Quietly Issued

GSA's Schedule refresh carrying the new AI clause issued on Thursday, November 12 — three days after this brief reported it still unissued, and with GSA's own guidance page still showing the previous refresh. A 90-day mass-modification clock now ends February 10. It was not the only deadline that started running this week without an announcement.

Nov 20	Dec 7	Dec 11	Jan 31	Feb 10
SBA SIZE STANDARDS	FEDRAMP VDR/VER	CR + 7 AUTHORITIES	SEWP V CLOSES	MAS MASS MOD
Comments close on the biggest change to “small” in a generation	Mandatory for every certified cloud service; a one-year ban at the end	Funding, CISA 2015, TMF awards and five more end together	Last day SEWP V accepts new orders	90 days from Refresh 34 to accept the AI clause

CHANGED SINCE NO. 7

- **GSA MAS Refresh 34 has issued.** We reported on November 9 that it had not. GSA's eOffer Published Schedules listing shows Refresh/Amendment 34 to solicitation 47QSMD20R0001 published **November 12, 2026** — which starts the 90-day mass-modification clock and dates it to **February 10, 2027**. Item 01.
- **A second cyber False Claims Act settlement, ten days after the first.** The $13 million ILC Dover and ILC Astrospace resolution we covered was announced November 3. Johnson Controls settled for $5 million on November 13. Item 05.
- **The December 11 cyber lapse is one of eight expirations in one statute.** Read end to end, P.L. 119-103 puts continuing appropriations, the Technology Modernization Fund's award authority, the Federal Cybersecurity Enhancement Act and five other authorities on the same Friday. Item 04.
- **CMMC Phase 2's original start date passed without effect.** November 10, 2026 was to be the Phase 2 start; the program remains suspended under the July 13, 2026 DoD CIO action with no restart date — and DISA has written Level 2 at award into a $500 million solicitation anyway. Item 08.

01 Mass mod: Feb 10, 2027 AI ACQUISITION SCHEDULES

GSA issued MAS Refresh 34 on Thursday — the AI clause is live and the mass-mod clock ends February 10

Refresh 34 · sol. 47QSMD20R0001 | Published Nov 12, 2026 | Mass mod due Feb 10, 2027 | GSAR 552.239-7001 | 41 GSAR provisions deleted

GSA published Refresh/Amendment 34 to the Multiple Award Schedule solicitation (47QSMD20R0001) on **Thursday, November 12, 2026**, per GSA's own eOffer Published Schedules listing, where every category attachment is now named for Amendment 34. This brief reported on November 9 that the refresh had not issued. It has. Schedule holders have 90 days from receipt to accept the Mass Modification, which dates the deadline to **February 10, 2027**.

- The refresh carries clause **GSAR 552.239-7001**, “Basic Safeguarding of Data within Large Language Model Artificial Intelligence Systems,” which took effect **October 19, 2026** as a class deviation under GSA's Executive Order 14275 framework and has since been applied to new task and delivery orders.
- Per counsel reading the final language, the clause carries three *separate* notice duties: 72 hours to the contracting officer on actual knowledge of a material violation; five business days on notice that a third-party provider is deprecating a model version, with best efforts to supply a successor; and seven calendar days for a material change that increases output bias, reduces safety guardrails or degrades truthfulness. Government may run automated bias and truthfulness assessments and suspend the model at any time.

- The advance Significant Changes attachment lists deletion of **41 GSAR provisions and clauses**, removal of eight Schedule-specific clauses, five new consolidated clauses at 552.238-190 through -194, and **removal of the 20-year limit** on MAS contract duration.
- Non-acceptance of a mass modification runs from temporary removal of your pricing and catalog data up to contract cancellation.

GSA's mass-modification guidance page was last updated November 10 and still showed Refresh 33 materials, which is most likely why the issuance went unnoticed. Of three advisory firms that predicted a date, two said November 6 and one said "mid-November (12th or 13th)." The clause body sits inside the Refresh 34 solicitation documents, which return binary data rather than readable text — the notice periods above are counsel's reading, not ours.

