

LIVE WEBINAR

CMMC Unlocked

What 48 CFR Means
for Your Business

Thursday, September 18th
1-2 PM Eastern



Topics

- Introduction
- The History of CMMC
- Overview of 48 CFR
 - Flow-Down Requirements
- CMMC Assessments
 - CMMC Level 2 – What Contractors Must Do
 - Preparing for Assessments
- Next Steps for Contractors
- Q&A

Meet the Speakers



Tobias Musser

Co-CEO MNS Group



Michael Dempsey

CEO CISEVE



Brian Hubbard

President, Evolved Cyber





Tobias Musser

Co-CEO MNS Group

A CMMC Level 2 Certified MSP/MSSP

STAFFED BY:

- CMMC Certified Professionals (73 CCP)
- CMMC Certified Assessors (40+ CCA's)
- Registered Practitioners (100% Staff RP's)

OVERVIEW

- Headquarters in Maryland – Supporting 300+ locations worldwide
- Security and compliance-focused
- Modeled on a risk framework, we assist our partners to identify and minimize risk areas: operational, financial, technological, human, vendor, client, and reputational.
- Committed to protecting the USA, business by business.



Michael Dempsey
CEO CISEVE

CISEVE is one of the first Authorized C3PAOs

CISEVE is an organization committed to servicing our clients with the highest integrity and quality. Our reliable, professional, certified and cleared staff provide services to a variety of industries through a commitment to confidentiality and integrity.

CISEVE is led by cybersecurity experts from various fields, backgrounds with over 50 years of total experience that pulls together to provide the most current and secure approaches to protecting and assessing your organization.



Brian Hubbard

President, Evolved Cyber

- 40+ years in cybersecurity, supporting DoD, NSA, and commercial enterprises
- Lead author of the original NIST Cybersecurity Framework (CSF) while supporting NIST
- Former Director of Commercial & Cybersecurity at Edwards Performance Solutions – built and led CMMC practice
- Extensive experience delivering Joint Surveillance Voluntary Assessments (JSVA) and CMMC assessments
- Founder & President, Evolved Cyber Solutions – specializing in CMMC consulting, training, and assessments
- Certified CMMC Assessor (CCA), CMMC Certified Professional (CCP), and Certified Instructor
- Proven track record guiding OSCs to successful assessment outcomes
- Industry thought leader and frequent speaker on cybersecurity compliance readiness

Disclaimer:

We would love to perform your assessment, so we cannot offer any advice during this webinar pertaining to your specific environment.



The History Of CMMC

(Cybersecurity Maturity Model Certification)

CMMC Unlocked
What 48 CFR Means for Your Business



CMMC Objectives

- Safeguard and protect CUI (Controlled Unclassified Information) and FCI (Federal Contract Information)
- Create a consistent standard for cybersecurity across the DIB (Defense Industrial Base)
- Increase accountability and compliance through C3PAOs (Certified Third-party Assessment Organizations) assessments
- Strengthen our National Security to protect our warfighters



CMMC Unlocked

What 48 CFR Means for Your Business



CMMC Levels

Level	Requirements	# of Controls	Information	Assessment Type
1 Foundational	FAR 52.204-21	15	FCI	Self-assessment
2 Advanced	DFARS 252.204-7012	110	CUI	- Self-assessment - C3PAO *Both require the same effort and stringency
3 Expert	-	24	CUI	A Final Level 2 C3PAO certification for the same scope (on a three-year cycle), a DIBCAC Level 3 certification assessment (three-year cycle)

The History of CMMC



September 2019

CMMC was announced as the DoW's effort to move beyond self-attestation for NIST SP 800-171 and protect the defense supply chain.



January 31, 2020

CMMC 1.0 was released.



November 4, 2021

After an internal review, DoW unveiled 'CMMC 2.0' streamlining the model to three levels.



October 15, 2024

The program was formally codified as 32 CFR Part 170 (effective December 16, 2024).



September 10, 2025

DFARS/48 CFR rule was finalized, allowing CMMC clauses appear in DoW contracts beginning November 10, 2025.

CMMC Unlocked

What 48 CFR Means for Your Business



2017
NIST 800-171 CUI



Defense contractors are required to meet NIST 800-171 when handling controlled unclassified information (CUI)

2020
CMMC 1.0 Released



Cybersecurity Maturity Model Certification (CMMC) framework: Standardized cybersecurity approach over entire Defense Industrial Base, including suppliers. *Interim Rule effective 11/30/20*

2021
CMMC 2.0



Streamlined model announced after public comments. *November 2021*

2023
NIST SP 800-171 r.3



Revised draft guidelines announced for CUI. *Final to be published early 2024*

2024
32 CFR CMMC Rule Published



Published Oct 15, 2024; effective Dec 16, 2024. Defines the CMMC program inside the DoW.

2025
48 CFR Rule Published



Published Sept 10, 2025; effective Nov 10, 2025. Implements CMMC in solicitations and contracts through DFARS clauses.

Requirements start appearing in new DoD contracts on the effective date.

