

// REGULATORY BRIEF FOR DEFENSE SUPPLIERS

The Certification Paused. The Liability Did Not.

Third-party CMMC assessment has been pulled out of defense contracts by regulation. That is not relief. It moves the entire weight of your compliance claim onto a self-attestation you sign — and that is the document the Justice Department has started prosecuting.

TUSA-BRIEF-001 · V1.1 · 11 SEPTEMBER 2026 · PUBLIC · TRANUSA, LLC

01 What has actually happened

Where this stands today, 11 September 2026. Third-party CMMC assessment is out of defense contracts. Self-assessment, NIST SP 800-171 and your SPRS score are all still in force. The operative instrument is DFARS Class Deviation 2026-O0025, Revision 3. Below is how it got there, because the sequence is what tells you how hard it would be to reverse.

13 July 2026. The Department of War Chief Information Officer issued a memorandum, *Suspension of the Advancement to Cybersecurity Maturity Model Certification Phase 2 Requirements*. This is the decision. Everything since has been the machinery of putting it into contracts.

16 July 2026. Class Deviation 2026-O0025, Revision 2 carried the CIO memo into contracting practice — the instrument that actually tells a contracting officer what to do.

3 September 2026. Revision 3 supersedes Revision 2 and is now the operative instrument. **It does not change the CMMC instruction**; it restates it and carries it forward while implementing several unrelated statutory items. If you are reading about a September CMMC change, this is what is being described — and the substance of it dates from July.

11 September 2026. The CMMC Reform Task Force's final report is due to the Department of War CIO today. Whether any of it becomes public is at the CIO's discretion.

02 What the deviation actually tells contracting officers to do

Four instructions, taken from the signed memorandum. They are worth reading literally, because the difference between them is where people are going wrong.

- **Self-assessment stays.** Requiring activities may still include **CMMC Level 1 (Self)** or **Level 2 (Self)** assessments in procurement requests and requirement documents. CMMC has not been removed from contracting — the third-party part of it has.

- **NIST SP 800-171 Rev 2 is required.** The memo names baseline compliance under DFARS 252.204-7012 explicitly. This is not softened anywhere in the document.
- **New solicitations get amended.** Program managers initiate the amendments; contracting officers issue them as soon as practicable.
- **Existing contracts get modified.** Where the requirements are already in a contract, the contracting officer must **remove them by modification** — before the next option is exercised, or at the next scheduled administrative modification.

THE DISTINCTION THAT MATTERS

Third-party assessment is not prohibited and it is not illegal to pursue. It is being **taken out of contract language**. Nobody is going to require it of you, and a clause that used to demand it will disappear from your contract at the next modification. What you claim about yourself is unchanged, and so is who is on the hook for it.

03 What most people are taking from this, and why it is wrong

The reading going around small supplier networks is that CMMC is dead, or delayed long enough to stop worrying about. It is an understandable reading and it is a costly one.

What was suspended is **the mechanism by which an outside party verifies your claim**. Nothing was suspended about the claim itself, the standard behind it, or your contractual duty to meet it. If anything, removing the assessor concentrates risk rather than reducing it: the assessor was the step that would have caught an overstated score before it became a certification to the government.

THE SHORT VERSION

Before, a C3PAO would have found the gap. Now nobody finds it until a government review does — and by then your score has been sitting in SPRS as a representation you made to obtain payment.

04 What is still binding on you today

Obligation	Status	What it means in practice
DFARS 252.204-7012	In force	Safeguarding covered defense information and incident reporting. Unchanged by the suspension.
NIST SP 800-171 Rev. 2 — all 110	In force	The standard itself. Still the basis on which you are measured.
FAR 52.204-21	In force	Basic safeguarding for Federal Contract Information.
Phase I self-assessment	In force	You assess, you score, you post to SPRS.

