

Building a CMMC Program from Near-Zero for a Defense and Aerospace R&D Manufacturer

A small R&D manufacturer doing mission-critical defense and space work had the contracts but no documented security program and a non-compliant cloud. InterSec sequenced a from-scratch CMMC Level 2 build against a firm November 2026 deadline.

<p>CLIENT A small defense and aerospace R&D manufacturer</p>	<p>PROFILE Engineered textiles and rapid prototyping; handles CUI and ITAR</p>	<p>STATUS ● In progress</p>
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<p>44→22 Active Directory accounts rationalized</p>	<p>14 Control families initiated</p>	<p>50+ Required artifacts templated</p>	<p>110 Controls mapped for Level 2</p>
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<p>STANDARD CMMC Level 2, NIST 800-171 R2</p>	<p>CLOUD Commercial M365 to GCC tenant</p>	<p>DEADLINE November 2026</p>	<p>FUTURE Level 3 roadmap for 2028</p>
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— THE CHALLENGE

A hard November 2026 deadline sat in the company's contracts, and this was a build from near-zero. It had 44 Active Directory accounts, many inactive, and a commercial Microsoft 365 environment unsuitable for CUI. Documented policies across the 14 control families did not exist, network diagrams were incomplete, and there was no data-flow map ready for an assessor. A GCC migration, account cleanup, and subcontractor flow-down all interlocked.

— THE APPROACH

InterSec's approach was deliberately practical, meeting the company where it was. Four concurrent workstreams ran through biweekly meetings and a shared evidence repository. Rather than confronting the team with all 110 controls at once, work was sequenced by control-family risk, starting with Access Control and Awareness and Training. The internal compliance lead owned policy drafting, with InterSec in a review and coaching role.

Starting from near-zero against a fixed deadline leaves no room for rework, only for getting the sequence right.

— THE SOLUTION IN PRACTICE

A shared SharePoint became the central evidence repository, with a GRC platform loaded for live SPRS scoring. The team provided templates for the 50+ required artifacts and set a cadence of two policies per week. Baseline work rebuilt inventories, network diagrams, data-flow maps, and a defined CUI boundary, and cut active accounts from 44 to roughly 22. The GCC workstream handled tenant setup, license right-sizing, and a planned manual migration.

— RESULTS & IMPACT

- ✓ A policy framework is initiated across all 14 control families.
- ✓ A shared evidence repository is live, with templates for every required artifact.
- ✓ The GCC architecture is defined and the license count right-sized.
- ✓ User scope is rationalized from 44 accounts to roughly 22, with CUI boundaries defined.

— KEY TAKEAWAYS

Start the GCC conversation early.

Migration cost and complexity are routinely underestimated. Quotes of \$1,500 to \$2,000 per user, before right-sizing, are common.

Policy ownership accelerates everything.

A client who owns the procedures, with the consultant in review mode, moves faster and is better prepared for an assessor.

ISO 9001 is an asset, not a distraction.

An existing documentation culture gives a from-scratch CMMC build a real head start.

Subcontractor flow-down is often last considered.

Raising it early lets a company assess supply-chain exposure before it becomes a late-stage gap.

CAPABILITIES DEMONSTRATED

CMMC Level 2 Readiness

GCC Migration Planning

CUI Scoping and Account Cleanup

Policy and Evidence Development

Technical Remediation

A near-zero start and a hard deadline are a tough combination.

InterSec builds the evidence trail that holds up and prepares contractors for CMMC assessment.

Let's talk →