2023
CMMC Review Complete

CMMC regulatory process is completed: DoD submitted CMMC rule to the OIRA in July. November 2023 OIRA completed their review.

OIRA



CMMC Timeline



Defense CUI

Defense CUI is unclassified information related to DoD missions or systems that the government says must be safeguarded and shared only on a need-to-know basis (per the CUI Registry's "Defense" category).



CMMC Unlocked

What 48 CFR Means for Your Business



What Counts as “Defense CUI”?

Examples of Defense CUI categories

- Controlled Technical Information (CTI)
- DoD Critical Infrastructure Security Information
- Naval Nuclear Propulsion Information
- Privileged Safety Information
- Unclassified Controlled Nuclear Information – Defense



Gut Check: If your team creates, receives, or stores any of the above for a DoD program, or if you handle documents marked as CUI, you likely handle CTI.



Overview of 48 CFR

What You Need to Know

CMMC Unlocked
What 48 CFR Means for Your Business





**48 CFR (DFARS) is the
enforcement lever
that turns the CMMC
program from policy
into contract reality.**

CMMC Unlocked
What 48 CFR Means for Your Business



32 CFR

- Became effective December 16, 2024
- Established the CMMC program
- Provides the framework for implementing CMMC across the DIB.
- Defines the roles, responsibilities, and structure of the CMMC ecosystem.
- Guides the certification process

48 CFR

- Effective: November 10, 2025
- Establishes uniform policy and procedures across the federal government
- Includes clauses that require compliance with NIST SP 800-171 and CMMC Certification for handling CUI/FCI
- Covers technical data rights, counterfeit part avoidance, cost accounting, and supply chain integrity.
- Mandatory flow-down: Primes must ensure subcontractors comply with requirements for cybersecurity and sourcing

What Changed?

Topic	Pre-publication	Post-publication
Core clauses in play	DFARS 7012, 7019, 7020 (safeguarding, SPRS score + assessment methodology). No 7025. 7021 existed but wasn't the active CMMC engine.	New provision 252.204-7025 (notice of level) + updated clause 252.204-7021 (CMMC compliance).
Award Gate	Award eligibility tied to current NIST 800-171 assessment score in SPRS .	Award/option requires current CMMC status at the specified level and annual affirmation in SPRS .
Status "currency" windows	N/A for CMMC (no enforced CMMC status windows).	Final L1: 1 yr; Final L2/L3: 3 yrs; Conditional L2/L3: ≤180 days; affirmation ≤1 yr.
Conditional Status	N/A	Conditional (L2/L3) certification allowed up to 180 days. Must close POA&M to reach Final certification
CMMC UID	No concept	Contractors must list 10-char CMMC UID(s) per in-scope info system
SPRS Postings	Post NIST 800-171 assessment summary score; no CMMC affirmation	
Phase-in	No phase-in	3 year phase-in
Flowdown, Supplier Checks	Flowdown of 7012/7019/7020, no way for primes to view subs CMMC status or SPRS	Flow down 7021; prime must ensure subs have current required CMMC status ; subs may share

What is New?

- **Effective Date:** November 10th, 2025
- **Clarifications:** Newly clarified definitions, FCI, CMMC Status, CMMC UID, current
- **Conditional statuses allowed:** Up to 180 days with a valid POA&M; award can proceed. (Level 2-3)
- **Flowdown Reaffirmed:** Supplier checks
- **Award gate:** No award, option, or PoP extension unless the current required CMMC status and current annual affirmation are in SPRS for each in-scope system.



Code of Federal Regulations

A point in time eCFR system



Title 48

Displaying title 48, up to date as of 9/15/2025. Title 48 was last amended 9/11/2025. [view historical versions](#)

There have been changes in the last two weeks to Title 48. [view changes](#)

Enter a search term or CFR reference (eg. fishing or 1 CFR 1.1)

Details

Print

Search

Subscribe

Timeline

Go to Date

Published Edition

Developer Tools

ECFR CONTENT

Title 48 Federal Acquisition Regulations System

Chapter 1 Federal Acquisition Regulation1 – 99

Chapter 2 Defense Acquisition Regulations System, Department of Defense200 – 299

Chapter 3 Health and Human Services300 – 399

Chapter 4 Department of Agriculture400 – 499

Chapter 5 General Services Administration500 – 599

Chapter 6 Department of State600 – 699

Chapter 7 Agency for International Development700 – 799

Chapter 8 Department of Veterans Affairs800 – 899

Chapter 9 Department of Energy900 – 999

Chapter 10 Department of the Treasury1000 – 1099

Chapter 12 Department of Transportation1200 – 1299

Chapter 13 Department of Commerce1300 – 1399

Chapter 14 Department of the Interior1400 – 1499

Chapter 15 Environmental Protection Agency1500 – 1599

Chapter 16 Office of Personnel Management Federal Employees Health Benefits Acquisition Regulation1600 – 1699

