

# Cybersecurity Maturity Model Certification (CMMC)

## Summary:

Cybersecurity Maturity Model Certification (CMMC) is a DoD-wide program that provides a comprehensive framework to protect the Defense Industrial Base’s (DIB) sensitive information from frequent and increasingly complex cyberattacks. CMMC is designed to increase the overall cybersecurity posture of the DOD supply chain.

## What is CMMC?

The CMMC framework operates on a **tiered model (CMMC 2.0)** with progressively advanced cybersecurity requirements at each level. The current model consists of **three levels**, aligned to federal cybersecurity standards.

Assessment requirements include:

- Self-assessments
- Third-party assessments (C3PAO)
- Government-led assessments (DoD)

The DOD’s [proposed CMMC rule](#) was published in the [Federal Register](#) on December 26, 2023. Key proposed updates include requiring defense contractors and subcontractors to implement "required security measures to expand application of existing security requirements for Federal Contract Information (FCI)" and would "add new Controlled Unclassified Information (CUI) security requirements for certain priority programs." The [final CMMC program rule](#) was released on October 15, 2024 and went into effect on December 16, 2024.

CMMC Model 2.0		
	Model	Assessment
<b>LEVEL 3</b> Expert	<b>110+</b> practices based on NIST SP 800-172	Triennial government-led assessments
<b>LEVEL 2</b> Advanced	<b>110</b> practices aligned with NIST SP 800-171	Triennial third-party assessments for critical national security information; Annual self-assessment for select programs
<b>LEVEL 1</b> Foundational	<b>17</b> practices	Annual self-assessment

The focus of the CMMC framework is protecting Controlled Unclassified Information (CUI) and Federal Contract Information (FCI) residing on contractor systems. Security requirements are aligned to established federal standards, primarily NIST SP 800-171 (Level 2) and NIST SP 800-172 (Level 3).



## Policies

CMMC builds on security requirements outlined in NIST SP [800-171](#), NIST SP [800-172](#), and [FAR 52.204-21](#). The DoD implemented CMMC through updates to the Defense Federal Acquisition Regulation Supplement (DFARS). DFARS [252.204-7021](#) prohibits award to an offeror that does not have the CMMC level required in the solicitation. DFARS [252.204-7020](#) allows DoD to leverage Supplier Performance Risk System (SPRS) scores in evaluation of contract proposals.

## Marketplace Outlook

CMMC timeline:

- Rule draft was completed late '22 and being coordinated at pentagon
- July 2023: Rule submitted to White House OIRA
- Nov 2023: OIRA completed their review of the 9 CMMC model documents
- Dec 2023: White House published proposed rules
- November 10, 2025: Final rule is in effect, DoD can begin incorporating requirements in new contracts

Following the publication of the final Title 48 CFR CMMC acquisition rule on September 10, 2025, the DoD implemented a four-phased plan, including:

- **Phase 1 – November 10, 2025:** DoD includes CMMC Level 1 Self-Assessment or CMMC Level 2 Self-Assessment for all applicable solicitations and contracts as a condition of contract award. DoD also has discretion to require Level 2 C3PAO Certification Assessment for select high-priority contracts.
- **Phase 2 – November 10, 2026:** 12 months after the beginning of Phase I, DoD intends to include CMMC Level 2 Certification Assessment all for applicable DoD solicitations and contracts as a condition of contract award.
- **Phase 3 – November 10, 2027:** One year after phase two begins, DoD intends to include CMMC Level 2 Certification Assessment for all applicable DoD solicitations and contracts as a condition of contract award and as a condition to exercise an option period on a contract awarded prior to the effective date. Additionally, DoD intends to include CMMC Level 3 Certification Assessment for all applicable DoD solicitations and contracts as a condition of contract award
- **Phase 4 – November 10, 2028:** One year after phase three begins, DoD will include CMMC Program requirements in all applicable DoD solicitations and contracts including option periods on contracts awarded prior to the beginning of Phase 4.