



## Cybersecurity Maturity Model Certification (CMMC)

# Final rule sets CMMC rollout in motion



The long-awaited final rule ([48 Code of Federal Regulation "CFR"](#)) for the CMMC program was published in the Federal Register on September 10, 2025, and became effective November 10, 2025<sup>1</sup>, prompting the start of the official phased roll-out of CMMC. This structured approach will span four phases over a three-year period culminating in the full implementation of CMMC requirements, with CMMC provisions included in all contracts by Phase 4 (November 2028).

### NOTABLE TAKEAWAYS<sup>1</sup>

- 1 Reporting requirement changes**  
Reporting information security lapses or compliance changes under 32 CFR part 170 is no longer required, as Defense Federal Acquisition Regulation Supplement (DFARS) 252.204-7012(c) addresses notification of security incidents.  
  
Contractors must provide CMMC unique identifiers (UIDs) to Contracting Officers for all information systems that will process, store, or transmit federal contract information (FCI) or controlled unclassified information (CUI) during the contract. Additionally, any changes in the CMMC UIDs throughout the contract must also be reported to the Contracting Officer.
- 2 Subcontractor considerations for primes**  
Prime contractors cannot access Supplier Performance Risk System (SPRS) details for subcontractors but remain responsible for verifying compliance. For example, prior to subcontract award, primes must confirm subcontractors have a requisite CMMC.  
  
Subcontractors can share their CMMC status (such as a screenshot from SPRS) and copies of their certification as needed.
- 3 Inclusion of CMMC requirements in existing contract**  
The Department of Defense (DoD) did not adopt recommendations to limit inclusion of CMMC requirements in existing contracts, emphasizing that modifications after the rule's effective date are at the contracting officer's discretion.
- 4 Clarification around FCI**  
Added a definition for FCI based on the definition in Federal Acquisition Regulation (FAR) 52.204-21.  
  
While the FCI definition indicates that "simple transactional information" does not constitute FCI, "information necessary to process payments" was given as an example of this type of non-FCI.
- 5 Clarification around conditional status**  
For CMMC Levels 2 and 3 only, a conditional CMMC status may be granted for 180 days in accordance with 32 CFR 170.21, and award can be granted with a conditional CMMC level, however, closeout of plan of actions and milestones (POA&M) is needed for final CMMC status.

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Federal Register, [Defense Federal Acquisition Regulation Supplement: Assessing Contractor Implementation of Cybersecurity Requirements](#), September 10, 2025

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