

# CMMC Anticipation: Makin' Us Late and Keepin' Us Waiting

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- Revisiting CMMC First Principles
- CMMC: The Cyber House Rules
- The Cyber AB and The Powers That Be
- Are You There DoD?...It's Me, the CMMC Ecosystem
- The Back of the CMMC Baseball Card
- Where Are We Going and When Do We Go?
- Q&A

## “Why, remind me again, are we even doing this?”

- The Pentagon entrusts you (*we're talking to you, DIB*) with very important information
- This information is theirs...not yours
- You have agreed to safeguard this information via conformance to NIST SP 800-171
- Yet cyber threat actors continue to compromise your networks and exfiltrate this information
- Our adversaries then take this information to undermine our national defense and security

# Revisiting CMMC First Principles



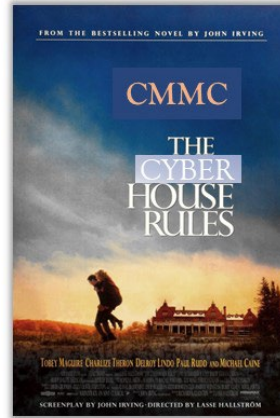
# ENTER CMMC

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# CMMC: The Cyber House Rules

## Title 32 CMMC Rule

- Title 32: National Defense
- RIN: 0790-AL49
- Establishes CMMC as a DoD program
- Proposed Rule released Dec 2023
- Main elements of significance:
  - History of the program
  - Glossary
  - Answers to questions from 2020 CMMC rule
  - CMMC roles and responsibilities
  - Program requirements
  - Affiliated documentation (e.g., guides)



## Title 48 CMMC Rule

- Title 48: Federal Acquisition System
- RIN: 0750-AK81
- Establishes contractual requirements
- Rule expected...now.
- Anticipated elements of significance:
  - New or updated DFARS clauses
  - Guidance for contracting officers
  - Administrative matters
  - ?

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# The AB Powers That Be



- **Authorize** CMMC Third-Party Assessment Organizations
  - **Accredit** CMMC Third-Party Assessment Organizations
  - Enforce the CMMC Code of Professional Conduct (CoPC)
  - **Render final decisions on CMMC Assessment appeals**
  - Administer the CMMC Ecosystem, including applications
  - Operate the CMMC Marketplace
  - Convene the CMMC Ecosystem, as necessary
- Certify CMMC Assessors and Instructors
  - Oversee CMMC formal training
  - Administer CMMC continuing education

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# Are You There DOD? It's Me, the CMMC Ecosystem

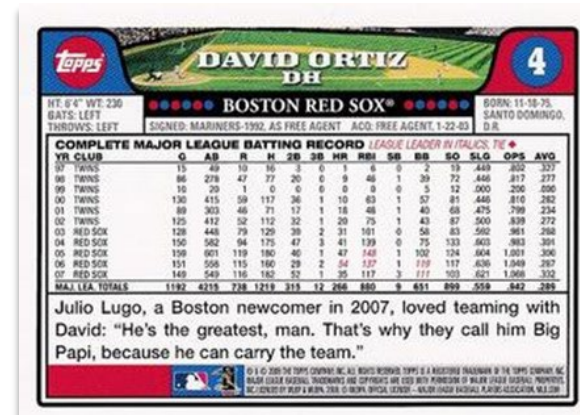
- Federal Rulemaking is a curious thing...
- DoD is doing what they said they would do
- And they are holding you accountable to do what you said you would do
- That notwithstanding, it would be really great if DoD would:
  - Actively promote the program
  - Use DoD public affairs to assist in recruiting CMMC Assessors
  - Provide more details on ESP (*i.e.*, MSPs and MSSPs) certification
  - Clarify further the FedRAMP Moderate equivalency determination policy for CSPs
  - Revisit CMMC Assessor Tier 3 Suitability requirements and process



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# The Back of the CMMC Baseball Card

Cadre	April 2024
<b>Authorized C3PAOs (Active)</b>	<b>51</b>
Candidate C3PAOs (Active)	240
Applicant C3PAOs	179
Registered Practitioner Advanced (RPAs)	113
Registered Practitioners (RPs)	1,333
Registered Practitioner Organizations (RPOs)	309
<b>Certified CMMC Assessors (CCAs)</b>	<b>205</b>
Trained CCA Candidates	200
Certified CMMC Professionals (CCPs)	737
Trained CCP Candidates	1,983
Licensed Publishing Partners	14
Licensed Training Providers	49



