



May 7, 2025

**Evaluation of Cybersecurity Maturity Model Certification (CMMC) Readiness at the Colorado State University System, May 2024 – Public Status Report**

Members of the Legislative Audit Committee (LAC):

Attached is the status report from the Colorado State University System (CSU System) on the implementation of recommendations contained in the Office of the State Auditor's (OSA) Evaluation of Cybersecurity Maturity Model Certification (CMMC) Readiness at the Colorado State University System, May 2024 – Public Report.

**OSA Review of Documentation**

As part of the status report process, we requested and received supporting documentation for each recommendation that the CSU System reported as having been implemented or partially implemented. Specifically, we reviewed the following documentation:

- Information Technology Security Policy – The CSU System's policy establishing an IT governance model for managing and protecting information technology resources and data at the CSU System's institutions and establishing that the CSU System's Chief Information Security Officer (CISO) is responsible for enforcing the CSU System's information security program and information security policies, procedures and standards.
- Advanced Cybersecurity Protection Standard: Controlled Unclassified Information – The CSU System's standard that establishes that the CISO is also responsible for ensuring compliance with CMMC and for submitting the annual CMMC compliance affirmation. In addition, this standard states that the Senior Director, Research Information Technology, is responsible for CMMC required uploads to the federal Department of Defense's Supplier Performance Risk System.
- Training Materials – The CSU System's training developed to provide information to protect Federal Contract Information and Controlled Unclassified Information.

- Controlled Unclassified Information (CUI) Award Lifecycle – The CSU System’s process for managing and safeguarding CUI through the federal award lifecycle.

Based on our review, the supporting documentation substantiates the CSU System’s reported implementation status.

We will discuss the confidential status report with the LAC during the August 11, 2025, hearing at approximately 12:30 p.m. Following the Committee’s vote to go into executive session in accordance with Section 24-6-402(3)(a)(IV), C.R.S., we will distribute and discuss the status report for the Evaluation of Cybersecurity Maturity Model Certification (CMMC) Readiness Confidential Report, May 2024. The confidential material will be collected at the conclusion of the executive session.