





# efirst Reämagining Cyber Defense



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## 0.5 - CMMC 2.0



Chief Executive Global Cyber Defense

Thought Leader

Cybersecurity is only as good as an organization's weakest link. Increasingly, the weakest link is the cyber supply chain. Third-party vendors and business associates such as CSPs or technology firms have long struggled to establish a credible cyber defense to protect sensitive and confidential information they process for their clients.

To aid with this and to ensure cyber resilience in its supply chain, the U.S. DoD introduced the CMMC framework in 2020. The latest version of this standard is CMMC.

The CMMC framework is of relevance not only to the DoD but other federal and state government agencies, and organizations that provide services to government agencies. CMMC is built on the NIST family of standards. CMMC establishes cybersecurity certification requirements, so achieving CMMC Certification brings credibility to any organization wanting to do business with the federal government. Senior executives will benefit from studying CMMC standard and considering raising the bar of their NIST-based program by achieving CMMC Certification.

The latest version of CMMC framework, CMMC, is a comprehensive framework that includes cyber protection standards that aim to protect the DIB from being damaged by APTs.

**CSPs** Cloud Service Providers

#### NIST

National Institute of Standards and Technology

**DIB** Defense Industrial Base

> APTs Advanced Persistent Threats



CMMC 2.0 framework includes several updates to CMMC 1.0 model. Both models address the following topics:

- Safeguarding sensitive information such as FCI and CUI
- Enhancing accountability while minimizing barriers comply with DoD requirements
- Dynamically enhancing DIB cybersecurity to meet evolving threats

By incorporating CMMC standards into acquisition programs, the DoD ensures that contractors and subcontractors will meet its cybersecurity requirements.

The DIB is the target of increasingly frequent and complex cyberattacks by adversaries and non-state actors. Made up of hundreds of thousands of small, medium, and large organizations, the DIB exists globally. It is a top priority of the DoD to dynamically enhance DIB cybersecurity requirements to protect against these evolving threats and safeguard the information that supports and enables U.S. military services and operations such as the exchange of sensitive information. CMMC is a key component of the DoD's expansive DIB cybersecurity effort.

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"CMMC will dramatically strengthen the cybersecurity of the Defense Industrial Base," said Jesse Salazar, U.S. Deputy Assistant Secretary of Defense for Industrial Policy. "By establishing a more collaborative relationship with industry, these updates will support businesses in adopting the practices they need to thwart cyberthreats while minimizing barriers to compliance with DoD requirements."

The changes reflected in CMMC will be implemented through CMMC rulemaking process. Enterprises will be required to comply once the forthcoming rules go into effect. The DoD intends to pursue rulemaking in both Part 32 of the CFR and the DFARS in Part 48 of the CFR. FCI Federal Contract Information

CUI Controlled Unclassified Information

**DoD** Department of Defense

**CFR** Code of Federal Regulations

DFARS Defense Federal Acquisition Regulation Supplement

#### CMMC Certification Training Program Guide

The DoD is exploring opportunities to provide incentives for contractors who voluntarily obtain a CMMC Certification in the interim period.

#### FCI and CUI Are a CMMC Priority

FCI is defined as information not intended for public release; that is, information 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 provided by the government to the public (such as that which exists on public websites). Simple transactional information such as that necessary to process payments is also defined as FCI.

CUI is information the government creates or possesses, or that an entity creates or possesses for or on behalf of the government, that a law, regulation or government-wide policy requires or permits an agency to handle using safeguarding or dissemination controls.

The DoD's intent under CMMC is that if a DIB enterprise does not process, store or transmit CUI on its unclassified network, but does process, store or handle FCI, then it must perform a CMMC Level 1 Self-Assessment and submit the results with an annual affirmation by a senior enterprise official.

The CMMC model is designed to protect FCI and CUI that are shared with contractors and subcontractors of the DoD to support contract acquisition and performance.

CMMC only applies to DIB contractors' unclassified networks that process, store or transmit FCI or CUI.

#### The Structure of CMMC

CMMC is aligned with U.S. NIST standards, specifically NIST SP SP 800-171 Rev 2, Protecting CUI in Nonfederal Systems and Organizations, and NIST SP 800-172, Enhanced Security Requirements for Protecting CUI. The DoD's requirements will continue to evolve as changes are made to the underlying NIST SP 800-171 and NIST SP 800-172 requirements.