Annual affirmation — DFARS 252.204-7021	In force	A named affirming official signs that you remain compliant. A person, not a company.
Flow-down to subcontractors	In force	Primes still push it down. Your customer is still going to ask you for a score.
Government assessment — DFARS 252.204-7020	In force	DoD keeps the right to run Basic, Medium and High assessments of your environment, and you are obliged to give access. This is how overstatements surface.
C3PAO third-party certification	Suspended	Stripped from contracts by the 3 September class deviation.

05 The case that should change how you think about your score

The LOGZONE settlement — announced 18 June 2026

An Alabama defense contractor posted a self-assessed **110** to SPRS in October 2021 — a perfect score. A DIBCAC assessment in February 2024 put the same environment at **negative 170**, on a scale that runs from -203 to 110. The Department of Justice alleged the company knowingly submitted false claims for payment on two Navy contracts between May 2021 and March 2025 while failing to implement required NIST SP 800-171 controls. The settlement was **\$507,144**, of which \$253,572 was restitution.

110

SCORE CLAIMED

-170

SCORE ASSESSED

\$507,144

SETTLEMENT

\$682K

PAYMENTS RECEIVED

Two things are worth sitting with. The settlement is **roughly three quarters of what the company was actually paid** — this is not a rounding error against revenue, it is a multiple of the margin. And the gap between 110 and -170 is not fraud in the cartoon sense. It is what happens when somebody fills in a scoring worksheet without understanding that unimplemented controls carry negative weight, and nobody ever checks.

The Justice Department's Civil Cyber-Fraud Initiative is now actively pursuing this category. With third-party assessment gone, the self-attestation is the only artifact in the file — and it is signed.

06 What to do in the next thirty days

- 1 Pull your current SPRS score and find out who calculated it, and when.** If the answer is "someone in IT, a few years ago," that is the finding. Scores go stale as environments change.
- 2 Re-run the scoring against the actual environment, with the negative weightings applied correctly.** Most bad scores are arithmetic and scope errors, not dishonesty. They are equally actionable.

- 3 Identify your affirming official by name and make sure they understand what they are signing.** Under DFARS 252.204-7021 that is an individual attestation. Ask them whether they could defend the number.
- 4 Keep going on the control work.** The standard did not move. Any remediation you do now counts toward whatever the program looks like on the other side of the review.
- 5 Do not repost a higher score to look better for a prime.** That is precisely the act in the LOGZONE file.

07 What we are watching

- Whether the task force report, or any summary of it, is released publicly — and on what timeline.
- Whether the class deviation is extended, narrowed, or replaced with rulemaking.
- Whether primes keep requiring posted scores contractually even with the federal mechanism paused. Early signs are that they do; their own flow-down duty has not changed.
- Whether government-led DIBCAC assessment volume increases to fill the verification gap.

If you want a second set of eyes on your score

A thirty-minute readiness call: we look at what you posted, how it was derived, and whether it would survive a review. No pitch deck, no obligation. calendly.com/tony-tranusa/cmmc-readiness-call · CMMC@tranusa.com

About this document. TRANUSA CMMC Brief No. 001, version 1.1, issued 11 September 2026 by TRANUSA, LLC, Buford, Georgia. Prepared for Defense Industrial Base suppliers and their advisors; this issue is public and may be forwarded freely.

Basis. Department of War announcement of 13 July 2026 suspending CMMC Phase II; reporting on DFARS Class Deviation 2026-O0025 Revision 3, issued 3 September 2026, which codified the suspension and directed contracting officers to remove third-party assessment requirements from solicitations and, by modification, from existing contracts; the Department of Justice press release announcing the LOGZONE settlement, 18 June 2026, and published law-firm analysis of the settlement terms; and published legal analysis of what remains enforceable under DFARS 252.204-7012, DFARS 252.204-7021, FAR 52.204-21 and NIST SP 800-171 Rev. 2.

Limitations. This is general information about a regulatory situation that is changing week to week, not legal advice and not an assessment of any particular company. TRANUSA is not a law firm and is not a C3PAO; we prepare organizations for assessment and cannot certify them. Verify any statement here against the primary source before relying on it in a contract decision. Current as of the issue date above.