

The November 2026 Quiet

Why Few Contractors Are Reacting and What That Actually Means

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Summary

Practitioners are reporting quiet inquiry funnels. Contractors are not reacting to the November 2026 effective date of CMMC Phase 2 with the urgency that practitioner content has been predicting. The conventional interpretation is that contractors are apathetic, distracted, or in denial about the regulatory transition. The interpretation is wrong, and the misreading is producing analytical confusion across the practitioner community.

The contractor behavior is not apathy. It is structural rationality given how the CMMC regulation actually operates. The November 2026 date triggers a regulatory mechanism that affects new contract awards and certain contract modifications. It does not retroactively apply the certification requirement to contracts already in performance. Most DIB contractors operate primarily on existing contracts that will continue under existing terms until those contracts reach natural end dates or undergo substantive modification. The transition for most contractors is gradual rather than immediate, and the specific timeline for any individual contractor depends on the contract portfolio they hold rather than on the calendar date alone.

This paper documents the actual regulatory timeline structure, explains why most contractors are operating on individualized timelines rather than on a universal November deadline, identifies which contractors should be acting now and which contractors are reasonably waiting, and provides operational guidance for executives evaluating their own contract portfolio. The paper is intended as a corrective to the urgency-driven content that has dominated the practitioner conversation. Most contractors are not in trouble. Most contractors are not behind schedule. Most contractors are operating rationally on contract-specific timelines that will produce certification decisions over the next 24 to 36 months rather than all at once on November 10, 2026.

This paper does not argue that contractors can delay cybersecurity. DFARS 252.204-7012 obligations continue for contractors handling covered defense information. The narrower point is that CMMC certification timing is driven by contract-specific events, not by a universal contractor deadline.

1. The Observation

The CMMC practitioner community has been observing a phenomenon that does not match the dominant narrative in trade press, vendor marketing, and conference content. Contractors are not behaving as though November 2026 is an emergency. Inquiry volumes at practitioner firms are lower than the population of affected contractors would suggest. Some practitioners are reporting that contractors who initiated readiness conversations earlier in 2026 have gone quiet without explanation. The phenomenon is widespread enough across the practitioner community that it cannot be dismissed as a localized sales challenge.

The observations in this paper draw from direct field experience. The author has worked with aerospace companies on cybersecurity for over 10 years, including the period preceding the current CMMC implementation. The firm currently maintains active client relationships across multiple DIB contractors, with ongoing conversations about DFARS 252.204-7012 and DFARS 252.204-7021 implications stretching back through the past year. The contractors in these conversations have consistently raised the same observation about the broader practitioner marketing environment. Many describe the volume of urgency-driven CMMC marketing as resembling a wave of high-pressure sales tactics, with siren-emoji posts, urgency-framed webinars, AI-generated graphics carrying CMMC shield imagery, high-volume email outreach, and “CMMC now” messaging arriving from multiple practitioner firms simultaneously. The contractor reaction is skepticism, sometimes irritation, and a deliberate retreat from practitioner content that does not match their actual situation. The phenomenon documented in this paper has been visible in client conversations for months before becoming visible in practitioner inquiry funnels at the aggregate level.

The conventional explanations attempt to reconcile the contractor behavior with the urgency narrative. Common framings include “contractors are in denial,” “contractors do not understand the regulation,” “contractors are waiting for the requirement to be delayed or softened,” or “contractors are paralyzed by the cost picture they have begun to discover.” Each of these explanations contains some truth in specific cases, but none of them explain the breadth of the pattern across the contractor population.

The accurate explanation is structural rather than psychological. Most contractors are not reacting to November 2026 because the regulatory mechanism does not produce the universal contractor compliance deadline that the urgency narrative implies. The contractor population is operating on individualized timelines determined by individual contract portfolios. The contractors who appear to be ignoring the deadline are responding to their actual situation rather than to a misleading universal deadline that does not match the regulation as written.

This paper documents the actual timeline structure, identifies the contractors who are reasonably acting now and the larger group who are reasonably waiting, and explains what preparation looks like for each. The paper is intended to replace the urgency narrative with an analytical reading that respects contractor decision-making while still recommending appropriate preparation. The recommendation is not to ignore the regulation. The recommendation is to engage with the regulation on the timeline that the regulation actually produces, which differs from the timeline that practitioner urgency content has been advertising.