CMMC standard is organized into 3 specific levels:

**1. Level 1 Foundational** - Represents the entry level for CMMC 2.0 framework and includes 17 practices.

**2. Level 2 Advanced** - Includes 110 practices aligned with NIST SP 800-171 Rev 2. Level 2 may include:

- CUI (non-prioritized acquisitions)
- CUI (prioritized acquisitions)

SP

Special

Publication

3. Level 3 Expert - Includes more than 110 practices based on NIST SP 800-172 and is the highest level.

Level 1 applies to organizations that process FCI but not CUI. Level 2 organizations process both FCI and CUI and require the implementation of additional cybersecurity capabilities. In addition, Level 2 organizations must meet all security requirements specified in NIST SP 800-171 Rev 2.

#### CMMC Assessment and Certification

DIB organizations are fully responsible for obtaining the necessary CMMC Certification, including coordinating and planning their participation in CMMC assessment.

Level 1 and a subset of organizations at Level 2 can demonstrate compliance with CMMC requirements through Self-Assessments. Self-Assessments associated with Level 1 and a subset of Level 2 programs (e.g., CUI, nonprioritized acquisitions) will be required on an annual basis.

Third-party and government-led assessments, associated with some Level 2 (e.g., CUI, prioritized acquisitions) and all Level 3 programs, will be required on a triennial basis. The assessment requirements will be applicable to the impacted organizations and their associated contractors.

Once CMMC is fully implemented, the DoD will only accept CMMC assessments that are provided by an authorized and accredited C3PAO and conducted by certified CMMC Assessors. Under certain circumstances, the DoD allows enterprises to make POA&Ms to earn their CMMC Certifications.

After completion of CMMC assessment, the C3PAO will provide an assessment report to the DoD. As part of the CMMC implementation, the DoD will approve all CMMC AB conflict-ofinterest-related policies that apply to CMMC ecosystem.

#### Conclusion

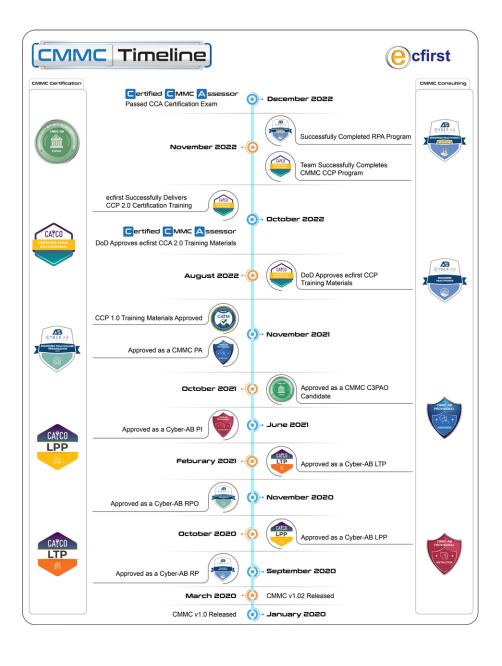
CMMC is organized into 3 levels. Level 2 (advanced) will be equivalent to NIST SP 800-171. Level 3 (expert) will be based on a subset of NIST SP 800-172 requirements. C3PAO CMMC Third-Party Assessor Organization

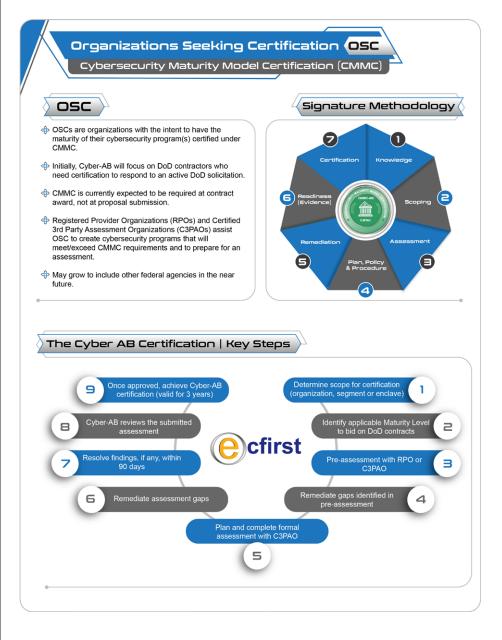
**POA&Ms** Plans of Action and Milestones Cybersecurity professionals and senior executives across industries should take note of CMMC framework. This is the cybersecurity standard for this decade and beyond. Organizations across industries can leverage CMMC requirements to improve their cyberdefense posture and establish a more credible, evidence-based security program.

