

CLIENT ALERT

Cybersecurity Maturity Model Matures: DoD Adds New Requirements to Draft Cybersecurity Certification

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The Defense Department has released [Revision 0.4](#) of its [Cybersecurity Maturity Model Certification](#) (CMMC) that, starting next year, independent auditors are to use to certify contractor compliance with DoD cybersecurity requirements. Revision 0.4 more than doubles the number of cybersecurity controls across the CMMC's five maturity "Levels." But the DoD emphasizes that it will further down-select these controls and that mature contractor processes may counteract gaps in the final controls' implementation. In addition to NIST SP 800-171 (the default standard under DFARS 252.204-7012), Revision 0.4 now incorporates requirements from the NIST Cybersecurity Framework, ISO 27001, and CIS Critical Security Controls, as well as from "additional DIB inputs." Notably missing is NIST SP 800-171B, which remains under review.

The DoD is requesting feedback on Revision 0.4 through September 25, 2019, and plans on releasing Revision 0.6 for comment in November 2019. The final CMMC is expected in January 2020.

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