



SHARPE
CONSULTING LLC

CMMC

CUI

REMOVING THE FOG

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Alex Sharpe

“Sharpe like a knife”

- Big 4 Trained Management Consultant with Real World Operational Experience
- Practitioner, Consultant, Speaker, Author
- 35+ years Cybersecurity
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Agenda

Why?

The Basics

CUI?

Pitfalls to Avoid

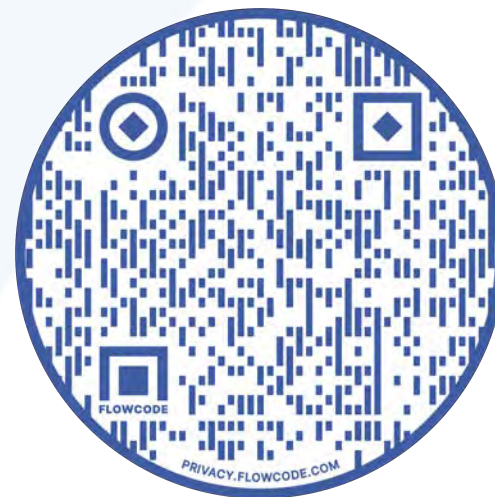
It's all about:

Awareness and clarification

Hints, tips, and resources

Slides available with bonus material

<https://www.SharpeLLC.com/insights>



Challenge to you

“How does this apply to my organization?”

Ask yourself:

“Even if not required does it makes sense for my organization?”

Don't hesitate to reach out alex@SharpeLLC.com





WHY?

Subtitle



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AI Supremacy: Russia, China Could Edge Out US, Experts Warn

"AI is deepening the threat posed by cyberattacks and **disinformation** campaigns that **Russia, China** and others are using to infiltrate our society, **steal our data** and **interfere in our democracy,**"

"The limited uses of AI-enabled attacks to date represent the tip of the iceberg."



Loss of IP - Innovation is Expensive



Reference

SMB & Critical Infrastructure Hit the Hardest



The average Phishing attack costs a medium sized business \$1.6M



The average Ransomware attack costs a small business \$713k



It is not unusual for a small business to go out of business after a Phishing attack



77% of SMBs do not have a Cybersecurity Program





REMOVING THE FOG



The basics

- The CMMC Model
 - “Owned” by DoD
 - CMMC Accreditation Body (CMMCAB) is an **Independent** body running the program
- Its all about the Controlled Unclassified Information (CUI)
- **AUDIT** by an unbiased certified third party
 - no more self assessments; they don’t work
- Five-year rollout
- Cybersecurity from IT to a systems and business problem
- Expect expansion outside of DoD

← aka 4th Line of Defense

← aka GRC



Controlled Unclassified Information (CUI)

- EO13526 established one common term for ALL not classified, private Government information
- Replaces things like FOUO, SBU, UBS
- Handling restrictions remain (e.g., NOFORN)
- ~~23~~ 20 (Groups?) Categories, 84 subcategories
- Federal Contract Information (FCI)
 - FAR and DFAR Contract Info
- Covered Defense Information (CDI)
 - DFARS Clause 252.204-7012
- Controlled Technical Information (CTI)
 - technical information with military or space application





National Archives

Organizational Groupings

- Critical Infrastructure
- Defense
- Export Control
- Financial
- Immigration
- Intelligence
- International Agreements
- Law Enforcement
- Legal
- Natural and Cultural Resources
- North Atlantic Treaty Organization (NATO)
- Nuclear
- Patent
- Privacy
- Procurement and Acquisition
- Proprietary Business Information
- Provisional
- Statistical
- Tax
- Transportation

