

Your 2026 CMMC FAQ



The CMMC Program officially launched November 10, 2025, with a four-phase implementation through 2028. Here's what defense contractors need to know right now.

What's Required in 2026?

Phase 1 (Nov 2025 - Nov 2026)

Solicitations require Level 1 or Level 2 self-assessments where applicable.



Phase 2 (Nov 2026 - Nov 2027)

Level 2 Certification Assessments by authorized C3PAOs become standard for CUI contracts.

Important: Some Phase 1 solicitations may require Level 2 C3PAO assessments immediately, so don't assume you have until November 2026.

What's an Annual Affirmation?

Even though CMMC certifications last three years, you must affirm continuous compliance annually. If you don't submit your annual affirmation, your CMMC status expires immediately.

Your affirmation confirms:

- All controls remain implemented and effective
- No changes in compliance since certification
- Security configurations match certified baselines
- Your assessment boundary hasn't changed

This requires operational evidence, not documentation. It's where most contractors realize they need managed services.

What Are the Three CMMC Levels?

Level 1 Basic Safeguarding of FCI

- 15 security requirements (FAR 52.204-21)
- Annual self-assessment
- No POA&Ms allowed

Level 2 Protection of CUI

- 110 security requirements (NIST SP 800-171 R2)
- Self-assessment or C3PAO assessment every 3 years
- Annual affirmation required
- Limited POA&Ms (must close within 180 days)

Level 3 Advanced Protection Against APTs

- 134 total requirements (NIST 800-171 + 24 from NIST 800-172)
- DIBCAC assessment every 3 years
- Must maintain Level 2 certification continuously
- Annual affirmations for both Level 2 and Level 3

Can I Use POA&Ms to Remediate Findings?

Plans of Action and Milestones provide limited flexibility:

Not Permitted:

- Level 1 assessments
- Critical security requirements

Permitted for Level 2 and 3:

- You receive "Conditional CMMC Status"
- 180-day maximum to close findings
- Requires closeout assessment for "Final CMMC Status"
- Status expires if not closed within 180 days

Don't build your strategy around POA&Ms. They're emergency relief, not project timelines.

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What Should I Do Right Now?

If you're competing for contracts in 2026: Implement operational capability for Level 1 or Level 2 self-assessments now. You need functioning security controls with evidence collection systems—not just documentation.

If you're planning for late 2026/early 2027: Begin Level 2 C3PAO certification preparation immediately. The assessment process takes 3-6 months minimum, assuming controls are already implemented.

If you're targeting high-value DoD programs: Start planning for Level 3. You'll need advanced security capabilities, sophisticated monitoring, mature incident response, and Level 2 certification first.

What's the Biggest Mistake Contractors Make?

Treating CMMC as a documentation project instead of an operational requirement.

Annual affirmations require continuous compliance between assessments. Configuration changes, staff turnover, alert fatigue, and evidence collection all impact your ability to maintain certification.

How Do Managed Services Help?

VSO operates your complete IT environment—infrastructure, security, endpoints, and compliance—in ways that maintain CMMC compliance naturally:

- Configuration management with automated baseline enforcement
- 24/7 SOC monitoring with documented analysis
- Evidence collection from daily operations
- Incident response procedures tested and documented
- Third-party assessment support with organized artifacts

We prepare contractors for certification, then operate their environments to maintain compliance for annual affirmations—generating evidence from professional managed services, not manufactured for audits.

What's Your Timeline?

- **Q1-Q2 2026:** Finalize Level 1/2 self-assessment capabilities
- **Q3 2026:** Complete Level 2 C3PAO preparation
- **Q4 2026:** Achieve certification before Phase 2 begins
- **2027:** Prepare Level 3 capabilities for applicable programs

Waiting until solicitation requirements appear means you're already behind competition.

Ready to build operational CMMC compliance? Schedule a consultation to discuss your certification timeline.

