University of Pittsburgh | Office of Research Protections

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To: **University of Pittsburgh Research Community**

From: **Allen A. DiPalma, Executive Director**
Office of Research Security & Trade Compliance

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Subject: **CMMC Level 2 CUI Environment Description and Costs**

CMMC Level 2 CUI Environment Description

The University of Pittsburgh Controlled Data Enclave (CDE) provides a secure, isolated computing environment designed to protect Controlled Unclassified Information (CUI) in support of the University's federal research mission. The CDE enables University researchers to compete for, receive, and perform Department of Defense (DoD) contracts and other federal awards that require the safeguarding of CUI in accordance with DFARS 252.204-7012.

The CDE is designed to:

- Protect the confidentiality of CUI as defined by 32 CFR Part 2002 and the NARA CUI Registry;
- Implement security controls required by NIST SP 800-171 Rev. 2;
- Achieve and maintain CMMC Level 2 certification;
- Provide researchers with secure access to collaboration tools, data storage, and computing resources necessary to conduct CUI-related research activities; and
- Enable the University to fulfill its contractual obligations for safeguarding federal information.

The CDE is hosted entirely within Microsoft Azure Government and Microsoft 365 GCC High, both of which maintain FedRAMP High authorization. The environment is managed by Summit 7, a CMMC Level 2 certified Managed Service Provider (MSP), under the oversight of the University's Office of the Chief Information Officer and Office of Research Protections.

The University of Pittsburgh Controlled Data Enclave (CDE) environment utilizes Azure Government (certified FedRAMP High) and Microsoft 365 Government Community Cloud High (M365 GCC High) (certified FedRAMP High). These services provide storage, email, analytical applications, and office productivity applications.

The environment is CMMC Level 2 certified with a score of 110 which is posted in the Supplier Performance Risk System.

CMMC Level 2 CUI Costs for Budgeting

The University of Pittsburgh's CMMC Level 2 CUI cost model was calculated on a per project annual basis for 3 people and includes both fixed and variable costs. Fixed costs include triennial certification; operation MSP; Azure subscriptions; and onboarding inclusive of training, security reviews, and an internal technology control plan that will govern the entire project. Variable costs include access to Azure virtual desktops, storage, and virtual machines. Annual costs are $14,547 for fixed costs and $14,631 for variable costs for a total of $29,178. The per person annual cost is $9,726 and can be used to calculate budget costs whenever the number of individuals needed to access this environment is less/greater than 3.

All fixed and variable costs used in this model are considered new costs and are not included in the University's negotiated and approved federal indirect cost rates. Thus, all costs associated with this CMMC Level 2 CDE environment should be reflected as direct costs in sponsored project budgets and included in the Modified Total Direct Cost (MTDC) base when calculating indirect costs.