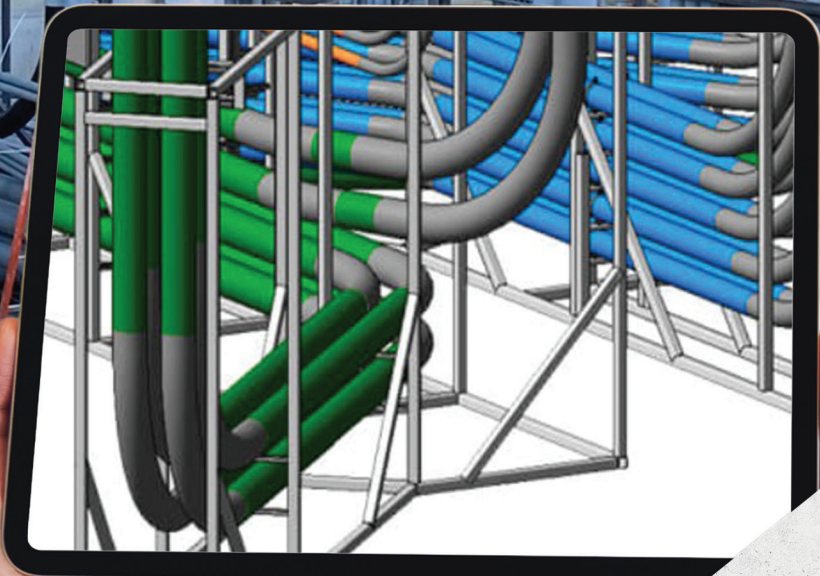


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# ABC 2023 TECH REPORT



**ABC**  
Associated Builders and Contractors



## Our CMMC Journey

*By Chris Thomas, Director of Information Technology, Harkins Builders Inc.*

### Introduction

If you work for a company involved in government projects, you might be familiar with CMMC, the Cybersecurity Maturity Model Certification. It requires organizations handling controlled unclassified information to meet specific requirements that demonstrate their environment is secure enough to be trusted with it. There are different levels of CMMC, so it's essential to research and determine that you're setting down the correct path from the start.

My experience with CMMC began in 2020 when a colleague from our government division asked me if I was aware of it. I confessed that I wasn't and, after some reading of my own, I concluded that it sounded like something we should investigate, since a significant portion of the work we do at Harkins relies on the government. I contacted a consultant that we had utilized for past IT work, and they put me in touch with a company that specializes in helping organizations navigate the CMMC process.

Over the following year, I became buried in an overwhelming amount of Word and Excel documents as we slowly chipped away at documenting how we met each requirement. Deciphering the government jargon and acronyms added to the confusion. Although some controls were reasonable and were based on sound security practices, there were redundancies and nonsensical aspects that added to the frustration.

### The New and Improved CMMC 2.0

In late 2021, the government unleashed CMMC 2.0, which brought some pretty big changes and even simplified it a bit. We had recently added an information technology and security specialist to our staff, so I was able to share the CMMC awesomeness with someone else. In mid-2022, we decided to engage a new partner, Edwards Performance Solutions, which not only better understood our environment, but also had a consistent team we could rely on. We also adopted FutureFeed, an outstanding application that streamlined our progress tracking and moved us away from the pile of Excel and Word documents we had accumulated.

We started fresh with Edwards, engaging various departments at Harkins, such as accounting, marketing, human resources and, of course, members of our

## ABC AWARDS AND ACKNOWLEDGMENTS

- ▶ 2022 National Excellence in Construction® Award
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government division, to understand how they each interacted with CUI. Data flow diagrams were completed, followed by a gap assessment to identify areas that required improvement. This helped us build our plan of action and milestones, which is an essential piece of the CMMC puzzle.

### FedRAMP and Microsoft 365

Since Harkins is heavily invested in the Microsoft 365 platform and utilizes SharePoint and Teams to store much of our project data, we faced a challenge. The commercial version of Microsoft 365 is not FedRAMP compliant, which means that we can't securely store CUI there. Rather than move our 300+ users and 600+ devices over to the Microsoft 365 Government Community Cloud (the 365 environment that is FedRAMP compliant), we set up a new GCC environment only for employees needing to interact with CUI, reducing the CMMC scope.

### Where We Are Now

With that project mostly complete, we continue working through the controls with Edwards, now with a simpler scope. Regular biweekly meetings help us progress steadily, addressing items on the list and establishing new processes when needed. We still have a few larger items on our radar that will need to be addressed. For instance, we utilize Procore at Harkins, and it is not yet FedRAMP compliant. There are compliant products out there, but the thought of moving to a new platform is daunting, to say the least.

Another item of concern is understanding what our responsibility is of ensuring that the trade partners that we engage with in the future on government jobs are CMMC compliant. I have heard mixed opinions about whether the government is going to ever enforce CMMC, and many companies have either decided to completely ignore it or just adopt a wait-and-see attitude. This is a decision that businesses will have to decide for themselves. The amount of time and money that it will take to complete the CMMC process is considerable, and I often wonder how smaller organizations are handling it.

### Why We Did It

The decision to comply with CMMC or ignore it lies with each business. However, the importance of increased security when handling CUI cannot be denied. Those enticing government contracts that we all love will come at a higher cost and companies will have to weigh the benefits and decide accordingly, considering the effort and resources required for the CMMC process.