State of CMMC 2.0 Preparedness in the DIB — Europe Executive Summary

THE MOST EXPOSED SEGMENT IN THE SURVEY: EUROPE'S DIB FACES THE SAME OBLIGATIONS FROM A WEAKER POSTURE, WITH THE LEAST CURRENT SELF-ATTESTATIONS OF ANY REGION

Overview

North America makes up 60% of the survey (n=163); Europe is essentially all of the rest, at 38% of the 273 respondents (n=104) — the only region of any scale outside North America, and the clearest counterpoint to the US-dominated sample. These are Defense Industrial Base organizations that do business with the Department of War and carry an active CMMC requirement. They face exactly the obligations their North American peers face, and they meet them from a measurably weaker position on every readiness dimension this report measures.

The report's two composite indices, each built from eight binary indicators, make the gap precise. For European respondents the CMMC Compliance Maturity Score (CCMS) averages 74.0, against 78.2 for the full sample. The Suspension Governance Score (SGS) averages 69.5, against 74.9. Multiplied into the CMMC Suspension Readiness Index (CSRI), Europe averages 53.9, against the full-sample mean of 60.0, and North America's 64.7. Europe trails on compliance state, on active governance, and on the combined index.

One number states the European problem more sharply than the composite scores do. 44% of European DIB organizations fall in the report's Exposed quadrant, low on both compliance maturity and active governance at once, against 31% across the full sample. Only 15% of European respondents reach the Audit-Ready quadrant, against 23% overall. Europe is not a smaller version of the North American profile. It is a distinctly more exposed one.

Reader's Key

How to read the scores. This report builds two indices from the survey's own data, each from eight yes/no indicators on a 0–100 scale. CCMS (CMMC Compliance Maturity Score) measures where an organization's compliance stands today — is the SPRS score current, has a C3PAO been engaged, and so on. SGS (Suspension Governance Score) measures what the organization has actively done since the July 13 suspension. The two are multiplied, not averaged, into the CSRI (CMMC Suspension Readiness Index): a weak score on either dimension pulls the total down, so readiness has to be earned on both. SPRS (Supplier Performance Risk System) is the self-assessed cybersecurity score a contractor submits to the government — the number the whole confidence-evidence gap turns on.

The Suspension Paused the Mandate, Not the Law

The July 13, 2026 suspension of CMMC 2.0 Phase II third-party assessments changed nothing about the underlying obligation, and that obligation does not stop at the U.S. border.[1] DFARS clause 252.204-7012 applies to any contractor handling covered defense information, wherever it is headquartered.[2] Phase 1 self-assessment requirements remain in effect. The False Claims Act applies to the self-attested SPRS score. Phase II was the independent-verification layer on top; removing it removes the check on whether a contractor's own claim is true, not the requirement[3] to make an accurate one.

The Department of Justice has shown what an inaccurate self-attestation costs. In June 2026, a defense contractor, LOGZONE Inc., settled a False Claims Act case for $507,144 after self-attesting a perfect SPRS score of 110 that a government audit later assessed at −170,[4] with no whistleblower involved.[5] That enforcement mechanism, a routine government-led audit, applies to a European DIB subsidiary exactly as it applies to a North American prime. 82% of European respondents are concerned about that exposure, close to the 84% full-sample rate, but only 83% have engaged legal or compliance review to check it, against 92% overall. European concern is comparable; European action on it lags.

Readiness Gap in European Numbers

Mapping CCMS against SGS at the report's 7-of-8 threshold on each dimension places European organizations very differently from the full sample:

Quadrant	European DIB	All Respondents
Audit-Ready (strong on both)	15%	23%
Coasting (compliant, passive)	28%	28%
Scrambling (active, unproven)	13%	18%
Exposed (weak on both)	44%	31%

The Exposed quadrant is where Europe concentrates: **44%** of European organizations are weak on both compliance state and active governance at once — against **31%** across the full sample, and **more than double North America's 21%**. The mirror image is just as stark: only **15%** of European organizations reach Audit-Ready, versus **28%** in North America, so across the European DIB the Exposed outnumber the audit-ready **nearly three to one**. This is the single clearest fact for a European reader. These are organizations already pre-qualified to do business with the Department of War and carrying a live CMMC requirement, meaning they cleared the bar to compete for defense work, yet nearly half of them sit weakest on the exact two dimensions that decide whether a self-attestation holds up under review.

The confidence–evidence gap that defines the full report is wider still in Europe. 94% of European respondents are confident their self-attested SPRS score would hold up if reviewed today. Follow that confident group one step at a time:

The Confidence–Evidence Cascade (European DIB)	% of the Confident Group
Confident their SPRS score would hold up under review	94%
… of those, SPRS submission is actually current	45%
… of those, already on a FedRAMP-authorized platform	42%
… of those, can point to BOTH a current score and an audited platform	29%

The European drop-off is steeper than the full sample's at the first and most important step. Only 43% of all European respondents have a current SPRS submission, against 59% across the full sample, the single largest Europe-versus-global gap in the survey. European self-attestations are the least current, even as European confidence in them stays high. Confidence outrunning evidence is the report's central finding; in Europe, the evidence falls further behind.

Key Findings Relevant to Europe

1

Preparedness: active, but less so than North America

European organizations did not sit still, 96% took at least one concrete action after the suspension, against 98% overall, but they acted at a lower intensity on the substantive controls. 56% continued implementing technical controls as planned, against 62% full-sample, and 60% report they have already achieved or expect within six months to achieve full compliance readiness, against 70% overall. Europe is engaged but further from the finish line.

