Naval Facilities Engineering Systems Command

NAVFAC SOUTHEAST

Cybersecurity Maturity Model Certification (CMMC) 2.0

Presented by Keith Long

Panel: Andrea Freeman, Antonio Jefferson, Joseph Ellis

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CIO Cybersecurity POCs

CYBERSECURITY PROGRAM OVERSIGHT

CIO2 CYBERSECURITY

CIO2: Joseph Ellis
Cybersecurity Division Director
904-542-5839

CIO21: Maria Lopez
RMF Team Lead
Risk Management Framework (RMF)
Requests for Authority-to-Operate (ATO)
904-546-9060

CIO42: Bobby Kelley
Control Systems Support Branch Manager
AMI, SCADA, DDC, and HVAC Support
Cyber Hygiene & Continuous Monitoring Support
904-542-2490

CIO: Andrea Freeman
Command Information Officer
904-542-4191

CIOPM: Antonio Jefferson
Cybersecurity Program Manager
Red Zone/Cybersecurity Commissioning
Construction and Design Contracts Review
904-546-9056

CIO43: Paddy Jackson
Information Systems Security Engineer Team Lead
Cybersecurity Commissioning Support
Risk Management Framework (RMF) Support
904-542-5488

CIO4 OPERATIONAL TECHNOLOGY

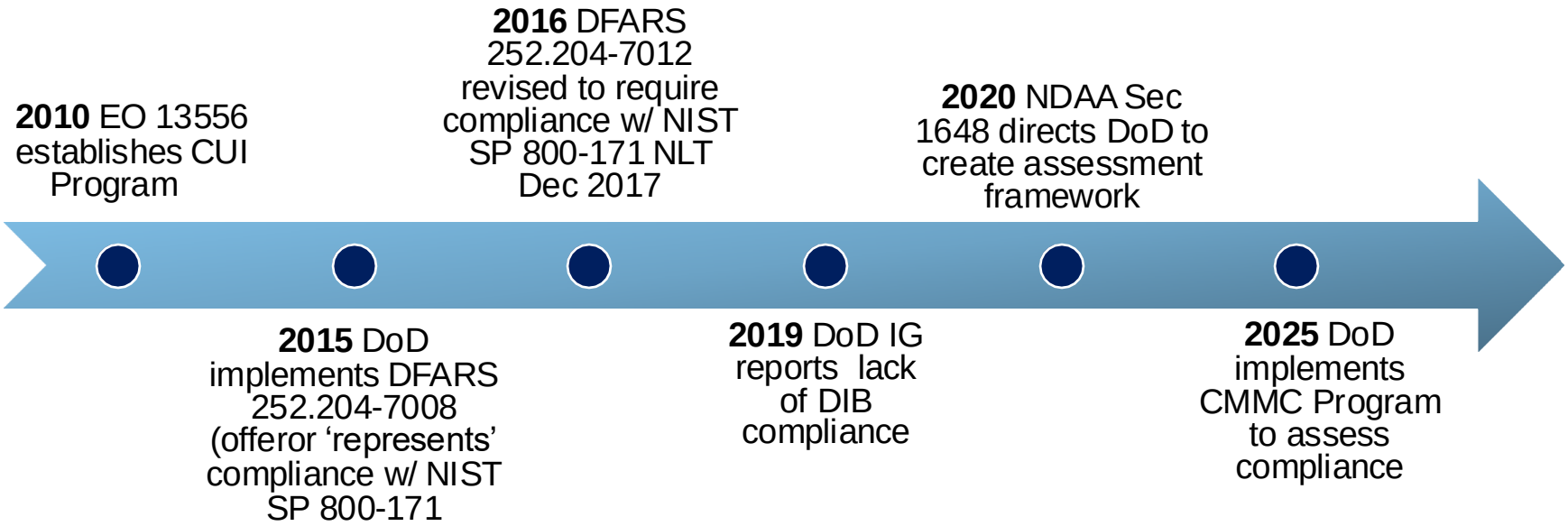
CIO4: : Kevin Gaddist
Acting Operation Technology Division Director
904-542-8495

CIOC2: Joseph Ellis
Defensive Cybersecurity Operations
Protect Systems and Networks from Cyber Threats
Analyze Cyber Threats and Vulnerabilities
904-542-5839

CIO44: Keith Long
CyCx Team Lead
Cybersecurity Commissioning Support
Construction and Design Contracts Review
904-542-8434

CMMC Program Overview and History

The CMMC Program helps ensure that DoD contractors and subcontractors comply with DoD requirements to safeguard Federal Contract Information (FCI) and Controlled Unclassified Information (CUI).