2. What November 2026 Actually Triggers

The November 10, 2026 date marks the beginning of Phase 2 of the CMMC implementation schedule documented in 32 CFR Part 170.4. Beginning on that date, DoD may include the DFARS 252.204-7021 clause in new contract solicitations and awards. The clause requires the contractor to hold the appropriate CMMC certification level at the time of contract award. For contracts requiring Level 2 certification, the contractor must hold either Final or Conditional Level 2 status before the award can be made.

The regulatory mechanism operates at new awards, applicable option exercises, follow-on awards, and contracting actions where the clause is added. The regulation does not require contractors to hold certification merely because the date has passed. The regulation requires certification when a contract or modification that contains the DFARS 252.204-7021 clause is being awarded. A contractor performing on a contract awarded in 2024 without the clause continues performing under existing terms until that contract reaches its end date or undergoes a modification that adds the clause.

This distinction matters because it determines when individual contractors actually face the certification decision. A contractor whose current contracts run through 2028 without an applicable option exercise, recompetes, follow-on award, or contracting action adding the CMMC requirement may not face a certification gate until later in the contract lifecycle. A contractor whose current contracts end in 2027 and who needs follow-on awards faces the certification decision in the lead-up to those follow-on awards. A contractor who is bidding on new contracts in 2027 or 2028 faces the certification decision at the bid point for those new contracts.

The regulation does not contain a universal contractor deadline that operates independent of contract awards. The Federal Register text is explicit on this point. The implementation phases govern when DoD applies the new requirements to its contracting actions. The phases do not retroactively require contractors to hold certification merely because the calendar has reached the phase effective date.

The urgency narrative that treats November 2026 as a universal contractor deadline misreads the regulatory mechanism. The narrative may serve practitioner marketing because it produces inbound urgency, but it produces analytical confusion for contractors trying to make accurate planning decisions. The contractor who hears the urgency narrative and recognizes that it does not match their actual situation is correctly skeptical of the framing. The contractor is not failing to understand the regulation. The contractor is correctly identifying that the regulation does not work the way the urgency narrative claims.

3. The Contract Portfolio Reality

A typical small to mid-size DIB contractor operates 8 to 20 active contracts at any given time. The contracts span different prime relationships, program offices, and scope categories. Some contain the existing DFARS 252.204-7012 cybersecurity clause that has been in effect since 2017. Others predate that clause. Some are subcontracts under primes with their own flowdown structures, and some are direct DoD awards.

The certification timeline pressure for any individual contractor depends on which specific contracts represent revenue, when those contracts end, and which prime relationships produce follow-on awards. Most contractors have not analyzed their portfolio against the regulatory timeline. The typical contractor tracks current performance, backlog, and projected revenue but does not maintain a portfolio view mapping each contract to certification timeline implications. Without that view, the contractor cannot identify when their specific contracts will require certification.

The analysis identifies which contracts already contain DFARS 252.204-7012 obligations, which are likely to have DFARS 252.204-7021 added at next modification or recompetition, which end dates create the deadline pressure, and which prime communications have established specific expectations. The output is a contractor-specific timeline that may differ substantially from the November 2026 narrative. Some contractors find they have until 2029. Others find they have until late 2026. The variance across the population is wide.

4. The Prime Communication Pattern

Primes do not communicate certification expectations through a universal announcement. The communication operates contract by contract, supplier by supplier, through several channels with varying clarity.

The formal channel is the Supplier Enablement Inquiry or compliance questionnaire that prime contracts groups send to suppliers throughout 2025 and 2026. These ask

about CMMC readiness status, current SPRS score, target certification level, planned C3PAO engagement, and expected timeline. Subcontractors who respond with credible timelines stay on the active supplier list. Subcontractors who do not respond or who indicate they are not pursuing certification get flagged for replacement.

