CMMC Overview: Are you Ready? Are you Sure?

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Today’s Presenters

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Needling Worldwide
DNV GL Group: Who we are

Long history, Global presence

≈100,000 Customers
1864 Established
350 Offices Worldwide
100+ Countries

GLOBAL SHARED SERVICES

OUR PURPOSE
To safeguard life, property and the environment

OUR VALUES
WE CARE for each other, our customers, our planet, and we take care of ourselves.
WE DARE to explore, to experiment, to be different, and to be courageous, curious and creative.
WE SHARE our experience and knowledge. We collaborate with each other and our customers, and we continue to grow and develop as a result.

OUR VISION
A trusted voice to tackle global transformations

MARITIME HEADQUARTERS: HAMBURG, GERMANY
OIL & GAS HEADQUARTERS: OSLO, NORWAY
ENERGY HEADQUARTERS: ARNHEM, NETHERLANDS
BUSINESS ASSURANCE HEADQUARTERS: LONDON, UK
DIGITAL SOLUTIONS HEADQUARTERS: OSLO, NORWAY

STRATEGY RESEARCH

GROUP CENTRE

DNV GL HEADQUARTERS: OSLO, NORWAY
DNV GL - Business Assurance: 

**Americas in a nutshell**

- **8** Offices (39 locations)
- **12,250+** Certificates
- **630+** Employees
- **500+** Hospitals Accredited
Certification & verification
Results in a certificate or statement of compliance.
- Management system certification
- Product assurance
- Certification of persons
- Sustainability reporting & assessment
- Supply chain management & assurance
- Sustainability practices
- Industry specific services

Assessment
Supports reliable decision making.
For many global brands, we perform audits and assessments that do not end in a certificate, but rather provide benchmark feedback and critical guidance on important metrics like corporate responsibility, environmental impact, safety and quality.
- Risk assessment
- Gap analysis
- ISRS™ assessment

Training
Learning how to improve from a global perspective.
Sustainable performance means having the in-house skills and knowledge to continuously improve. Our worldwide training programs empower customers to self-enhance and constantly adapt to their changing market conditions and customer needs.
- Accredited training courses (IRCA) and public training, in-house training

Focus industries
Automotive & aerospace
- Quality, safety and functional safety
Healthcare
- Patient safety, Managing infection risk, Disease-specific
Food & beverage
- Food safety and GFSI benchmarked standards, traceability, supply chain, responsible sourcing, product sustainability, aquaculture and safe & sustainable seafood
DoD Cybersecurity Maturity Model Certification (CMMC)

Puts cybersecurity on same level as costs, quality, and schedule
With over six decades of IT Security and Compliance experience, the Needling Worldwide management team is equipped to provide its clients with:

- Compliance Analysis (Gap Analysis);
- Risk Assessment;
- Internal IT Audit;
- Certification Readiness;
- Audit Readiness & Defense;
- Policy Development;
- Security Awareness Training;
- Virtual Chief Information Security Officer (vCISO).
What Is CMMC? and How Did It Come About?

- What is CMMC?
- How did it come about?
  - DoD IG 2019-105 Report on Contractors’ Compliance with DFARS 252.204-7012
  - Solution – CMMC with 3rd Party Assessment Organizations (3PAO) and independent auditors
  - Security model required between 17 control practices for maturity level 1 (basic hygiene), up to 171 control practices for maturity level 5 (advanced)
  - Most CMMC controls are migrated NIST 800-171 controls
Who is impacted?

- Defense Industrial Base (DIB)
  - Prime Contractors
  - Subcontractors and their subcontractors throughout the entire supply chain [Micro, Small, Medium, or Large]
  - Products/Parts vendors [Manufacturers]

- Exempt
  - CMMC does not apply to Classified Systems
  - CMMC does not apply to vendors of Commercial Off The Shelf (COTS) products [software or hardware vendors]
CMMC Maturity Levels

- **Maturity Levels**
  - **Level 1 – Basic Cyber Hygiene [17 Control Practices] FCI**
    - Processes - None
  - **Level 2 – Intermediate Cyber Hygiene [72 Control Practices] FCI/CUI**
    - Processes - Documented
  - **Level 3 – Good Cyber Hygiene [130 Control Practices] CUI**
    - Processes – Managed [SSP]
  - **Level 4 – Proactive [156 Control Practices] CUI**
    - Processes – Reviewed [Audit]
  - **Level 5 – Advanced [171 Control Practices [adds resistance to APT]**
    - Processes – Optimizing [Continuous improvement]
Third Party Assessor Organizations

- DoD delegated the responsibility for managing the CMMC to its CMMC Accreditation Board (AB)
  - Establish criteria for organizations seeking C3PAO status
  - Establish audit standards and provide for accrediting C3PAO and CMMC auditors
  - Enforce CMMC audit standards

- C3PAO and CMMC Auditor
  - C3PAO manages CMMC Auditors
  - Schedules CMMC Audits [vendor contracts directly with C3PAO for CMMC audits] [cost of certification is considered recoverable costs – if awarded contract]
  - Oversight and training of CMMC Auditors
The C3PAO’s Certified Assessment Team will need to interview some of your personnel.

- Persons responsible for some processes.
- Workers to ensure that they know and follow documented processes.
- Advise pre-assessment organization.
Timelines

- CMMC requirements published – January 2020
- CMMC AB established – January 2020
- RFIs with CMMC requests begins July 2020
- First RFPs with CMMC requirements – Fall 2020/Winter 2021
- All RFPs and contracts under CMMC by 2025
- Initial source of CMMC auditors ready by Fall 2020
- Full Go-Live – Winter/Spring 2021
Timelines

- DoD expects CMMC to take five years to fully rollout and not really get going until 2021. DoD expects the third-party assessors to certify about 1,500 vendors in 2021, 7,500 in 2022 and 25,000 more by 2023
Timelines

- By fiscal year 2026, all new DoD contracts will contain CMMC requirements that companies (and their suppliers and subcontractors) must meet to win the award.
The Survey Says:

- 27% admitted they are unprepared for a cyber breach.
- 58% were unfamiliar with CMMC. Only 25% correctly identified the acronym.
- 12% were confident in the cybersecurity of their vendors.
- 40% said they only have between 1 and 10 individuals dedicated to IT and 10% didn’t have a dedicated IT professional at all.
- 44% said they were still working to meet NIST 800-171 requirements
- 41% said their cyber incident response plan was a work in progress, and only 10% said they have an incident response plan in place.
Schedule and Complete Your Assessment

Did you know?

C3PAOs must adhere to a Code of Professional Conduct and be ISO 17021 certified.

Go to the CMMC-AB Marketplace to find an available C3PAO

C3PAO schedules assessment with a Certified Assessor
Finalize Your Assessment

The CMMC-AB reviews the assessment with Quality Auditors

OSC(s) have up to 90 days to resolve any findings with the C3PAO
Receive Your CMMC-AB Certification!

CMMC-AB Quality Auditors review the assessment

CMMC Maturity Level Certificate is issued!
CMMC-AB Certificate

The CMMC-AB Certificate is valid for 3 years

The Certificate allows your organization to bid on DoD contracts up to the identified Maturity Level
Conclusion

- CMMC is here to stay.

- Delayed action (inaction) increases costs as supply of auditors/demand for certifications fluctuate.

- Many micro and small organizations are ill-prepared to demonstrate sufficient cyber maturity.

- Cybersecurity maturity cannot be built and implemented overnight. Mature practices and processes take extensive time and resources, along with management support.
Questions?
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