Cyber Maturity Model Certification (CMMC)

What:

A consistent pre-award assessment methodology to determine whether a prospective contractor has implemented cybersecurity protections necessary to adequately safeguard DoD information.

Why:

To increase the cybersecurity posture of the DIB and better protect sensitive unclassified information.

How:

All defense contractors and subcontractors will show compliance with applicable security requirements through self-assessment or independent assessment, prior to contract award (excluding Commercial-Off-The-Shelf procurements).

CMMC Applicability

- **CMMC Program requirements will apply to all DoD solicitations and contracts for which a defense contractor or subcontractor will process, store, or transmit FCI or CUI on its unclassified contractor information systems.**
  - New DoD solicitations
  - New DoD procurement instruments including contracts, task orders, delivery orders
  - As a condition to exercise an option period
  - Subcontractors are subject to flow-down requirements

The CMMC Program does not alter separately applicable requirements to protect FCI or CUI

Safeguarding FCI and CUI

Safeguarding Requirements for Non-federal Information Systems

FCI

- Information that is not marked as public or for public release and is not designated as CUI
- Defined in Federal Acquisition Regulation (FAR) 52.204-21
- Minimum safeguarding requirement: 48 CFR 52.204-21

CUI

- Information that is marked or identified as requiring safeguarding in the DoD CUI Program
- Defined in 32 Code of Federal Regulations (CFR) Part 2002
- Minimum safeguarding requirement: NIST SP 800-171

Existing DoD Cybersecurity Requirements

- **DFARS clause 252.204-7012 – Effective Dec 2017**
  - Safeguard DoD CUI that resides on or is transiting through a contractor/subcontractor internal information system or network by implementing NIST SP 800-171 at a minimum
  - Report cyber incidents that affect contractor/subcontractor ability to perform requirements designated as operationally critical
- **DFARS Provision 252.204-7019 – Effective Nov 2020**
  - Implement DFARS clause 252.204-7012 and have at least a Basic NIST SP 800-171 DoD Assessment that is current (i.e., not more than three (3) years old unless a lesser time is specified in the solicitation) posted in Supplier Performance Risk System (SPRS)
- **DFARS clause 252.204-7020 – Effective Nov 2020**
  - Provide Government access when necessary to conduct or renew a higher-level Assessment
  - Include requirements of the clause in all applicable subcontracts and ensure applicable subcontractors can conduct and submit an Assessment

CMMC assesses whether a prospective DoD contractor has implemented these standards

