

CYBERSECURITY MATURITY MODEL CERTIFICATION PREPARATION CHECKLIST

12 months
PRIOR

One year out from a Cybersecurity Maturity Model Certification (CMMC) engagement, your organization should begin to lay the groundwork for an engagement by determining your internal team who will be responsible for the CMMC process and evaluating where both Federal Contract Information (FCI) and Controlled Unclassified Information (CUI) are processed and reside within the environment. Your organization should determine if a readiness assessment for the CMMC assessment will be performed in-house or with assistance from a third party.

- Assign responsibility for managing the CMMC process internally.
- Review all your current Department of Defense (DoD) contracts, subcontracts, and agreements for FCI/CUI/CMMC-based requirements.
- Evaluate potential contract bids for FCI/CUI/CMMC-based requirements.
- Evaluate where FCI and CUI reside, and any data flows associated with them.
- Determine a process to perform a readiness assessment against the required CMMC level, dependent on your DoD contracts.
 - Evaluate if a third party should be used for the readiness and start reaching out for an assessment.
 - If performing the readiness assessment in-house, determine a team and approach.

9 months
PRIOR

Nine months prior to the assessment, your organization should be in the process of performing a readiness assessment and determining potential gaps against the CMMC control standards. Any gaps should have a roadmap created to resolve the issue with actionable milestones.

- Perform the readiness assessment aligning to the CMMC standards and evaluate your internal environment for potential gaps.
 - Identify control owners and subject matter experts.
 - Depending on gaps or weaknesses identified, develop a project timeline and roadmap to remediate any issues.
- If required by your DoD contract, establish a Supplier Performance Risk System (SPRS) account within the DoD systems.

6 months PRIOR

Six months prior to the assessment, your organization should continue to remediate any gaps detected and ensure timelines are being met. Additionally, your organization should start to evaluate CMMC Third Party Assessor Organizations (C3PAO's) to perform the assessment based on the CMMC guidelines.

- Continue to monitor project roadmap and ensure milestones are met for remediation.
- If required by your DoD contract, submit your self-assessment score into the SPRS system.
- Contact and evaluate potential C3PAO's to perform the CMMC assessment.

3 months PRIOR

Three months prior to the assessment, your organization should have selected a C3PAO and should be coordinating the approach, assessment timetable, and key contacts to perform the assessment. In addition, your organization should ensure that all the gaps detected from the readiness have been or will be remediated by the time the assessment starts.

- Continue to monitor project roadmap and ensure milestones are met for remediation.
- Select and coordinate planning of CMMC assessment approach and timing with C3PAO.

How Can Schneider Downs Help?

Schneider Downs is a Candidate C3PAO. Our team currently offers CMMC readiness and consulting services as a Registered Provider Organization (RPO). Our team includes a Certified CMMC Provisional Assessor, and several other members currently in process of applying for CMMC Certified Assessor status who plan on completing training in Q2 of 2021. OSCs should note that a single firm cannot perform both consulting and audit services for a single client per the CMMC-AB standards. In the meantime, until such requirements are made public, we can help your organization prepare for CMMC by performing an assessment against the NIST 800-171 framework.

For more information visit www.schneiderdowns.com/cmmc or contact us at contactsd@schneiderdowns.com.



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