

CMMC Is Already Here: What Construction Firms Need to Know

The next certification phase was suspended. The cybersecurity obligation was not.

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For many construction companies, cybersecurity still feels like an information technology issue. CMMC turns it into an eligibility issue. If your company works on a Department of Defense project, supports a prime contractor, or receives protected project information, your ability to win or keep that work may depend on meeting the required cybersecurity level.

What is CMMC?

The Cybersecurity Maturity Model Certification program is the government's method for checking whether companies in the defense supply chain are protecting federal information. It does not apply only to defense manufacturers. Architects, engineers, general contractors, specialty trades, technology providers and other partners can be included when their systems handle covered information.

Does it apply to every construction company?

No. The key questions are whether a solicitation, contract or subcontract contains a CMMC requirement and whether your company will process, store or transmit Federal Contract Information, known as FCI, or Controlled Unclassified Information, known as CUI. Examples may include nonpublic project records, technical drawings, specifications, security details or other protected information. Company size does not create an exemption.

What are the levels?

- Level 1 generally applies to FCI and uses 15 basic safeguarding requirements with an annual self-assessment.
- Level 2 applies to CUI and follows the 110 security requirements in NIST SP 800-171 Revision 2 (soon to be Revision 3). Depending on the contract, Level 2 may require either a self-assessment or an independent C3PAO (Certified Third-Party Assessment Organization) assessment. Many will require the C3PAO assessment.

- Level 3 is reserved for the most sensitive programs and adds government-led assessment requirements.

What is required right now?

Phase 1 began on November 10, 2025 and remains active. CMMC requirements can appear in current solicitations and contracts. When required, a company needs the correct current status in the Supplier Performance Risk System (SPRS) before award, must maintain that status during the contract and must complete annual affirmations. Prime contractors (usually the General Contractor in construction) also has flow-down requirement when subcontractors (MEP etc) will handle FCI or CUI.

IMPORTANT UPDATE: On July 13, 2026, the Department suspended the transition to Phase 2, which had been scheduled for November 10, 2026, and paused later milestones while it reviews the program. It explicitly kept Phase 1 self-assessment requirements in place. As of August 30, 2026, no replacement Phase 2 date has been announced.

Why not wait for the review to end?

Because the underlying duty to protect covered defense information remains. A pause in the certification rollout is not permission to ignore DFARS cybersecurity clauses or NIST SP 800-171. Readiness can also take months. Companies may need to identify where protected information travels, narrow the systems in scope, change technology, document procedures, train employees and collect evidence that the controls actually work.

What should leadership do now?

- Review current contracts, solicitations and subcontract flow-down clauses.
- Determine whether the company receives FCI, CUI or both.
- Map where that information is stored, shared and accessed, including cloud services and mobile devices.
- Confirm the company's assessment, SPRS entry and annual affirmation status.
- Build a realistic remediation plan before a bid, option year or prime contractor request creates a deadline.

CMMC is not solved by purchasing one product or downloading a policy template. It requires a clear scope, working safeguards and evidence. The smartest first step is understanding what applies to your company and what does not.

LEARN MORE: Join us **October 7th at 8AM at the Engineers Club of Dayton** for ***CMMC 2.0: The Questions Contractors Ask Most***. We will explain the rules in plain language, address common misconceptions and show how to build a practical readiness plan. [Click here to register](#) or go online to www.bxdayton.org