The CMMC Clause

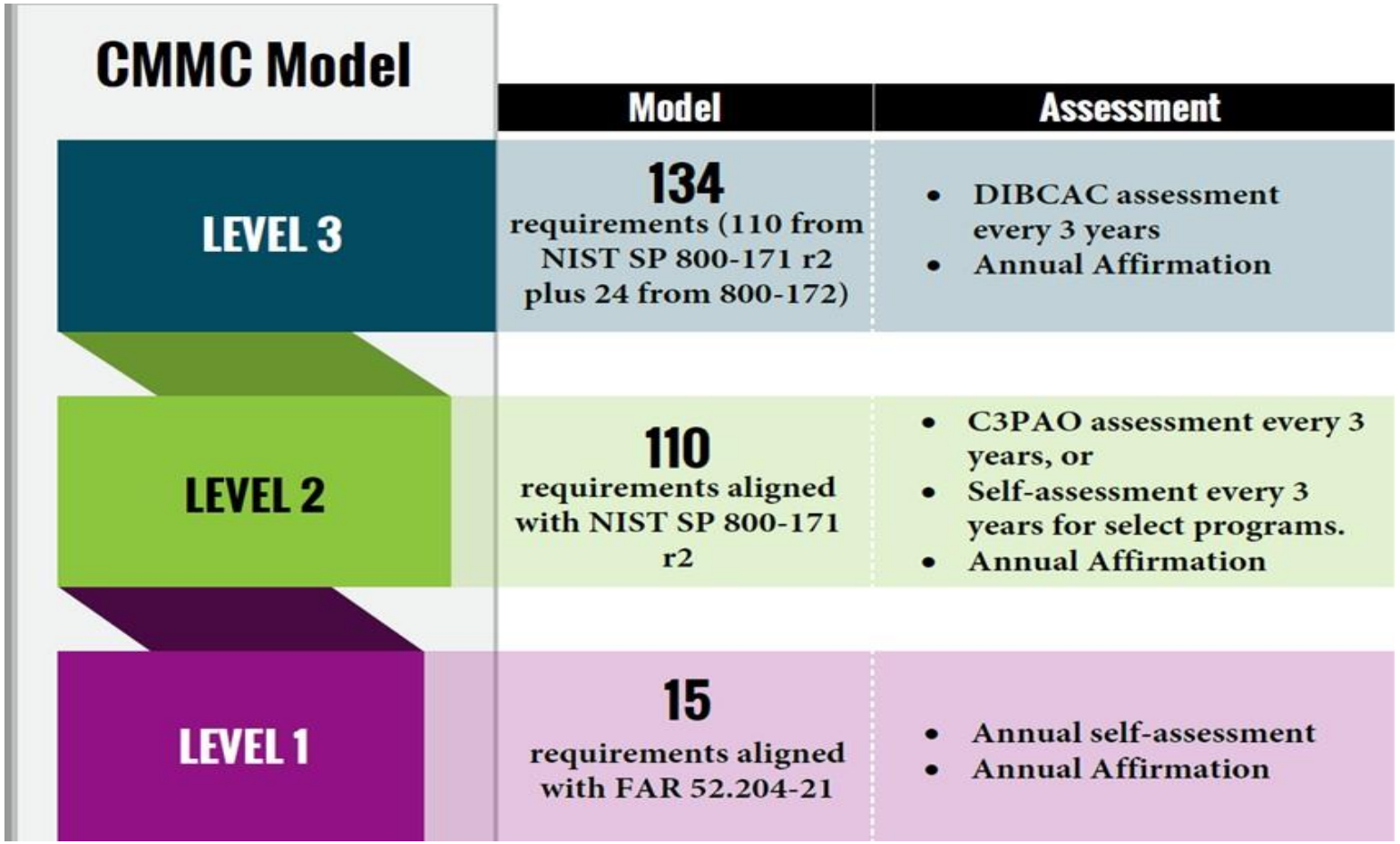
- **DFARS Clause 252.204-7021**

- Relies on the requiring activity to identify the appropriate CMMC status requirements based on the type of information to be processed, stored, or transmitted

- Requires the contractor/subcontractor to:
  - Develop and update Artifacts and Deliverables per RFI/RFP
  - Conduct Self-Assessment or request a C3PAO or DIBCAC to perform a CMMC Certification Assessment, depending on the sensitivity of the data on the contractor's or subcontractor's information system
  - Complete annual affirmation of continued compliance in SPRS
  - Flow-down the DFARS clause 252.204-7021 to subcontractors

DoD is updating Title 48 CFR (the DFARS) to include revised CMMC Requirements

Revised CMMC Framework Requirements



When specified in a solicitation, all CMMC requirements must be met prior to award

CMMC Alignment to NIST SP 800-171 Revisions

- DoD followed federal rulemaking guidelines when aligning CMMC assessment requirements to NIST SP 800-171 Rev 2.
- Defense contractors can implement NIST SP 800-171 Rev 3, but must comply with Rev 2 requirements not covered in Rev 3 to meet CMMC assessment requirements.
- DoD will incorporate Rev 3 with future rulemaking.

Conditional and Final Status

- An Organization Seeking Assessment (OSA) may achieve a **Conditional CMMC Status** if the initial assessment (with passing score) resulted in allowable POA&M items.

- An Organization Seeking Certification (OSC) achieves a **Final CMMC Status** when assessment results in a passing score with no POA&M, or when the POA&M has been closed out within 180 days of achieving a Conditional CMMC Status.