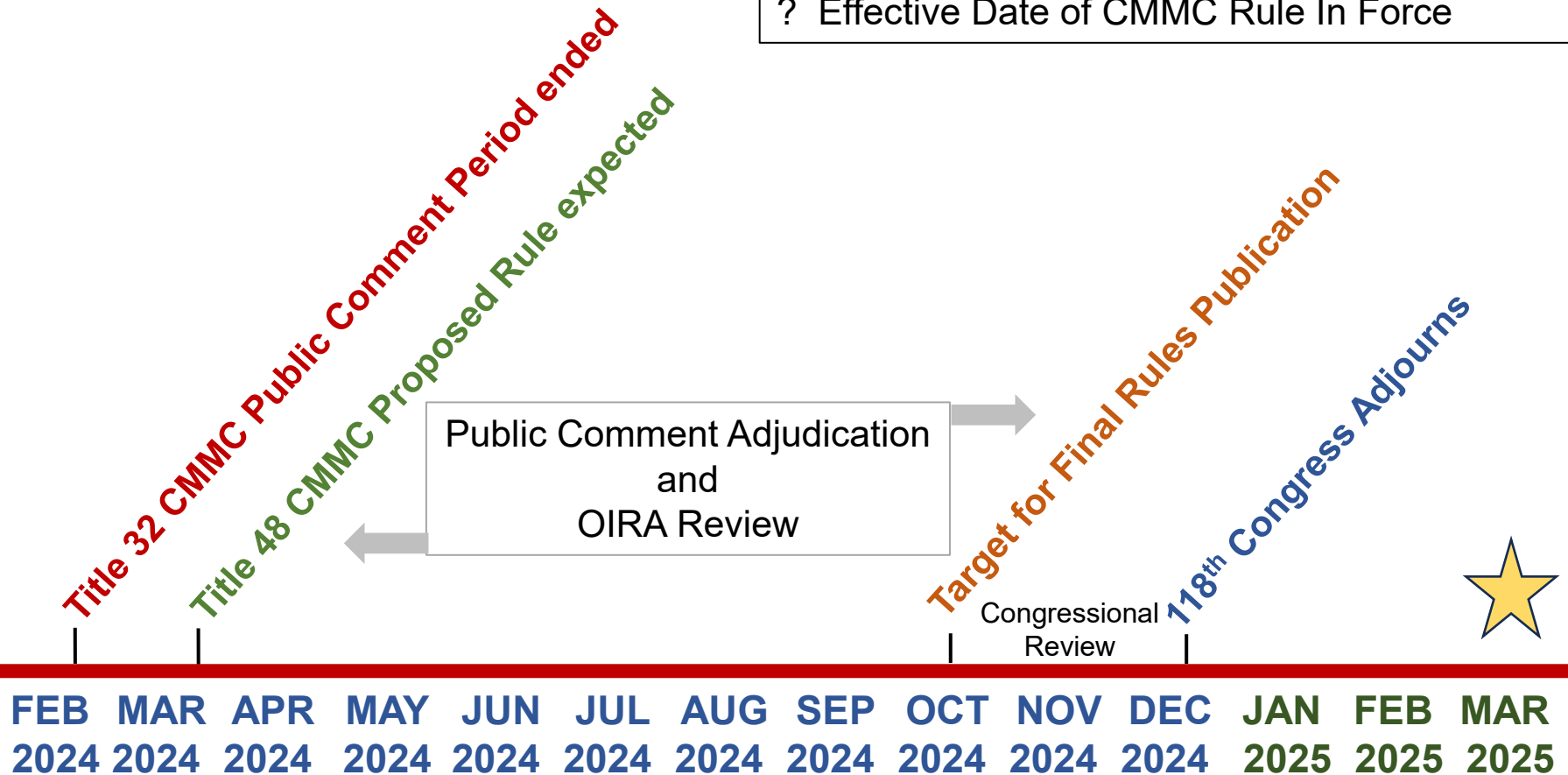
Joint Surveillance Assessments	Total
Total OSC JSVA Candidates	<b>188</b>
Assessments Completed	54
In Progress or Scheduled	20
Eligible with Scheduling Pending	28
Not Eligible or OSC Withdrawals	53
Under Review	33
C3PAOs Participating	28

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# Anticipating the CMMC Timeline

## Dates We Do Not Yet Know

- ? Completion of Comment Adjudication by DoD
- ? Completion of OIRA Interagency Review
- ? Effective Date of CMMC Rule In Force

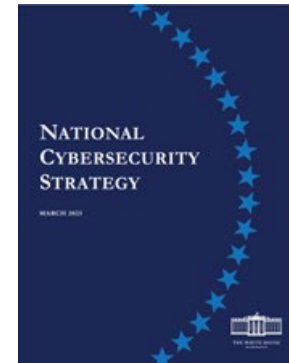


We do not necessarily expect CMMC to enter into force officially until **Q1 2025** at the earliest

# CMMC and the National Cybersecurity Strategy

## The CMMC model is in consonance with many of the key principles of the Strategy

- Establishes minimum cybersecurity requirements for critical infrastructure
- Rebalances the responsibility to defend; places appropriate burdens on industry (*i.e.*, the DIB)
- Realigns incentives to favor the long-term
- Utilizes existing cybersecurity frameworks (NIST SP 800-171)
- Designed to support the harmonizing of regulations across the government landscape
- Scaling public-private collaboration
- Holds the stewards of our data accountable
- Leverages Federal procurement to improve accountability





# 51 Authorized C3PAOs



Booz | Allen | Hamilton



**Get started now...CMMC will be here before you realize it**

- The requirements are not going away
- Help is out there...you don't have to go it alone
- Take advantage of the delays in rulemaking
- **The future is now**