The specific patterns visible in the field show three distinct prime behaviors. Some primes are sending notices to subcontractors stating that certification will be required as early as July 2026 to bid on future contracts, which establishes forward-looking eligibility expectations without affecting current performance. Other primes are sending compliance questionnaires that assess current readiness and capture supplier scorecard data without imposing a specific deadline. The pattern that is not appearing is equally significant. Primes are not sending modification notices to existing contracts that add DFARS 252.204-7021 mid-performance and force certification as a condition of continued performance. Existing contracts continue under existing terms. The eligibility consequence applies to future bidding and to follow-on awards rather than to contracts currently in performance.

The semi-formal channel is the supplier development conversation that prime program management staff conduct during normal business reviews, where the certification topic often appears as part of broader discussion about supplier capacity and strategic sourcing direction. The informal channel is the operational discussion between prime program managers and subcontractor account leads about future work. The informal channel often produces the earliest signals, with account leads sometimes learning about prime certification expectations 6 to 12 months before the formal questionnaire arrives.

Most contractors have not yet received specific signals from their primes. The Supplier Enablement Inquiries are going out selectively rather than universally, prioritized based on supplier criticality, contract calendar, and internal sourcing planning. General industry awareness that CMMC is coming differs materially from the specific contract-level knowledge that produces action.

5. The Information Asymmetry

There is one aspect of the current environment that should temper any conclusion that contractors can safely wait for prime communications to arrive. Primes are doing substantial work behind the scenes that contractors do not see. The information asymmetry produces the surprise some contractors will experience in 2027 and 2028 when they discover their prime has been sourcing elsewhere.

Primes maintain supplier scorecards that include CMMC readiness as a column. Some publish these to suppliers. Others maintain them internally and use them for sourcing decisions without informing suppliers of their classification. A subcontractor marked as low likelihood of certifying by the required date may not learn about that classification until the prime begins sourcing alternatives. By the time the alternative sourcing becomes visible, the alternative has been qualified and the contractor position is harder to recover.

Primes are also actively qualifying alternative suppliers for critical capacity and restructuring existing subcontract portfolios in anticipation of Phase 2. Some existing subcontracts that would naturally end in late 2026 or early 2027 are being modified to extend through 2028 with non-certified contractors who deliver critical capacity, while parallel sourcing matures with certified alternatives. The restructuring protects the prime from supply disruption without informing the existing supplier that their continuity is being evaluated.

The implication for contractors is that the absence of explicit prime communication about certification does not mean the prime has no certification expectations. Scorecards and sourcing strategies may already exist that will produce visible effects in 2027 or 2028. The contractor who proactively initiates conversations with their primes about certification expectations creates the opportunity to learn about prime planning before it is implemented.

6. Contractors Who Are Acting

Some contractors are acting on certification readiness during 2026. This group represents a small fraction of the total contractor population but a meaningful portion of the practitioner inquiry funnel.

Three subgroups are acting because an external signal has produced a concrete action requirement. Contractors bidding on new contracts that explicitly require CMMC certification are acting because the requirement appears in the solicitation, since some DoD components are including the DFARS 252.204-7021 clause in solicitations issued during 2026 in anticipation of Phase 2. Contractors whose primes have communicated specific certification expectations through Supplier Enablement Inquiries or supplier development conversations are acting because the prime signal is explicit. Contractors whose major contracts end in 2027 are acting because the certification timeline structure requires action 12 to 18 months before contract end to allow for readiness, assessment, and conditional certification path resolution.

Two additional subgroups are acting from internal rather than external drivers. Contractors with sophisticated compliance leadership who have analyzed their contract portfolio against the regulatory timeline are acting because the analysis produced action recommendations. Contractors operating in DoD program offices with accelerated certification expectations are acting because their specific programs have moved faster than the broader acquisition community.

The contractors acting are not panicking. Each subgroup is responding to specific signals that produce concrete action requirements. They are the visible portion of the contractor population from the practitioner inquiry funnel perspective, but they represent a minority. The majority is operating on different timelines.

7. Contractors Who Are Waiting

Most contractors are waiting. This group is the larger of the two and represents the bulk of the eventual demand for certification readiness services.

Contractors whose major contracts run through 2028 or 2029 are waiting because the contract timeline does not yet require action. A contractor with major revenue ending in 2029 has runway through 2027 before needing to begin readiness work on the standard 12 to 18 month timeline. Beginning readiness work prematurely commits capital before the timeline requires it and may produce certification expiration before the follow-on contract award, since the recertification timing matters as much as the initial certification timing.

