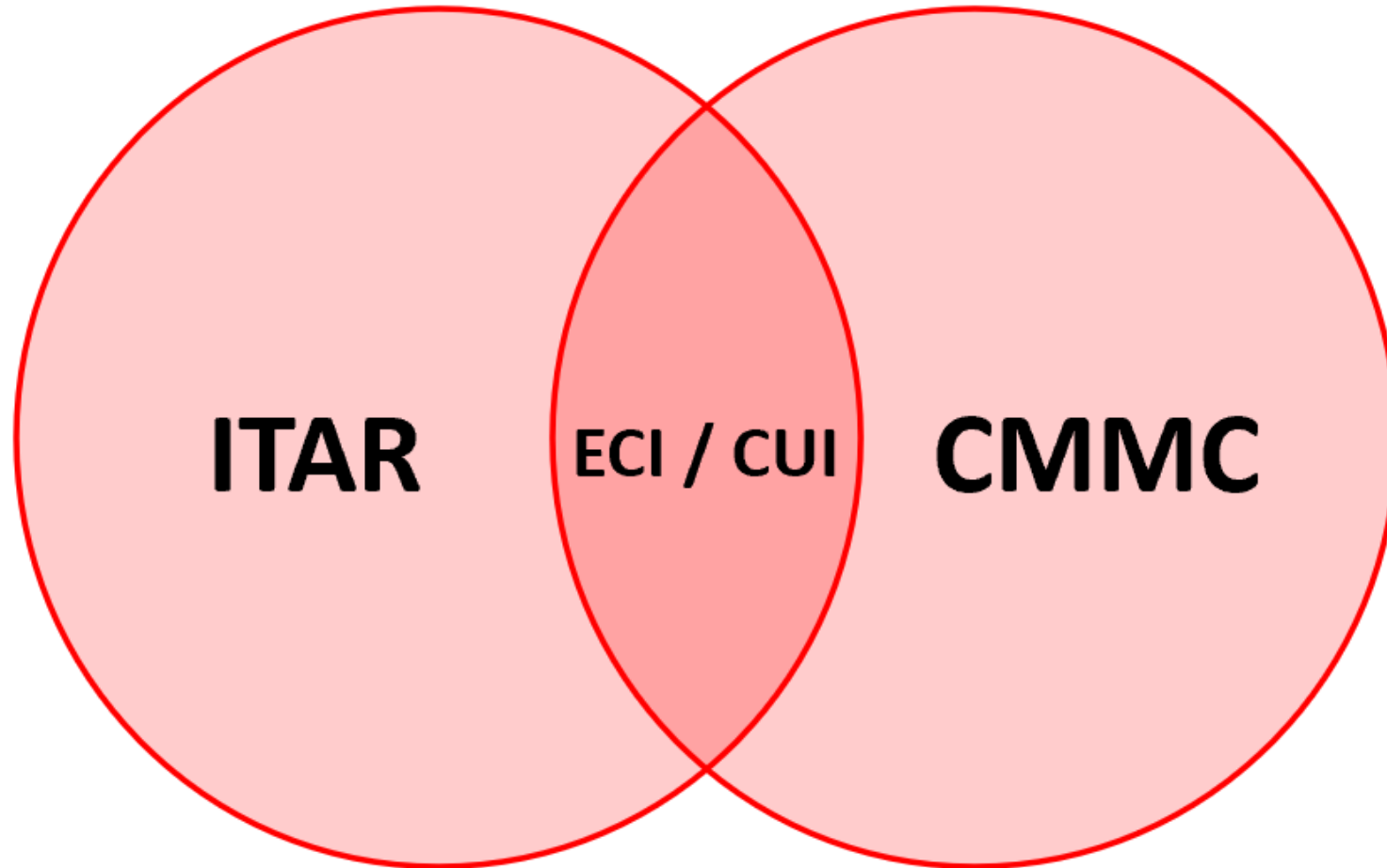
02

The Differences

03

When and Where Compliance Programs Overlap





## Not So Different...

- ❑ **Identify and Label:** Label all CUI and ITAR, often applying both labels
- ❑ **Track and Log:** Accountability of data, and understanding data movements, critical
- ❑ **Encrypt and Control:** Encrypt once, at the proper level, if you handle both types of information (ITAR has higher encryption requirements and data handling requirements)

## Direct Overlaps

- ❑ **Access Control:** Section 3.1 of CMMC 2.0 works directly towards ITAR Requirements
- ❑ **Compliance Management:** Managing compliance programs requires dedicated effort and awareness.
- ❑ **Training and Handling:** Regularly training employees on the proper handling has a real effect and satisfies compliance requirements of both regulations.

