

The Phased Approach of CMMC 2.0

What does it mean and how will it work?



Phase 1

CMMC Level 1 & Level 2 Self-Assessment

Start Date: Upon Finalization of CMMC Rule

Key Points:

- DoD includes CMMC Level 1 and/or Level 2 Self-Assessment in applicable solicitations and contracts.
- Organizations required to self-assess for bid eligibility.
- Option for CMMC Level 2 Certification Assessment based on DoD discretion.



Phase 2

Expansion to CMMC Level 2 Certification

Start Date: 6 Months Following Phase 1

Key Points:

- Includes Phase 1 requirements.
- DoD intends to include CMMC Level 2 Certification Assessment as a condition of contract award.
- Option to delay inclusion or select specific organizations for certification.



Phase 3

CMMC Level 2 & Level 3 Certification

Start Date: One Calendar Year Following Phase 2

Key Points:

- Includes Phase 1 and 2 requirements.
- CMMC Level 2 Certification Assessment for contract award and option periods.
- Intention to include CMMC Level 3 Certification Assessment as a condition of contract award.



Phase 4

Full Implementation

Start Date: One Calendar Year Following Phase 3

Key Points:

- CMMC Program requirements in all applicable solicitations and contracts.
- Covers option periods on contracts awarded prior to the beginning of Phase 4.
- Official launch of CMMC 2.0.

Important Considerations:

- The phased approach may be subject to changes during the public comment period.
- You could be asked to provide proof of certification by a Prime or the DoD at any time or even before any of these phases occur.
- Organizations waiting to comply might face challenges due to the limited availability of Certified CMMC Assessors (CCAs).

Organizations are encouraged to take proactive steps in scheduling assessments to avoid potential delays.