Two additional subgroups are waiting for related but distinct reasons. Contractors who have not yet received specific prime communications about certification timing are waiting because the prime signal has not arrived, and without the specific signal the contractor has no basis for choosing a particular timeline. Contractors who have done initial cost research and recognized the readiness work is substantial are waiting to time the capital commitment to match the actual timeline pressure. Both behaviors reflect capital allocation discipline rather than denial of the regulatory requirement.

Smaller subgroups include contractors hoping the requirement will be delayed or softened (a belief not strongly supported by current regulatory signals) and contractors who do not yet understand the timeline structure and are waiting by default. The contractors waiting enter the readiness process gradually through 2027 and 2028 rather than all at once. The demand wave that practitioners and C3PAOs will service is built from this gradual entry pattern.

8. What Preparation Actually Looks Like

Preparation that respects the contractor situation produces better outcomes than panic-driven readiness work. The analytical foundation for any timeline decision is the contract portfolio analysis. The portfolio analysis maps each active contract against the CMMC certification timeline implications, identifying which contain DFARS 252.204-7012 obligations, which are likely to have DFARS 252.204-7021 added at next modification or recompetition, which end dates create the deadline pressure, and which prime communications have established specific expectations. The output is a contractor-specific timeline that informs all subsequent decisions.

With the timeline established, the contractor moves to proactive prime engagement. Rather than waiting for the Supplier Enablement Inquiry to arrive, the contractor initiates conversations with prime program management about certification expectations. The conversation produces information about prime sourcing strategy, supplier scorecards, and certification timing that the contractor would not otherwise see. Some primes share this information candidly. Others do not, but the proactive contractor learns more than the passive contractor regardless of the response.

The scoping analysis identifies which systems handle CUI, which personnel access CUI, which physical spaces process CUI, and which third-party providers touch CUI environments. The analysis determines what the certification effort will actually cover and what cost categories will apply. It can be done independent of any decision about whether to pursue certification and produces information the contractor needs whether they certify in 2026 or 2029.

The contractor-specific cost picture accounts for the scoping reality, starting infrastructure condition, internal labor capacity, and preferred consulting engagement structure. The picture informs both the capital allocation decision and the strategic decision about whether to pursue certification, consolidate with a certified contractor, restructure into subtier work, or exit defense work.

The readiness timeline planning maps the work back from the certification deadline produced by the portfolio analysis. A contractor needing certification by mid-2028 begins readiness work in late 2026 or early 2027 to allow the 12 to 18 month standard timeline. A contractor needing certification by mid-2027 should already be in readiness now or about to begin. The planning produces specific start dates the contractor can act on with discipline rather than urgency.

The choice between a deliberate 18 month preparation timeline and a compressed 6 month timeline produces materially different certification outcomes. The longer timeline allows sequential completion of the readiness phases. Scoping and asset

categorization, control implementation, evidence collection, internal validation, gap remediation, and pre-assessment readiness review each receive the attention the work requires. The longer timeline also accommodates the normal operational disruptions that occur in any contractor environment over an 18 month window, including personnel changes, technology refresh cycles, and competing program priorities. The compressed 6 month timeline forces parallel execution of phases that are better completed sequentially, increases the likelihood of incomplete evidence at assessment, increases the risk of Conditional certification rather than Final certification, and increases the cost of remediation work performed under time pressure rather than as part of normal operations. The deliberate timeline produces a stronger certification outcome at a lower total cost than the compressed alternative.

9. The Demand Wave Pattern

The demand for certification readiness services and C3PAO assessments arrives in waves rather than as a single peak. Understanding the wave pattern helps practitioners, C3PAOs, contractors, and counsel position correctly for the actual demand profile that will develop through 2027 and 2028.

The first wave is already in progress. Contractors who have received specific prime signals, contractors bidding on new contracts that require certification, and contractors with 2027 contract end dates are entering readiness work throughout 2026. The volume in this wave is modest but visible. The C3PAO capacity is currently adequate for this wave with substantial unused capacity available.