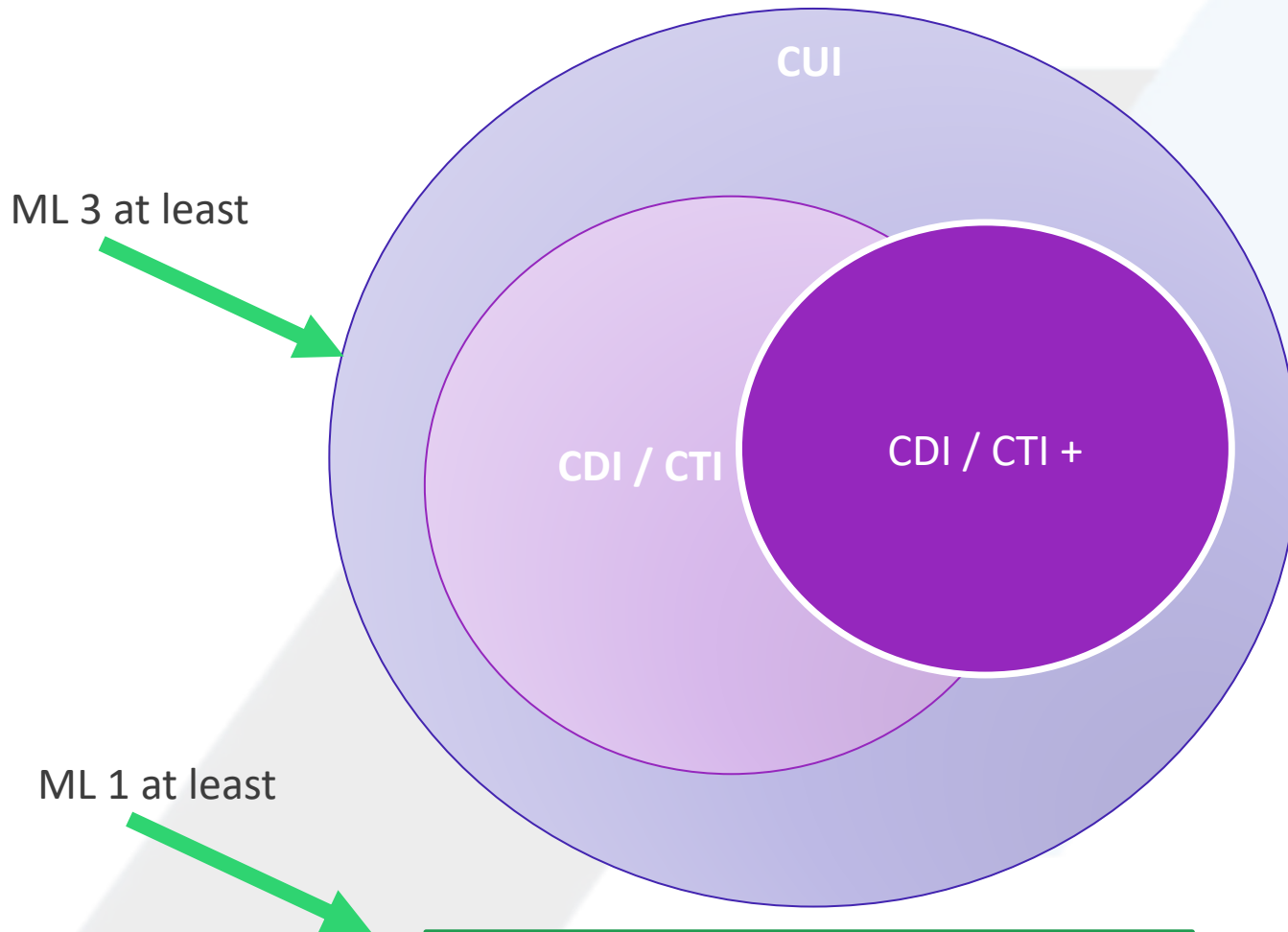


<https://www.archives.gov/cui>

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Not all CUI is created equal



Federal Contract Information (FCI)



CUI – You'll know it when you see it

- Government **Creates** or **Possesses**
- You **Create** or **Possess** on behalf of the Government
- You **Receive** or **Share** with a Third Party
 - Primes
 - Subs
 - Cloud providers, MSPs, etc...
- Not sure?
 - Ask - Contracting Officer, Prime, Source
 - NARA
 - In doubt - presume CUI



The Model

Description	Level	Asset	Processes	Domains	Practices	Processes*
CDI/CTI+ Advanced/ Progressive	5	CDI/ CTI	Optimized	17	171	3
CDI/CTI Proactive Cyber Hygiene	4	CDI/ CTI	Reviewed	17	156	3
CUI Good Cyber Hygiene	3	CUI	Managed	17	130	3
Intermediate Cyber Hygiene	2	Transition	Documented	15	72	2
Basic	1	FCI	Performed	6	17	0
* Requirements placed on what processes exist, how they are documented and how they are institutionalized NOT how many						



Don't wait

- Competitive advantage
 - Your competition cannot be awarded a contract without meeting the Maturity Level requirement
- This is about protecting:
 - Your business
 - Our Country
 - Our Allies
 - Our Economy
 - Our way of life
- It will take time. Sooner you start, the less painful it will be



Pitfalls to Avoid

- Start with the CUI
- Collect CUI where possible
- Don't pre-assess yourself
 - The assessor will be an objective third party
 - It is natural to lose objectivity
- Check the Marketplace before engaging anyone
- CMMC is about protecting your business



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Free Consultation

We promise you two good
ideas