The future demands active cyber defense. The threats faced by enterprises will require leaders to rethink and reimagine cybersecurity. Forward-thinking organizations should target CMMC Certification at the appropriate level based on the risk to their businesses and associated assets.



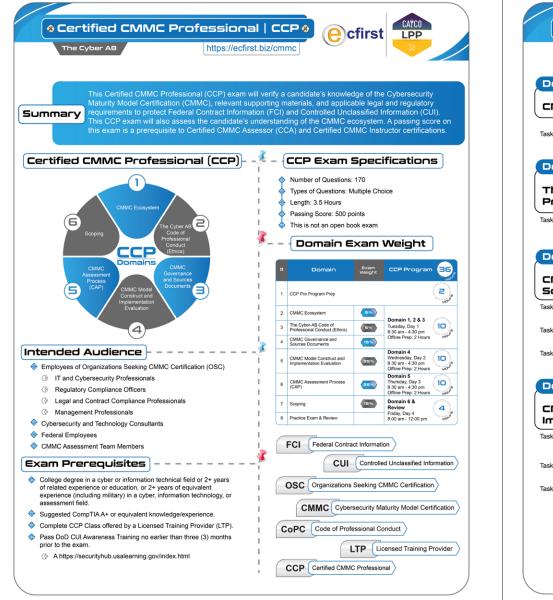


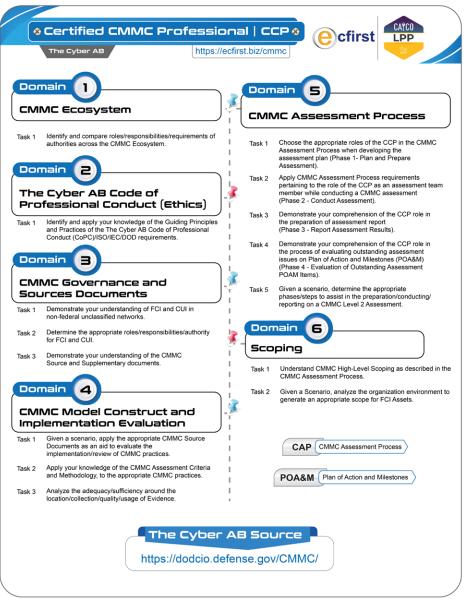


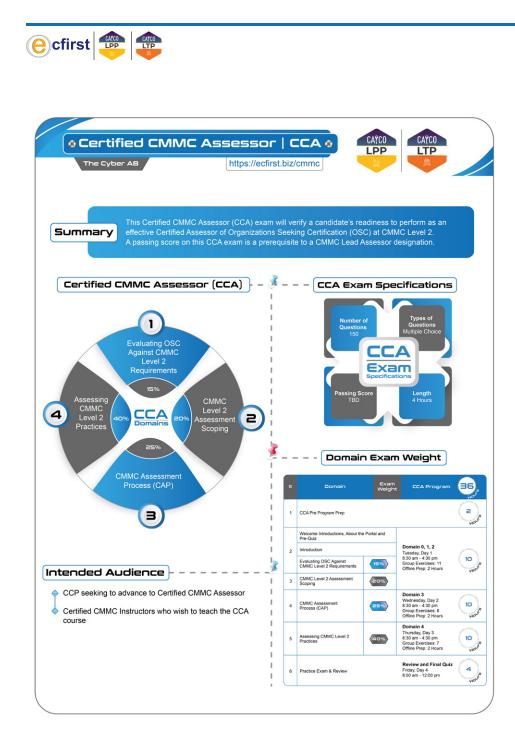


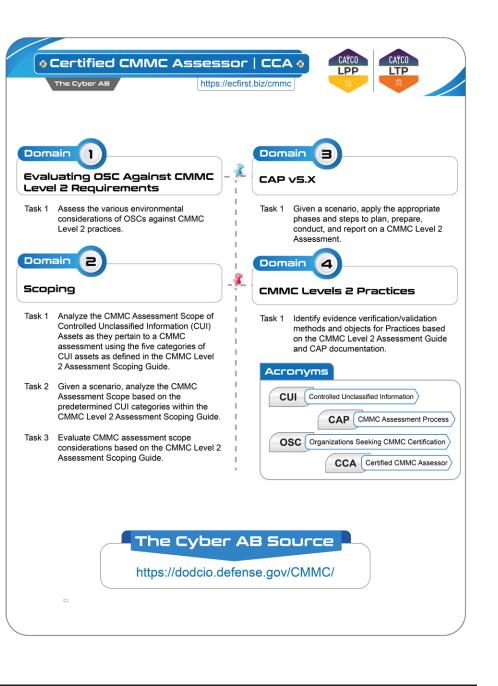




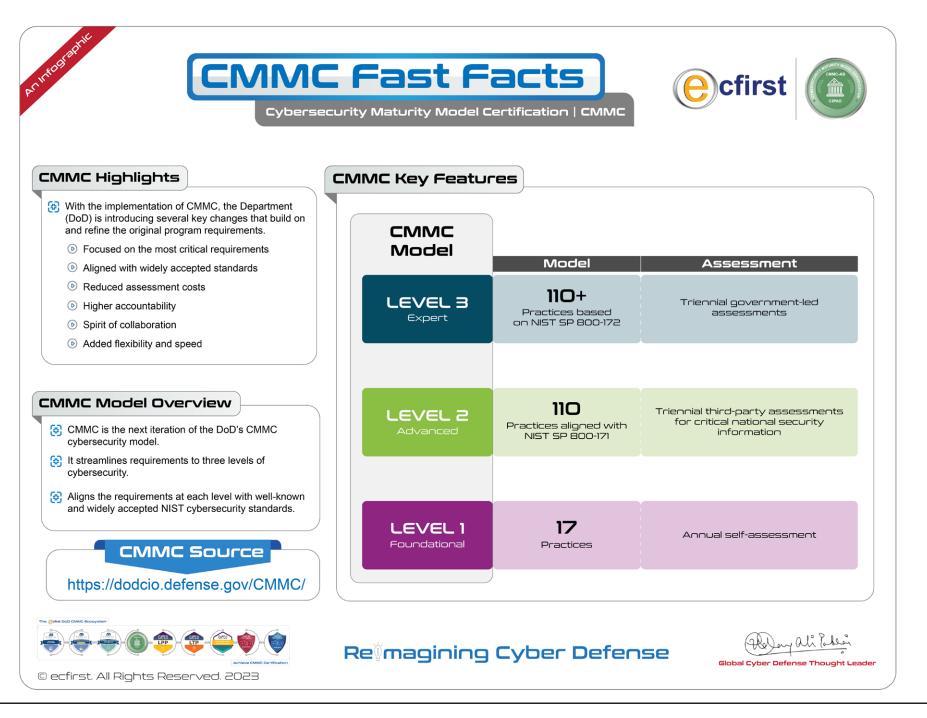




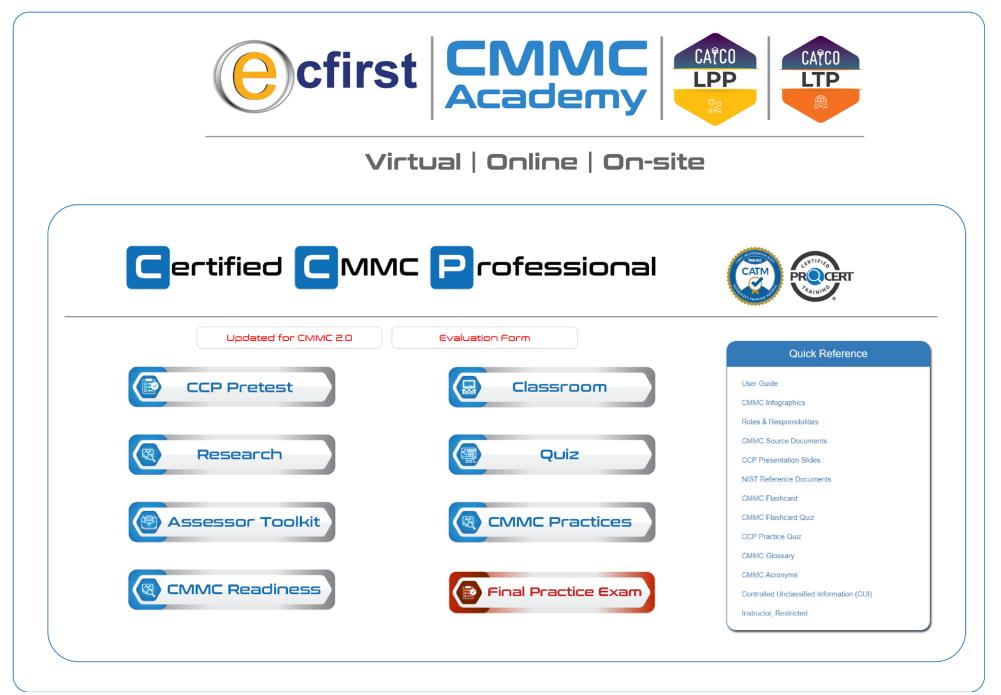


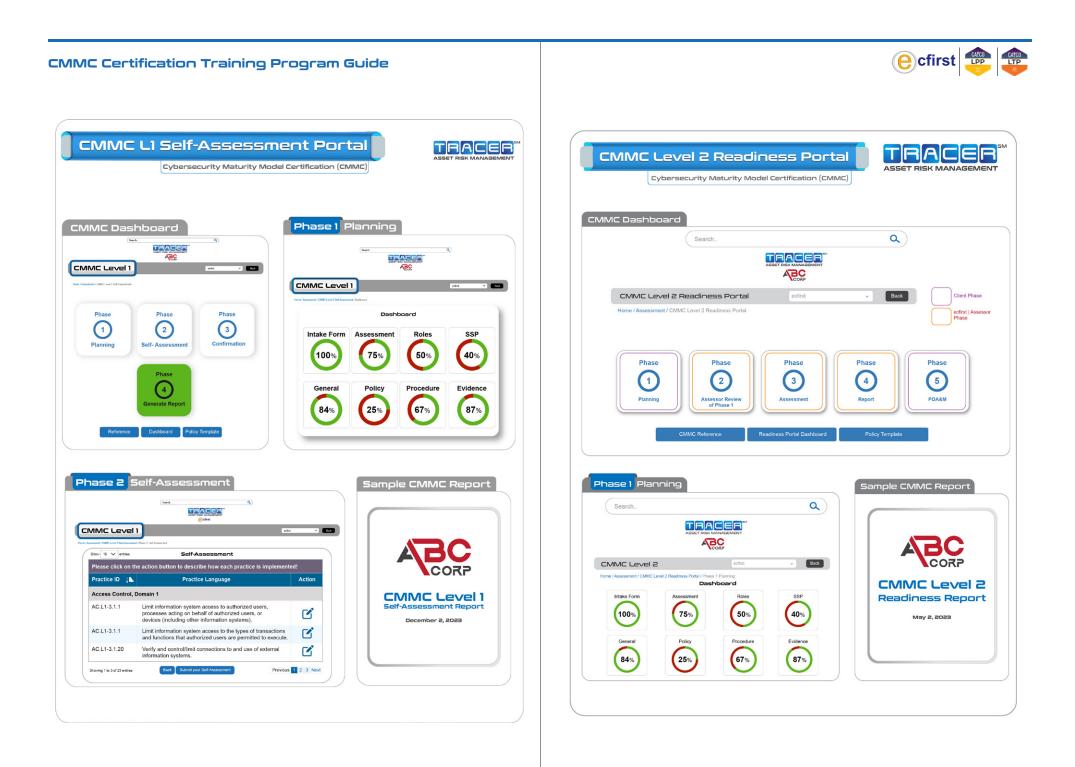




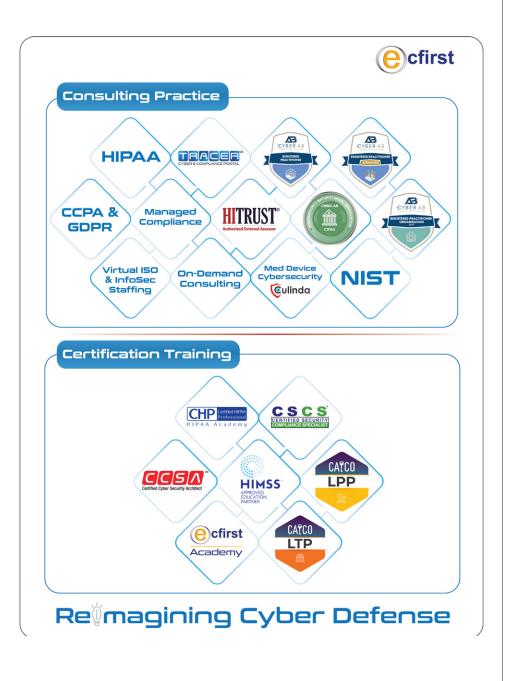














### Global Cyber Defense Thought Leader MSEE | CISSP (ISSAP | ISSMP) | CMMC (CCA, CCP, PA, PI, RPA, RP) | HITRUST



+ISACA

Mr. Ali Pabrai, a global cybersecurity & compliance expert, is the chairman & chief executive of ecfirst. A highly sought after professional, he has successfully delivered solutions