



# Cybersecurity Maturity Model Certification (CMMC): Are You Ready?

CMMC L2 Key Documents

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# Presenters



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- 26 Years with the firm
- Leads CMMC, SOC 2, HITRUST, and Internal Audits service areas
- Accountable for the firm's IT team

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- 21 Years with the firm
- Quality Assurance CCA
- Founding member of the CMMC C3PAO Team
- Internal Audit background including IT Audit and NIST 800-53 framework audits

**Michael Murray, Manager**  
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- Leads Assessment Teams
- 7 years Experience with NIST 800-53, 800-171 assessments
- 15 years in the Pennsylvania Air National Guard

# Firm Overview

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# Agenda

- Authoritative Sources For Scoping Your Environment
- Key Documents
- System Security Plan
- Network Diagrams
- CUI Flow Diagram
- Categorized Asset List (CUI, SPA, CRMA, Specialized)
- Determining Service Provider Type
- SRMs (if applicable)
- Initial Evidence Package



# Scoping the Environment

- Authoritative sources for scoping your environment
  - [CMMC Scoping Guide Level 2, Sep 2024](#)
  - [CMMC Assessment Guide Level 2, Sep 2024](#)

# Key Documents

- Key Documents Include:
  - System Security Plan
  - Network Diagrams
  - CUI Flow Diagrams
  - Categorized Asset List
  - Share Responsibility Matrices (if applicable)
- These documents are crucial to determining scope during phase 1 of a CMMC L2 assessment. These documents should work in conjunction with each other to provide a clear picture of the environment.

# System Security Plan

- The SSP must address/include the following:
    - CMMC L2 Implementation at the objective level (320 objectives)
      - All 110 security controls and their associated 320 objectives described in detail
      - Reference supporting documents where applicable
    - An overview/description of the CMMC L2 environment
    - All applicable roles and responsibilities
    - Version/revision history
    - Network diagram
    - CUI flow diagram
- } These two may be included in a single diagram

# Network Diagrams

- All assets in the categorized asset list should be present on this diagram
- Overall network architecture should be present and apparent
- Should accurately describe the scope of the assessment

# CUI Flow Diagrams

- Should answer the following questions:
  - Where does CUI enter the environment?
  - Where does CUI traverse the environment? (in transit)
  - Where is CUI stored in the environment? (at rest)
  - Where does CUI exit the environment?

# Categorized Asset List

- Assets should be categorized IAW the CMMC L2 scoping guide

Asset Category	Asset Description
Controlled Unclassified Information (CUI) Assets	Assets that process, store, or transmit CUI
Security Protection Assets	Assets that provide security functions or capabilities to the OSA's CMMC Assessment Scope
Contractor Risk Managed Assets	Assets that <b>can, but are not intended to, process, store, or transmit CUI</b> because of security policy, procedures, and practices in place. Assets are not required to be physically or logically separated from CUI assets
Specialized Assets	Assets that can process, store, or transmit CUI but are unable to be fully secured due to inherent design or other limitations.
Out-of-Scope Assets	Assets that cannot process, store, or transmit CUI; and do not provide security protections for CUI Assets. Assets that are physically or logically separated from CUI assets

# Cloud Service Provider Characteristics

- See [NIST 800-145](#) for reference.
- Essential characteristics for a Cloud Service Provider (CSP):
  - On-demand self-service
  - Broad network access
  - Resource pooling
  - Rapid elasticity
  - Measured service

# ESP/CSP Additional Details

- CSPs handling CUI must be FEDRAMP moderate or equivalent
- CSPs handling SPD only do not have to be FEDRAMP moderate or equivalent, but will be included in the OSC's assessment scope as Security Protection Assets (SPA)
- Non-CSP ESPs handling CUI will be included in the OSCs scope as CUI assets (All 320 objectives)
- Non-CSP ESPs handling SPD only will be included in the OSCs scope as SPA and will be assessed IAW the services that they provide

# Determining Service Provider Type

- Table from the final rule (32CFR)

TABLE 4 TO § 170.19(c)(2)(i)—ESP SCOPING REQUIREMENTS

When the ESP processes, stores, or transmits:	When utilizing an ESP that is:	
	A CSP	Not a CSP
CUI (with or without SPD) ..	The CSP shall meet the FedRAMP requirements in 48 CFR 252.204–7012.	The services provided by the ESP are in the OSA's assessment scope and shall be assessed as part of the OSA's assessment.
SPD (without CUI) .....	The services provided by the CSP are in the OSA's assessment scope and shall be assessed as Security Protection Assets.	The services provided by the ESP are in the OSA's assessment scope and shall be assessed as Security Protection Assets.
Neither CUI nor SPD .....	A service provider that does not process CUI or SPD does not meet the CMMC definition of an ESP.	A service provider that does not process CUI or SPD does not meet the CMMC definition of an ESP.

# Shared Responsibility Matrix

- A good SRM should avoid vague language, such as ‘may or may not,’ ‘might,’ ‘possibly,’ when describing the assignment of responsibility.
- The assignment of responsibility should mirror what is in the SSP
- The SRM should specify responsibility down to the objective level
- For objectives marked as shared, what part is OSC’s responsibility, and what part belongs to SRM owner?

