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A Division of Clearwater

NAVIGATING THE POST-CERTIFICATION LANDSCAPE

WHAT HAPPENS AFTER THE ASSESSMENT?

CUI CON, 2024

REDSPIN

POINTS OF CONTACT

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VICE PRESIDENT, CISO, CCA, AND CMMC PROVISIONAL INSTRUCTOR AT REDSPIN

- Chief architect of Redspin becoming the first authorized CMMC C3PAO
- Previous experience supporting the Defense Health Agency (DHA) where his team received a FedHealthIT award for innovation, Naval Commendations, and the Captain Joan Dooling Award
- Prior Information Assurance Officer (IAO) supporting DISA and MARCORSYSCOM
- Lead Assessor for Aero-Glen International (First OSC to pass Joint Surveillance) and Microsoft Federal

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PROPOSED RULE REQUIREMENTS

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§ 170.17 (4) ARTIFACT RETENTION & INTEGRITY

- (4) Artifact Retention and Integrity. The artifacts used as evidence for the assessment must
- be retained by the OSC for the duration of the validity period of the certificate of assessment, and
- at minimum, for six (6) years from the date of certification assessment.

- To ensure that the artifacts have not been altered, the OSC must hash the artifact files using a NIST-approved hashing algorithm.

- The OSC must provide the C3PAO with a list of the artifact names, the return values of the hashing algorithm, and the hashing algorithm for upload into the CMMC instantiation of eMASS.

- Additional guidance for hashing artifacts can be found in the guidance document listed in paragraph (h) of appendix A.

§ 170.22 AFFIRMATION

(a) General. The OSA must affirm continuing compliance with the appropriate level CMMC Self-Assessment or CMMC Certification Assessment. The affirmation shall be submitted in accordance with the following requirements:

1. Affirming official. All CMMC affirmations shall be submitted by the OSA senior official who is responsible for ensuring OSA compliance with CMMC Program requirements.
2. Affirmation content. Each CMMC affirmation shall include the following information: Name, title, and contact information for the affirming official; and
    i. Affirmation statement attesting that the OSA has implemented and will maintain implementation of all applicable CMMC security requirements for all information systems within the relevant CMMC Assessment Scope at the applicable CMMC Level.
3. Affirmation submission. The affirming official shall submit a CMMC affirmation in the following instances:
    i. Upon completion of the assessment (conditional or final);
    ii. Annually thereafter; and
    iii. Following a POA&M closeout assessment, as applicable.

(b) Submission procedures. All affirmations shall be completed in SPRS. The Department will verify submission of the affirmation in SPRS to ensure compliance with CMMC solicitation or contract requirements.

§ 170.18 CMMC LEVEL 3

(a) Level 3 Certification Assessment Requirements. To comply with CMMC Level 3 Certification Assessment requirements, the OSC must meet the requirements set forth in paragraphs (a)(1) and (2) of this section. Receipt of a CMMC Level 2 Final Certification Assessment for information systems within the Level 3 CMMC Assessment Scope is a prerequisite for a CMMC Level 3 Certification Assessment.

(1) Level 3 Certification Assessment. The OSC must achieve a CMMC Level 2 Final Certification Assessment on the Level 3 CMMC Assessment Scope, as defined in § 170.19(c) and complete and implement all Level 3 security requirements specified in table 1 to § 170.14(c)(4) CMMC Level 3 Requirements prior to initiating a CMMC Level 3 Certification Assessment, which will be performed by DCMA DIBCAC1 on behalf of the DoD.

To achieve and maintain CMMC Level 3 Certification Assessment, OSCs must achieve both a CMMC Level 2 Final Certification Assessment in accordance with § 170.17 and a CMMC Level 3 Final Certification Assessment in accordance with this section on a triennial basis for all information systems within the Level 3 CMMC Assessment Scope. DCMA DIBCAC will submit the assessment results into the CMMC instantiation of eMASS, which then provides automated transmission to SPRS.

§ 170.17 CMMC STATUS REVOCATION

(iv) CMMC Status Revocation. If the CMMC PMO determines that the provisions of Level 1 or Level 2 of this rule have not been achieved or maintained, as addressed in § 170.6, a revocation of the validity status of the CMMC Level 2 Final Certification Assessment may occur.

At that time, standard contractual remedies will apply and the OSC will be ineligible for additional awards with CMMC Level 2 Certification Assessment or higher requirements for the information system within the CMMC Assessment Scope until such time as a valid CMMC Level 2 Certification Assessment is achieved.

The revocation of a CMMC Level 2 Final Certification Assessment will automatically cause the revocation of any CMMC Level 3 Certification Assessments that were dependent upon that CMMC Level 2 Final Certification Assessment.

