Hypori

Cybersecurity Maturity Model Certification (CMMC) Industry Insights

Challenges & Strategies

Industry Insights

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Hypori

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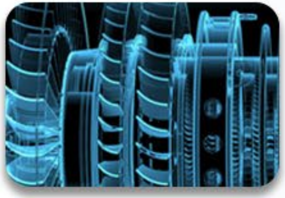

KRATOS
READY FOR WHAT'S NEXT™

Cybersecurity Maturity Model Certification (CMMC)

Industry Insights

Challenges and Strategies

CMMC Accelerate | Carahsoft Conference & Collaboration Center

Herndon, VA | March 13, 2025

Agenda

- Kratos – Who We Are
- State of the Ecosystem
- Strategies
- Assessments (So Far)
- What's Ahead
- How to Help Your Assessor

Kratos – Who We Are

- Kratos builds technology and other products supporting strategic and transformational national security programs
  - ❑ Unmanned systems
  - ❑ Assured aerospace communications
  - ❑ Cybersecurity (FedRAMP 3PAO, CMMC C3PAO, RPO, and Advanced Cyber Services)
  - ❑ Strategic programs
  - ❑ Microwave electronics
  - ❑ Training and simulation

State of the Ecosystem

- The 32 CFR (Program Rule) was published on October 15, 2024
- Phased implementation extended
- Applicability of CMMC to External Service Providers clarified
- FedRAMP equivalency requirements are unchanged, but applicability updated for Security Protection Assets
- Assessment Team composition requirements defined
- Assessment scoring and POA&M eligibility defined
- Quality Assurance requirements defined
- **Contracting officers <u>can</u> write CMMC requirements into contracts <u>today</u>**

Strategies – Scope

- At the most basic level, the scope is what’s being evaluated
- Define the assets in scope (people, processes, and technologies)
- Remember those things you forgot
  - ❑ Data flows are part of your scope
  - ❑ Automation can be helpful
- Leverage the CMMC scoping guide
- If you’re not confident in your scope, keep working at it

Strategies – Auditing

- Need to capture from a potentially wide-range of endpoint types
- Defined audit events for capture (broader the better)
- Detection and notification of logging failures (prove the negative)
    - ❑ Failure of an endpoint to audit events
    - ❑ Failure to process an endpoint’s logged events
- Reporting, correlation, and reduction capabilities
- Audit log reviews and analysis (reviewing auditable event types and reviewing audit events are not the same thing)

Strategies – Those Things That Haven’t Happened Yet

- Common things we’ve assessed that haven’t happened yet
  - ❑ Emergency changes
  - ❑ Security incidents
  - ❑ Termination or transfer of users
  - ❑ Documentation reviews
  - ❑ Removing material that shouldn’t have been posted publicly
- Process, Process, Process (in documentation, of course)
- Testing is a great practice to demonstrate *how* these *would* be handled

Strategies – POA&Ms

- Understanding what a POA&M actually is (and isn't)
    - ❑ An integral part of maintaining any system
    - ❑ More just vulnerabilities
    - ❑ Key component of maturity, as it tells a story of the system
    - ❑ It is <u>not</u> the outcome of an assessment
- An empty POA&M is problematic
    - ❑ No system has zero vulnerabilities
    - ❑ Part of managing a system should include <u>identifying areas for improvement</u>
- Leveraging automation can be helpful

Strategies – Risk Assessments

- A security control assessment is not a risk assessment by itself
- Vulnerability scanning is not a risk assessment by itself
- Evaluating security configuration settings is not a risk assessment by itself
- Comprehensive risk assessments must evaluate risks to the business and mission and determine the likelihood of their occurrence
- The activities above can be components of risk assessments
- More importantly, the activities above can be informed by risk assessments, which enables targeted risk reduction

Strategies – Defined Frequency

- Organizationally defined frequencies cannot exceed 1 year
- Don’t use ‘frequently’
- Don’t use ‘occasionally’
- Don’t use ‘periodically’
- Don’t use ‘sometimes’
- Don’t use ‘every three years’
- Be specific, but also give yourself wiggle room (e.g., “a period not to exceed 30 days”)

Assessments (So Far)

- CMMC Assessments began on January 2, 2025
- The Certificate of Status was released for use on March 7, 2025
- ‘Continuous monitoring’ is an annual attestation of compliance
- Enclaves can make it easier (especially VDI)
- Organization and role definition are important
- The queue is growing steadily

What’s Ahead?

- Assessments, assessments, assessments (but maybe not so fast)
- Title 48 CFR will trigger Phase 1 of the implementation
- The mechanics of the program
- FedRAMP Equivalency updates
- Enclaves look more and more appealing
- Stronger focus on implementing ‘make-or-break’ controls
- Assessor interpretations highlight the need for strong preparation

How to Help Your Assessor

- Finish your SSP (no, really)
- Documentation matrix
- Clearly define external service provider relationships
- Shared Responsibility Matrices
    - ❑ Understand them (really)
    - ❑ They’re needed for more than just cloud service providers
- Leverage inheritance properly (e.g., don’t regurgitate material from a provider’s SSP in your SSP)