# Initial Evidence Package

- Should include a complete listing of all applicable policies and procedures pertaining to the selected scope of the CMMC L2 Assessment
- Should include as many artifacts/evidence of implementation as possible
- Being prepared up front allows for the most efficient use of time during the assessment
- In addition to artifacts, assessors may choose to request a live demonstration during interview sessions to clarify any evidence/artifacts received

# NIST 800-171A Terminology

- Defined, Specified
  - If a NIST 800-171A objective states that something must be defined or specified, it must be written, *explicitly stated* in a policy, procedure, or the SSP itself.
  - Follow-on objectives within the same requirement usually ask assessors to determine if implementation is matching organizationally defined policy, so without these, determination on implementation cannot be made.
  - Sometimes enterprise policies are not specific enough. Policy definitions must speak to what is happening, or what is intended to be happening, within the scope of the CMMC L2 assessment.

# NIST 800-171A Terminology cont'd

- All objectives that do not specifically state that something must be defined or specified are looking for proof of implementation.
- This can be achieved through screen shots, live demonstration/shoulder-surf, processes, or interviews with applicable staff.

# Specific Objectives Example

- 3.3.1[e] – retention requirements for audit logs are defined
  - See pg. 14 of example AU policy included with presentation package

VM audit logs are **retained** within AlienVault SEIM for one year. AlienVault will alert the System Administrator, IT Director, and Security officer via e-mail in the event a VM experiences an audit logging process failure, shows signs of compromise, or configuration errors. AlienVault SEIM allows filtering by several parameters including: event type, time, device/system component. AlienVault can produce on-demand reporting and analysis. AlienVault allows in-depth analysis, providing insights and resources for potential indicators of attack, abnormal device behavior, and configuration issues.

Unless otherwise stated within this document, all system flaws will be remediated according to the following table. If there are any identified items that need to be added to the Risk Registry, security assessment, and/or the Incident Response Repository. Please see the Risk Assessment, Security Assessment, and the Incident Response Plan for more information:

System Flaw Severity	Time to Respond to System Flaw
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# Specific Objectives Example

- 3.3.1[f] – audit records are retained as defined
  - See “3.3.1 Evidence AlienVault logs.docx” included with presentation package

The screenshot displays the 'Settings' page for a subscription. Key elements include:

- License Usage:** Consumed data is 953.3 MB of 500 GB (19%). Projected data consumption is 11.1 GB of 500 GB (2.2%).
- Recovery Mode:** A green 'HEALTHY' status indicator is shown. A tooltip explains that Recovery Mode is a safety net for data retention.
- License Information:** License type is Standard 30 Days, service tier is 500 GB per month, and the license end date is January 24, 2020.
- Performance Metrics:** EPS is 1.32, Failed EPS is 0%, and Firing Rules are 0.

The screenshot shows the 'Cold Storage' section of the LevelBlue documentation. It includes a search bar and a table of key terms:

<b>Important:</b>	Tier options do not have unlimited processing power, memory allocation, or disk input/output (I/O) speeds. In addition to storage per month, your deployment size's impact on any of these factors will influence which tier option is right for your environment. LevelBlue recommends pre-deployment sizing discussions with your sales representative to help select the right tier for you.
<b>License End Date</b>	Either the trial expiration date (for trial licenses) or support end date (for subscription licenses). The displayed date depends on your computer's time zone.
<b>Cold Storage</b>	Click <b>Export Raw Logs</b> to download the raw log files in ZIP format. See <b>Raw Log Data</b> for more information. <b>By default, cold storage is unlimited for USM Anywhere customers within their service terms but unlimited for LevelBlue Threat Detection and Response for Government (LevelBlue TDR for Gov) customers for three years. Keep in mind these points:</b> <ul style="list-style-type: none"><li>• You can export raw logs for a 31-day month, but you are limited to a 31-day span if the range exceeds a single month.</li><li>• The start time is 00:00:00 on the start date selected, and the end time is 23:59:59 on the end date selected. So if you select from 1/1/2020 to 2/1/2020, the logs start at 00:00:00 1/1/2020 and end at 23:59:59 2/1/2020.</li></ul>
<b>Email</b>	Email address associated with your license.
<b>MSSP Status</b>	Indicates whether the USM Anywhere deployment has been successfully connected to a USM Central or not. See <b>Connecting a USM Anywhere to a USM Central</b> for more information.
<b>MSSP Service</b>	Name of the connected USM Central deployment.
<b>Historical Data Consumption</b>	A list of data consumption by month. Click <b>Download CSV</b> to download a file with this information.
<b>Top Data Sources</b>	Displays a list of the top data sources. Click <b>Download CSV</b> to download a file with this information.
<b>Top Event Names</b>	List of the top event names related to their data source. Click <b>Download CSV</b> to download a file with this information.
<b>Top Reporting Devices</b>	List of top reporting devices. Click <b>Download CSV</b> to download a file with this information.

# Questions?



# Contact Information



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