



NSTXL's CMMC Membership Policy

As the U.S. Department of War (DoW) implements the Cybersecurity Maturity Model Certification (CMMC) program, NSTXL members are expected to stay informed and aligned with evolving requirements. This policy document outlines how CMMC compliance will affect membership access and participation in NSTXL opportunities.

1. Background on CMMC

- The DoW began a phased rollout of CMMC requirements with Phase 1 rolling out on Monday, November 10, 2025.
- CMMC establishes mandatory cybersecurity requirements for all contractors and subcontractors that handle Federal Contract Information (FCI) or Controlled Unclassified Information (CUI).
- Over the three-year phase-in period, more solicitations will require CMMC, including Level 2 Certified Third-Party Assessor Organizations (C3PAO).
- Official details and resources are available at the DoW CIO website: <https://dodcio.defense.gov/cmmc/About/>
- NSTXL has created their own CMMC resource page for further guidance: <https://nstxl.org/cmmc-compliance/>

The full CMMC rollout schedule as stated by the DoW can be found below.

11/10/2025	Phase I: Level 1 and 2 self-assessments begin
11/10/2026	Phase II: Level 2 (C3PAO) requirements begin
11/10/2027	Phase III: Level 3 (DIBCAC) requirements begin
11/10/2028	Phase IV: Applicable CMMC requirements will be included in all solicitations as a condition for contract award



2. Membership & Portal Access

All NSTXL members will continue to have general portal access regardless of current CMMC status until Tuesday, November 10, 2026, at 5:00 p.m. ET.

CMMC Level 2 (Self-Assessment) Guidelines:

All members must complete and submit proof of their CMMC Level 2 (Self-Assessment) by Tuesday, November 10, 2026, at 5:00 p.m. ET. Members who do not submit proof by that deadline risk losing access to their membership or being ineligible to compete for proposals.

CMMC Level 3 (DIBCAC) Guidelines:

CMMC Level 3 (DIBCAC) compliance requirements will be reviewed and evaluated at a later date.

3. Opportunity & Submission Access

- Opportunities, accompanied documentation, and associated events will be restricted on a case-by-case basis depending on stated CMMC requirements decided by each solicitation's associated government team.
- If a solicitation requires compliance with CMMC Level 1 or above, members must demonstrate the necessary compliance to submit a proposal on that solicitation.
- Members who cannot demonstrate the required CMMC level for a given solicitation may not be eligible to submit proposals or view restricted documentation under that opportunity.
- Prime contractors will be required to provide proof of their CMMC Level and their associated subcontractors' CMMC Levels upon submission. It is up to the prime contractor to educate and gather CMMC levels on behalf of their subcontractors.



4. Additional Resources for Members

NSTXL does not provide compliance services or certifications. Members are encouraged to:

- Review official DoW CMMC guidance: <https://dodcio.defense.gov/cmmc/About/>
- Review NSTXL's CMMC resource page: <https://nstxl.org/cmmc-compliance/>
- Stay informed about evolving requirements and timelines.
- Engage with qualified compliance consultants as needed.

5. Regulatory Disclaimer

NSTXL reserves the right to revisit enforcement mechanisms as CMMC requirements expand and mature.

Membership policies are subject to change due to DoW policy updates and requirements. For the latest information on CMMC compliance, visit <https://dodcio.defense.gov/CMMC/>.