



EAB

# Q&A Panel: Navigating CMMC in Higher Education

A Q&A Session with a Panel of IT Leaders in  
and Outside of Higher Education

Information Technology Forum

# Your Presenters for Today's Session

## Panelists



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## Facilitators



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# CMMC: A Maturity Model in Flux

## An Ongoing Timeline of the CMMC Program Rollout

*November 2020*

### **Five-Year Phase-In Period for CMMC 1.0 Begins**

During the period, only select pilot contracts will require CMMC 1.0 compliance

*November 2021*

### **Streamlined CMMC 2.0 is Announced**

CMMC 2.0 replaces CMMC 1.0. Rulemaking will ensue over next 9-24 months after which requirements will go into place



*January 2020*

### **DoD<sup>1</sup> Releases CMMC 1.0**

DoD releases initial version of the CMMC program



*March 2021*

### **DoD Initiates Internal Review of CMMC 1.0**

Internal review occurs in response to 850 public comments regarding CMMC 1.0



1) Department of Defense

Source: "[CMMC Guidance for Higher Education](#)", Summit 7 Systems, May 28, 2021; D White, "[CMMC 2.0 is here! What changed? What now!](#)", Beryllium InfoSec Collaborative, 2021; "[Securing the Defense Industrial Base CMMC 2.0](#)", Office of the Under Secretary of Defense Acquisition & Sustainment, 2021; EAB interviews and analysis.

# CMMC: A Basic Overview



## Cybersecurity Maturity Model Certification (CMMC) 2.0

Certifies the level of an organization's ability to protect Federal Contract Information (FCI) and Controlled Unclassified Information (CUI).

### What is CMMC 2.0?

- ▶ Applies to **all higher education and research institutions** doing business with the Department of Defense (DoD)
- ▶ **Three maturity levels** comprised of **110+ cybersecurity practices** based on existing federal regulations and commonly accepted practices (e.g., NIST SP 800-171<sup>1</sup>)
- ▶ Expected to **set the tone for other federal agencies** in the future (e.g., DHS<sup>2</sup>, GSA<sup>3</sup>)

### How and When Will it be Enforced?

- ▶ **CMMC 2.0 requirements will be in place** in contracts after rulemaking is completed, which may take **9 to 24 months**
- ▶ Current **CMMC piloting** efforts will be **suspended** until rulemaking concludes
- ▶ **Baseline number of requirements** are required to earn contract awards. **Plans of Action & Milestones** with specified timelines can be employed to complete rest of CMMC 2.0 level requirements

1) National Institute of Standards and Technology Special Publication Special Publication 800-171

2) Department of Homeland Security

3) General Services Administration

# How Does CMMC Work?

## New: Government-Led and Third-Party Assessments

### CMMC Model 1.0

**Level 5**  
Advanced  
*CUI, critical programs*

**Level 4**  
Proactive  
*Transition Level*

**Level 3**  
Good  
*CUI*

**Level 2**  
Intermediate  
*Transition Level*

**Level 1**  
Basic  
*FCI only*

### CMMC Model 2.0

**Level 3**  
Expert  
*CUI, critical programs*

**Level 2**  
Advanced  
*CUI*

**Level 1**  
Foundational  
*FCI only*

### Model

**110+**  
practices based on  
**NIST SP 800-172**

**110**  
practices aligned  
with **NIST SP  
800-171**

**17**  
practices

### Assessment

Triennial  
government-led  
assessments

Triennial third-party  
assessments for  
critical national  
security  
information; Annual  
self-assessment for  
select programs

Annual self-  
assessment

Source: "CMMC Guidance for Higher Education", Summit 7 Systems, May 28, 2021; D White, "CMMC 2.0 is here! What changed? What now!", Beryllium InfoSec Collaborative, 2021; "Securing the Defense Industrial Base CMMC 2.0", Office of the Under Secretary of Defense Acquisition & Sustainment, 2021; EAB interviews and analysis.



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