

CMMC (V 2.0) - NIST SP 800-171 and NIST SP 800-172

On November 5, 2021, the DoD announced its strategic direction of the CMMC program.

The original goal of safeguarding sensitive information has been retained. The framework has been simplified minimizing barriers to comply with DoD requirements.

The number of levels has been reduced from five to three with the number of controls reduced.

The CMMC Version 1.0 vs Version 2.0:

OVERVIEW OF CHANGES

MODEL ELEMENTS	CMMC V1.0	CMMC V2.0	
LEVELS	5	3	
CONTROLS	171	110+	
PROCESS MATURITY LEVELS	5	REMOVED	
PLAN OF ACTIONS	NOT ALLOWED	ALLOWED	
WAIVERS	NOT ALLOWED	ALLOWED	
SELF ASSESSMENT	NOT ALLOWED	ALLOWED FOR LEVEL 1 & FOR LEVEL 2 NON-MISSION CRITICAL INFORMATION	

CMMC (V 2.0) – NIST SP 800-171 and NIST SP 800-172 (Cont.)



The number of controls in each level of Version 2.0 are as follows along with the requirements:

OVERVIEW OF CHANGES

NEW LEVELS OF V2.0	# OF CONTROLS	REQUIREMENTS	
LEVEL 1 (BASIC)	17	Applicable for FCI (Federal Contract Information) NIST 800-171 Self Assessment	
LEVEL 2 (ADVANCED)	110	Applicable for CUI (Controlled Unclassified Information) NIST 800-171 Self Assessment or C3PAO Assessment	
LEVEL 3 (EXPERT)	110 + any or all of 35 requirements from NIST SP 800-172	Applicable for CUI (Controlled Unclassified Information) NIST 800-171 and Selected Requirements from NIST 800-172 (35 requirements) based on RFQ C3PAO Assessment	

Below is a list of domains and controls for both NIST 800-171/172. As you can see, NIST 800-172 includes all of NIST 800-171 requirements with additional requirements in certain domains.

DOMAIN & CONTROLS - NIST 8000-171/172

Domains	NIST 800-171 Controls	NIST 800-172 Enhanced Controls
ACCESS CONTROL	22	3
AWARENESS AND TRAINING	3	2
AUDIT AND ACCOUNTABILITY	9	0
CONFIGURATION MANAGEMENT	9	3
IDENTIFICATION AND AUTHENTICATION	11	3
INCIDENT RESPONSE	3	2
MAINTENANCE	6	0
MEDIA PROTECTION	9	0
PERSONNEL SECURITY	2	2
PHYSICAL PROTECTION	6	0
RISK ASSESSMENT	3	7
SECURITY ASSESSMENT	4	1
SYSTEM AND COMMUNICATIONS PROTECTION	16	5
SYSTEM AND INFORMATION INTEGRITY	7	7
Total - 14	110	35

For more information on CMMC or other Information Security Standards such as the ISO 27000 series, contact PJC.