



**CMMC Webinar with Chris Newborn, DAU**

**“Steps to prepare for CMMC Assessment”**



## **Agenda**

- . Introduction**
- . Steps to prepare for CMMC Assessment**
  - . Do the DAM**
  - . Have the deliverables (SSP, SAR, POA&M)**
  - . Upload to SPRS**
  - . Get Audit Ready**



## Company Overview



**Kelly C. Kendall, MBA**

**CEO and President**

Disabled Veteran (US Marine Corps)



**Chuck Buresh**

**EVP and COO**

- ★ Formed 2018
- ★ CVE Verified SDVOSB/VOSB
- ★ Founded by Two Disabled Veterans, and one Veterans/  
Military Advocate
- ★ Extensive Experience



## Services and Products Offered

### Cybersecurity Professional Services

- ★ Risk Management and Assessment
- ★ Cybersecurity Support and Staffing Services
- ★ Vulnerability Assessment and Management
- ★ Regulatory Compliance Consulting
- ★ Cybersecurity Systems Integration

### IT Value Added Reseller

- ★ Managed Security Services
  - ★ SOC-as-a-Service
  - ★ Compliance-as-a-Service
- ★ IT Products and Services
- ★ Software Licensing



## Contractor's Preparation for CMMC

- DIB legally bound to follow the provisions of DFARS Clause 252.204-7012:
  - Safeguarding DoD CUI
  - Reporting Cyber Incidents
  - Flow-down DFARS Clause to subs/vendors
- Identify/focus efforts on deltas between DFARS Clause and CMMC process
- From the CMMC Accreditation Board:
  - “... Do not focus training on future requirements (CMMC) at the expense of current requirements ...”





## CMMC Scenario - Prime/Sub Prerequisites

- Ensures Subs are CMMC level certified or will be prior to awarding of contract
- Provides SSP & POA&M for CMMC certification of their network/Supply Chain Networks
- Conducts periodic (1/4ly, etc.) drills, inspections, Scans, IR exercises, Pen Testing
- Subject to random PMO / Gov. initiated Pen Test and Adversarial Red Team Assessment
- Plans supply chain / Subs security network upgrades for the projected Threat increase as per Gov. provided Intel over the lifecycle of the contract
- Reports loss /compromise /incident WRT CUI data on Prime/Subs networks
- Incorporates data at rest and in transit encryption, code signing, markings and physical security for all CUI. This applies in general to ALL forms of data communications & storage not just IP -based networks.
- Determine which services/capabilities will be performed in-house and out-sourced

### **Deliverables (have available):**

SSP, SAR, POA&M, SPRS Report

### **References:**

CFR 52.204-201

DFARS 252.204-7012 Clause

NIST SP 800-171 v1.1, DAM Tool

NIST SP 800-171R2/171B

NIST SP 800-171A

DoDI 5200.48

CMMC v1.02



## Documenting NIST SP 800-171 DoD Assessment Results

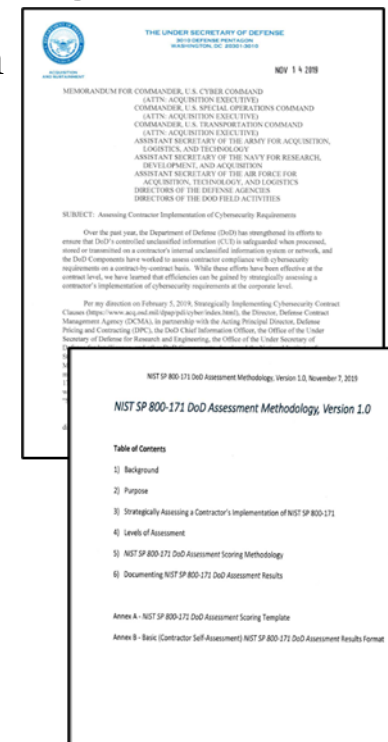
- **Summary level assessment scores will be posted in the Supplier Performance Risk System (SPRS) to provide DoD Components with visibility to the results of:**
  - Basic (self) assessments completed by the Contractor
  - Medium and High assessments conducted by DoD
- **DoD Components should rely on scores posted in SPRS in lieu of including requirements to assess implementation of NIST SP 800-171 on a contract-by-contract basis.**
- **Authorized Contractor representatives may access SPRS to view their own results**

