

# CAUTION HAZARD AHEAD

## CMMC Phase I Affirmation is almost here

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If you're responsible for overseeing your organization's CMMC readiness, it's critical to understand the implications of the CMMC Phase I Affirmation rollout, especially the contractual timelines, scoring thresholds, and requirements that will directly affect your eligibility for DoD contracts.

The CMMC Phase Affirmation I timeline represents both an opportunity and a countdown clock. The decisions and preparations made over the next several weeks will not only determine your eligibility to compete for DoD contracts but also your capacity to keep them.



### What CMMC Phase I Affirmation means for your organization

As we shall explain, **Phase I** is likely to begin in **August 2025\***, triggered by the effective date of the final **DFARS 252.204-7021** rule. Don't think "self-assessment" in CMMC Phase I is the same old email "yes" and wink in previous years. The DoD is intentionally ratcheting down Organizations Seeking Affirmation (OSAs) to ensure they are accountable for their current status while feeling the pressure to fully meet requirements.

### Eligibility Triggers Under CMMC Phase I

CMMC Phase I introduces a set of eligibility conditions tied not only to compliance readiness but also to the timing of **Request for Quotes (RFQs)** or **Request for Proposals (RFPs)** and contract awards. These conditions are grounded in **32 CFR § 170.16 and § 170.23** and are driven by the effective date of the final DFARS 252.204-7021 rule, anticipated in **August 2025\***.

### RFQs or RFPs Issued Before August 2025\*

If a solicitation is released **prior to August 2025\***, it will **not contain** the DFARS 7021 clause. However, if the award occurs after August 2025\*, the **eligibility clause may still be added** to the awarded contract. In these cases, DoD may grant the prime contractor a 180-day supervised period to satisfy the eligibility requirements. During that period:

- The **prime contractor must achieve** the necessary CMMC Level 2 status.
- All **subcontractors named in the award must also comply**, as mandated by **32 CFR § 170.23(a)(3)**.
- If the prime fails to meet the required eligibility within the 180 days, the contract will go into remediation.

### RFPs or RFQs Issued After August 2025\*

When a solicitation is released after August 2025\*, it will automatically include the DFARS 7021 clause as required by **32 CFR 170**. Under these conditions:

- The **prime and any named subcontractors must meet Phase I eligibility requirements** before an award is made.
- No 180-day grace period applies prior to award; eligibility must be demonstrated up front.
- Upon award, the prime contractor is bound by the DFARS 7021 clause, and subcontractor compliance becomes a mandatory condition for subcontract issuance.

### Implications for Subcontractors

It's also important to note that **CMMC requirements will be enforced across the supply chain**. This means all subcontractors engaged in contract performance must also meet the same SPRS score threshold and documentation standards in order to be eligible for subcontract awards as required by 32 CFR § 170.23(a)(3). Their SPRS score and documentation must meet the required minimum to preserve flow-down compliance.

DFARS clause 252.204-7021 stipulates that contractors will be responsible for flowing down the CMMC requirements to their subcontractors. Prime contractors must ensure their subs meet the same CMMC eligibility thresholds, including SPRS score minimums and documentation readiness.

Prime contractors bear the responsibility of ensuring their partners are CMMC eligible. If you're relying on a subcontractor to perform work involving Controlled Unclassified Information (CUI), their inability to meet CMMC readiness could jeopardize your entire organization's eligibility.

### What is your risk to revenue without DoD contract eligibility after August 2025?

## AFFIRMATION REQUIREMENTS

### Critical Requirements

Minimum SPRS score 80% or 88 points required for Conditional Affirmation

No Prohibited POA&M Items

Adequate and sufficient evidence to support all documentation

### Prohibited POA&M Items

- AC.L2-3.1.20 External Connections
- AC.L2-3.1.22 Control Public Information
- PE.L2-3.10.3 Escort Visitors
- PE.L2-3.10.4 Physical Access Logs
- PE.L2-3.10.5 Manage Physical Access

### 180-Day Deadline

All other POA&M items must be closed within 180 days.

Full affirmation requires 110 SPRS score with sufficient evidence.

If not, supervised remediation by DoD COR and Prime Contractor



## CMMC Phase I Requirements – Minimum SPRS Score and Conditional Level 2 CMMC Status

For organizations who receive and develop information which qualifies as CUI, **CMMC Level 2** compliance will likely be required. In CMMC Phase I, the minimum requirement is a 80% of the self-assessed score of 88. The DoD Assessment Methodology, v.1.2.1 is used to determine the score. Read and follow the document closely.

It's important not to presume the “scope” you used in past self-assessments matches the more recent scoping guidance provided in the CMMC Scoping Guide, v.2.13. There are critical, but subtle errors in the previous versions and it's very important you “forget what you knew” and closely read the latest version. Your scope is primarily determined by two factors, the systems you need to perform the contract, and the permitted flow of CUI during the performance of the contract. Take the important steps to align the accurate scope of your requirements BEFORE beginning or updating your score.

This must be submitted to the **Supplier Performance Risk System (SPRS)** and supported by sufficient documentation and evidence. Achieving this threshold grants your organization a **Conditional Level 2 CMMC Status**, but that status is provisional or temporary, and time-bound.

This threshold assumes a self-assessment based on NIST SP 800-171, and your ability to demonstrate both:

1. **Implemented controls**, and
2. **Documented artifacts** supporting that implementation. Remember the exact evidentiary requirements and standards apply to score and documentation as if

you were undergoing a DIBCAC High Audit or an actual C3PAO assessment. Any lack of adequate or sufficient evidence should result in no score.