SO WHAT

If you hold MAS and anything you sell has a large language model in it — including AI features bolted onto document and productivity tools you have sold for years — you have until **February 10** to decide whether you can live with suspension-at-will and a 72-hour breach clock. That is a contract decision, not an IT one, and it needs your contracts lead and your general counsel in the same room this month. Separately, the 20-year cap removal is a quiet gift to incumbents worth re-reading your renewal strategy over.

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02 **Mandatory: Dec 7, 2026** CLOUD CYBER FEDRAMP

FedRAMP's vulnerability-reporting migration goes mandatory December 7, and the far end of it is a one-year ban

NTC-0017 · Nov 10, 2026 | Mandatory Dec 7, 2026 | Progress report Dec 17, 2:00 pm ET | Grace ends Mar 7, 2027 | Ban: one year

FedRAMP published Notice to Cloud Service Providers **NTC-0017** and a VDR/VER migration resources page on **November 10, 2026**. On **December 7, 2026**, the Vulnerability Detection and Response and Vulnerability Evaluation and Reporting rules become mandatory for every FedRAMP Certified cloud service offering. These dates supersede the earlier plan of June 1, 2027 for mandatory adoption and January 1, 2028 for the end of the grace period.

- "Fully migrated" means every MUST and MUST NOT rule fully implemented, and every SHOULD and SHOULD NOT rule fully implemented or otherwise addressed.
- A service planning to complete migration after **February 3, 2027** is placed into "FedRAMP Certified (In Remediation)." The grace period ends **March 7, 2027**, and an extension requires a FedRAMP-approved Corrective Action Plan *and* agreement to a FedRAMP-coordinated red team assessment.
- On **March 8, 2027**, a service with neither full migration nor an approved CAP loses its certification and is barred from FedRAMP for **one year**.
- Providers not fully migrated owe a per-rule Progress Report with corrective actions and target timelines — collected through an FY27 Q1 "Security Inbox Emergency Test" with a response deadline of **December 17, 2026 at 2:00 p.m. ET**. An unmonitored security inbox is now itself a compliance event.
- Agency-provided offerings are exempt from VDR/VER and fall under CISA Binding Operational Directive 26-04 instead.

SO WHAT

This is the hardest-edged revenue risk on the calendar: three weeks to a mandatory date, and a written path to losing certification and being locked out of the Marketplace for twelve months. The red team assessment that buys you an extension is in nobody's FY27 budget, so the cheap move is finishing the migration rather than planning to appeal. Two things are due before your December pipeline review — the per-rule progress report, and confirmation that a human being actually reads the inbox FedRAMP will send it to.

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03 **Comments close: Nov 20, 2026** ACQUISITION SMALL BUSINESS

SBA's size-standard rewrite closes for comment Friday — it moves "small" up to the 4- and 5-digit

level and deletes every exception

`FR doc 2026-17042` `91 FR 53741` `RIN 3245-AI67` `338 standards` `+114,541 firms`

SBA's proposed overhaul of its size standards (**FR doc 2026-17042**, 91 FR 53741, published August 20, 2026) closes for comment on **Friday, November 20, 2026**, following a September 24 extension. It is a proposed rule, not a final one — and it is the largest change to who counts as small in a generation.

- It abandons 6-digit NAICS size standards for **338 standards set at the 4- and 5-digit level** — 276 four-digit and 62 five-digit — and proposes to "remove all size standard exceptions," of which there were 18.
- It flips the default to headcount: revenue-based standards fall from **496 to 129**, and employee-based standards rise from **478 to 208**, wherever SBA has discretion.
- SBA "proposes not to reduce any industry size standard," so nothing moves down. The stated net effect is **+114,541 small firms**, from 6,344,967 to 6,459,508.

The per-industry threshold tables in the Federal Register document are embedded images that do not render as text, so this brief prints no specific new dollar or employee thresholds — including several circulating in secondary coverage that we could not tie to the readable preamble. The preamble also contradicts itself: it says 45 industries were held harmless, and elsewhere that "only 24 industry groups or industries result in a reduction in number of eligible firms." A second inconsistency runs 477 against 478 for employee-based industries. Separately, regulations.gov's docket metadata shows a November 21 comment end date; the Federal Register DATES text says November 20 and controls.

