

2025

STATE OF CMMC: C3PAO INSIGHTS ON CERTIFICATION TRENDS & READINESS

**SURVEY-BASED INSIGHTS FROM AUTHORIZED
C3PAOS ON THE FRONTLINES OF CERTIFICATION
UNDER THE CMMC 2.0 FINAL RULE**

Executive Summary

This report presents findings from a survey of Certified Third-Party Assessor Organizations (C3PAOs) actively conducting CMMC Level 2 assessments under the CMMC 2.0 framework.

Developed to inform OSCs, RPOs, MSPs, and other stakeholders, it highlights data, trends, and practical lessons drawn directly from assessors navigating evolving OSC readiness challenges. For perspectives from contractors themselves, see our [Small Contractor Readiness Report \(2025\)](#).

The survey explores contractor readiness, certification volume and scheduling, the role of consultants, and a collection of field insights from C3PAOs—providing best practices available nowhere else.



Key Finding Areas

The survey identified key findings in the following areas:

Readiness

Certification Volume &
Scheduling

Field Insights

Consultant
Ecosystem



For acronym definitions and terminology, see our [CMMC glossary](#).



Only **25%** of C3PAOs feel staff are typically well prepared



50% reported they delay or turn away OSCs 50% or more of the time

Readiness

You Might Not be as Ready as You Think

After tremendous preparation, clients often approach a C3PAO only to be turned away due to lack of readiness.

Even after securing a spot on the C3PAO's calendar, about **1 in 4 respondents report that in more than half of cases, clients ask to reschedule**—usually because they realize they aren't as prepared as they thought.

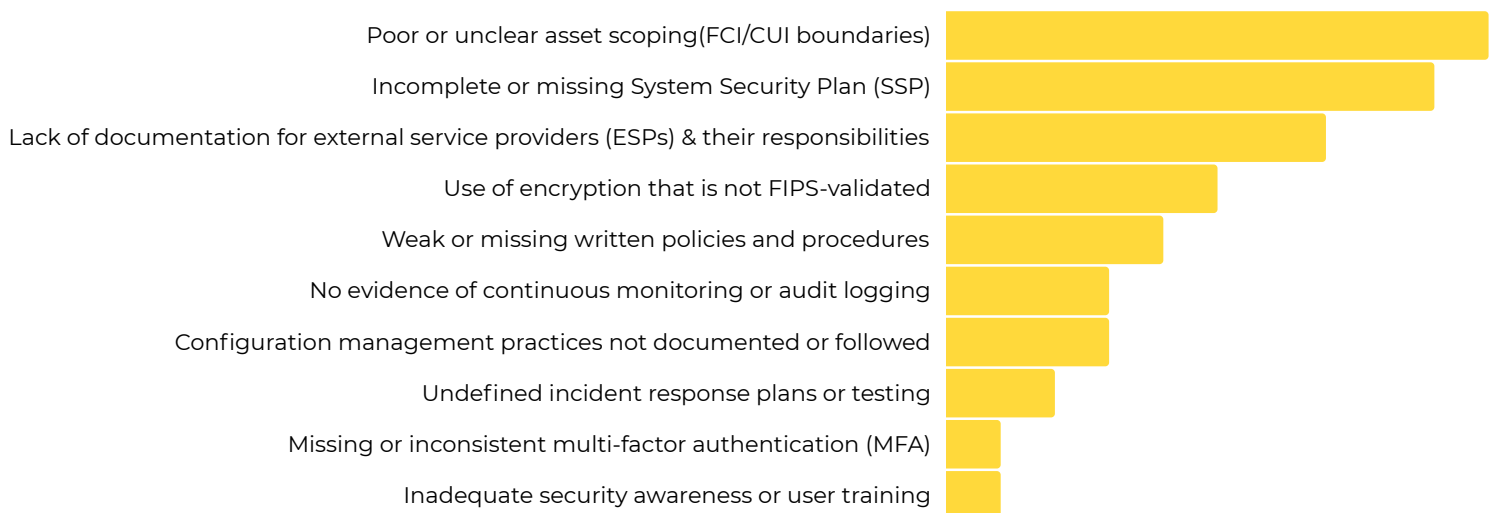
Key Drivers of Rescheduling

Why are so many assessments rescheduled? **80% of C3PAOs surveyed cite an assumption of readiness without validation as the top reason for rescheduling.**

When asked about OSC readiness gaps, poor or unclear asset scoping topped the list, followed closely by incomplete or missing System Security Plans (SSPs), and lack of documentation related to ESPs and their role.

