CUI Enclave for Defense Suppliers While CMMC Rules Settle

A scoped, documented environment for Controlled Unclassified Information (CUI). It meets today's NIST SP 800-171 obligations and is built so it can pass a third party assessment if and when one is required.

PRACTICE

Cyber Resilience and Zero Trust

CLIENT PROFILE

A small or midsize defense supplier, or a commercial manufacturer with a defense line of business, that handles CUI across a mixed corporate network. The company is unsure how much to invest in CMMC compliance while CMMC Phase II is suspended.

Challenge

- On July 13, 2026, the Department of War (DoW) suspended CMMC Phase II, which had been scheduled for November 10, 2026. No restart date has been announced.
- The suspension did not remove the underlying obligations. DFARS 252.204-7012, NIST SP 800-171, incident reporting and Phase I self assessments posted in SPRS all remain in force.
- CUI is spread across email, file shares, laptops and engineering tools. That makes the assessment boundary, and the cost of compliance, far larger than it needs to be.
- An inaccurate SPRS score or attestation can create False Claims Act exposure, whatever happens to the CMMC timeline.

Approach

- Map where CUI is created, stored, processed and transmitted, and who touches it.
- Define a small enclave boundary that contains CUI, the people who need it and the tools they use.
- Build the enclave on hardened identity, phishing resistant multifactor authentication, managed endpoints, encrypted storage, logging and backup.
- Map the enclave to all 110 NIST SP 800-171 Revision 2 requirements. Document the System Security Plan, and track gaps in a plan of action and milestones.
- Validate the configuration in the Norseman integration lab, then deploy it and train users.
- Produce evidence packages that support an accurate self assessment now and a third party assessment later.

Typical Outcomes

- A much smaller compliance boundary, with a lower cost to secure and to assess
- An SPRS score backed by documented evidence
- A defensible position if CMMC Phase II restarts with short notice
- Clear separation between CUI work and the rest of the business

Cost of Waiting

Phase II is paused, not cancelled, and DoW's own task force has floated restarting it for a narrower group of contractors. Suppliers who wait may find themselves in a short window with limited assessor availability, while carrying the same obligations and enforcement risk they carry today.

Procurement Paths

- GSA MAS for assessment, engineering and integration services
- NASA SEWP VI (Category A) for security hardware and software
- DoD ESI for Palo Alto Networks and Elastic components where eligible
- **Commercial:** direct purchase and financing

Compare vehicles and ordering steps on **How to buy**.

Technology Categories

- Identity and access management
- Phishing resistant authentication
- Endpoint protection
- Government cloud collaboration
- Data loss prevention
- Logging and SIEM
- Backup and recovery
- Governance, risk and compliance tooling

Frequently Asked Questions

Do we still need to comply with NIST SP 800-171 while CMMC Phase II is suspended?

Yes. DFARS 252.204-7012 and the related NIST SP 800-171 obligations remain in force. A September 2026 DoW class deviation confirmed the baseline requirement.

Is an enclave right for every supplier?

No. If CUI touches most of your business, it may be better to secure the whole environment. Scoping tells you which approach costs less.

Is Norseman a CMMC assessor?

No. Norseman designs, builds and supports the environment, and it is itself CMMC Level 2 compliant. Assessments are performed by authorized third party assessment organizations.

This page is general information, not legal advice.

Book a CUI Enclave Scoping Workshop

In one working session plus a written follow up, you will learn where your CUI lives, how small your boundary can be, and what it takes to defend your SPRS score.

This is a representative use case. To request a briefing or a quote, contact Norseman Defense Technologies at 410.579.8600 or sales@norseman.com.