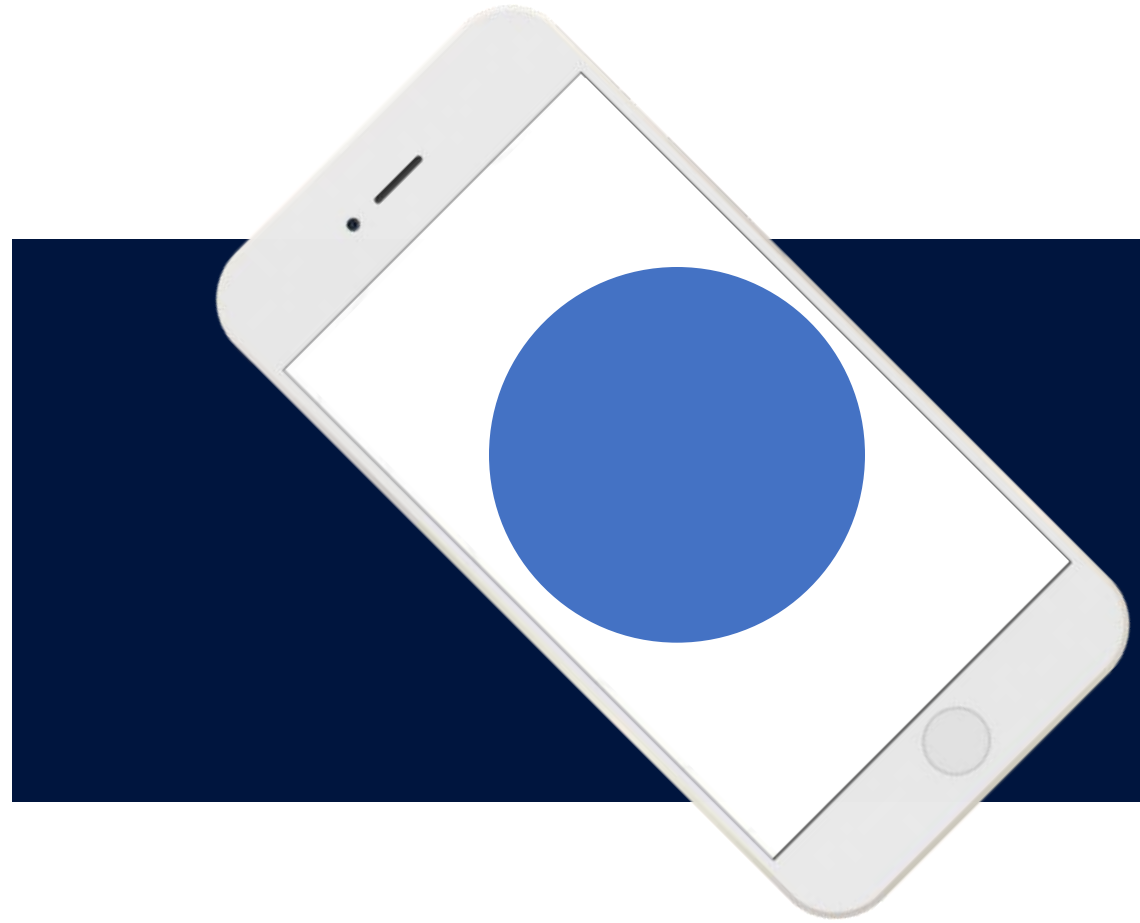
# The Intentions Aligned

## NIST National Institute of Standards and Technology



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# Upcoming Events

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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.

- **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.

- **November 20** – Federal Cyber Update – Review of current regulations
- **December 18** – CMMC – From Top to Bottom – A Program Review

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

# Featured Newsletters

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**Acquisition Alert | Cyber Newsletter**  
**Events Newsletter**

**This webinar is eligible for  
1 CPE credit**

**To receive a certificate of completion, contact  
[apexaccelerator@wispro.org](mailto:apexaccelerator@wispro.org)**

# PRESENTED BY

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