COMPLETE TECHNOLOGY SOLUTIONS

A NEW CHARTER COMPANY

CMMC Paused, Not Dead

Navigating the DoW's Phase II Suspension

MEET THE SPEAKER

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- Certified as an Information Systems Security Professional (CISSP), Certified Ethical Hacker (CEH) and CMMC-AB Registered Practitioner.
- 25+ years of IT and cybersecurity experience
- Contributor to regional and national publications, including New York Times and NPR
- Tim devotes time sharing his cybersecurity knowledge across the world, speaking at international industry events and conferences.
- Volunteer fire chief and diehard New England Patriots fan.

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CMMC BACKGROUND/HISTORY

History

WHAT IS CMMC?

- **Cybersecurity Maturity Model Certification**
- DoD program to enforce cybersecurity across Defense Industrial Base (DIB)
- REQUIRED for companies working with or bidding on DoD contracts

TIMELINE

2016 DFARS 7012 launched, requiring NIST 800-171 self-attestation

2020 CMMC 1.0 Released (5 CMMC Levels)

2021 CMMC 2.0 Released (3 CMMC Levels)

2024 Final CMMC Program Rule Published

2025+ Phased rollout of CMMC requirements into DoD contracts begins

CMMC Background

KEY ACRONYMS

OSC Organization Seeking Certification

FCI Federal Contract Information

CUI Controlled Unclassified Information

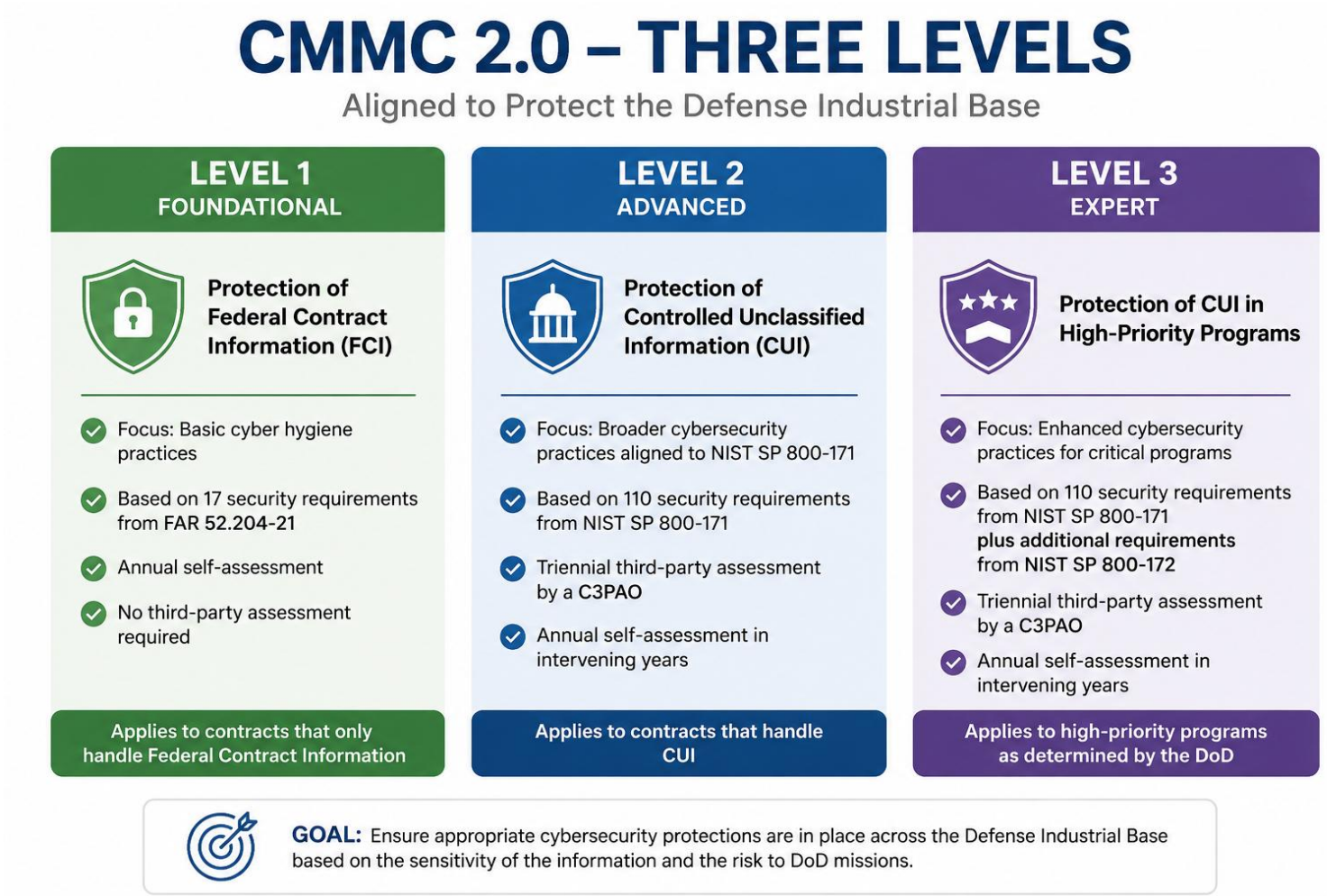
C3PAO Certified Third-Party Assessor

SPD Security Protection Data

SSP System Security Plan

POA&M Plan of Action & Milestones

CMMC Levels



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TIMING (INITIAL)

WHEN DID I NEED TO BE READY BY?

