

CMMC Final Rule

On September 10,2025 the DoD completed the Cybersecurity Maturity Model Certification (CMMC) rulemaking process, which among other requirements, amends the Defense Federal Acquisition Regulation Supplement (DFARS). The DFARS Rule takes effect on November 10,2025 and applies to all DoD solicitations and contracts other than contracts exclusively for commercially available off-the-shelf items.

CMMC New Requirements

Beginning November 10,2025:

- DoD includes CMMC Level 1 and Level 2 self-assessment requirements in applicable DoD solicitations and new contracts as a condition of contract award.
- DoD has discretion to include CMMC Level 2 Certified Third-Party Assessment Organization (C3PAO) certification assessment requirements.
- DoD has discretion to require CMMC Level 1 and Level 2 self-assessments for applicable contracts issued before November 10, 2025 as a condition of exercising an option period.

Supplier Survey

If your company has received but not yet completed a survey from Triumph partner SupplierSoft regarding CMMC certification status, please do so as soon as possible. Accurate information about supplier self-assessment completion and CMMC certification status is important information to prevent any potential delays in contract award.

For more information, please contact your Triumph supply chain representative.