

CLIENT ALERT

Immaturity of the Cybersecurity Maturity Model: Revisions Omit Higher-Level Updates

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Last week, the Defense Department (DoD) released [Revision 0.6](#) to the [Cybersecurity Maturity Model Certification \(CMMC\)](#). Notably absent were revisions to Levels 4 – 5, which DoD promises in the next public release. While the final version of the CMMC is due in late January, Revision 0.6 updated CMMC Levels 1 – 3 by:

- Condensing the CMMC requirements;
- Modifying the practices and processes; and
- Providing clarifications and examples for CMMC Level 1 requirements.

Revision 0.6 also distilled the core requirements for Levels 1 – 3 into the following categories:

- Level 1 -- Basic cyber hygiene: Implementation of security controls in FAR 52.204-21, *Basic Safeguarding of Covered Contractor Information Systems*;
- Level 2 -- Intermediate cyber hygiene: Implementation of select NIST SP 800-171 controls; and
- Level 3 -- Good cyber hygiene: Full implementation of NIST SP 800-171 controls.

Industry will benefit from reviewing this latest draft and preparing for DoD's pending implementation of the CMMC.

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