In the current CMMC landscape, there are three levels:

1. Level 1 is required if you handle Federal Contract Information (FCI)
   - Certification is done through self-attestation in SPRS.
2. Level 2 is required if you handle CUI.
   - Certification is done by a 3rd Party Assessment Organization (3PAO)
3. Level 3 is required for specially designated programs.
   - Certification is the same as Level 2 plus an assessment by

DIBCAC The final CMMC rule is expected no later than Q1 2025 calendar year.

Any documents marked as the following are considered CUI (including but not limited to):

- ITAR
- EAR
- Distribution Statement B
- Distribution Statement C
- Distribution Statement D
- Distribution Statement E
- Distribution Statement F
- For Official Use Only (FOUO)
- Controlled Unclassified Information (CUI)

The DoD CUI Registry (https://www.dodcui.mil/Home/DoD-CUI-Registry/) provides a more complete listing of indexes and categories of CUI.

Common Questions:

- What are the Level 1 requirements?
  - Full compliance and implementation of the 17 NIST 800-171 controls as defined in 32 CFR. §170.15.
- What are the Level 2 requirements?
  - Full implementation of the current NIST 800-171 framework controls as defined in 32 CFR. §170.17.
- What are the Level 3 requirements?
  - Full compliance with Level 2 and a subset of NIST 800-172 controls as defined in 32 CFR. §170.18.

<u>Supplemental Information:</u>

DFARS Part 252 Solicitation Provisions and Contract Clauses

https://www.acquisition.gov/dfars/part-252-solicitation-provisions-and-contract-clauses

DFARS Case 2019-D041 – 85 FR 61505

https://www.govinfo.gov/content/pkg/FR-2020-09-29/pdf/2020-21123.pdf

NIST Special Publication 800-171, Revision 2

https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-171r2.pdf

NIST SP 800-171 DoD Assessment Methodology, Version 1.2.1, June 24, 2020

https://www.acq.osd.mil/dpap/pdi/cyber/docs/NIST%20SP%20800-171%20Assessment%20Methodology%20Version%201.2.1%20%206.24.2020.pdf

CUI Plan of Action Template

https://csrc.nist.gov/CSRC/media/Publications/sp/800-171/rev-2/final/documents/CUI-Plan-of-Action-Template-final.docx

CUI System Security Plan (SSP) Template

https://csrc.nist.gov/CSRC/media/Publications/sp/800-171/rev-2/final/documents/CUI-SSP-Template-final.docx

Supplier Performance Risk System (SPRS)

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

Commercial and Government Entity (CAGE) Program

https://cage.dla.mil/

Cybersecurity Maturity Model Certification (CMMC)

https://www.acq.osd.mil/cmmc/index.html

https://www.federalregister.gov/documents/2023/12/26/2023-27280/cybersecurity-maturity-model-certification-cmmc-program