to U.S. government agencies, IT firms, healthcare systems, legal & other organizations worldwide. His career was launched with the U.S. Department of Energy's nuclear research facility, Fermi National Accelerator Laboratory. He has served as vice chairman and in several senior officer positions with

Mr. Pabrai has led numerous engagements worldwide for ISO 27001, PCI DSS, NIST, CMMC, GDPR, CCPA, FERPA, HITRUST CSF and HIPAA/HITECH. Mr. Pabrai served as an Interim CISO for a health system with 40+ locations.

Mr. Pabrai has presented passionate briefs to tens of thousands globally, including the USA, United Kingdom, France, Taiwan, Singapore, Canada, India, UAE, Saudi Arabia, Philippines, Japan, Ireland, Bahrain, Jordan, South Africa, Egypt,

He is a globally renowned speaker who has been featured as a keynote as well as moderated cybersecurity conferences. Mr. Pabrai is the author of several published works. Clients that Mr. Pabrai has delivered to have included the U.S. Defense Intelligence Agency (DIA), and the U.S. Naval Surface Warfare Center.

Mr. Pabrai was appointed and served (2017) as a member of the select HITRUST CSF Assessor Council. Mr. Pabrai is a proud member of the InfraGard (FBI).

<sup>44</sup> We have had the true pleasure of working with Ali Pabrai at conferences all over the world during the past few years – with one unanimous word that keeps resounding among audiences and staff alike - AWESOME! " Michael Mach | Conference Program Manager | ISACA

#### FBI Conference

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<sup>66</sup> On behalf of the Idaho InfraGard (FBI), I would like to thank Pabrai for presenting at our conference. Pabrai is the kind of speaker you want to bring to executives and staff. He says it in a simple, no nonsense way, in a manner that everyone can understand." Rachel Zahn | President | InfraGard (FBI) | Idaho Alliance

<sup>44</sup> You delivered a fantastic presentation and we all felt your passion for cyber security. James E Lamadrid | Supervisory Special Agent | Federal Bureau of Investigation (FBI) | Cyber Task Force

<sup>16</sup> Thank you Pabrai. Your enthusiasm and relevance for the Information Security material you presented at our combined Infragard (FBI) conference in Idaho Falls was very well received and pertinent to both our chapter as an organization and the constituents in attendance.\*\*

<sup>44</sup>As a government employee, I appreciated the simplified insight of highlighting the importance of compliance and funding compared to information security success beyond qualitative metrics. I heard many times over that your specific information with measurable results made your material directly relevant to individuals, businesses and organizations. Thanks again and I hope you are able to join us again in the future. Clark Harshbarger | FBI

