Kiteworks

SOLUTION BRIEF

FOR DIB CISOS & COMPLIANCE LEADERS

CMMC PHASE II IS PAUSED. YOUR COMPLIANCE RISK IS NOT.

Why the DoW Suspension Changes the Audit Timeline, Not the Underlying Requirement to Protect CUI

CMMC 2.0 | DFARS 7012 | NIST SP 800-171 | FedRAMP

The Challenge

On July 13, 2026, the Department of War suspended CMMC Phase II third-party assessment requirements, originally set for November 10, 2026. The headlines read as relief. In the market, that reads as permission to stand down on cybersecurity investment. Neither is accurate: DoW's own release states plainly that the suspension 'does not eliminate the requirement for companies to protect federal data,' and that contractors remain bound by DFARS 252.204-7012 regardless of the CMMC phase-in timeline.

The Solution

Kiteworks helps Defense Industrial Base contractors close the gap between what changed on paper and what didn't change in practice. The platform supports 90% of CMMC 2.0 Level 2 requirements out of the box, is FedRAMP Moderate Authorized, and is FIPS 140-3 validated, giving contractors a way to demonstrate real security posture through self-assessment and audit logging, not just paperwork, while DoW conducts its 60-day program review.

What DoW's Own Numbers Say

100,000+
DIB Companies Still Needing Third-Party Assessment

~100
C3PAOs Currently Available To Assess Them

60 Days
Length Of The Reform Review Before Recommendations Are Due

Why Readiness Still Matters Right Now

The Assessor Backlog Isn't Going Away

DoW's own CIO cited roughly 100,000 DIB companies needing assessment against only about 100 available C3PAOs as the reason for the pause. That bottleneck doesn't resolve itself during a 60-day review. Contractors who get audit-ready now avoid competing for the same narrow pipe once Phase II resumes.

DFARS 7012 Never Paused

The contractual obligation to safeguard covered defense information stands independent of CMMC's phase-in schedule. Kiteworks' access controls, encryption, and audit logging map directly to the security domains DFARS 7012 and NIST SP 800-171 require.

Self-Assessment Raises the Stakes On Accuracy

With third-party audits paused, self-attested SPRS scores no longer have an external check before they're relied upon. An inaccurate self-assessment can still carry False Claims Act exposure, so a documented, audit-ready platform matters more, not less, during this interim period.

Why Readiness Still Matters Right Now

Government-Led Assessments Continue

DoW confirmed it will keep enforcing NIST SP 800-171 Rev 2 through self-assessments and select government-led assessments during the interim, with an emphasis on tangible cyber hygiene over administrative overhead.

Flow-Down Obligations Don't Reset

Primes still must flow cybersecurity requirements to subcontractors, and in-flight solicitations that already reference CMMC Level 2 aren't automatically relieved by the phase-in pause.

Phase II Is Paused, Not Cancelled

A CMMC Reform Task Force is already running a public RFI with a 60-day deadline. History suggests the requirement returns in some form, possibly faster once assessor capacity is addressed. Waiting only shortens the runway to comply later.

Where Kiteworks Fits Today

Support for 90% of CMMC 2.0 Level 2

Configuration management, access control, audit and accountability, and system and information integrity controls built into the platform.

Consolidated Audit Trail

A single, real-time activity log across email, file sharing, managed file transfer, and web forms, feeding directly into SIEM systems for audit readiness.

FedRAMP High In Process

Kiteworks has enhanced its federal cloud security capabilities by achieving FedRAMP High In Process status for its Secure Gov Cloud. This milestone builds upon its established FedRAMP Moderate Authorized Federal Cloud service, which has maintained authorization since June 2017.

FIPS 140-3 Validated Encryption

Double encryption at rest and in transit, with customers retaining ownership of their encryption keys at every step.

Don't Let a Paperwork Pause Become a Compliance Gap

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