SO WHAT

Four days. If you graduated out of small, the 4- and 5-digit rollup may well put you back in. If you are a $20 million firm living comfortably in a set-aside niche, your competitive set may be about to include companies several times your size. The receipts-to-headcount flip is the part people will miss, because it changes affiliation and joint-venture arithmetic — exactly where mentor-protégé structures break. Run both effects against your top ten NAICS codes and file by Friday.

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04 **Lapse begins: Dec 12, 2026** APPROPRIATIONS CYBER MODERNIZATION

Eight authorities expire on December 11, all in the same statute — and the Senate has released seven of twelve bills with no markup

`P.L. 119-103` `Div. A § 106(3)` `TMF: Div. B § 2014` `7 of 12 bills released` `Lapse Dec 12`

This brief reported on November 9 that the cyber information-sharing law lapses December 11. Reading the enrolled text of **Public Law 119-103** (H.R. 6500, approved September 2, 2026) shows that date carries far more than one statute: continuing appropriations plus seven separate authorities all end on the same Friday.

- Division A § 106(3) runs funding through **December 11, 2026**; a lapse begins December 12. What is being continued is all twelve FY2026 appropriations Acts — which is dispositive that no FY2027 regular bill has been enacted.
- Division B ends the same day for the Cybersecurity Information Sharing Act of 2015 (§ 2011), the Federal Cybersecurity Enhancement Act of 2015 (§ 2012), joint task forces (§ 2013), the **Technology Modernization Fund and Board** (§ 2014), Defense Production Act authority (§ 2004), TSCA fee authority (§ 2005) and USPTO fee-setting (§ 2015).
- A TMF lapse bars **new** TMF awards; GSA can keep administering existing projects. TMF has invested roughly $1 billion across about 70 projects at 34 agencies.
- Division A § 157 bars issuing or finalizing the Uniform Guidance rewrite through December 11 and denies force and effect to one already issued. Division A § 102 bars DoD from using CR funds for new production starts, production-rate increases, or anything unfunded in FY2026, and bars new multiyear procurements using economic-order-quantity advance procurement.
- Senate Appropriations released FY2027 bill text for two bills on **November 10** and five more on **November 12** — seven of twelve, with no committee markup, no votes and no 302(b) suballocations announced. Among the five still unreleased: Defense, and Financial Services and General Government.

One genuine anomaly in the enrolled text: Division C § 3002 ends the surface transportation extension on December 11 while § 3201 runs Highway Trust Fund expenditure authority to December 12. Also, OMB Bulletin No. 27-01 (September 28, 2026) sets automatic pro-rata apportionment at 72/365, or 19.73 percent, for the initial CR period, with an additional 14/365 — 3.84 percent — per two-week extension.

SO WHAT

Four separate revenue mechanisms break on one date. If a TMF-funded task order is anywhere in your pipeline, it must be awarded before December 11 or the authority to award it is gone — check whether any of your work is TMF-funded rather than agency-appropriated, because the two look identical on an invoice. If your Q2 FY27 bookings assume a December award, carry a lapse case against it. And with Defense and FSGG text not even released, a second continuing resolution into 2027 is the base case for award timing, not the pessimistic one.

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05 Settled Nov 13, 2026 CYBER FALSE CLAIMS ACT

A second cyber False Claims Act settlement lands exactly ten days after the first — $5 million, from an HVAC supplier

$5,000,000 | Relator share $850,000 | Jan 2018 – Aug 2025 | NIST SP 800-171 | DOJ release 26-1360

DOJ announced on **Friday, November 13, 2026** that Johnson Controls, Inc. and two subsidiaries — Johnson Controls Fire Protection LP and Johnson Controls Security Solutions LLC — will pay **$5 million** to settle False Claims Act allegations about cybersecurity requirements on contracts *and subcontracts* with NASA and the Departments of Defense, Energy and Justice. The $13 million ILC Dover and ILC Astrospace settlement this brief covered on November 9 was announced November 3 — exactly ten days earlier.

