

// ASSESSMENT AND IMPLEMENTATION, PROPERLY SEPARATED

Independence Is the Whole Product.

The compliance market splits assessors who cannot implement from implementers who do not understand assessment. We close that gap with an accredited C3PAO partner, and take no fee from any of them.

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01 The gap this closes

The compliance market is split down the middle, and the split costs you money.

On one side are accredited assessors who can tell you what is wrong but are barred from fixing it, independence is the whole point of their role. On the other are managed service providers who will happily install things without understanding how any of it will be examined. In between sits a handoff: a report written for one audience, handed to a team that reads it as a shopping list.

That handoff is where six weeks disappear, and where the same environment gets discovered twice.

HOW WE WORK INSTEAD

An accredited C3PAO conducts the independent NIST SP 800-171 assessment and scores it. Those findings flow directly into TRANUSA's remediation program, the same findings, no translation layer, no second discovery exercise. One program, two properly separated roles.

02 Independence is not a formality

A referral fee moving between an assessor and the firm that prepared you is a conflict of interest under the Cyber AB Code of Professional Conduct. It also puts at risk the only thing you are actually buying: a certification that holds up.

TRANUSA takes no fee from any C3PAO, under any circumstances

Not a referral fee. Not a rebate. Not a reciprocal arrangement. Your assessor's independence is the entire value of the assessment, and we are not going to sell it for a commission. This is a question worth asking every firm you are considering, including us.

03 The assessment-to-implementation pipeline

- 01 **Scoping and engagement.** TRANUSA scopes the CUI boundary against your contract requirements and documents what is in and out. An accredited C3PAO is engaged separately as the independent assessor.
- 02 **Independent gap assessment.** The C3PAO conducts a formal NIST SP 800-171 assessment across all 110 practices against your actual environment, and produces a scored gap report.
- 03 **Remediation and build.** TRANUSA works every gap in the findings, enclave and identity, security controls, network and endpoint work, and the documentation set, using a stack we run in our own operations first.
- 04 **Validation and readiness.** System Security Plan, POA&M and evidence packages assembled, then reviewed again before the formal assessment, so the audit is a confirmation rather than a discovery.

04 What you hold at the end

Gap report Independent NIST SP 800-171 assessment across all 110 practices.	SPRS score Calculated and posted: the artifact your customer is asking for.	System Security Plan Every applicable practice documented as it is actually met.	POA&M What is open, who owns it, and by when, eligibility rules applied correctly.
Evidence repository Artifacts captured as they occur, not reconstructed before an audit.	CUI boundary & architecture Documented, defensible, and reusable whoever you continue with.	Operated program Change control, monitoring, reporting: the part that keeps it true.	Audit support Evidence packages prepared and defended through the formal assessment.

All of it is yours outright. The plan, the POA&M, the evidence, the assessment result and the posted score are unaffected by the engagement ending.

05 Which role is TRANUSA?

We are the implementer and the program operator. We are not a C3PAO and we cannot certify you. No firm can both prepare a client and certify that same client, any firm implying otherwise is describing something that does not exist. We get you to a defensible, audit-ready position and support you through the formal assessment. An accredited assessor certifies.

Ask us who we work with

Thirty-minute readiness call: we will walk you through the pipeline, name our C3PAO partner, and tell you plainly where the independence line sits. calendly.com/tony-tranusa/cmmc-readiness-call · CMMC@tranusa.com

About this document. TRANUSA Capability Document TUSA-CAP-001, version 1.1, issued 12 September 2026 by TRANUSA, LLC, Buford, Georgia. Public; may be forwarded freely.

Basis. TRANUSA's delivery methodology and its working relationship with an accredited C3PAO as of the issue date; the Cyber AB Code of Professional Conduct on assessor independence; and NIST SP 800-171 Rev. 2.

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