Timing

- **When did companies need to be certified?**
  - Title 48 came out in November 2025 – the start of the program
  - 12 month ramp up period allows for self attestation
  - November 2026 – contracts would begin to include certification requirements

> *In the end,*
> *the contract is king*

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THE ANNOUCEMENT

WHAT CHANGED AND WHAT DOES IT MEAN?

The Announcement

WHAT HAPPENED

- **DoW suspended CMMC Phase 2 – effective immediately**
- The mandatory third-party (C3PAO) audit requirement, originally set to hit contracts Nov. 10, 2026, is on hold
- Pending Phase 3 and Phase 4 milestones are paused too
- DoW's CIO is standing up a CMMC Reform Task Force for a 60-day review, informed by industry feedback through a public Request for Information
- Stated goal: cut compliance red tape without lowering the cybersecurity bar

July 13, 2026

DoW announces immediate suspension of CMMC Phase 2 assessment requirements

60-day Reform Task Force review now underway

What Does It Mean?

NO MANDATORY 3RD-PARTY AUDITS

- Level 2 (C3PAO) third-party certification is paused
- New DoW solicitations won't require it while the review is underway

SELF-ASSESSMENT CONTINUES

- DoW keeps enforcing NIST 800-171 through self-assessment
- Select government-led assessments continue as before

THE TIMELINE RESET

- The Nov. 10, 2026 deadline is off the table for now
- A new schedule follows the 60-day review and RFI comment period

What Doesn't Change

STILL IN EFFECT TODAY

- **Phase 1 self-assessment requirements**
  - –Level 1 and Level 2 (Self) status still apply where required
- **Your DFARS 252.204-7012 obligations**
  - –Contractually bound to safeguard covered defense information regardless of certification status
- **The NIST SP 800-171 Rev 2 baseline**
  - –Still the underlying standard your systems and processes must meet
- **Individual contracts**
  - –Can still write in compliance requirements today, pause or not

> *"The obligations you signed haven't moved*
> *— only the certification audit has*

Is the Work Wasted?

WHY IT STILL MATTERS

- Certification was designed to validate the NIST 800-171 controls you already have to meet
- SSPs, POA&Ms, CUI/FCI scoping, and enclave work reduce real cyber risk to your plant floor and data – not just paperwork for an auditor
- None of it expires – it carries forward once the review concludes and a certification path returns
- Companies that keep going build a real head start over competitors bidding the same contracts who stop cold

NO

Your groundwork still counts

Recommendations

1 **Stay the course –** keep implementing NIST 800-171 and completing self-assessments now

2 **Keep your SSP and POA&M current –** they're living documents, not one-time paperwork

3 **Check your contracts –** confirm what current and prospective DoW contracts actually require today

4 **Engage the review –** submit feedback through the RFI, directly or via your industry association

5 **Treat this as a head start, not a stop sign –** be ready to move fast once Phase 2 resumes

QUESTIONS?

ASK OUR EXPERTS

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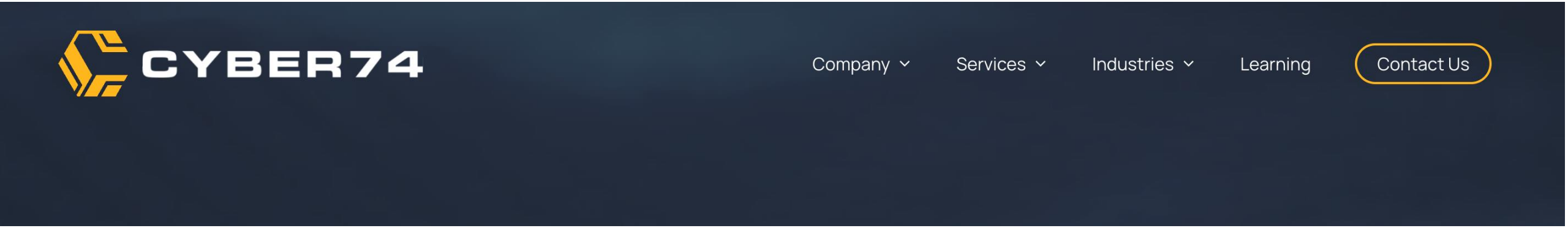
Ready to talk about your CMMC needs?

Reach out to us or visit cyber74.com.



Thank you

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