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CMMC UPDATE · OCTOBER 2026

A BRIEF FOR DEFENSE MANUFACTURERS

Paused. Not over.

What the CMMC Phase 2 suspension means for your contracts, and five smart moves to make with the extra time.

July 13
the day Phase 2 certification requirements were suspended

110
NIST security controls that still apply to your contracts

78%
of suppliers surveyed are still pursuing Level 2 or already hold it

HOW WE GOT HERE

One year, five dates, and a deadline that moved.

NOV 10, 2025

Phase 1 begins

Self assessment requirements start appearing in defense solicitations and contracts.

JUL 13, 2026

Phase 2 is suspended

Two memoranda pause mandatory third party certification and launch a 60 day review of the program.

SEP 3, 2026

The pause goes into contract rules

Contracting officers are directed to remove third party assessment requirements from solicitations.

SEP 11, 2026

The review closes

The task force delivers its recommendations. As of early October, the report has not been made public.

NOV 10, 2026

The original Phase 2 date

On hold. No replacement date has been announced.

Sources: Department of War memoranda of July 13, 2026, as summarized by Holland & Knight, Secureframe, and KSG. Status as of early October 2026.

THE FINE PRINT

What paused. What did not.

The suspension is narrow. It covers the outside audit, not the security work underneath it.

On hold

- Mandatory third party certification as a condition of award
- Government led Level 3 assessments
- The November 10, 2026 start date
- CMMC waivers during the review

Still required

- Phase 1 self assessments
- A current, accurate SPRS score
- An annual affirmation signed by a senior official
- All 110 required NIST security controls
- Reporting a cyber incident within 72 hours
- Whatever your prime contractors still require

One more wrinkle: program managers can still require a third party assessment on a specific contract, and some primes have kept their own supplier deadlines. Ask before you cancel anything.

Source: Holland & Knight analysis of the July 13, 2026 suspension memoranda. General information, not legal advice.

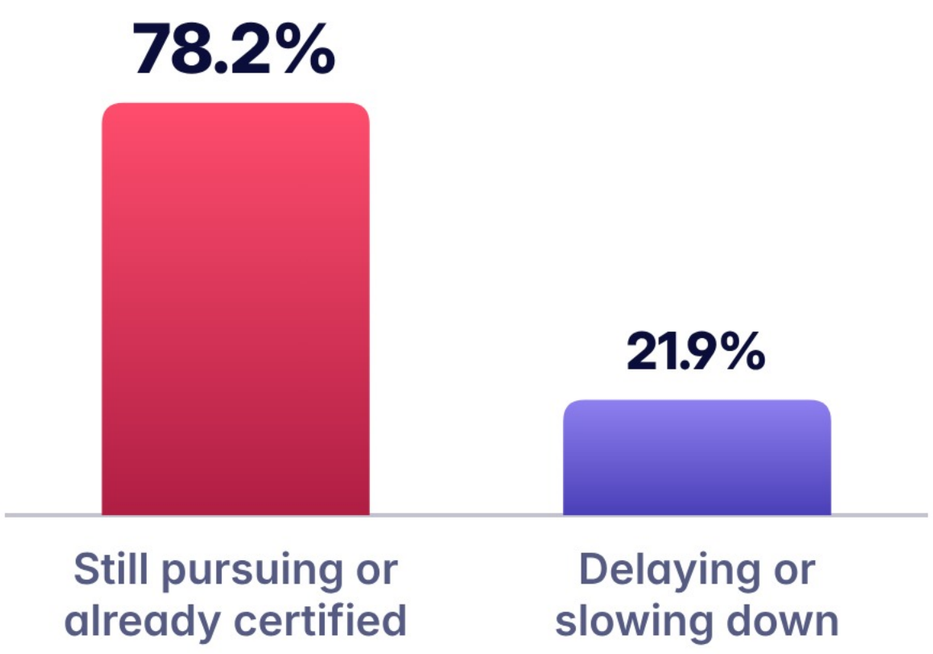
THE NUMBERS BEHIND THE RISK

The line is long, and most suppliers are staying in it.

THE CERTIFICATION GAP

Companies that will need Level 2	about 80,000
Companies certified so far	1,000+

WHAT SUPPLIERS ARE DOING DURING THE PAUSE



Under 100
authorized assessor organizations serve the entire defense supply chain

6 to 12
months is the typical runway to get ready for a Level 2 assessment

77%
of subcontractors have heard nothing from their prime about the pause

88 of 110
is the minimum score for conditional Level 2 status

3x
damages possible under the False Claims Act for a false certification

Sources: Smithers, CMMC Level 2 Requirements and 2026 Updates. Redspin, Committed to the Mission, October 2026. Holland & Knight.

WHAT TO DO NOW

Five smart moves to make during the pause.

1

Rescore yourself, honestly

Check all 110 controls against what is really in place today, not what is planned.

2

Make your SPRS score true

If the number on file is higher than reality, fix the number or fix the gap. Then affirm it.

3

Get the paper trail in order

A current System Security Plan and a real plan of action are your best protection.

4

Ask your primes what they expect

Most subcontractors have heard nothing. Do not assume silence means the requirement is gone.

5

Keep building toward Level 2

The runway is 6 to 12 months. The suppliers who keep moving will be first in line when dates return.

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General information, not legal advice. Talk to counsel about your specific contracts.