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MAINTAINING COMPLIANCE

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TRAINING

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Problem
OSCs must maintain CMMC assessment certification for the three-year duration

Solution
Recommend sending personnel to the CCP course to gain a better understanding of the CMMC program

Result
Personnel have a full understanding of how to manage and maintain compliance for the duration of the certification period

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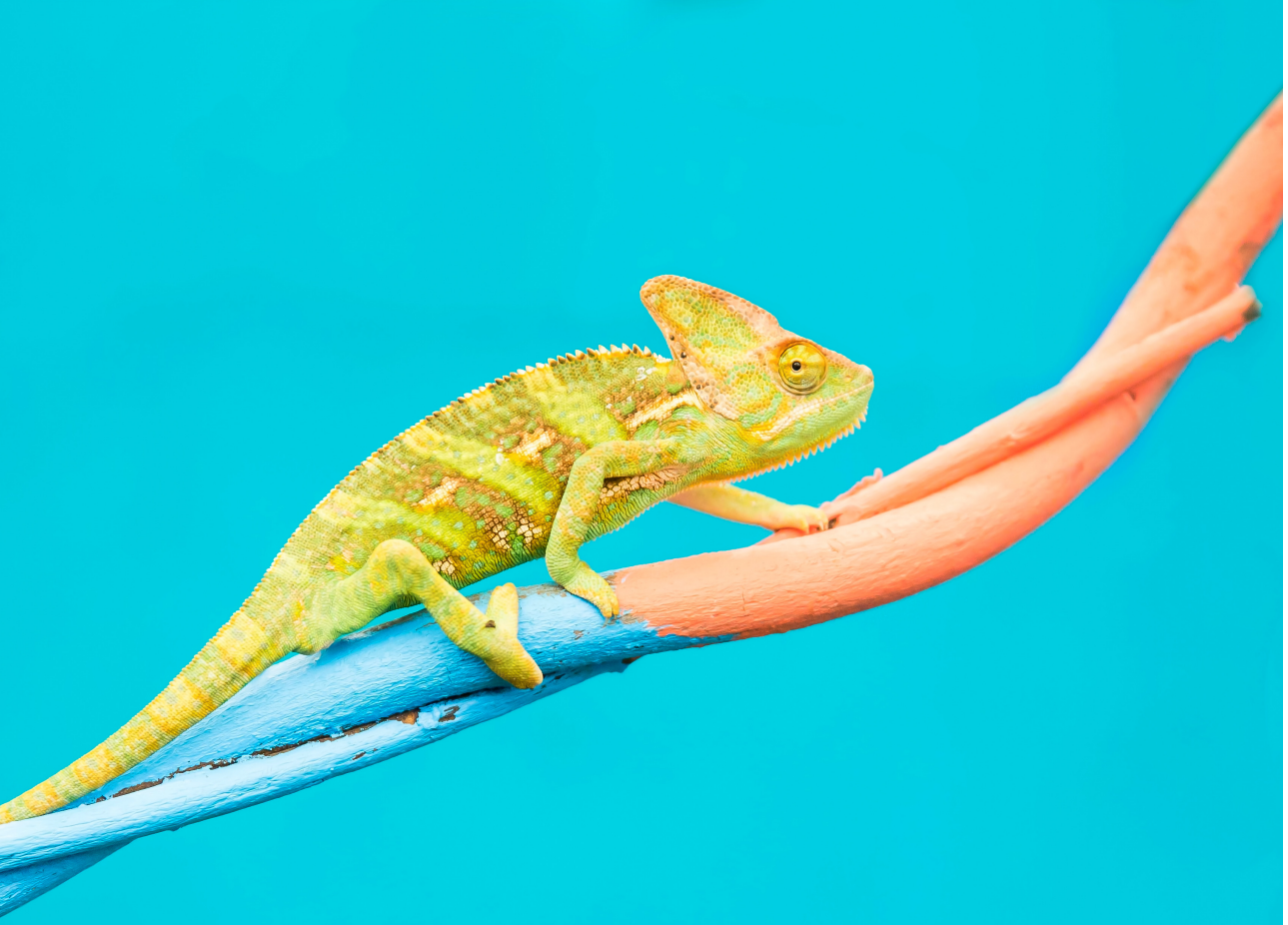
POA&M

Problem
Changes to the environment will affect compliance with CMMC Level 2 during the certification period

Solution
PAO&Ms should be utilized to address changes to the environment and be closed out prior to the recertification

Result
OSCs are fully managing changes within the environment to ensure security requirements are being maintained



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NIST SP 800-171 REV3

Problem
NIST SP 800-171 Revision 3 will be ingested into the CMMC program sometime over the next couple of years

Solution
Review the requirements for the updated version and begin implementing those requirements

Result
By implementing changes now, the OSC will be better postured for recertification

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