Now there are **certain security controls that will not be permitted to be addressed as POA&M items**; specifically, controls categorized as prohibited are listed in the CMMC Program's Final under **32 CFR §170.21(a)(2)(iii)**. These must be fully implemented to even be eligible to submit a score for Affirmation. None of these items may be on a POA&M at any time, regardless of the timing of the solicitation, contract award, and regardless of conditional status.

Again, Conditional Level 2 CMMC Status is **not a full authorization**. It gives your company a **180-day window** to complete the following actions:

- Fully implement all 110 NIST SP 800-171 controls
- Remediate all open POA&M items
- Successfully complete a POA&M closeout assessment

At the end of the 180-day window, the conditional status **expires**. If the organization fails to achieve full implementation and assessment closure by that deadline, it becomes **ineligible to perform on the contract**. This has the potential to impact contract execution and continuity of business operations.

If the prime contractor does not meet the requirements within the 180-day supervised period, the contract will go into remediation.

Once this phase begins, all **new solicitations and contract awards** will be required to include at least one of the following:

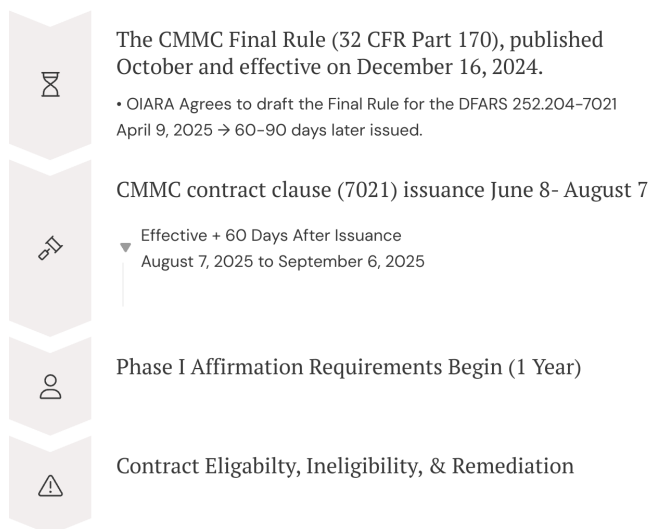
- CMMC Level 1 Self-Assessment (with FCI only), or
- CMMC Level 2 Self-Assessment (with CUI), or
- CMMC Level 2 Certification Assessment (by a C3PAO)

This requirement becomes a condition of award, meaning if your organization is not in alignment with these requirements by the time of proposal or award, you will be ineligible for contract consideration.

But Phase I doesn't just apply to future work. If your current contract includes **option periods**, the government may retroactively apply the CMMC requirement during the execution of those options, particularly for high-priority programs. That means even legacy awards may fall under the same scrutiny.



## CMMC Timeline



### Understanding the Reliability of the August 2025\* Start Date

Many organizations are asking the same question: **How firm is the August 2025\* estimated start date for CMMC Phase I?** While not yet formally published, the estimate is grounded in established regulatory processes and current federal rulemaking activity, and it is prudent to plan around it.

After a proposed rule's public comment period ends, the Office of Information and Regulatory Affairs (OIRA), a division of the Office of Management and Budget (OMB), reviews and reconciles public feedback before finalizing the rule. This reconciliation process typically takes **60 to 90 days**, depending on the number and complexity of comments.

The CMMC Final Rule (32 CFR Part 170) was published on October 15, 2024, and became effective on **December 16, 2024**. However, the DFARS clause that activates CMMC requirements in DoD contracts—DFARS 252.204-7021, under 48 CFR Part 204 (DFARS Case 2019-D041), requires its own rulemaking cycle.

OIRA formally began the final rule drafting process for DFARS 252.204-7021 on **April 9, 2025**.

### Timeline Calculation for Phase I Start

- **Issuance Period:** Assuming the standard 60–90 day reconciliation timeline from April 9, 2025, the DFARS rule could be **issued between June 8 and July 8, 2025**.

- **Effective Date Delay:** Once issued, federal rules usually include a **60-day delay** before becoming enforceable, allowing contractors and agencies time to prepare.
  - If issued on **June 8**, the effective date would be **August 7, 2025**.
  - If issued on **July 8**, it would take effect by **September 6, 2025**.

The **August 2025\*** estimate for CMMC Phase I is not arbitrary; it falls squarely within the projected window for the final rule's effective date and applies to both new contracts and option years of existing awards when CMMC clauses are added. It allows organizations to plan for the earliest likely start. Given that some awards or solicitations may be timed to coincide with the effective date, assuming an August 2025\* enforcement window provides a conservative, risk-aware planning target.

### Immediate Preparation Is Critical

Waiting until the August 2025\* enforcement date is a gamble. Achieving an SPRS score of 88+ requires not just implementation but **evidence gathering, policy development, and ongoing documentation**—tasks that often involve multiple stakeholders across IT, legal, HR, and operations.

Once a contract is awarded, the 180-day remediation clock starts ticking. If your team isn't already on the path to implementing and tracking control status, you could find yourself under contract and out of time.

Additionally, the DoD can retroactively require CMMC status for option periods on existing contracts during any Phase, increasing compliance pressure.

Last but not least, be aware that the DoD may require Level 2 (C3PAO) for select contracts, even in Phase I, accelerating the need for third-party certification.

### The Bottom Line

CMMC Phase I isn't just a compliance milestone; it's a strategic threshold. For your organization, it's the line between being eligible to compete and being left behind. The 180-day clock is not generous. Think of it as a buffer for the prepared, not a cushion for the unready.

Success in Phase I will depend on **urgency, clarity, and action** – starting now.

*\*The projected August 2025 start date for CMMC Phase I is not arbitrary but is a well-hypothesized estimate.*