DTS Do The Security™

CMMC COMPLIANCE
What It Means for Federal Contractors

Overview

The Department of Defense issued the final rule for DFARS 252.204-7021 on September 10, 2025. Beginning November 10, 2025, program offices can include Cybersecurity Maturity Model Certification (CMMC) in new solicitations. In three years, CMMC will be mandatory for nearly all contracts that involve Federal Contract Information (FCI) or Controlled Unclassified Information (CUI). This applies not only to prime contractors handling sensitive data directly, but also to vendors and service providers whose work involves FCI and CUI—such as manufacturers, professional services, IT and engineering support, and facility services. Contractors should act now to prepare, compete, and stay eligible.

What's Happening Now

The final rule was published in the *Federal Register* on September 10, 2025, and takes effect November 10, 2025.

From that date forward, program offices may choose to include CMMC requirements in solicitations. In three years, CMMC requirements will be mandatory for nearly all contracts that involve Federal Contract Information (FCI) or Controlled Unclassified Information (CUI), with the exception of contracts exclusively for commercially available off-the-shelf (COTS) items.

CMMC builds on existing compliance requirements, including:

- ✔ DFARS 7012 (NIST 800-171)
- ✔ SPRS scoring
- ✔ Annual affirmations of continuous compliance by an "affirming official"

What Will Be Required

Certification or Self-Assessment at Award
Depending on the contract, you'll need to either complete a self-assessment (Level 1 or Level 2 Self) or pass a third-party assessment (Level 2 C3PAO or Level 3 DIBCAC) before award. Certification must be current, issued within the past three years, and at the level specified in the solicitation.

Conditional Status and POA&Ms
For Levels 2 and 3, DoD allows a conditional certification for up to 180 days if tied to an approved Plan of Action and Milestones (POA&M). Final certification is achieved only once all POA&M items are closed.

Supply Chain Flow-down
Flow-down applies when subcontractors process, store, or transmit FCI or CUI. Subcontractors must also upload self-assessments and affirmations of compliance in SPRS.

SPRS Registration
Your assessment must be uploaded and validated in the Supplier Performance Risk System (SPRS).

Lifecycle Management
CMMC requires continuous compliance. You'll need to affirm compliance every year, revalidate after system changes, and complete a new assessment every three years to maintain eligibility. Contracting officers must also verify CMMC status before exercising options or extending a period of performance.

The Reality for Contractors

No Certification. No Award.
CMMC is now a condition of eligibility. Noncompliance risks are real: lost bids, contract delays or terminations, and reputational exposure. Contractors also face practical challenges: preparing can be costly, subcontractor compliance is uncertain, and the process is often confusing. The greater challenge is not just passing an assessment once, but maintaining compliance across the full life of a contract.

Let's Make Sure You're Ready

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🌐 DoTheSecurity.com

📅 Schedule an Appointment

We've Done It. We'll Help You Do It.

DTS is fully certified at CMMC Level 2 enterprise-wide. That puts us in rare company. Because we're already living it, we're uniquely qualified to help you prepare.

We know what it takes to pass an audit and, more importantly, to maintain compliance across the full contract lifecycle.

We've helped federal contractors:

- ✔ Build audit-ready systems
- ✔ Solve tenant and tooling issues before they become blockers
- ✔ Prepare and submit accurate SPRS documentation
- ✔ Manage continuous compliance beyond day one
- ✔ Align cyber strategy with contract performance and growth

Credentials

- ✔ Enterprise-wide CMMC Level 2 Certified
- ✔ ISO 27001 Certified
- ✔ GSA HACS SIN Approved
- ✔ OASIS+ Awardee
- ✔ SDVOSB with federal past performance
- ✔ Experts in Microsoft GCC, GCC High, PreVeil, and hybrid architectures
- ✔ Trusted by primes, subs, and MSPs across the ecosystem

DTS Helps You Prepare for Enforcement

- ✔ Determine your required CMMC level
- ✔ Define your CUI scope
- ✔ Complete a readiness assessment
- ✔ Remediate key security gaps
- ✔ Build governance to maintain compliance over time

The Goal Isn't Just Passing the Test. It's Staying in the Game.

The path is challenging, but you don't have to navigate it alone. DTS has already cleared the hurdles, and we can guide you through them.

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About DTS

DTS is a Service-Disabled Veteran-Owned Small Business (SDVOSB), ISO 27001 certified, and enterprise-wide CMMC Level 2 certified. We serve the Defense Industrial Base and federal agencies with cybersecurity strategy, managed services, compliance support, and IT modernization that keep organizations secure, compliant, and operational. DTS maintains active prime contracts and access to major vehicles including OASIS+, GSA MAS, FAA eFAST, and VA IHT 2.0. With more than 19,000 LinkedIn followers, DTS is recognized as a trusted leader in the GovCon community.

Credentials & Certifications

bsi ISO/IEC 27001 Information Security Management CERTIFIED

CYBER AB — Registered Practitioner Organization

SDVOSB cVe

BBB ACCREDITED BUSINESS

GSA Contract Holder

OASIS+ One Acquisition Solution for Integrated Services

Trusted Partner Ecosystem

Microsoft Cloud Solution Provider

AvePoint

carahsoft.

Lenovo

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