

A BRIEF HISTORY OF CMMC

CMMC IS A PROGRAM DESIGNED TO INCREASE TRUST IN THE ASSESSMENT OF SUPPLY CHAIN COMPLIANCE TO THE REQUIREMENTS IN NIST-SP-800-171 TO PROTECT CONTROLLED UNCLASSIFIED INFORMATION

2002



IT ALL BEGINS AND ENDS WITH FISMA

Federal Information Security Management Act (2002)

Requires each federal agency to develop, document, and implement an agency-wide program to provide information security for the information and information systems

FIPS 199 (2002)

Establishes three categories for protecting data: low, moderate, and high

FISMA PROJECT (2003)

Published FIPS 199, FIPS 200, and NIST Special Publications 800-53, 800-59, and 800-6. Then 800-37, 800-39, 800-171, 800-53A. Now the Risk Management Project



2006

2008

Executive Order 13556

-Controlled Unclassified Information (2010)

Creates a method to streamline and label sensitive unclassified information after 9/11



2012

Proposed Defense Federal Acquisition Regulations Supplemental rule revised (2013)

Updated the proposed clause as it applied to protecting Fundamental research 7000

Detection and Avoidance of Counterfeit Electronic Parts-Further Implementation (2014)

acquire electronic parts from trusted suppliers

2016

DFARS Case 2014-DOO5 becomes a final rule (2016)

Modifications made to DFARS Case 2014-DOO5 becomes a final rule, and modifies DFARS 7007 and 7008.

DoD IG issues a classified report on the cyber security at the Missile Defense Agency (2018)

Report is scathing and results in more attention on Cyber defense

Work on CMMC begins (2019)

In December DoD created the Cybersecurity Maturity Model Program

2020

-Jan, First Version of CMMC model released

-March CMMC-AB signs MOU with DoD
Sept-DFARS Interim Rules, 7018-7021 released establishing CMMC
Nov-DoD and CMMC-AB Signs no-cost contract



2022



Cybersecurity Research and Development Act (2002)

Paid for and authorized National Institute of Standards and Technology (NIST) to establish programs and standards



CYBERSECURITY & INFRASTRUCTURE SECURITY AGENCY

Homeland Security Presidential Directive 7 (2002)

identify and prioritize critical infrastructure and to protect them from terrorist attacks

2004

National Defense Authorization Act Draft (2008)

First mention of supply chain risk management in the federal congressional record

2010

National Defense Authorization Act Draft (2010)

NDAA 2011 Contains a section of law dedicated to supply chain risk reduction

Proposed Defense Federal Acquisition Regulations Supplemental rule (2011)

DFARS Case 2011-D039 Requirements for safeguarding unclassified information specifically as it related to fundamental research. Proposed DFARS rule 7000

DFARS 252.204-7000 Rule goes into effect (2013)

Requires the protection of sensitive data on non federal systems

Federal Information Security Modernization Act (2014)

Leads to the Development of NIST Risk Management Framework. DoD decides contractors present a risk due to cybersecurity.

DFARS Case 2013-D018 Defense Federal Acquisition Regulation Supplement: Network Penetration Reporting and Contracting for Cloud Service (2015)

cover the safeguarding of covered defense information .7008-7010 added to address cloud computing

2018

DFARS 7012 Interim Period Ends (2016)

By signing a contract carrying the clause, a contractor is self attesting to the implementation of DFARS 7012, and by extension the 110 controls of NIST 800-171.

DoD IG issues second report on the the Missile Defense Agency (2019)

official notice that the DoD supply chain is broadly not implementing the requirements of DFAR 7012

-March 2021 Deputy of Secretary of the Department of Defense directs an internal review.

-Nov 2021 CMMC 2.0 Model Comes out

- Removes any requirement beyond NIST 171 baseline.
- Reduces levels from five to three,
- Allows self-attestation with affirmation for some data
- Allows POAMs on limited practices
- Returns requirements in alignment with 2016 DFARS rule
- Requirements not in effect on contracts until Federal Rule Making process complete.