

# Cybersecurity Maturity Model Certification (CMMC) Program

RIN: 0790-AL49



American Association for Laboratory Accreditation

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# Attendees for A2LA

Trace McInturff, Vice President

Ashley Kamauf, Program Manager, Cybersecurity Program Manager

Randy Querry, Director, Government Relations

Rob Miller, General Manager, Accreditation Services

# Accreditation

Third-party attestation related to a conformity assessment body, conveying formal demonstration of its competence, consistent operation and impartiality in performing specific conformity assessment activities.

ISO/IEC 17000:2020

# A2LA

- Established in 1978
- Independent, nonprofit, internationally-recognized accredited body in the United States that offers a full range of comprehensive conformity assessment accreditation services
- Over 4200 actively accredited organizations
- A2LA supports the federal government and numerous industry sectors in a wide variety of areas from testing and calibration laboratories to inspection bodies to product certification bodies

# Purpose of Meeting

- Need for clear industry standards that provide a framework for inspections and technical criteria to determine competency for:
  - CMMC Certified Third Party Assessment Organizations (C3PAOs)
  - Accreditation bodies

# At Issue

- Need for clarity in the certification requirements
- The need for prerequisites for accreditation bodies and accredited organizations
- Industry standardization
- Capacity to ramp up and maintain reliability in the ecosystem

# Accreditation / Inspection Bodies

Accreditation bodies shall:

- Operate independently and impartially
- Be recognized to the international standard ISO/IEC 17011

C3PAOs shall:

- Be accredited to ISO/IEC 17020 and demonstrate competence in assessing to NIST SP 800-171

Resulting in being recognized as technically competent to offer assessments

# Need for Prerequisites

“CMMC assessments will be conducted by **accredited** CMMC Third Party Assessment Organizations (C3PAOs) “ Federal Register, Vol 85, No. 189, September 29, 2020, page 61506

DoD references need for “**independent, non-profit**” for accreditation

Federal Register, Vol 85, No. 189, September 29, 2020, page 61510



# Successful DFARS Example

## DoD Environmental Laboratory Accreditation Program

Title 32 / Subtitle A / Chapter 1 / Subchapter L / Part 188 / § 188.6

- Environmental laboratories voluntarily demonstrate competence and document conformance to ISO standard

DoD Quality Systems Manual for Environmental Laboratories

- Third party accreditation bodies must operate in accordance with ISO/IEC 17011

Title 32 / Subtitle A / Chapter 1 / Subchapter L / Part 188 / § 188.6

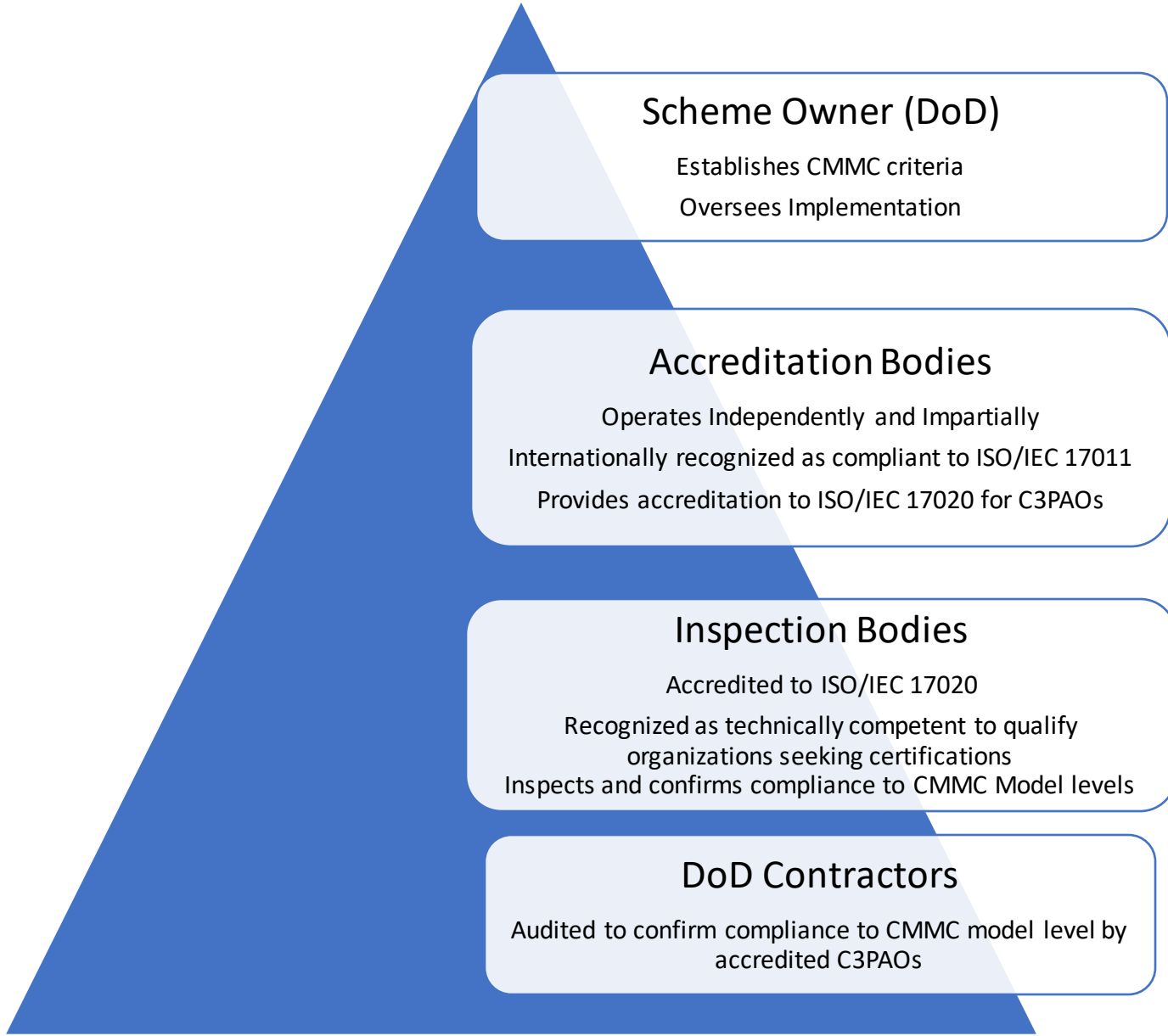
# Successful DFARS Example (continued)

## DoD ELAP fosters Title 32 / Subtitle A / Chapter 1 / Subchapter L / Part 188 / § 188.6

- Interoperability among the DoD components
- Fair, equitable and open competition
- Collection of data of known and documented quality
- A streamlined process for identifying and procuring competent providers

## DoD ELAP enables

- Approval and oversight of accreditation bodies
- Direction of resources and attention to program maintenance and policy



# Additional Successful Federal Government Examples

GSA Federal Risk and Authorization Management Program (FedRAMP)

EPA National Lead Laboratory Accreditation Program

FCC for telecommunications equipment

# Issues to Address

- Use independent, non-profit accreditation bodies that are a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement operating in conformance with the ISO/IEC 17011 standard
- Apply ISO/IEC 17020 as the accreditation standard for C3PAOs