

SAN FRANCISCO DISTRICT (SPN) CYBER SECURITY MATURITY MODEL (CMMC) 2.0

BUSINESS OPPORTUNITIES OPEN HOUSE (BOOH)

Cyber Security Maturity Model (CMMC) 2.0

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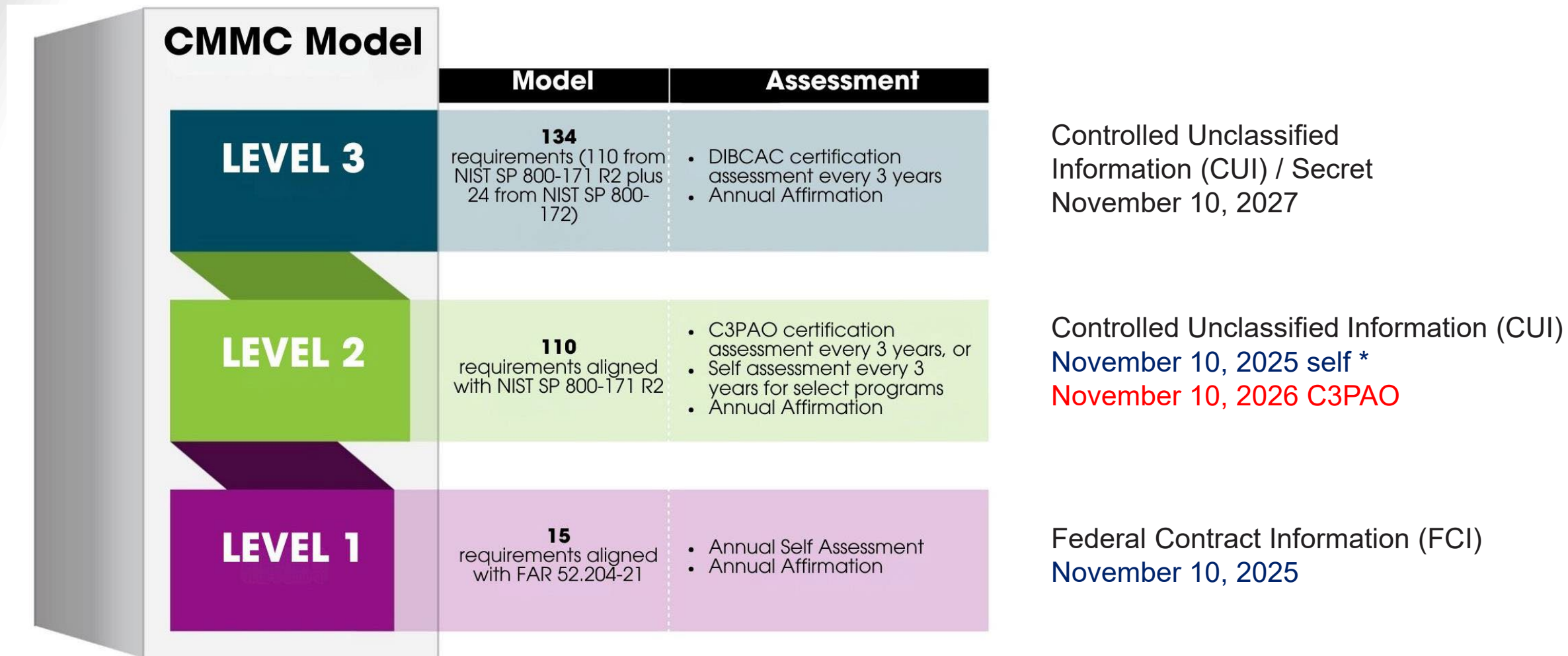


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CYBER SECURITY MATURITY MODEL (CMMC) 2.0



*Level 2 self certification can be required instead of C3PAO (November 10, 2026 – November 9, 2027) if market research indicates we would have inadequate competition



FCI VERSUS CUI



- **FCI** is information not intended for public release, that is provided by or generated for the Government under a contract.
 - Defined in 48 CFR 4.1901
 - Minimum safeguarding requirement : 48 CFR 52.204-21
 - **CMMC Level 1**
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- **CUI** is information marked or identified as requiring safeguarding in the DoD CUI Program, as defined in 32 CFR Part 2002.
 - Minimum safeguarding requirement for DoD: NIST SP 800-171 Revision 2
 - **CMMC Level 2**



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LVL 2 CMMC - SELF CERTIFY VS C3PAO



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Defense Organizational Index Grouping

- Defense is one Organizational Index Grouping for CUI that will mandate C3PAO certification for level 2 CMMC for certain CUI categories after 10 NOV 2026. However, if market research allows the government may award a CUI procurement base period as level 2 self certification and delay the C3PAO certification until option period 1.
- The cost of a C3PAO assessment for level 2 is estimated to be more than \$75K.
- Level 2 self or C3PAO can be given a “Conditional” status, which means the company had a high cybersecurity score, but still has additional fixes needed before obtaining “Finalized” status.
- Conditional status is only valid for 180 days.



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CUI EXAMPLES REQUIRING CMMC L2

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- **Controlled Technical Information (CTI):**
 - Engineering Drawings - Detailed plans for military facilities, including buildings, runways, and critical infrastructure.
 - Specifications - Documents outlining the specific materials, methods, and standards for a construction project on a federal site.
 - Technical Manuals - Instructions and guides related to the construction and maintenance of sensitive facilities.
- **Physical Security & Critical Infrastructure Information:**
 - Security System Layouts - Maps and diagrams detailing the placement of cameras, alarms, and other security devices.
 - Building Plans Revealing Sensitive Areas - Blueprints that show the design and construction of secure facilities like Sensitive Compartmented Information Facilities (SCIFs).
 - Vulnerability Assessments - Reports that identify potential weaknesses in the physical security of a facility.
- **Project & Operational Security (OPSEC) Information:**
 - Project Names and Details for Sensitive Sites - The name of a project supplying materials to. Example: a large order of a specific material for a known military project could reveal sensitive details about the project.
 - Geospatial Data (GIS) - Maps and topographical information of federal sites and military bases.
 - Construction Schedules - Timelines for construction on a military base revealing operational plans.