2

The knowledge gap is wider in Europe

The misconception that all CMMC requirements are paused is rare everywhere (3% in Europe, 3% overall). But component knowledge is thinner in Europe: 55% of European respondents do not know that Phase 1 self-assessment obligations continue, against 48% across the full sample, and 71% are fully aware DFARS 252.204-7012 remains binding, against 73% overall. A European DIB entity is more likely than its North American peer to be confident, obligated, and unaware of exactly which obligations survived the suspension, precisely the combination that produces False Claims Act exposure.

3

The self-attestation currency gap is the core European risk

43% of European respondents have a current SPRS submission, against 59% full-sample. This is where Europe's exposure concentrates. A self-attested score that is not current is the exact fact pattern behind the LOGZONE settlement, and European DIB organizations carry it at a materially higher rate than the survey as a whole, while reporting near-identical confidence that their score would hold up. The gap is not one of concern or intent; it is one of maintained, current, defensible evidence.

4

Market consequences are real but not yet a European advantage

47% of European respondents are now bidding on solicitations they previously would have avoided over Level 2 requirements, against 55% overall, and 47% have withdrawn from a bid rather than pursue certification, against 52%. 39% report a loss or disqualification over a Level 2 requirement, in line with the 38% full-sample rate. European organizations are absorbing the same market pressure as the rest of the DIB while entering it from a weaker readiness position, the combination least likely to convert a paused requirement into a competitive opening.

5

Demand for audited infrastructure is present, and slightly behind

86% of European respondents are already using, or plan to adopt within six months, a FedRAMP-authorized platform, against 89% overall, and 39% are already using one, marginally ahead of the 35% full-sample rate. 88% say independent third-party authorization will be essential or important to vendor selection, against 93%. On the assessor side, 93% have engaged a C3PAO and 33% are continuing a scheduled assessment voluntarily, in line with the full sample. The appetite for independently audited evidence and independent validation exists in Europe; it has simply not yet closed the currency-and-readiness gap the rest of this summary describes.

Variations Within Europe

Europe is not uniform, and France, at 58 of the 104 European respondents, dominates the regional picture. France reports one of the lowest SPRS-submission-currency rates in the survey, 43%, alongside the highest False Claims Act concern of any European country, 88%, a combination of high exposure and high awareness that has not yet translated into current attestations. The Netherlands (n=22) shows a similar shape: 50% SPRS currency against 86% FCA concern. Italy (n=13) sits somewhat better on currency (54%) with notably lower concern (62%). The smaller national samples, the United Kingdom (n=8), Germany, and Belgium, are too small to characterize on their own and are read here only as part of the European aggregate.

The European respondent base skews toward Information Technology and Cloud Services (36 of 104) and Telecommunications and Critical Infrastructure (23), with Aerospace and Defense Manufacturing (15) a smaller share of the European sample than of North America's. By supply-chain role, European respondents are led by prime contractors (37) and dual prime/subcontractors (31). The pattern that holds across the full survey, that subcontractors carry the lowest readiness and the highest bid-loss exposure, applies within Europe as well, and Europe's larger Exposed-quadrant share sits partly on that supply-chain composition.

Conclusion

European DIB organizations did not opt out of the CMMC obligation, and they did not sit still after the suspension. They are, however, the most exposed segment in this survey: lower on compliance maturity, lower on active governance, and, most consequentially, carrying the least current self-attestations of any region, 43% current against 59% across the full sample, even as 94% remain confident those attestations would survive review.

That gap, high confidence sitting on low current evidence, is the report's central finding, and Europe is its clearest regional expression. 44% of European organizations are Exposed on both dimensions at once, against 31% overall, and the knowledge gap that feeds False Claims Act exposure is wider in Europe than in the sample as a whole. Same obligations, same enforcement mechanism, weaker posture.

The fix is not a European exception. It is the same evidence-plus-validation path the full report describes, applied to a segment that needs it most: current, provable self-attestations produced by independently audited infrastructure, validated by an independent assessor. The European organizations that make that move before the next audit or enforcement action, rather than because of it, are the ones that will not be describing the same Exposed profile when this survey runs again.

Endnotes

1. U.S. Department of War, suspension of CMMC 2.0 Phase II third-party assessments, July 13, 2026. Justin Doubleday, "Pentagon suspends CMMC Phase Two requirements, launches review of program," Federal News Network, July 13, 2026; U.S. SBA Office of Advocacy.

2. DFARS clause 252.204-7012, "Safeguarding Covered Defense Information and Cyber Incident Reporting," U.S. Department of Defense, acquisition.gov; Crowell & Moring LLP.

3. Phase 1 self-assessment requirements remain in effect. Morgan Lewis, "Department of War Suspends CMMC Phase II Requirements, but Cybersecurity Obligations Remain," July 2026.

4. Self-attested SPRS scores carry False Claims Act exposure absent third-party assessment; U.S. DOJ Civil Cyber-Fraud Initiative. Foley & Lardner LLP, "DOJ's LOGZONE Settlement Highlights FCA Risk in Cybersecurity Compliance Representations," July 2026. [5] U.S. Department of Justice, Office of Public Affairs, "Alabama Defense Contractor Agrees to Pay $507,144 to Resolve False Claims Act Liability Relating to Cybersecurity Violations," June 18, 2026. See also DefenseScoop; Mayer Brown; Crowell & Moring.