

How data security led to a CMMC certification



Education Services LLC engaged CyberSheath to escape Microsoft's commercial data collection practices through GCC High. The compliance work that followed produced a CMMC Level 2 certification.



Client

Education Services LLC is a small business specializing in custom training development and learning platforms for defense and technology companies. The company brings expertise in learning science, instructional design, curriculum development, competency assessment, and user experience across online, classroom, and field training environments. With 11 full-time employees, Education Services supports a prime contractor that designs and sells advanced technology solutions for military, federal law enforcement, and commercial markets.

Situation

Education Services' path to CMMC certification started with a different challenge. The company was concerned with data collection from Microsoft products sitting in the cloud and wanted to migrate to GCC High for privacy assurance. Leadership recognized that achieving full, documented compliance with NIST SP 800-171 and DFARS 252.204-7012, formalized through CMMC Level 2 certification, would be even more valuable.

The timing proved fortunate. A few months after Education Services contracted with CyberSheath, the CMMC Program Rule was published, establishing the rules and phase-in schedule for mandatory Level 2 assessments. Within weeks, its prime contractor imposed the flow-down requirement on contracts supporting programs of record. Education Services was already well into the compliance process by then. By contracting with CyberSheath, the company gained access to a full team of specialists instead of hiring a single IT generalist.

Process

CyberSheath migrated Education Services into GCC High and deployed management and monitoring tools across the company's environment, taking on IT operations responsibilities that had previously been handled internally. The engagement covered the full enterprise rather than an enclave, which the company's structure required since its work doesn't segregate cleanly enough to isolate controlled unclassified information in a separate environment.

An initial gap assessment showed that the biggest area of improvement was documentation, creating the necessary policies and procedures in the required format. But there were also areas where CyberSheath engineered new technical solutions to close compliance gaps.

The implementation had to account for several complicating factors beyond a standard IT migration. Education Services operates a physical facility where CUI may be present. The company uses specialized photography, video, and printing equipment that had to be brought into the compliant environment. And because only some of its work falls under CUI and ITAR regulations — other projects serve commercial and international markets — the company needed a way to accommodate file exchange of unregulated materials alongside its controlled environment.

One of the company's priorities throughout the process was avoiding overcommitment. Drawing on experience with other compliance frameworks like SOX, PCI DSS, FERPA, and GDPR, the company's founder was wary of consultants guiding organizations to declare commitments to expensive and unnecessary controls that were never required until the company put them in its own documentation.

Results

Education Services achieved CMMC Level 2 certification with a 110 score through a third-party assessment. The C3PAO described the assessment process as professional and well-organized, and CyberSheath's documentation allowed the assessors to attest to controls efficiently. The certification/assessment information is recorded in the Pentagon's Supplier Performance Risk System (SPRS), where authorized acquisition personnel can access and verify applicable supplier information for procurement and contract-award purposes.



Insights

»» Data privacy can be the entry point for compliance.

Education Services didn't pursue CMMC first. The company went looking for GCC High to solve a data privacy problem, and the compliance opportunity followed from that decision. For companies already frustrated with commercial cloud data practices, the migration that addresses those concerns also closes a significant number of CMMC requirements.

»» Budget for expertise, not headcount.

Rather than hiring an IT employee, Education Services invested in CyberSheath's managed services. Small companies that try to handle compliance in-house often face a mismatch between the scope of the requirements and the capacity of an individual or small team.

»» Adopt your provider's proven practices wherever possible.

Compliance moves faster when a company can implement established policies and procedures rather than building custom documentation from scratch. Choosing an MSSP that already serves similar businesses means staff are familiar with common requirements, which streamlines implementation, documentation, audit preparation, and daily support.

CyberSheath is a longtime leader in the DOD/DOW cybersecurity space and an expert in DFARS, NIST and CMMC regulations. CyberSheath solves the whole problem with a flexible approach that meets each customer exactly where they are and guides them to full compliance at the lowest possible cost.