The second wave begins in early 2027 as contractors with major 2028 contract end dates begin their readiness timelines. This wave is larger than the first because the 2028 end date population is larger than the 2027 end date population, and because prime communications will have become more widespread by early 2027. The second wave produces meaningful capacity pressure on practitioners and C3PAOs but does not yet stretch the ecosystem beyond capacity.

The third wave begins in mid-2027 as the cumulative effect of prime communications, contract recompetitions, and 2028 to 2029 end date pressure pushes the bulk of the waiting group into readiness work. This wave is the largest of the three and represents the demand profile that will determine whether the ecosystem has adequate capacity. Practitioners and C3PAOs who are positioned for this wave with established reputations, audience recognition, and operational capacity benefit substantially. Practitioners who have not positioned for this wave will find themselves competing for engagements against well-positioned competitors.

The recertification cycle produces a sustained demand floor beginning in 2029 as the contractors who certified in late 2026 reach their 3-year recertification gate. The recertification work continues at a steady rate thereafter, supplemented by the gradual entry of contractors who delayed initial certification beyond 2028. The ecosystem reaches a steady-state demand profile around 2029 that is materially different from the 2026 profile but more sustainable for both practitioners and C3PAOs.

The wave pattern has implications for capacity planning across the ecosystem. C3PAOs who expanded capacity in anticipation of a November 2026 peak face overcapacity in the immediate term and adequate capacity when the second and third waves arrive. Practitioners who built capacity for November 2026 face similar timing pressure. The ecosystem capacity that looks underutilized in the current quiet period is positioned for the wave pattern that will define the 2027 and 2028 environment.

10. Operational Guidance for Executives

The recommendations that follow are intended for executives at DIB contractors who are evaluating their own CMMC certification timeline and want guidance that respects their actual situation rather than reacting to urgency narratives that may not apply to them.

Complete the contract portfolio analysis. The single most important preparation step is mapping each active contract against the certification timeline implications. The analysis takes a small team working with the contractor compliance lead, the contracts lead, and senior leadership a few working sessions to complete. The output is a contractor-specific timeline that may differ substantially from the November 2026 narrative. The analysis is not difficult and the cost is low relative to the certification work that the analysis informs.

Initiate proactive prime engagement. Rather than waiting for prime communications to arrive, executives should initiate conversations with key prime program management contacts about certification expectations. The conversations may produce candid information about prime sourcing strategy, supplier scorecard classifications, and certification timing that the executive would not otherwise see. The conversations also signal to the prime that the contractor is engaged with the certification question, which can influence the prime sourcing classification favorably.

Develop the contractor-specific cost picture. Generic cost estimates from trade press or vendor marketing do not produce the planning foundation a specific contractor needs. The cost picture should reflect the contractor scoping reality, the starting infrastructure condition, the internal labor capacity, and the preferred engagement structure. The

picture informs both the capital allocation decision and the strategic decision about whether to pursue certification at all.

Make the strategic decision deliberately. The certification decision is not the only available response to the regulatory transition. Contractors can choose to pursue certification, to consolidate with a certified contractor, to restructure into subtier work that does not require certification, or to exit defense work entirely. Each path has implications for the contractor business model, customer relationships, capacity allocation, and revenue trajectory. The strategic decision deserves explicit executive attention rather than defaulting to certification by inertia.

Reject the urgency framing and engage with the timeline that applies to your situation. The November 2026 date does not produce a universal contractor compliance deadline. The contractor specific timeline depends on contract portfolio, prime relationships, and individual circumstances. Executives who recognize this can plan with discipline and make decisions on appropriate timelines. Executives who accept the urgency framing without evaluating its applicability may commit capital prematurely or panic into rushed readiness work that produces poor outcomes.

Engage senior practitioner support for the analytical work. The contract portfolio analysis, the proactive prime engagement, the scoping analysis, and the cost picture development all benefit from senior practitioner involvement. Practitioners holding the Registered Practitioner Advanced credential or similar senior credentials with project management and budget advisory experience can perform this work substantially faster and more accurately than contractor staff working without specialized support. The cost of senior practitioner engagement at the preparation phase is modest relative to the cost of poor preparation that produces expensive readiness work later.

