

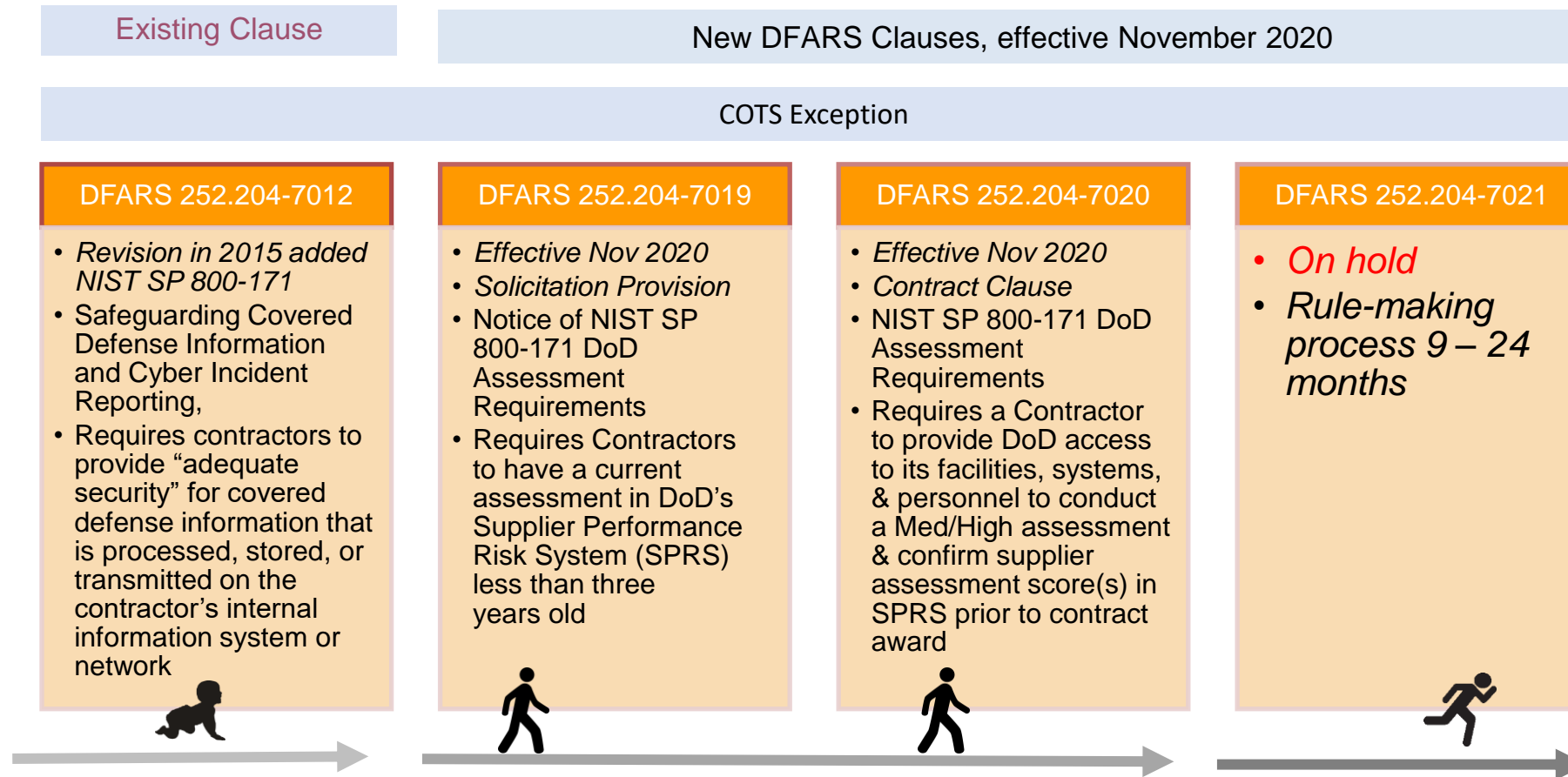


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Cyber Maturity Model Certification (CMMC) 2.0 Update

DFARS Clauses: CMMC “Crawl-Walk-Run”



CMMC 2.0 Model Structure Announced by DoD in November 2021

CMMC MODEL 1.0	Model		Assessment
Level 5 Advanced CUI, critical programs	171 practices	5 processes	Third-Party
Level 4 Proactive Transition Level	156 practices	4 processes	None
Level 3 Good CUI	130 practices	3 processes	Third-Party
Level 2 Intermediate Transition level	72 practices	2 maturity processes	None
Level 1 Basic FCI only	17 practices		Third-Party

CMMC MODEL 2.0	Model	Assessment	Comments
Level 3 Expert	110+ practices based on NIST SP 800-172	Triannual government- led assessments	Critical defense programs
Level 2 Advanced	110 practices aligned with NIST SP 800- 171	Triannual third-party assessments for critical national security information: Annual self-assessment for select programs	Contractors managing information critical to national security
Level 1 Foundational	17 practices	Annual self-assessment	Contractors who do not handle information deemed critical to national security



CMMC 2.0

- Once CMMC 2.0 is implemented, DoD will specify the required CMMC level in the solicitation and in any Requests for Information (RFIs), if utilized.
- If contractors and subcontractors are handling the same type of Federal Contract Information (FCI) and CUI, then the same CMMC level will apply. In cases where the prime only flows down select information, a lower CMMC level may apply to the subcontractor.
- DoD intends to allow companies to receive contract awards with a Plan of Actions and Milestones (POA&M) on a limited basis to complete CMMC requirements.
 - Allows the use of POA&Ms on a limited basis
 - Strictly time-bound – potentially 180 days to achieve full compliance
 - Highest weighted requirements cannot be on POA&M list
 - **DoD will establish a minimum score** requirement to support certification with POA&Ms; possibly a score of 90

The CMMC *program rule* needs to be effective before the CMMC *clause* begins to show up in contracts



First, DoD must submit the CMMC program rule to OMB for regulatory review by OIRA

- DoD: The Department of Defense
- CMMC: Cybersecurity Maturity Model Certification
- OMB: The Office of Management & Budget
- OIRA: The Office of Information & Regulatory Affairs



Then, the CMMC program rule is published in the Federal Register

- The Federal Register is the official daily publication for agency rules, proposed rules, and notices of Federal agencies and organizations, as well as for Executive Orders and other presidential documents.



Finally, the published rule becomes effective depending on one of two scenarios

- Published with "Proposed Rule" status
- or
- Published with "Interim Final Rule" status



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Timeline – Submission Date Key

Interim Final Rule or Proposed Rule?



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Key Takeaways

CMMC is a DoD assessment program that evaluates the government-wide requirements in NIST SP 800-171

The CMMC program rule needs to be effective before the CMMC clause begins to show up in contracts

There is a case for both possible rule status scenarios; DoD has consistently pursued an interim final rule

NIST SP 800-171 implementation for 50-100 person companies averages 12-18 months; most companies are over a year behind the interim final rule scenario

Recent indications are potential delays with rulemaking, and we will continue to monitor updates closely

Project Spectrum

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Project Spectrum is an initiative supported by the Department of Defense [Office of Small Business Programs](#).

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