Results posted in SPRS for each system security plan assessed:
<ul style="list-style-type: none"> <li>• The standard assessed (e.g., NIST SP 800-171 Rev 1)</li> </ul>
<ul style="list-style-type: none"> <li>• Organization conducting assessment (identified by DoD Activity Address Code (DoDAAC) or Commercial and Government Entity (CAGE) Code)</li> </ul>
<ul style="list-style-type: none"> <li>• Each information system/system security plan assessed, mapped to associated CAGE code(s)</li> <li>• — If contractor has multiple system security plans and/or CAGE codes, all CAGE codes must be mapped to appropriate system security plan(s)</li> </ul>
<ul style="list-style-type: none"> <li>• Date and level of assessment, i.e., Basic, Medium, High (Virtual) or High (Onsite)</li> </ul>
<ul style="list-style-type: none"> <li>• Summary level score (e.g., 105 out of 110)</li> </ul>
<ul style="list-style-type: none"> <li>• Date score of 110 will be achieved based on information gathered from associated plan(s) of action</li> </ul>



## NIST SP 800-171 v1.2.1, DoD Assessment Methodology Tool

- A methodology that enables assessment of a contractor's implementation of NIST SP 800-171, a requirement for compliance with DFARS Clause 252.204-7012
- **Consists of three+ levels of assessments (Basic, Medium, and High) that reflect the depth of the assessment and level of confidence in the assessment results**
- DCMA, Defense Counterintelligence and Security Agency (DCSA) and DoD Components completed High Assessments for the Department's largest contractors; **captured in the Supplier Performance Risk System (SPRS)**
- DoD will use methodology to assess the implementation of NIST SP 800-171 by its prime contractors. Prime contractors may use this methodology to assess the implementation status of NIST SP 800-171 by subcontractors.







