MALA TECHNOLOGY ADVISORS

Independent Technology Guidance. Market Intelligence. Better Decisions.

AEROSPACE & DEFENSE · INDUSTRY DATA SHEET

CMMC Certification Is Paused. Obligations Are Not.

In July 2026, DoD paused third-party CMMC certification pending a program review. Your obligations under DFARS and NIST SP 800-171 remain fully in force. MALA helps close the gap between paper compliance and what happens on the floor. Start with a no-fee initial assessment.

NIST SP 800-171 + CUI Data Flow + SPRS Readiness + Affirmation + **No-Fee Initial Assessment**

THE CHALLENGE

Paper compliance isn't the same as real compliance.

Pause confusion
Some contractors deprioritized work, though obligations didn't change.

Floor-level gaps
Legacy engineering systems and CUI in unmanaged file-sharing tools.

Affirming official risk
A senior official attests annually to what they may not be able to verify.

Flow-down failures
Subcontractor requirements treated as contract clauses, not verified reality.

OUR APPROACH

Separate what changed from what didn't.

01 Benchmark
Assess against all 110 NIST SP 800-171 controls.

02 Map CUI
Trace CUI across engineering, program and subcontractor systems.

03 Review SPRS
Check score methodology and affirmation readiness.

04 Verify Subs
Build a verification process for subcontractors.

05 Prioritize
Sequence remediation by contract risk exposure.

Still in force: all 110 controls, SPRS submission under DFARS 252.204-7012 and annual affirmation under DFARS 252.204-7021 where it applies.

HOW MALA HELPS

A roadmap tied to NIST 800-171 control families.

Reality Assessment
Benchmarked against all 110 NIST SP 800-171 controls.

CUI flow mapping
How CUI actually moves, not how the SSP says it does.

SPRS review
Score methodology checked for defensibility.

Affirmation readiness
Monitoring and documentation behind the annual attestation.

Subcontractor verification
Flow-down confirmed as technical reality.

Remediation roadmap
By control family, sequenced by contract risk.

A prime can be compliant on paper and still carry significant risk through unverified subcontractors.

BY THE NUMBERS

Why this matters now.

110
NIST SP 800-171 Rev. 2 controls still in force
DFARS 252.204-7012

Annual
affirmation of continuous compliance by a senior official
DFARS 252.204-7021

July 2026
third-party CMMC certification paused; obligations unchanged
DOD

$0
for your initial assessment. No obligation to move forward
NO-FEE INITIAL ASSESSMENT

WHO IT'S FOR

Built for the people who own the decision.

Affirming Officials	Evidence to support what you personally attest to.
Prime Contractors	Verified flow-down across your subcontractor network.
CIO / CISO	Gaps in engineering and legacy systems found and ranked.
Program Management	CUI handled correctly across program systems.
Subcontractors	Readiness for what primes and DoD will ask for.

THE MALA MODEL

Unbiased. Vendor-sponsored.

Our services are sponsored through strategic referral agreements with 330+ technology solutions providers, never billed to you. MALA is paid by the vendor only if you move forward with a vendor we recommend.

- **Unbiased recommendations**
  Providers within each category have similar compensation models, so your requirements drive the answer.
- **Paid only if you move forward**
  The selected vendor compensates MALA, and only when you choose a recommended vendor.
- **No obligation**
  You are never required to move forward with any recommended vendor.

COMMON QUESTIONS

What clients ask first.

Q Does the CMMC pause change our obligations?
No. The 110 controls, SPRS submission and annual affirmation remain in force.

Q Where does flow-down break down?
When it's handled as a contract clause and never verified technically.

Q What does the affirming official requirement mean?
A senior official attests annually to continuous compliance, and must be able to back it up.

Q Where do gaps really show up?
On the floor: legacy engineering systems, CUI in unmanaged tools and unverified subs.

ENGAGEMENT AT A GLANCE

Standard	All 110 NIST SP 800-171 Rev. 2 controls
Regulations	DFARS 252.204-7012 and 252.204-7021
Deliverable	Roadmap by control family, sequenced by contract risk
Cost to you	No-fee initial assessment. Vendor-sponsored, no obligation

SERVICES Reality Assessment · Cybersecurity · Vendor Selection

NO-FEE INITIAL ASSESSMENT

Request your no-fee CMMC / NIST 800-171 Readiness Assessment. No obligation.

We separate what changed from what didn't, then prioritize your NIST 800-171, SPRS and affirmation gaps by contract risk.

Vendor-sponsored: MALA is paid by the vendor only if you move forward with a recommended vendor. No obligation to do so.

Let's simplify your next technology decision. Talk to an advisor.

Eric Anderson
eanderson@malatechadvisors.com
+1 (603) 802-2469 · malatechadvisors.com