
CASE STUDY: **DATA SYSTEMS ANALYSTS INC.**

ACHIEVING CMMC
LEVEL 2 COMPLIANCE
FOR A MID-SIZED
DOD CONTRACTOR

OVERVIEW

Data Systems Analysts Inc. (DSA) is a Department of Defense contractor with a **uniquely structured workforce**, where approximately **75% of employees operate at client locations**. As a result, only a limited subset of staff required access to environments processing **Controlled Unclassified Information (CUI)**.

This operating model created both an opportunity and a challenge:

DSA needed to achieve **CMMC Level 2 compliance** without over-scoping systems, users, or driving unnecessary costs in secure environments.

TESTIMONIAL

“CMMC Level 2 felt daunting at first, especially with a distributed workforce and the risk of over-scoping our environment and driving up costs. Hartman helped us take a practical, disciplined approach that kept scope tight, aligned our policies with how we actually operate, and made us audit-ready. We are proud to have achieved CMMC Level 2, and we continue to partner with Hartman to stay compliant as requirements evolve.”

John P. Somplasky
Chief Information Security Officer
Vice President, Quality & Performance Excellence
DSA, Inc.

CHALLENGES

CMMC compliance is complex for any organization, but particularly difficult for **small and mid-sized defense contractors** with:

- Limited internal IT and compliance resources
- The cost impact of GCC High licensing and setup
- Evolving regulatory guidance and auditor expectations
- A shift from self-attestation to mandatory third-party audits

DSA faced several key hurdles:

- Defining the **minimum viable compliance scope** to meet requirements **without over-engineering systems or expanding scope unnecessarily**
- Aligning policy documentation with technical implementation
- Supporting a **novel technical architecture** unfamiliar to auditors
- Preparing for an audit environment transitioning from self-attestation to mandatory third-party assessments

SOLUTION

Hartman partnered with DSA leadership to guide the organization through compliance in a practical, cost-conscious, and audit-ready manner.

Hartman served as an **advisory and implementation partner**, supporting readiness, documentation, and technical alignment, while DSA engaged an independent Certified 3rd Party Assessor Organization (C3PAO) for assessment.

Early Preparation & Pre-Assessment

Before formal assessment, DSA:

- Procured Microsoft GCC High licenses
- Engaged an external auditor for a pre-assessment
- Began assembling required CMMC documentation

Hartman supported DSA by:

- Clarifying how CMMC Level 2 controls applied to DSA's environment
- Translating CMMC requirements into actionable documentation
- Guiding technical implementation to align with policy expectations



SOLUTION

Documentation & Audit Readiness

A major component of the engagement was documentation development and refinement.

Key Deliverables:

- **14 CMMC-aligned policies**
- A comprehensive **System Security Plan (SSP)**
- Continuous alignment between documentation and system configuration

As audit scrutiny increased, the SSP expanded to approximately 125 pages, driven by auditor requests for deeper justification, traceability, and control validation. Hartman worked closely with DSA to:

- Ensure documentation accurately reflected real-world operations
- Reconcile differences between policy language and technical controls
- Respond efficiently to auditor feedback and revision cycles

Unique Technical Implementation

DSA implemented a **virtual desktop interface (VDI)** strategy to isolate its GCC High environment - an approach that was **new to the auditors**.

This prompted:

- Additional technical questions
- Requests for expanded documentation and clarification

Hartman provided expertise to:

- Clearly articulate the architecture
- Demonstrate control effectiveness
- Provide supplemental documentation to satisfy audit expectations

RESULTS

Audit Outcome

DSA **successfully passed its CMMC Level 2 C3PAO audit** with no conditions or Plans of Action and Milestones (POAMs).

Key success factors included:

- Tight scope definition
- Strong alignment between documentation and implementation
- Rapid, informed responses to auditor questions
- Early investment in readiness rather than reactive remediation

Ongoing Compliance & Advisory Support

CMMC compliance does not end at certification. After achieving certification, DSA elected to engage Hartman for ongoing compliance advisory support, including:

- Annual self-attestation preparation
- Yearly review and updates to the SSP and policies
- Advisory support as regulations and auditor interpretations evolve

This ongoing engagement helps DSA remains compliant while avoiding unnecessary expansion of scope or cost.

INDUSTRY CONTEXT

CMMC requirements have existed for several years, but the most significant shift is the move from self-attestation to **mandatory third-party audits every three years** - raising the stakes for defense contractors.

A Small, Early Cohort

At the time of DSA's certification, **only 459 companies had achieved CMMC Level 2 (C3PAO) certification** out of an estimated **80,000+ Department of Defense contractors**.

This gap underscores both the rigor of CMMC requirements and the competitive advantage for contractors that prepare early.