QUALITY EXCELLENCE SERVICES

Quality Excellence Services
18 Maple Avenue, Ste. 148
Barrington, RI 02806
United States of America
+1 (401) 246-3204 · +1 (401) 252-9653
mweeden@qesisbest.com · https://QESisBest.com

STANDARDS & GUIDANCE BRIEF · UNITED STATES · REGULATION

CMMC · 32 CFR Part 170

Cybersecurity Maturity Model Certification Program

DOCUMENT	QES-WP-172, Rev B	DATE	November 7, 2026
ISSUED BY	US Department of Defense (Department of War)	PREPARED BY	Conner Davidson
EDITION	Program rule effective December 16, 2024; contract rule (48 CFR) effective November 10, 2025	STATUS CHECKED	October 24, 2026
INDUSTRIES	Government & Defense Suppliers, Aerospace & Defense, Risk & Cybersecurity	ONLINE	qesisbest.com/standard-cmmc.html

PARTLY SUSPENDED On July 13, 2026, the Department suspended Phase 2, the third-party (C3PAO) Level 2 certifications due from November 10, 2026, and launched a review. Phase 1 self-assessments, SPRS scores, and annual affirmations remain in force. **Next:** Watch for the outcome of the CMMC Reform Task Force review. Until then, keep meeting DFARS 252.204-7012, NIST SP 800-171 Rev. 2 and the Phase 1 self-assessment requirements.

What It Covers

A program that verifies defense contractors protect Federal Contract Information and Controlled Unclassified Information, at three levels, with the level set in each solicitation.

Who It Applies To

Defense contractors and subcontractors whose contracts involve Federal Contract Information or Controlled Unclassified Information.

Key Requirements

- Level 1: annual self-assessment against the 15 basic safeguarding requirements of FAR 52.204-21.
- Level 2: the 110 requirements of NIST SP 800-171 Rev. 2, by self-assessment now; third-party certification is suspended.
- Level 3: added NIST SP 800-172 requirements, assessed by the government (DIBCAC); also affected by the suspension.
- Scores posted to SPRS, with annual affirmations by a senior official.

What an Auditor Asks to See

- The System Security Plan and the current SPRS score.
- The affirmation, and who signed it.

Where Systems Fall Short

- A self-assessment score that the System Security Plan cannot support.
- Plans of action that never close.

How QES helps. CMMC readiness through QES's risk and cybersecurity partner, coordinated with the quality system's document control. Meet the risk and cybersecurity partner: qesisbest.com/team.html#partners · +1 (401) 246-3204 · mweeden@qesisbest.com

Sources, checked October 24, 2026. eCFR — 32 CFR Part 170 — www.ecfr.gov/current/title-32/part-170; WilmerHale — Pentagon suspends CMMC Phase 2 requirements (July 2026) — www.wilmerhale.com/en/insights/client-alerts/20260720-pentagon-suspends-cmmc-phase-2-requirements-and-launches-review-of-cybersecurity-certification-program.

A summary for orientation, prepared by Quality Excellence Services. It does not reproduce or replace the standard or regulation: read the official text, which governs. Not legal advice.