



Essential Information for Suppliers About CMMC 2.0

Guidance to suppliers for meeting Rolls-Royce standards

Cybersecurity Maturity Model Certification (CMMC) 2.0 requirements will soon appear in Department of Defense (DoD) contracts. To prepare, Rolls-Royce is providing this FAQ with answers to questions we are hearing from suppliers.

Information will continue to evolve as the DoD completes 48 Code of Federal Regulation (CFR) Part 252 rulemaking and as Rolls-Royce becomes compliant with CMMC requirements.

Suppliers are urged to watch for updates from Rolls-Royce, and we recommend that suppliers review the DoD's [CMMC FAQ](#) for additional information.

FAQ Categories

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1 CMMC 2.0 Rules and Implementation

Q: What are the primary rules driving implementation of CMMC 2.0?

A: Rules [32 CFR Part 170](#) and [48 CFR Part 252](#).

32 CFR Part 170

This rule defines the CMMC program and cybersecurity requirements for defense contractors and subcontractors. It was published in October 2024 and went into effect December 16, 2024. The final rule is accessible via [FederalRegister.gov](#).

48 CFR Part 252

This rule updates the Defense Federal Acquisition Regulation Supplement (DFARS) to enforce CMMC and defines contract clauses and solicitation provisions. Amendments to 48 CFR Part 252 were expected to be published in Q1. It is accessible via [Acquisition.gov](#).

Q: How will the DoD implement CMMC?

A: Once the Title 48 CFR CMMC acquisition rule is in effect, the DoD says it will implement CMMC requirements in four phases over three years. The phased implementation is intended to reduce ramp-up issues, allow for the training of the necessary number of assessors, and give companies the time needed to understand and comply with CMMC requirements. It will also minimize financial impacts to defense contractors, especially small businesses, and disruption to the existing DoD supply chain.

When CMMC is fully in effect, solicitations and resulting defense contracts involving the processing, storing, or transmitting of Federal Contract Information (FCI) or Controlled Unclassified Information (CUI) on a nonfederal system will have CMMC level and assessment type requirements that a contractor must meet.

2 Compliance and Assessments

Q: What level of CMMC compliance is Rolls-Royce working toward?

A: Rolls-Royce is planning to achieve CMMC Level 2, which will require a Certified Third-Party Assessor Organization (C3PAO) assessment.

Q: Is there a quick way to determine what level CMMC certification will be required?

A: See information as outlined by the DoD at <https://dodcio.defense.gov/cmmc/About/>



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General guidelines are:

- ▶ Level 1: Required for basic safeguarding of FCI
- ▶ Level 2: Required for broad protection of CUI
- ▶ Level 3: Required for higher-level protection of CUI against advanced persistent threats

Note: These levels stack and require compliance with all requirements equal to and below the highest-level certification being sought.

Q: As a Rolls-Royce US Defense supplier who does or could work with CUI data, what level CMMC certification is required?

A: The DoD requires a minimum of CMMC Level 2 compliance and a C3PAO assessment if an organization handles any type of CUI data.

Q: As a Rolls-Royce US Defense supplier who will not handle CUI data but may handle FCI data, what level CMMC certification is needed?

A: The DoD requires CMMC Level 1 compliance and self-assessments if an organization handles FCI data.

Q: As a Rolls-Royce US Defense supplier who does not work with CUI data and is not a supplier of commercially available off-the-shelf (COTS) items, do I need to be CMMC certified?

A: If handling FCI data, a minimum of CMMC Level 1 would likely be required.

Q: What are COTS requirements?

A: COTS items are exempt from CMMC.

Q: Does CMMC apply to non-US suppliers?

A: Yes, CMMC applies to all international or non-US suppliers who supply parts under US defense contracts.

Q: Will prime contractors and subcontractors be required to maintain the same CMMC level?

A: No, a lower CMMC level may apply to the subcontractor if the prime flows down only limited information.

Q: How will suppliers report Level 1 self-assessments?

A: A self-assessment option will be available in the Procurement Integrated Enterprise Environment (PIEE) Supplier Performance Risk System (SPRS) as soon as 48 CFR is final.



3 Timing

Q: When does Rolls-Royce anticipate achieving Level 2 compliance (C3PAO assessed)?

