

**T47 International, Inc. (T47) Testimony Prepared for  
The Committee on Small Business  
Members, Subcommittee on Oversight, Investigations and Regulations**

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Subject: CMMC Implementation: What it Means for Small Businesses

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**Chairman Dean Phillips, Ranking Member Beth Van Duyne, and Members of the  
Subcommittee, thank you for the invitation to testify today.**

I am Tina Wilson, CEO – T47 International and I am honored to have the opportunity to speak to you and provide some insight regarding the implementation of the Department of Defense Cybersecurity Maturity Model Certification (CMMC) initiative.

This initiative is extremely important to protect our nation’s Defense Industrial Base, supply chain, intelligence products and assets, and information technology infrastructure. As a Nation, we are at a critical juncture in our history, where cyber is our new warfare and the urgency to provide sustainable solutions to protect everything that IT touches is essential.

As a business owner with over 260+ employees, located in over 28 states and overseas, T47 provides a variety staffing services from budget and finance, janitorial, inventory management, aircraft tools maintenance, to mailroom and non-clinical medical and dental case managers. The diversity of service offered, puts me in a unique position to provide a different perspective regarding this subject and the implications. Most of our employees understand the meaning of cyber security but we have a handful that may not. Therefore, training them will be key to cyber defense.

As CMMC standards continue to be developed and incorporated into contracting agreements and modifications, it is essential that the small business committee be aware of the policy implications, if the CMMC standards are not clearly communicated and monitored for fraud, the financial ramifications to the over 300,000 defense industrial base of contractors, especially to the small business community could be devastating. Based on this statement, I will cover three main subject areas of concern and offer recommendations:

1. Cost to Secure CMMC
2. Cost Not to Secure CMMC
3. Audit Impostors

**Cost to Secure CMMC**

As of today, there is no set cost to obtain the CMMC. The CMMC Accreditation Body has stated that the marketplace will need to define the cost, which leaves it wide open for interpreting what this cost will be. Whether it is a tiered cost based on the size of the business or a set cost regardless of the size, there will be a initial and sustain cost that will impact a small business ability to secure the certification. Providing estimates of implementation costs, including and especially by tier, would allow companies to better predict future business expenses and plan for compliance. As of today, T47 is undergoing three International Organization for Standardization (ISO) and one of the ISO 27000 which is information technology – security for any kind of digital information. This certification is believed to be similar to what companies may expect for

a CMMC certification and is approximately \$28,000 - \$35,000 to obtain and takes approximately six (6) to eight (8) months to implement. This is a tremendous cost burden to add to very tight budget for most small business. Failure to have the CMMC will cost even more.

### **Cost of Not Having CMMC**

While unknown as of today, what has been communicated to the entire Defense Industrial Base, is that if you don't have the CMMC at the basic level, you will not be eligible for federal contracts. Many small businesses may not even be aware of this new requirement and that failure to obtain certification means ending contract work as a service provider to the Department of Defense. These companies will not be able to make employee payroll and the dream of having a meaningful business to take care of the business owner family could also end. Additionally, as a Prime contractor, it will be our responsibility to flow-down the requirements to our subcontractors. If the subcontractor does not have the certification, we would be required to end subcontractors contract agreement to remain in compliant with the DoD CMMC standards. Not having CMMC adds a tremendous cost and risk to any business but will disproportionately impact the small businesses.

### **Audit Imposters**

I raise this subject as an awareness to inform the subcommittee. When the DoD presented the CMMC as the new way of life for all businesses within the Defense Industrial Base, many businesses ask a lot of questions of why, who will conduct the implementation and audits, how much, when will this happen, implications of if you don't have it, and many more questions. This started in Summer of 2019 before the pandemic and lockdown in 2020. Even before the CMMC Accreditation Body was formed, audit imposters, started advertising that they would certify your company as cyber compliant. The audit imposters have had no training and certainly not accredited by the CMMC Accreditation Body. Matter of Fact, the first set of Third-Party Assessor Organization or C3PAO auditors certified to perform audits was just issued in May 2021. The audit imposters are charging thousands of dollars to get a company ready and for many small businesses that are just now hearing about this, may in a moment of pandemic, and fear of losing their government contract, may fall prey to an audit imposter.

As I close, I recommend that subcommittee members closely monitor this very important implementation of the CMMC initiative. While I know there are so many other issues to focus on, CMMC has ramifications that reach far beyond what we can realize at this moment. It is important that

1. Cost is articulated clearly to reduce price gouging and to allow small businesses to plan; and that there is a balanced cost approach that does not reduce small business participation in the federal marketplace;
2. DoD continues to work closely with the various advocacy groups to ensure that the Defense Industrial Base contractors know that the Office of Small Business is aware of the implications of this new initiative; and
3. DoD and the Office of Small Business start as soon as possible to put various roadblocks in place to reduce the number of audit imposters.

Thank you for your time and addressing this very important subject that impacts thousands of small businesses that do business with the Department of Defense.