CMMC Post-Assessment Remediation

❑CMMC Program will allow limited use of POA&Ms

- POA&Ms are not allowed for CMMC Level 1.
- Refer to§170.21 of the 32 CFR CMMC Program final rule for CMMC Level 2 and Level 3 POA&Ms requirements, including critical requirements not allowed in a POA&M.

❑Closeout Assessment

- POA&M closeout Self-Assessment is conducted by the OSA.
- POA&M closeout Certification Assessment is conducted by a C3PAO or the DIBCAC.
- POA&Ms must be closed out within 180 days of when the CMMC Assessment results are finalized and submitted to SPRS or CMMC eMASS, as appropriate.

Failure to close POA&M within 180 days will result in an expired CMMC Status

CMMC Scoring Methodology (§ 170.24)

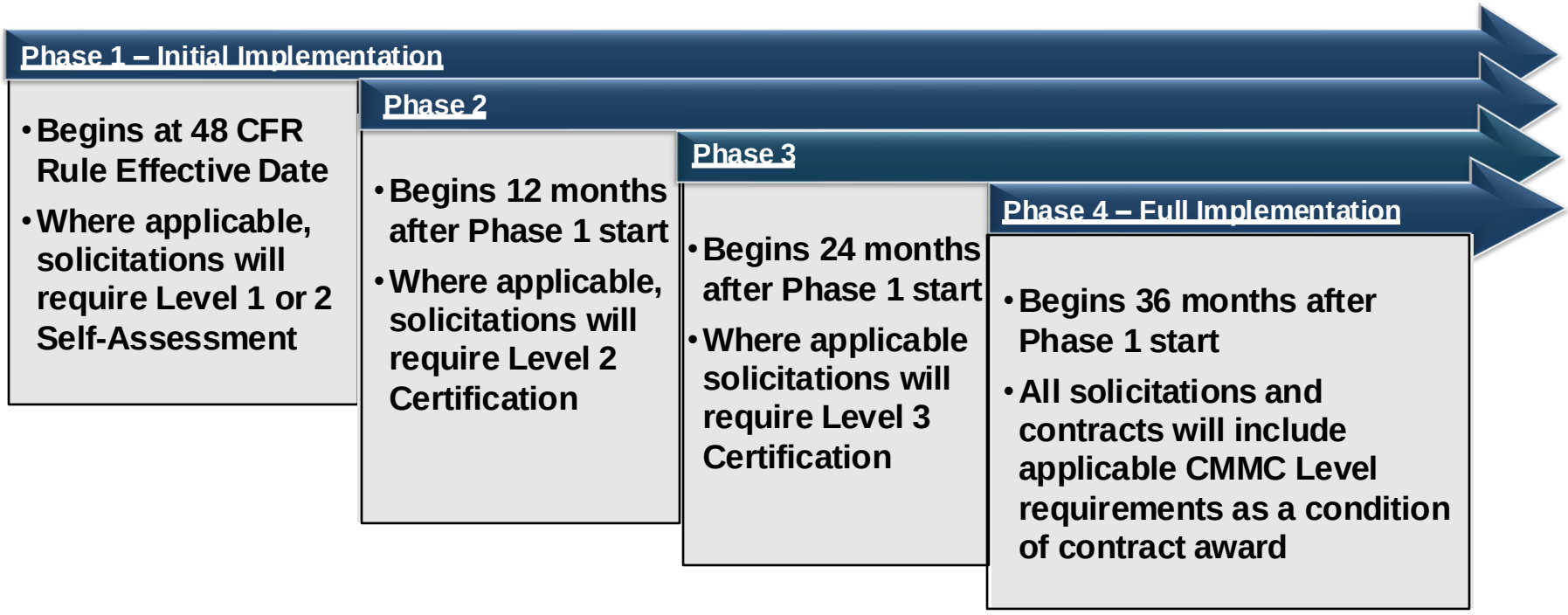
- Level 1: Score not required; either MET or NOT MET
- Level 2: Security requirements are valued 1, 3, or 5 points with a range of -203 to 110, with a **minimum passing score of 88**. Partial credit is allowed for 2 requirements:
  - MFA: 5 points deducted from overall score of 110 if MFA is not implemented or implemented only for general users and not remote and privileged users;
  - MFA: 3 points deducted if MFA is implemented for remote and privileged users but not implemented for general users;
  - FIPS: 5 points deducted from overall score of 110 if no cryptography is employed;
  - FIPS: 3 points deducted if cryptography is employed, but not Federal Information Processing Standards (FIPS) validated.
- Level 3: All Level 3 security requirements are valued 1 point with a maximum score of 24. Requires a prerequisite Level 2 score of 110.
- **Results for all Levels are posted in SPRS and reviewed by contracting officers and requiring activities.**