Part of the senior practitioner role in this environment is helping clients build a timeline-aware plan rather than reacting to urgency narratives. The work begins with a review of client capabilities, an analysis of contract clauses across the active portfolio, and structured assistance with long-term goals for third-party assessment engagement. The practitioner who delivers this work helps the client move into a better cybersecurity posture on a deliberate timeline rather than pushing the client into a rushed assessment that does not match their contract calendar. The combination produces a stronger cybersecurity outcome and a more defensible compliance position than the alternative of treating CMMC as an emergency to be resolved at any cost. Practitioners who screen client situations through the urgency lens and recommend immediate assessment regardless of contract timeline are not serving the client. Practitioners who screen client situations through the analytical lens and recommend the timeline that the client situation actually requires are doing the work the regulation expects practitioners to do.

One observation deserves emphasis because the timeline-aware framing in this paper can be misread. The contractor who has time before their certification deadline is not free to neglect cybersecurity in the interim. DFARS 252.204-7012 has been in effect since 2017 and continues to require contractors handling Controlled Unclassified Information to implement the NIST SP 800-171 controls and to safeguard the information. Contractors operating under existing DFARS 252.204-7012 obligations must maintain a secure environment regardless of when their CMMC certification timeline requires formal assessment. The timeline patience the paper recommends applies to the certification decision and the readiness work that supports certification. The security obligation operates continuously, and contractors who use the certification timeline as justification for neglecting current cybersecurity obligations expose themselves to FAR, DFARS, and False Claims Act risks that have nothing to do with the November 2026 date. A senior practitioner working with a client on timeline planning addresses the current security obligation as a foundation for the eventual certification work, not as an optional element that can wait until the assessment approaches.

The professional posture of the practitioner matters to the client engagement as much as the technical work itself. Contractors reacting against urgency-driven marketing are reacting against the specific patterns that marketing typically uses. High-volume email outreach with CMMC subject lines arrives in contractor inboxes daily. AI-generated graphics with shields, locks, and badges carrying CMMC text appear across LinkedIn and trade press. Webinar invitations promise urgent updates that turn out to be sales pitches. Contractors notice the pattern and form impressions about practitioner quality based on what they see publicly. The practitioner who produces substantive analytical content, who communicates with contractors in measured professional voice, and who avoids the manufactured urgency that characterizes much of the current marketing environment signals through that posture that the engagement work will operate at a similar professional standard. Contractors are increasingly able to distinguish between practitioners who treat CMMC as a marketing volume opportunity and practitioners who treat CMMC as substantive analytical and operational work. The distinction matters to the contractor making engagement decisions, and the public content a practitioner produces is the most reliable evidence contractors have of which posture they are dealing with.

Recognize that most contractors are not behind schedule. The dominant narrative that contractors who are not actively pursuing certification in mid-2026 are behind schedule is incorrect for most of the contractor population. Most contractors have time. The time is not unlimited, and the actual timeline depends on individual contractor circumstances, but the behavior of waiting is rational and does not represent a failure mode that needs immediate correction. Executives should evaluate their specific situation analytically rather than accepting the narrative that they are behind.

11. Closing Observation

The CMMC practitioner community has been operating with a misleading frame that treats November 2026 as a universal contractor compliance deadline. The frame may serve practitioner marketing, but it produces analytical confusion for contractors and the executive leadership making decisions on behalf of those contractors. The accurate frame treats the regulation as it actually operates: a multi-year transition that affects individual contractors on individualized timelines determined by their contract portfolios, prime relationships, and specific circumstances.

Most contractors face decisions in 2027 and 2028 rather than in 2026. The decisions deserve analytical attention and timely preparation but do not require panic or capital commitment two or three years before the timeline the contractor actually faces. The quiet that practitioners are observing in their inquiry funnels is not a problem to be solved. It is the visible operational form of the contractor population operating rationally on contract-specific timelines, and the volume will arrive on schedule as the contract calendar and prime communications produce the action signals for each individual contractor.

Very few care about November 2026 in the urgency sense the practitioner community has been advertising. Many will care about specific 2027 and 2028 dates that apply to their specific situations. The transition will happen on a different schedule and with a different shape than the urgency narrative predicts. Contractors and the practitioners who serve them are best positioned by engaging with the actual schedule and shape rather than the advertised version.

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Additional Reading

Readers interested in the November 2026 timeline themes may find the following related work from the firm useful for further context.

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