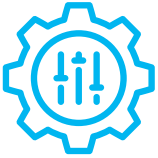


Top Readiness Gaps



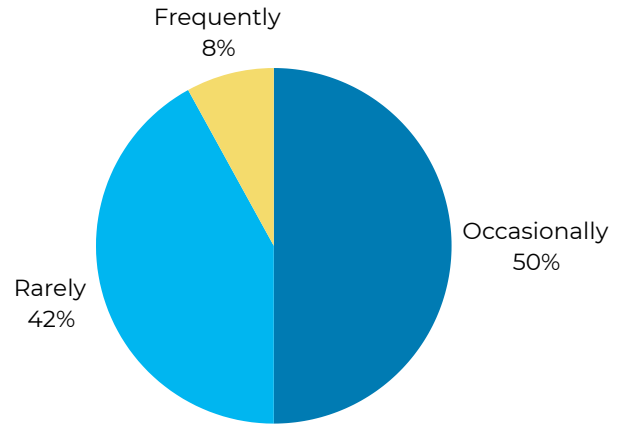
Additional Sentiments on Readiness

The good news? In most cases, by the time certification begins, OSCs are well prepared. C3PAOs note that mismatches between implementation evidence and written documentation occur rarely or occasionally.



Configuration settings and system outputs were also frequently reported as gaps.

Implementation Evidence Gaps

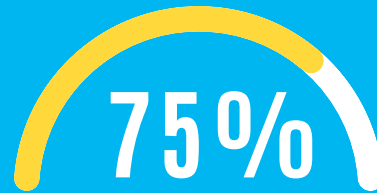


Where to Focus Before Assessment

Before an assessment, organizations should focus on the most common evidence gaps: audit logs, configuration settings, and system outputs. System configuration documentation is the most critical, with the majority of assessors citing it as incomplete or outdated.



Of C3PAOs cited missing audit logs as a common evidence gap.



Of C3PAOs identified system configuration documentation as the top area lacking completeness and currency.

Common Areas of Concern





Certification Volume & Scheduling

Rising Volume of Level 2 Assessments

A clear trend is emerging: the majority of C3PAOs surveyed have completed **double digit CMMC Level 2 assessments** since the final rule went into effect. This confirms that certification activity is active and accelerating.


Schedule Soon, Bottlenecks on the Horizon


C3PAOs reported that **most OSCs are able to schedule assessments within six months**. However, timelines vary significantly and are expected to grow longer. With fewer than 100 C3PAOs available to serve thousands of OSCs, capacity is likely to become a future bottleneck.



Field Insights

When asked to share lessons learned, respondents consistently emphasized two themes: **scope drives effort, and internal ownership is non-negotiable**—even when consultants or MSPs are involved.

 **Scope:** Getting scope right is one of the biggest factors in CMMC preparation. **Use the official scoping guide and lock scope early to avoid surprises.** Know the limits of your CUI storage solution. For example, commercial Microsoft 365 needs add-ons to handle CUI, and a PreVeil solution doesn't exclude endpoints from scope. And don't assume company size equates to maturity—**what matters is how well scope is defined and managed.**

 **Ownership:** Outsourcing doesn't remove responsibility. Some MSPs don't fully understand CMMC, and “easy button” services create false confidence. OSCs must own their SSP and documentation, and **verify that providers handling CUI (such as CSPs) meet FedRAMP Moderate or equivalent—with no exceptions.**



Consultant Ecosystem

The Role of Consultants

The overwhelming majority of OSC's assessed have had some level of consultant support prior to their assessment whether it be an RPO, MSP, or vCISO. Sentiments around the consulting ecosystem, however, vary greatly.