Chapter 17 Office of Personnel Management1700 – 1799

Chapter 18 National Aeronautics and Space Administration1800 – 1899

Chapter 19 Broadcasting Board of Governors1900 – 1999

Chapter 20 Nuclear Regulatory Commission2000 – 2099

Chapter 21 Office of Personnel Management, Federal Employees Group Life Insurance Federal Acquisition Regulation2100 – 2199

Chapter 23 Social Security Administration2300 – 2399

Chapter 24 Department of Housing and Urban Development2400 – 2499

Chapter 25 National Science Foundation2500 – 2599

Chapter 28 Department of Justice2801 – 2899

Chapter 29 Department of Labor2901 – 2999

Chapter 30 Department of Homeland Security, Homeland Security Acquisition Regulation (HSAR)3000 – 3099

Chapter 34 Department of Education Acquisition Regulation3401 – 3452

Chapter 51—Department of the Army Acquisition Regulations [Reserved]

Chapter 52 Department of the Navy Acquisition Regulations5200 – 5299

Chapter 53—Department of the Air Force Federal Acquisition Regulation Supplement [Reserved]

Chapter 54 Defense Logistics Agency, Department of Defense5400 – 5499

Chapter 57 African Development Foundation5700

Chapter 61 Civilian Board of Contract Appeals, General Services Administration6100 – 6199

Chapter 99 Cost Accounting Standards Board, Office of Federal Procurement Policy, Office of Management and Budget9900 – 9999

ECFR CONTENT

SPRS Score

Supplier Performance Risk System

- An SPRS score is a numeric summary of your organization's implementation of NIST SP 800-171 using the DoW Assessment Methodology
- CMMC assessment results flow into SPRS and are used pre-award to verify you meet the required level
- Primes must confirm that subs have current SPRS scores on file before award
 - Level 1 – within 1 year
 - Level 2/3 – within 3 years
 - 180 days if Conditional



CMMC Unlocked

What 48 CFR Means for Your Business



What Contractors Should know

- **CMMC UIDs:** You must provide 10 character UIDs for each in-scope information system, COs will check SPRS by UID, and you must report UID changes during performance.
- **SPRS postings & affirmations:** Post self-assessment results for each UID not covered by a C3PAO/DIBCAC assessment and complete an annual “affirming official” affirmation per UID.
- **Flowdown & supplier checks:** Flow down the clause when subs process/store/transmit FCI/CUI and ensure subs have a current CMMC status prior to subaward; subs must post their self-assessments and annual affirmations in SPRS.
- **Prime visibility limits:** Primes cannot view a subcontractor’s SPRS CMMC record; subs may share screenshots/printouts to prove status.
- **Scope & exclusions:** Applies to unclassified contractor information systems that process/store/transmit FCI or CUI; DoD only; COTS excluded (but applies to commercial items/services).
- **Phased roll-in:** DFARS clause prescription reflects a phased implementation—watch solicitations for the required level and plan accordingly.



CMMC Assessments

Get Assessed, Get Compliant, Win Contracts

CMMC Unlocked
What 48 CFR Means for Your Business



Types of CMMC Assessments

- Self-Assessment (Level 1 and 2)
- Mock Assessment
- Level 2 C3PAO Assessment
- Level 3 (DIBCAC) Assessment



You may need a few different types of assessments.



CMMC Unlocked

What 48 CFR Means for Your Business



The Assessment

It's an interview/review 320 objectives (questions)!

Includes:

- Compliance with 110 controls
- 72-hour incident reporting to the DoW
- Cooperation with DoW investigations
- Requires strong systems, processes, and training
- It's a full-company effort. (You cannot simply throw the program to your IT guy to figure out.)
- Assessors are also looking for *muscle-memory* that these practices are truly implemented.



CMMC Unlocked

What 48 CFR Means for Your Business



The Urgency of CMMC Certification



CMMC is no longer theoretical.

It's active and required for defense contracts.



CMMC Gatekeeping

Certification determines contract eligibility for award and competitiveness.



C3PAOs are booking out months in advance.

Delays could mean lost opportunities for contractors.

CMMC Unlocked

What 48 CFR Means for Your Business





Getting Ahead of the Rule

What Contractors Can Do Now

CMMC Unlocked
What 48 CFR Means for Your Business



What C3PAOs Are Seeing



Waitlisting

A growing backlog of companies seeking assessments



Underestimated Workload

Many OSCs underestimate the time and steps to prepare for their assessment



Larger Scope Than Expected

The assessment is more rigorous and detailed than many expect
(Not a “IT” thing)



Requirement Expectations

Many primes are beginning to require certification from their subs

CMMC Unlocked

What 48 CFR Means for Your Business



What To Do Now



Post Your SPRS Score

Update your applicable “self” level 1 & 2 assessment results in SPRS



Plan POA&Ms

Closeouts to finish with 180 days, and schedule your assessment



Scrutinize Your Supply Chain

Require subs handling FCI/CUI to have a posted status in SPRS pre-award



Be Prepared! This could roll out faster than expected

CMMC Unlocked

What 48 CFR Means for Your Business



Q&A

CMMC Unlocked
What 48 CFR Means for Your Business



THANK YOU

CMMC Unlocked
What 48 CFR Means for Your Business