- The allegations are documentary, not breach-based: that the companies failed to control access to protected information for want of sufficient information about their own information systems, failed to maintain a **System Security Plan** meeting contractual requirements, and failed to adequately document, fully develop or fully implement a **Plan of Action and Milestones**. The duty arose on contracts requiring NIST SP 800-171.
- Conduct period runs January 2018 through August 2025. Relator Kelly Vance receives **$850,000**; a second relator, David Thomas, is named with no stated share. The cases are No. 1:24-cv-2500 (N.D. Ga.) and No. 1:26-cv-448 (D.D.C.). The claims are allegations only; there was no determination of liability.
- CMMC Phase 2 remains suspended under the DoD CIO's July 13, 2026 action, with no announced restart date. Its original November 10, 2026 start date passed this month with no effect.

SO WHAT

Two settlements in ten days is a cadence, not an outlier — and the second is a building-systems supplier, much of it in subcontractor positions nobody ever scoped for 800-171. Suspending CMMC did not suspend the False Claims Act. The SSP and the POA&M *are* the representations, so a plan with a stale system inventory, or open items past their own milestone dates, is the exhibit. Price the refresh across your facilities and non-IT lines now; it is cheaper than an $850,000 relator check and far cheaper than $5 million.

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06 Effective: Jan 15, 2027 ACQUISITION CONSTRUCTION

The surety bond rule published today moves your bonding line onto the government's fiscal year — and the eligibility caps out of the CFR

FR doc 2026-23225 | 91 FR 73436 | RIN 3245-AI06 | 13 CFR part 115 | Final rule

SBA published a **final rule**, "Surety Bond Guarantee Program: Streamlining and Modernizing," **today, November 16, 2026** (FR doc 2026-23225, 91 FR 73436), effective **January 15, 2027**. Most of it is genuinely streamlining. Three changes are not, and they are the reason to read the rule rather than its title.

- **§ 115.33(b)(1)** shortens a bonding line's term to "not to exceed the fiscal year of approval subject to renewal in writing." It was one year.
- **§ 115.12(f)** makes the sale of an entire SBA-partnered business division without SBA's prior written approval **void** SBA's guarantee and claims reimbursement agreements as to that division, unless the buyer is already an SBA partner.
- The Quick Bond contract-size parameters and the Preferred Surety Bond threshold move out of the regulation and into SBA's standard operating procedures, with future changes announced by Policy Notice — that is, outside notice and comment.
- The streamlining, for the record: emailed application packages, a master certification in a new Prior Approval Surety Participation Agreement in place of per-application signatures, and removal of the obsolete SBA Form 912 reference. Fee amounts and guarantee percentages are unchanged. The Principal's guarantee fee is now due within 60 calendar days after SBA approves the Surety Bond Guarantee Agreement — for Preferred Surety Bond sureties, 60 days from submission — rather than with the application.

The preceding proposed rule published November 19, 2024 at 89 FR 91284; SBA received 18 comments and treated 15 as substantive.

SO WHAT

If you are a bonded federal construction contractor, your bonding line now renews on the government's fiscal year instead of twelve months from approval — re-sequence bonding renewal against your bid calendar before January 15, or you will find the mismatch in the middle of a proposal. If you are buying or selling a division, § 115.12(f) is a new diligence item that can void a guarantee you were counting on transferring. And the caps you plan around are no longer in the CFR, so the thing to track from January is SBA Policy Notices, not the Federal Register.

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07 Legislative text ≈ Nov 28, 2026 AI POLICY

The Pentagon's AI office is now the Super Intelligence Office — and the only AI item in the Federal Register this week never says "AI"

EO 14434 · 91 FR 63129 | Signed Sept 29, 2026 | CDAO → SIO Nov 13 | GenAI.mil → SI.mil | 15 U.S.C. 9401(3)

On **Friday, November 13, 2026**, the Department of War redesignated the Chief Digital and Artificial Intelligence Office as the **Super Intelligence Office** and renamed its GenAI.mil platform SI.mil, effective immediately. No new authorities, no budget change and no reorganization were announced with it. The rename implements **Executive Order 14434**, "Inaugurating the Era of Super Intelligence" (signed September 29, 2026; 91 FR 63129), whose § 2(a) directs agencies to use "Super Intelligence" and "SI" in place of "Artificial Intelligence" and "AI" in correspondence, public communications, websites, reports and policy documents.

