**Jamie Sutton**

**CMMC notes**

<https://www.acq.osd.mil/cmmc/docs/CMMC_AG_Lvl3_20201208_editable.pdf>

“A CMMC assessment is the methodology to certify that a contractor is compliant with the CMMC standard. Assessments are conducted by CMMC Third-Party Assessment Organizations (C3PAOs) and Certified Assessors” (p. 13).

**“CMMC Level Descriptions**

CMMC Levels 1 through 3 consist of the security requirements specified in National Institute of Standards and Technology (NIST) Special Publication (SP) 800-171, Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations; 20 additional CMMC practices; and 3 CMMC maturity processes per each of the 17 domains.

Level 1 of CMMC addresses the protection of Federal Contract Information (FCI) and encompasses the basic safeguarding requirements for FCI specified in Federal Acquisition Regulation (FAR) Clause 52.204-21, which defines FCI 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.*

Department of Defense (DoD) contracts that specify the need for a contractor to process, store, or transmit FCI only require the contractor to comply with CMMC Level 1 practices. There is no CMMC process maturity assessed at Level 1.

CMMC Level 2 is a transitional level. At Level 2, a contractor is not yet approved for CUI. CMMC Level 2 practices and processes provide additional safeguarding above CMMC Level 1 and help to prepare a contractor to handle CUI at CMMC Level 3.

CMMC Level 3 addresses the protection of Controlled Unclassified Information (CUI), which the National Archives and Record Administration (NARA) defines as:

*Information that requires safeguarding or dissemination controls pursuant to and consistent with laws, regulations, and government-wide policies, excluding information that is classified under Executive Order 13526, Classified National Introduction CMMC Assessment Guide – Level 3 | Version 1.10 2 Security Information, December 29, 2009, or any predecessor or successor order, or Atomic Energy Act of 1954, as amended.*

For a CMMC Level 3 assessment, the practices and processes that encompass CMMC Levels 1, 2, and 3 apply. CMMC Level 3 provides increased assurance to the DoD that a contractor can adequately protect CUI at a level commensurate with the risk, accounting for information flow with its subcontractors in a multi-tier supply chain” (p. 13-14.