Standards Acceptance

Contractors and subcontractors that completed a Defense Contract Management Agency (DCMA) Defense Industrial Base Cybersecurity Assessment Center (DIBCAC) High Assessment aligned with CMMC Level 2 Scoping are eligible for CMMC Level 2 Final Certification Assessment under the following conditions:

- **Achieved a perfect score with no open POA&M from a DCMA DIBCAC High Assessment conducted prior to the effective date of the CMMC rule**
  - CMMC Level 2 will be valid for 3 years from the date of the original High Assessment.
  - Eligible High Assessments include those conducted under DCMA's Joint Surveillance authority.
- **Scope of the CMMC Level 2 Final Certification Assessment is identical to the scope of the High Assessment**

Phased Implementation of CMMC Requirements



In some procurements, DoD may implement CMMC requirements in advance of the planned phase

CMMC Process - OSA Perspective

Government determines CMMC Status Requirements

CMMC Status visible to DoD in SPRS

Contractor/Sub perform Self-Assessment

OR

Contractor/Sub completes Annual Affirmation

Contractor/Sub undergo C3PAO or DIBCAC Assessment

Assessment results entered into SPRS or eMASS, depending upon assessment type

CMMC Ecosystem

DoD – DoD CIO CMMC PMO - § 170.6

- Provides oversight of the CMMC Program, to include the CMMC AB
- Develops and maintains the CMMC Model Overview, Assessment Guides, Scoping Guides, and Hashing Guide
- Scheme Owner for ISO/IEC Requirements
- Establishes DoD requirements of C3PAOs, CAICO, Assessors, and Instructors

DoD - DCMA DIBCAC - §170.7

- Conducts CMMC Level 2 Certification Assessments on C3PAOs
- Conducts CMMC Level 3 Certification Assessment on DIB
- Advises DoD CIO CMMC PMO

DoD Contract

CMMC AB - §170.8

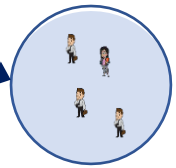
- Professionally staffed
- Managed by Board of Directors
- ISO / IEC 17011 Compliant
- Accredits C3PAOs
- Accredits CAICO

Agreements

CAICO - §170.10

C3PAOs – § 170.9

- ISO / IEC 17020
- Conducts CMMC Level 2 Certification Assessments on DIB contractors
- Employs Assessors
- Submits Assessment Report in eMASS
- Issues CMMC certificate to DIB contractor



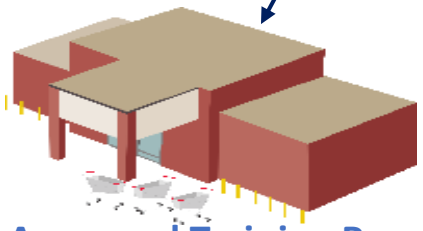
CMMC Certified Processionals, Assessors & Instructors – § 170.11, § 170.12 and 170.13

- Certified by CAICO IAW ISO/IEC 17020

CAICO

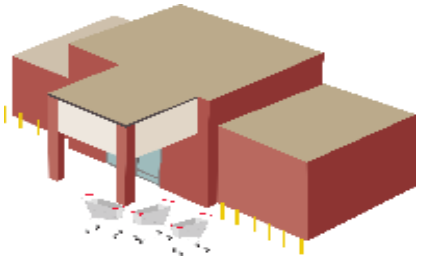
CMMC Assessor and Instructor Certification Organization - §170.10