- The order is almost entirely terminological. Section 3(a) defines SI as exactly the technologies covered by "artificial intelligence" at 15 U.S.C. 9401(3), until superseded by presidential action or an Act of Congress. Section 2(b) expressly says existing regulations, prior Presidential actions, **contracts**, grants and historical documents need not be altered. There are no procurement or acquisition provisions, and no new funding beyond standard general-provisions language.
- The operative forward action is § 3(b): within 60 days — **about November 28, 2026**, computed, because the order states days rather than a date — the Assistant to the President for Science and Technology must submit proposed legislative language establishing a federal statutory definition of "Super Intelligence," together with an assessment of its relationship to the existing statutory definition and conforming amendments.
- The practical consequence is a blind spot. A Federal Register phrase search for "artificial intelligence" across November 9–16 returns three documents, none of them about AI. The one AI-governance document published in the window — HUD's reorganization notice, establishing "a division for data and super intelligence (SI) under the Chief Technology Officer" — never uses the phrase at all.
- Agencies that have retitled their Chief AI Officer as Chief SI Officer, per a roster dated October 19–20, are Treasury, HHS (acting), NASA and FTC. VA and State still list *acting* Chief Artificial Intelligence Officers, and State's own Foreign Affairs Manual still reads CAIO.

war.gov refuses automated retrieval, so the Department of War release itself was not read here; the rename rests on two independent secondary accounts that agree on the date and the substance.

SO WHAT

Two things to do, and one not to buy. Rekey your market monitoring to “super intelligence” and “SI” — if it still watches only for “artificial intelligence” it is going blind on federal sources. Flip your capability briefs, past-performance library and website to the vocabulary your evaluators now use, because a Section L compliance matrix is a bad place to discover the change. What not to buy: § 2(b) grandfathers existing contracts, so nothing needs re-papering, and anyone selling you EO 14434 contract remediation is selling air. What to watch is the statutory definition due around November 28 — future clause scope, data rights and export-control triggers will key off whatever it says.

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08 **RFI due: Nov 30, 2026** CYBER MODERNIZATION DISA

DISA's $500M portal recompete demands CMMC Level 2 at award — while the program that issues it is suspended

`Up to $500M / 10 yrs` `RFI due Nov 30, 2026` `CMMC L2 at award` `SPRS score required` `Incumbent TO ≈ $59M`

DISA posted a sources sought notice for **ADAPTS** (All-Domain Adaptive Platforms and Technologies Support) during the week of November 9, seeking a lead systems integrator to operate and sustain its Connect portal. The value is up to **$500 million over ten years** — a five-year base plus one five-year option. Responses are due **November 30, 2026**.

- The gating compliance term: offerors must hold **CMMC Level 2 at award**, submit their SPRS score, and provide a remediation milestone plan if not fully compliant. The notice also asks whether respondents have completed a Joint Surveillance Voluntary Assessment or a C3PAO assessment, and sets no minimum SPRS score.
- DISA wants demonstrated ServiceNow, Salesforce, Workday and Palantir expertise, coordination across at least three distinct platform ecosystems, plus subcontractor management, sustained operations, continuous software integration and platform-as-a-service engineering.
- The incumbent, Business Computers Management Consulting Group, holds a 2023 five-year SETI task order sunsetting April 2028 with roughly $59 million obligated to date per GovTribe — so this is a tenfold expansion of scope into a lead-integrator franchise.

