

CMMC Compliance Implementation Checklist

1. Affirm Applicability

- Determine if CMMC applies to your organization.
- Validate DoD contract status and data classification (CUI Basic or CUI Specified).

2. Validate Regulatory Compliance for FAR/DFAR

- Ensure compliance with FAR/DFAR regulations.
- Remember DFARS includes items not specifically annotated in CMMC (e.g., DIBNET reporting).

3. Determine Data Flow and Flow Down Requirements

- Identify where data is stored.
- Assess your position as a sub to a Prime or a Prime to subs.
- Evaluate current data sharing methods.
- Create a Data Flow Diagram for CUI.

4. Understand Data Protection Requirements

- Identify legislative requirements for protecting sensitive data.
- Check for additional requirements from sources like cyber insurance provisions.

5. Affirm Timeframe and Conduct Gap Assessment

- Set a timeframe for compliance.
- Perform a gap assessment to identify areas needing improvement.