A: Rolls-Royce is working toward compliance by mid-2025, although that date hinges on the availability of C3PAOs to conduct the assessment.

Q: When does Rolls-Royce expect to see CMMC requirements flow into new contracts and task orders?

A: Rolls-Royce could see CMMC requirements flow into new contracts after the DoD publishes updates to 48 CFR to the Federal Register. However, this depends on the DoD's contracting officer because CMMC will be a phased rollout.

Q: When will Rolls-Royce require suppliers to be compliant with the new CMMC 2.0 requirements?

A: Timing for compliance will be specified at the individual contract level. When Rolls-Royce receives contracts with these new requirements, we will not be able to issue subcontracts to suppliers without the required CMMC certification.

Q: Are there expectations from Rolls-Royce that suppliers will get certified before contracts are released?

A: When Rolls-Royce receives contracts with CMMC requirements, we will not be able to issue subcontracts to suppliers without the required CMMC approvals and/or plans of action and milestones (POAMs) in place. To reduce risk of delays and/or elimination from subcontract consideration, if you believe your company will be required to achieve CMMC certification, we recommend moving forward with the certification process in advance of contract release. If you are unsure whether this is likely, please contact your Rolls-Royce Supply Chain representative.

4 Data Types and Flow-Down Requirements

Q: What information is considered CUI?

A: In general, CUI is defined by the customer or supplier in specific contracts. Rolls-Royce receives CUI data and information via the customer and/or contract. Anything derived from CUI data or information ("derived CUI") is also treated as CUI.

CUI information may include, but is not limited to: non-technical information tied to budget, procurement, program schedule and phasing information, and technical data related to aircraft, engine, engine subsystems, and associated components.



Q: What is the difference between FCI and CUI data?

A: FCI is any information that is “not intended for public release.” CUI is information that requires safeguarding and may also be subject to dissemination controls. FCI is defined in [Federal Acquisition Regulation \(FAR\) clause 52.204-21](#) and CUI is defined in [Title 32 CFR Part 2002](#).

Q: How will flow-down requirements work for CUI requirements?

A: Rolls-Royce will flow down [DFARS clause 252.204-7021](#) in the purchase order with the usual US Government Flow Downs document reference. In addition, we will flow down what data and information is CUI and expect that subcontractors treat anything derived from CUI as CUI. Rolls-Royce will mark data and information that has been categorized as CUI (see <https://www.dodcui.mil>). When Rolls-Royce shares information that is marked (in whole or in part) as CUI, that information and anything derived from it must be marked as CUI and contain the same distribution statement marked on the original CUI data.

5 **Rolls-Royce Support**

Q: What if I have questions regarding CUI or "derived CUI" specific to a purchase order (PO), program, or component?

A: For questions regarding CUI or “derived CUI” tied to a specific PO, program, or component, please reach out to your Rolls-Royce Supply Chain representative. Rolls-Royce may be able to provide additional detailed information regarding CUI depending on the PO or program.



6 Additional Resources

- 1** DoD CMMC 2.0 Overview:
<https://dodcio.defense.gov/Portals/0/Documents/CMMC/ModelOverviewv2.pdf>
- 2** DoD CMMC FAQ:
<https://dodcio.defense.gov/Portals/0/Documents/CMMC/CMMC-FAQs.pdf>
- 3** 32 CFR Part 170 Final Rule:
<https://www.govinfo.gov/content/pkg/FR-2023-12-26/pdf/2023-27280.pdf>
- 4** 48 CFR Part 252:
<https://www.acquisition.gov/dfars/part-252-solicitation-provisions-and-contract-clauses>
- 5** Assessment Guide – DoD CMMC Level 1:
<https://dodcio.defense.gov/Portals/0/Documents/CMMC/AssessmentGuideL1v2.pdf>
- 6** Assessment Guide – DoD CMMC Level 2:
<https://dodcio.defense.gov/Portals/0/Documents/CMMC/AssessmentGuideL2v2.pdf>
- 7** Assessment Guide – DoD CMMC Level 3:
<https://dodcio.defense.gov/Portals/0/Documents/CMMC/AssessmentGuideL3v2.pdf>