`sam.gov's website refuses automated retrieval and no SAM.gov API key was available this week, so the notice itself was not read here. Its terms are as reported by Washington Technology on November 12, which dates the posting to “Tuesday” — November 10, computed rather than published.`

SO WHAT

Read this next to item 05. The program that issues CMMC certifications is suspended with no restart date, and DISA is writing Level 2 at award into a $500 million solicitation regardless — which means your SPRS score and your remediation plan, not a certificate, are what you will actually be measured on. If your assessment is not done, November 30 is the moment to say so in writing rather than the moment to go quiet. The real discriminator is the platform spread: ServiceNow plus Salesforce plus Palantir in a single team is something almost nobody has organically, so the teaming calls are this week's work, not December's.

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09 **Promos lapse Nov 2026 – Mar 2027** AI CLOUD PRICING

The dollar-a-seat AI honeymoon is expiring on a published schedule, and GAO is warning about what replaces it

`Gemini $0.47 → Nov 2026` `Claude $1 → Oct 2026` `Perplexity $0.25 → Mar 2027` `Grok $0.42 → Mar 2027` `ChatGPT 50% → Dec 2028`

GSA's “Buy SI” page, last updated **November 4, 2026**, lists the OneGov AI promotional prices alongside the months they end. Google's Gemini for Government at **$0.47** runs “until Nov 2026.” Anthropic's Claude Enterprise at **$1** is listed as running until October 2026 — the page still displays the offer. Perplexity's Enterprise Pro for Government at **$0.25** and xAI's Grok for Government Teams at **$0.42** both run to March 2027. OpenAI's ChatGPT Enterprise token discount of 50 percent runs to December 2028. GSA gives months, never days.

- At GovCIO Media's AI Summit on **November 6, 2026**, GAO Chief Scientist Sterling Thomas said token-based pricing can become tremendously expensive at scale, and described vendors moving from unlimited use to daily caps — "get this many tokens a day and that's it" — adding that this "is becoming a reality within the federal government."
- Thomas: "You're going to see a significant slowdown of use of AI until we deal with that policy." The eight-to-ten-month horizon attached to that slowdown in coverage is the reporter's framing of his remarks, not his words.
- GAO's mitigations, as reported: avoid consumption-only contracts in favor of firm-fixed-price tied to outcomes, self-host open-weight models, reset agents that hoard context, and finish AI use-case inventories.

SO WHAT

This cuts both ways on the same P&L. Gemini's federal promotion expires this month and two more expire in March, so agencies are about to re-price AI consumption with no OneGov floor underneath them — the opening to sell firm-fixed-price, outcome-priced and self-hosted alternatives while the budget pain is fresh. It is also your exposure: any task order bid on a pass-through token assumption set during the dollar-a-seat era is about to be repriced by somebody else's rate card. Find every uncapped consumption line in your backlog before December and put a cap or an index on it.

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10 **Comments close: Dec 7, 2026** QUANTUM EXPORT CONTROL

Treasury's outbound-investment rule puts quantum entirely in the prohibited bucket — there is no notify-and-proceed path

FR doc 2026-21786 | 91 FR 67396 | RIN 1505-AC94 | 31 CFR 850, 851 | Docket TREAS-DO-2026-0595

Treasury's proposed Outbound Investment Security Program regulations (**FR doc 2026-21786**, 91 FR 67396, published October 26, 2026) implement Subtitle C of the Comprehensive Outbound Investment National Security Act, Title VIII of the Defense Production Act. The rule sorts covered technology into "notifiable" and "prohibited." For quantum, it chooses only one of those. Comments are due **December 7, 2026**.

- The preamble states the rule "would not include any quantum information technologies within the definition of a notifiable technology" and "would include quantum information technologies within the definition of prohibited technology." Treasury is exercising a carve-out the statute permits, not contradicting it.
- Prohibited scope covers developing a quantum computer or producing critical components needed to produce or operate one — the preamble names a dilution refrigerator and a two-stage pulse tube cryocooler as examples; software for designing, simulating, testing, controlling, identifying, implementing, costing or optimizing a quantum computer and its algorithms; quantum sensing platforms intended for any military, government intelligence or mass-surveillance end use; and certain quantum networks and secure-communications systems.