- ISO/IEC 17024
- Certifies CMMC Certified Professionals, Assessors, and Instructors
- Defines knowledge areas required for CCPs, CCA,s and CCIs with input from DoD
- QCs curriculum developed by ecosystem



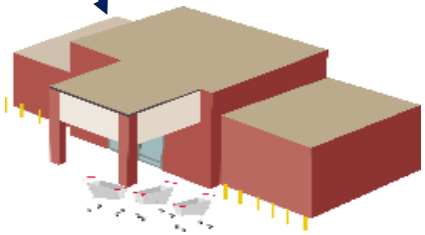
Approved Training Providers

- Trains Certified Professionals
- Trains Assessors
- Trains Instructors



Approved CMMC Exam Org

- Develops and administers Assessor and Instructor Certification Exams



Approved Publisher Partners

- Develops Training Materials

NAVFAC Southeast Preparation For CMMC

- Communicating and Collaborating with Industry Partners on CMMC compliance
- Developing a checklist to aid in (1) reviewing existing infrastructure and privatized Operational Technology (OT) systems and (2) identifying potential changes needed to safeguard FCI and CUI.
- Brainstorming about site visits to perform unofficial spot checks to aid in audit preparation.

Frequently Asked Questions

- If the government has a contract with a private industry to run a operational technology (OT) system does the CMMC rules apply? **If the OSC runs the OT and the OT is managed and ran by a member of the DIB than the OT is in scope. Additionally, the contract established between the government and the OSC is a contract, which means the OSC must be CMMC Level 2 certified and the OT is in scope.**

- What happens to a contractor/sub-contractor who violates the CMMC process (e.g. negligence, mishandling of FCI/CUI)? **From a CyberAB perspective, they can be dropped from all official registrations and certifications. From a client perspective, the client may sue for damages if they followed the consultant's recommendations and those recommendations led to a breach.**

- In regard to the CMMC process from the OSA perspective, the government determines CMMC status requirements; are these requirements determined by the location or the mission? For example, would the CMMC status requirements for a government contract at Fort Liberty be based on its location or mission? **The location is not relevant. The requirements are based on the type of data the contract includes. Requirements for a specific type of assessment are listed in the contract-specific clause 252.202-7021.**

