

RFI RESPONSE — CMMC REFORM TASK FORCE

WHAT WE TOLD THE PENTAGON ABOUT FIXING CMMC

OUR POSITION

Keep the program. Cut the duplicate proof, the all-or-nothing cliff, and the paperwork that doesn't protect anything. This way, contractors spend less time certifying and more time securing.

SYNOPSIS

On August 14, 2026, Schellman — alongside hundreds of other members and contributing partners across the Defense Industrial Base — responded to the Department of War's Request for Information (RFI) on the CMMC program, which paused Phase 2 in July to reevaluate the program.

1

REAFFIRM

REAFFIRM THE PROGRAM WHILE YOU REVIEW IT

CMMC is in law and regulation. Uncertainty now costs more than the rules do.

2

DEDUPLICATE

STOP MAKING COMPANIES PROVE THE SAME CONTROL TWICE

Validated under FedRAMP, ISO 27001, or SOC 2?
Assess the gap, not the whole environment.

3

RETHINK THE CLIFF

REVISIT THE ALL-OR-NOTHING THRESHOLD

Codify risk tiers by CUI sensitivity, and allow compensating controls, instead of one pass/fail bar for every contractor.

4

PRIORITIZE

SEPARATE WHAT PROTECTS FROM WHAT ONLY COSTS

Keep the controls that reduce risk. Retire the ones that only generate paperwork.

5

FUND & SHRINK SCOPE

SUPPORT THE DIB THROUGH GRANTS AND TECHNOLOGY THAT REDUCE SCOPE

Back the FY 2027 grant program alongside pooled assessments and shared enclaves, so small businesses have less to certify, not just help paying for it.

WHAT EARNS ITS COST, AND WHAT DOES NOT

REAL SECURITY VALUE

- ✓ Multi-factor authentication
- ✓ Network segmentation
- ✓ Encryption at rest and in transit
- ✓ Tested incident response
- ✓ Vulnerability scanning cadence

COST WITHOUT PROTECTION

- ✓ Documentation volume for its own sake
- ✓ Manual log review without tooling
- ✓ Media marking in cloud-only systems
- ✓ Certain FIPS module requirements
- ✓ Re-proving already validated controls

This response comes from Schellman's experience auditing across more than 90 frameworks, not just CMMC. If any of this raises questions about what your organization actually needs to prove, **CONTACT US TODAY** to discuss your journey to CMMC and 800-171 compliance.

SUBMITTED TO THE CMMC REFORM TASK FORCE, DEPARTMENT OF WAR