Consultants: Snake Oil or Saving Grace?

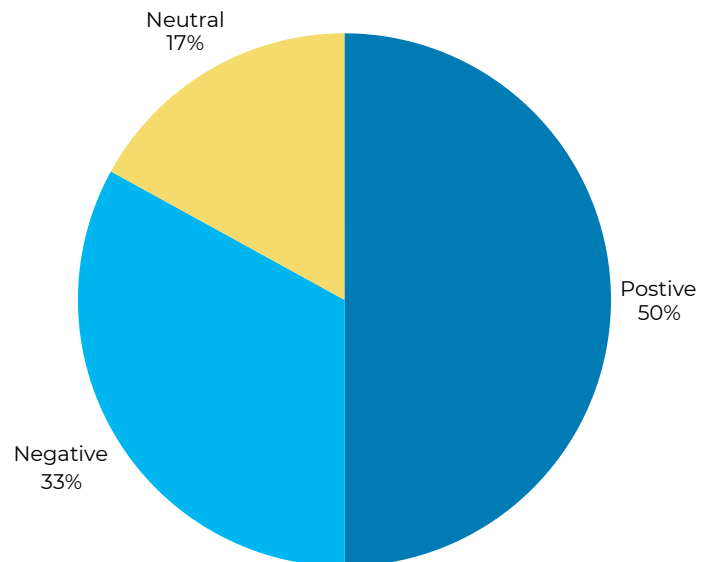
While most respondents rated consultant involvement as **positive or neutral**, nearly **one-third reported negative experiences**—a warning sign that can't be ignored.



Reported that at least half of OSCs use a consultant

C3PAOs frequently caution that OSCs who attempt to handle CMMC entirely on their own are the ones most often forced to **reschedule assessments due to lack of readiness**. At the same time, some consultants contribute to the problem by offering **“turn-key solutions”** and making unrealistic claims like “we satisfy 300 of 320 controls.”

Consultant Sentiments



These misleading promises leave companies underprepared, inflating both **timelines and budgets** later in the process. One C3PAO specifically urged OSCs to scrutinize RPO staff qualifications, noting that inexperienced advisors have created significant setbacks for clients.

Consultant Ecosystem Takeaway

The takeaway: Choose consultants wisely.



Vet their experience—ask for referrals, do background research, and confirm they have **proven success guiding clients through actual CMMC assessments**.



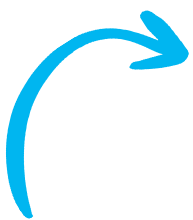
Invest in your internal team—provide **CCA training** and run a **mock assessment with a C3PAO** to validate readiness before the real thing.



Key Takeaways & Next Steps

The survey highlights a clear pattern: many OSCs believe they are ready but encounter major delays once assessments begin. To avoid this, organizations should focus on these priorities before scheduling:

- 01** **Validate Readiness Early**
Don't assume preparedness. Run a mock assessment with a C3PAO or trusted partner to confirm gaps before booking certification.
- 02** **Tighten Documentation**
Pay particular attention to audit logs, system configurations, SSPs, and ESP documentation. These are the most common evidence shortfalls flagged by assessors.
- 03** **Scope Correctly**
Use the official CMMC scoping guide, lock scope early, and confirm your CUI handling solutions (e.g., Microsoft 365 with add-ons, PreVeil, FedRAMP Moderate CSPs) meet requirements.
- 04** **Choose Consultants Wisely**
If you use outside support, vet experience carefully, ask for referrals, and avoid "easy button" promises. Pair external expertise with strong internal ownership.
- 05** **Plan Ahead for Scheduling**
While most OSCs can currently book within six months, demand will soon outpace supply. Secure your slot early to avoid future bottlenecks.



Act now to validate readiness, close documentation gaps, and strengthen internal ownership so OSCs can minimize rescheduling, control costs, and move smoothly through certification.