Frequently Asked Questions

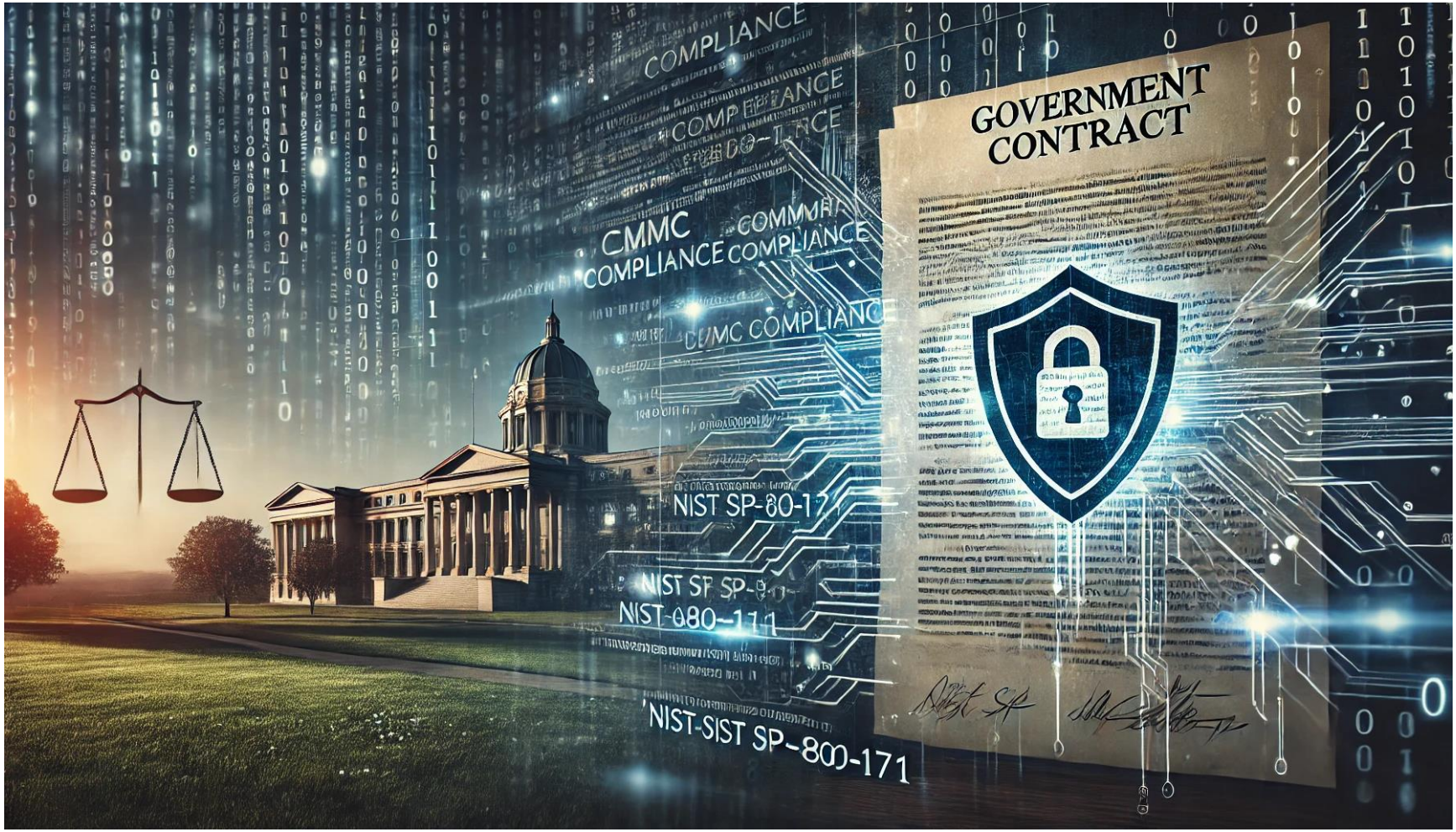
- In regard to CMMC scoring methodology, the results for all levels are posted in SPRS and reviewed by contracting officers and requiring activities; who are the requiring activities? **The required activity is the program office for the department (i.e. Army, Air Force, Navy, Marines)**

- What's the difference between DCMA DIBCAC and C3PAO? **A C3PAO performs CMMC assessments on companies to determine their cybersecurity maturity level, while DCMA DIBCAC is the organization that manages and oversees the CMMC assessment process, including accrediting C3PAOs. The C3PAOs act as independent auditors, evaluating companies against CMMC standards to determine their compliance level, whereas DCMA DIBCAC sets the CMMC standards and ensures the quality of C3PAO assessments.**

- Does CMMC affect current DoD Contracts? **CMMC will affect new DoD contracts, starting from 2025. However, the transition may vary depending on the type of contract. Existing contracts will not require CMMC certification unless they are modified or renewed after the CMMC rules are fully implemented.**

Additional Resources

- Please refer to the **official DoD CMMC Program website**, including the FAQ page, for more information about CMMC: https://dodcio.defense.gov/CMMC/
- **DoD no-cost cybersecurity compliance resources** can be found at dibnet.dod.mil under *DoD DIB Cybersecurity-As-A Service (CSaaS) Services and Support*.
- **Additional cybersecurity resources** can be found at:
  - https://www.cisa.gov/shields-up
  - https://www.nist.gov/mep
  - https://www.apexaccelerators.us/#/
- **Locate a C3PAO**, visit the CMMC Accreditation Body Marketplace at cyberab.org.
- To **obtain additional information on CMMC Assessments, Scoping, and Hashing**, visit: https://dodcio.defense.gov/ cmmc/Resources-Documentation/
- The Department's **CUI Quick Reference Guide** includes information on the marking and handling of CUI: https://www.dodcui.mil/
- To find a **FedRAMP Moderate Authorized Service Provider**, please visit: https://marketplace.fedramp.gov/assessors


COMPLIANCE
CMMC
COMPLIANCE COMPLIANCE
GOVERNMENT
CONTRACT
NIST SP-80-171
NIST-SIST SP-800-171

Questions??