The codified definitions sit at § 851.218 (Notifiable Technology) and § 851.226 (Prohibited Technology). This brief read the preamble's characterization of those sections, not the regulatory text itself, which it could not reach.

SO WHAT

If you have a quantum arm, a quantum-adjacent sensing or secure-communications line, or an investment vehicle touching foreign quantum firms: there is no filing that makes the transaction permissible. It is a flat bar, and the diligence duty attaches to deal flow rather than products — which puts it on corporate development, not program management. Three weeks remain to argue scope, and two provisions are worth the legal spend: "critical components," and the software clause, which as drafted could sweep in design-automation and control-plane tooling that has nothing to do with building a computer.

DATED ACTIONS

Every deadline above, in order. Red binds or lapses.

DATE	WHAT HAPPENS	ITEM
Nov 18, 2026	OPM's administrative leave final rule takes effect (91 FR 65924; RIN 3206-AP07; 5 CFR 351, 630, 715). § 351.806(a) now reads “under ordinary circumstances” rather than “when possible,” and new (b) *permits but does not require* administrative leave during a RIF notice period. A 12-week-per-instance cap on realignment leave appears in the preamble's policy template, not the codified text.	—
Nov 19, 2026	Senate Homeland Security and Governmental Affairs Committee hears 13 nominees, including an unnamed nominee to be **Comptroller General**. The post has been vacant since December 2025. Roll Call reports the expected nominee is Eric Ueland, OMB's Deputy Director for Management — the same official who on November 9 put the consolidation target at 229 non-defense procurement systems and more than 117 HR systems.	—
Nov 20, 2026	SBA size-standard comments close.	03
Nov 28, 2026	EO 14434 § 3(b) legislative language on a statutory “Super Intelligence” definition is due to the President. Date computed from the September 29 signing; the order states days.	07
Nov 30, 2026	DISA ADAPTS sources-sought responses due.	08
Dec 4, 2026	Air Force white papers due on off-the-shelf autonomy for cislunar spacecraft. The notice asks for software needing *no* development and little training, fieldable within 90 days of an Authority to Proceed and fully qualified within about 18 months — and states the government is not interested in investing in a cislunar SI research and development program. No dollar value or solicitation number was published.	—
Dec 7, 2026	FedRAMP VDR/VER becomes mandatory; Treasury outbound-investment comments close.	02, 10
Dec 11, 2026	Continuing appropriations and seven authorities expire, including the Technology Modernization Fund's award authority and the two 2015 cyber statutes. A lapse begins December 12.	04
Dec 17, 2026	FedRAMP VDR/VER Progress Reports due, 2:00 p.m. ET, via the FY27 Q1 Security Inbox Emergency Test.	02
Dec 18, 2026	Comments close on NIST SP 2400-102e2026 initial public draft (“Adversarial Machine Learning: A Taxonomy and Terminology of Attacks and Mitigations,” released November 9) and on the planned revision of SP 800-108r1.	—
Dec 19, 2026	Under EO 14412 § 6(c), the FAR Council's proposed rule requiring covered contractors to meet NIST FIPS including post-quantum algorithms by December 31, 2030 is due. Date computed from the June 22 signing. Worth noting against the record: the FAR Council has published nothing in the Federal Register since October 2.	—
Jan 15, 2027	SBA's Surety Bond Guarantee final rule takes effect.	06
Jan 27 – Apr 28, 2027	Deadline for civilian agencies to remove Acronis products under the DHS FASCSA exclusion and removal order — **unresolved**, three months wide. See “Where this is uncertain.”	—
Jan 31, 2027	NASA SEWP V stops accepting new orders. SEWP V and SEWP VI have run concurrently since November 1, 2026; after January 31 only order modifications continue on SEWP V, for five further years. SEWP VI carries a ten-year period of performance, and NASA recommends using it “unless there is a specific reason to use SEWP V.” NASA publishes no SEWP VI awardee count and the trade-press figures conflict, so this brief prints none.	—
Feb 8, 2027	HUD's reorganization begins, approximately 90 days after its November 10 notice (91 FR 72551; FR doc 2026-22838). It establishes a division for data and super intelligence under the Chief Technology Officer. HUD states staffing is “almost 35 percent below historic staffing levels” and that “immediate, quantifiable	—

DATE	WHAT HAPPENS	ITEM
	cost savings are not expected to be realized from anything in this reorganization plan." It proposes no office closures or staff relocations, with a footnote referencing a separately noticed Kansas City move.	
Feb 10, 2027	MAS Refresh 34 mass-modification acceptance deadline, 90 days from the November 12 issuance.	01

WHERE THIS IS UNCERTAIN

Flagged because acting on the wrong version is expensive.

