Monreal IT
Building Powerful Partnerships

AEROSPACE & DEFENSE SUPPLY CHAIN · AUGUST 2026

Third-party certification is paused. Your obligations aren't.

The Department of War (DoW, still legally the Department of Defense) suspended Phase 2 third-party CMMC certification on July 13 while a reform task force reviews the program. That single line item is the only thing that stopped. Phase 1 self-assessment, DFARS 252.204-7012, and all 110 NIST SP 800-171 controls remain in force, and primes are still flowing requirements down to their suppliers.

The result is a supply chain full of suppliers who think the clock stopped. It didn't. This is a five-question check on where you actually stand, with a scoring key and the next step for each outcome.

PAUSED JULY 13

Third-party (C3PAO) certification

C3PAO and government-led assessments stopped while the reform task force reviews the program. New solicitations that required a certificate at award are on hold with it.

NEVER PAUSED

Everything else

Phase 1 self-assessment, your SPRS score, the 110 NIST SP 800-171 controls, and DFARS flow-down clauses stay in force on every current and new contract, with False Claims Act exposure attached.

What's suspended vs. what's active

One line item paused. Four kept moving.

REQUIREMENT	STATUS	WHAT IT MEANS FOR YOU
Phase 1 self-assessment (SPRS)	ACTIVE	Your score must be current in SPRS, and it must be defensible.
NIST SP 800-171 (110 controls)	ACTIVE	The technical baseline hasn't changed. Gaps are still gaps.
DFARS 252.204-7012	ACTIVE	Safeguarding CUI and 72-hour incident reporting still apply.
Prime flow-down clauses	ACTIVE	Primes set their own bar and are still writing it into subcontracts.
Phase 2 third-party (C3PAO) certification	PAUSED	Suspended pending reform. Expect it to return, not disappear.

The five-question self-assessment

Score each answer: Yes = 2, Partially = 1, No = 0. Answer where you actually stand, not where you wish you stood.

1 Have you submitted a current NIST SP 800-171 self-assessment score to SPRS?

Phase 1 self-assessment via the Supplier Performance Risk System never paused. It's still required on every DFARS 252.204-7012 contract, and scores go stale.

☐ Yes (2) ☐ Partially (1) ☐ No (0)

2 Do you have an SSP and POA&M covering all 110 controls?

Your System Security Plan and Plan of Action & Milestones are the paper trail behind your SPRS score. Primes and DoW can ask to see them any time, with or without a C3PAO in the room.

☐ Yes (2) ☐ Partially (1) ☐ No (0)

3 Do you know which CMMC level your prime contracts flow down, and where those clauses sit?

Flow-down clauses under DFARS 252.204-7019, 7020 and 7021 keep moving through the supply chain even with third-party certification on hold.

☐ Yes (2) ☐ Partially (1) ☐ No (0)

4 Could you produce evidence (policies, configs, logs) for your weakest controls if asked tomorrow?

A self-assessment without evidence is a liability, not a checkbox. False Claims Act exposure doesn't wait for Phase 2 to resume.

☐ Yes (2) ☐ Partially (1) ☐ No (0)

5 Do you have a plan to reach full Level 2 certification once third-party assessments resume?

The reform task force is revising the program, not ending it. Suppliers who keep building won't be scrambling when C3PAO assessments restart.

☐ Yes (2) ☐ Partially (1) ☐ No (0)

YOUR TOTAL SCORE _____ / 10

Read your score

Find your band, then work the three steps under it.

On track 8 TO 10 POINTS

You're ahead of most of the supply chain. The work now is keeping the record current so a restart of Phase 2 is a formality, not a fire drill.

- Re-validate your SPRS score annually, and after any material system change
- Keep POA&M target dates current as controls close out
- Track the reform task force's Phase 2 timeline so certification isn't a scramble

Needs attention 4 TO 7 POINTS

You're self-assessing, but gaps in evidence or flow-down clarity could cost you a contract before certification even restarts.

- Close the gap between your SPRS score and the evidence behind it
- Map exactly which flow-down clauses each prime contract carries
- Turn open gaps into a POA&M with real target dates, not placeholders

At risk 0 TO 3 POINTS

A paused certification program doesn't pause your exposure. Primes can already flag you, and DoW can already ask.

- Get a current NIST SP 800-171 self-assessment into SPRS
- Start a System Security Plan before your next audit request lands
- Get a second set of eyes on your real gap before a prime finds it first

NEXT STEP

Book a CMMC readiness call.

We'll walk your five answers with you, pressure-test the evidence behind your SPRS score, and give you a written roadmap to Level 2. No jargon, no runaround.

EMAIL
info@monrealit.com

PHONE
(440) 373-5805

Based on the Department of War's published CMMC program status as of August 2026. Program guidance is changing; confirm specific requirements with your contracting officer and prime.