



Notice to all Chugach Government Solutions, LLC and subsidiary company suppliers and subcontractors under a Department of Defense prime contract

In order to continue doing business with DoD, prime contractors and their suppliers and subcontractor at all tier levels will be required to obtain the Cybersecurity Maturity Model Certification (CMMC). The following information is provided to assist you in that endeavor.

Cybersecurity Maturity Model Certification: What Suppliers and Subcontractors Need to Know

Chugach Government Solutions, LLC and its subsidiary companies are leading efforts, in coordination with our U.S. Defense Industrial Base (DIB) partners, to work with the U.S. Department of Defense (DoD) to increase and strengthen the cybersecurity within the multi-tier supply chain.

What is the CMMC?

The CMMC is a new requirement for U.S. DoD contractors, replacing the self-certification model with a third party certification.

The DoD plans to migrate to the new CMMC framework in order to assess and enhance the cybersecurity posture of the DIB. The CMMC is intended to serve as a verification mechanism to ensure appropriate levels of cybersecurity controls and processes are adequate and in place to protect controlled unclassified information (CUI) that resides on contractor / subcontractor digital networks.

The certification is built on existing requirements such as NIST SP 800-171, DFARS 252.204-7012, etc. The CMMC consist of 5 levels to measure the cybersecurity practices of contractors.

Timeline for CMMC requirements?

The CMMC final version was released in January 2020. Currently, CMMC requirements are being included in DoD's Requests for Information (RFI's) starting June 2020 and projected to be included in DoD's Requests for Proposals (RFP's) starting in September 2020. In fact we are already seeing the CMMC requirement in preliminary or draft RFP's.

What are the impacts to suppliers and subcontractors?



Suppliers and subcontractor, under a DoD prime contract, who do not obtain the necessary CMMC as required by a particular DoD prime contract will be ineligible for awards until the required CMMC level is obtained.

An exception to CMMC *may* apply to a supplier that only provides commercial off the shelf (COTS) products. However, even companies that do not possess CUI still must meet the Level 1 Certification if they possess Federal Contract Information. Federal Contract Information is defined under FAR 52.204-21 as “information, not intended for public release, that is provided by or generated for the Government under a contract to develop or deliver a product or service to the Government, but not including information provided by the Government to the public (such as on public websites) or simple transactional information, such as necessary to process payments.”

What can suppliers and subcontractors do to prepare?

As noted, much of the CMMC assessment model will be based on NIST 800-171 controls. Make a concerted effort to understand and complete any outstanding implementations of policy and/or technical controls to prepare for the third party certification.

Understand and keep current with the status of the CMMC by frequently visiting the [OUSD CMMC website](#). Provide your feedback to the CMMC directly or via industry associations with which you are affiliated (e.g. AIA, ND-ISAC, NDIA, etc.).

Ensure your suppliers who handle CUI are informed of the CMMC and that they are also addressing any outstanding NIST 800-171 requirements/POAM items.

Additional Resources:

- Official Office of the Under Secretary of Defense for Acquisition & Sustainment CMMC website: <http://www.acq.osd.mil/cmmc/index.html>
- Article: <https://www.executivegov.com/2020/01/dod-releases-cmmc-reforms-to-bolster-supply-chain-cybersecurity-andrew-schnabel-ellen-lord-quoted/>
- Article: <https://www.govconwire.com/2020/07/govcon-expert-kim-koster-as-cyber-threats-persist-so-does-dods-push-to-implement-cmmc/>
- Article: <https://www.dhg.com/article/cmmc-accreditation-body-announces-plans-for-assessor-certification>
- Article: <https://smallgovcon.com/statutes-and-regulations/cmmc-update-details-on-certification-infrastructure-and-cots-products/>