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CMMC 2.0 is Final – Are you Ready?

On December 26, 2023, the DOD published the proposed rule for the Cybersecurity Maturity Model Certification (CMMC) Program. 32 CFR 170, establishing cybersecurity requirements, was effective as of December 16, 2024. 48 CFR (DFARS) 252.204-7021 and 252.204-7025 were published on September 10, 2025, with an effective date of November 10, 2025. On November 10, 2025, contracting officers may add the DFARS clauses to solicitations and contracts with immediate compliance requirements.

CMMC is a framework designed to enhance the cybersecurity posture of the Defense Industrial Base (DIB). Implemented in response to increasing cyber threats, CMMC establishes a set of security standards that all contractors must meet to handle Federal Contract Information (FCI) and Controlled Unclassified Information (CUI). For certain levels of information, CMMC mandates third-party assessments to verify that contractors comply with the required cybersecurity standards.

Neither contracting officers nor prime contractors may waive or deviate from the CMMC cybersecurity control and assessment requirements. Contracting officers may not award contracts to noncompliant contractors and prime contractors may not award purchase orders to noncompliant subcontractors. We encourage you to proactively prepare to comply with this future contractual requirement.

Resources include [NIST MEP](#) and [The Cyber AB](#). Northrop Grumman has collaborated with other Defense Industrial Base (DIB) companies to establish the [Cyber Assist Website](#). Another helpful resource is [CI2 Project Spectrum \(DoD Small Business Office Sponsored\)](#).

This notice is for informational purposes only and does not constitute Northrop Grumman direction or legal advice.