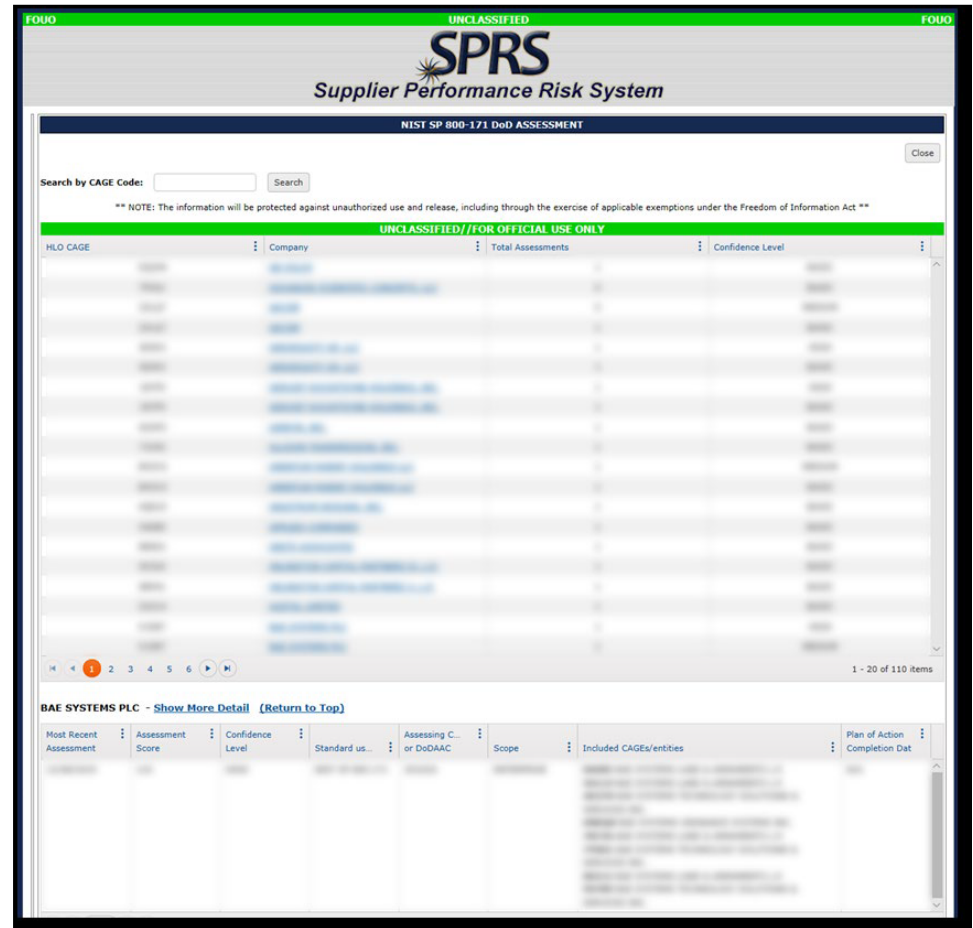
# SPRS Access

Go to

<https://www.sprs.csd.disa.mil>

for information on how to

access





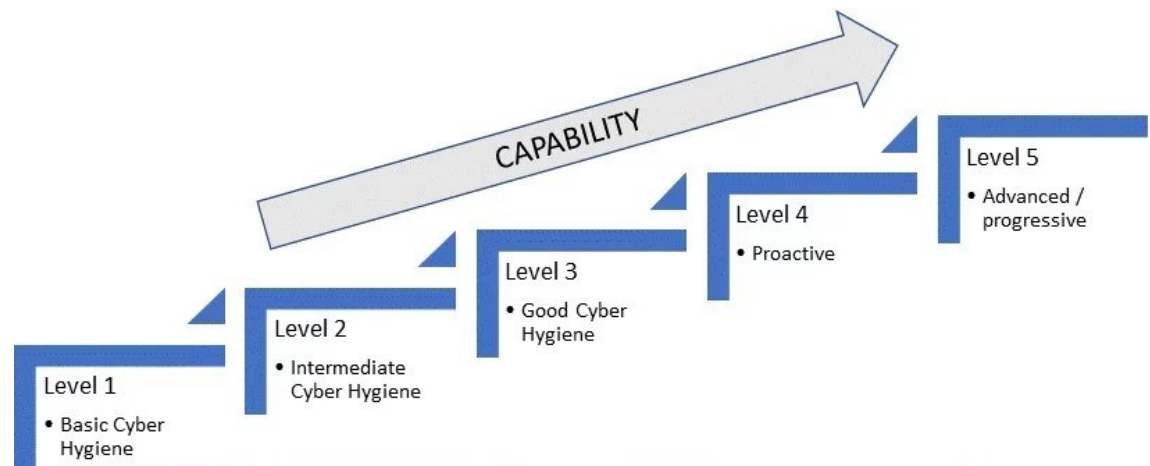
## **Jumpstart Process for "Audit Ready" From CMMC AB**

- **Baseline NIST CSF Risk Assessment**
- **30 Hours of Policy Editing**
- **Helper Approval of Edited Policies**
- **Adoption of Policies**
- **Implementation of Policies**
- **Updated Risk Assessment**
- **Producing POAM, SSP, DODAM reports**
- **CUI Compliant: CMMC Audit Ready**



## CMMC/NIST/DFARS Compliance Services

- ★ **Cybersecurity Risk Assessment - What problems are there?**
- ★ **Current Compliance Status Analysis - How ready are you?**
- ★ **Correct/Address All failed requirements**
- ★ **Mock Audit - How do you perform during an audit?**
- ★ **Remediation - Implement all needed changes to become compliant**





## **SUMMARY**

### **Steps to prepare for CMMC Assessment**

- . Do the DAM**
- . Have the deliverables**
- . Upload to SPRS**
- . Get Audit Ready**
- . Get Started Now**



**Thank You**

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