Developing a Foundational CUI Program
This roadmap will assist industry in developing a Controlled Unclassified Information (CUI) program and provides 11 key areas which industry can focus on to become compliant with CUI requirements.

1. Identifying Key Personnel
   - Senior Management
   - Facility Security Officer
   - Information Technology (IT) Manager/ISSM
   - Insider Threat Program Senior Official
   - Network Engineers
   - Program Managers
   - Contracting and Acquisition Professionals

2. CUI Training
   - 11 CUI training requirements
   - CDSE courses
   - Required annually (DOD)

3. DOD Policy
   - DODI 5200.48
   - NIST SPs
   - CUI Policy

4. Contract Identification
   - DD Form 254 review
   - Review contracts
   - Review legacy information

5. Customer Engagement
   - Review SCGs
   - Engage customers
   - Understand contractual requirements

6. Safeguarding & Access
   - How is it stored?
   - Who has access?
   - Long term storage
   - Access hours
   - Encryption requirements
   - Decontrol and destruction
   - Leveraging resources

7. SSP Development
   - Facility security procedures
   - Facility CUI contacts
   - Information system security policies
   - Contractual-specific guidance
   - Safeguarding and Marking
   - Reporting

8. Conduct Initial Self-Assessment
   - Review results
   - Correct findings
   - Identify opportunities
   - Make improvements

9. IS Controls
   - NIST SP 800-171
   - NIST SP 800-172

10. CMMC 2.0 Implementation
    - Implemented through the acquisition and contracting process.
    - Requires compliance with CMMC as a condition of contract award.
    - CMMC level will be specified in the solicitation & RFIs, if utilized.
    - Key features identified in the CMMC Model Structure:
      - LVL 3 Expert (110+ NIST SP 800-172 Controls); USG-led Triennial Assessments
      - LVL 2 Advanced (110 NIST SP 800-171 Controls); Self-Assessments or Triennial Third-Party Assessments
      - LVL 1 Foundational (17 NIST SP 800-171 Controls); Annual Self-Assessments

11. Conduct Full Assessment
    - Evaluate program
    - Report findings to management
    - Mitigate findings
    - Identify program improvements
    - Enhance program