The Acronis removal deadline is not public

DHS's FASCSA exclusion and removal order covering Acronis products was noticed at FR doc **2026-22215**, published October 30, 2026. The notice states no order number, no effective date and no removal deadline — the strings "180" and "removal deadline" do not appear in it — and the signed order sits in the Federal Register appendix as three scanned images that do not render as text. Docket DHS-2026-0694 on regulations.gov holds exactly one document and *no attachments*, so the order is not reachable there either. Counsel reporting says 180 days from issuance; measured from a July 31, 2026 signing date that itself comes from counsel rather than the notice, that is roughly **January 27, 2027**, and measured from publication, roughly **April 28, 2027**. Nobody has resolved the three-month spread. If you resell, embed or manage backup and disaster recovery for civilian agencies, plan capital against the earlier date and get the order in writing before you commit it.

SBA's new size thresholds are literally unreadable

The per-industry tables in the size-standard proposed rule are embedded images rather than text. Several specific new thresholds are circulating in secondary coverage; one attributes a $47 million receipts figure to software publishers, and the only $47 million figures in the readable preamble attach to waste collection and to drycleaning and laundry. We are printing none of them, and we would treat any roundup that does with suspicion until someone reads the tables by eye.

The AI clause's text, and its three notice periods

GSAR 552.239-7001's operative text now lives inside the Refresh 34 solicitation documents, which return binary data rather than readable text. The 72-hour, five-business-day and seven-calendar-day periods in item 01 are counsel's reading of the final language, and they attach to *three different triggers* — they are not three competing figures for one obligation, and some coverage has presented them that way. Confirm against the clause itself before you brief a deal team on any one of them.

Protest coverage here is structurally incomplete

There is still no systematic way to sweep GAO's protest docket from this environment, and gao.gov rate-limits hard enough that decisions must be fetched one at a time. We did read **Castro & Company, B-424145.2** (November 9): GAO sustained, holding that DOT unreasonably downgraded Castro for omitting surge-staff résumés the solicitation never required, and wrongly concluded it had submitted no single fixed price when its volume stated a total firm fixed price of $649,400. GAO then declined to disturb Guidehouse's award — performance had run and been extended to March 25, 2027 — and recommended only proposal preparation and protest costs. The lesson is schedule rather than law: you can win every merit ground and recover nothing but B&P. Other decisions issued in the window went unread.

What this brief could not see

Checked this week rather than copied from last week. Refusing automated retrieval: **cisa.gov** (so CISA's enhanced incident-reporting form, announced the week of November 9, is known only through press), **war.gov** (the CDAO-to-SIO release itself — item 07 rests on secondary coverage), **acq.osd.mil**, **sam.gov**'s website, **congress.gov** and **breakingdefense.com**. federalnewsnetwork.com was intermittent again. **No SAM.gov API key was available**: the file that normally holds it is missing from the GovCon News folder, so item 08 and the December 4 Air Force notice rest on trade-press readings rather than the notices themselves, and a GSA post-quantum sources-sought notice was dropped outright for want of any corroboration. Scanned images defeated us twice — the Acronis order's appendix and SBA's size-standard tables. Senate Appropriations' bill-text download endpoints returned nothing, so committee figures for VA electronic health record modernization were dropped. Three contract actions were dropped for failing verification inside the window: an FAA legacy-application modernization award, a TSA screening-equipment deployment selection, and every figure attached to the November 13 FAA ground stop. Finally, a caution on one of our own habits: acquisition.gov's "requesting comments" page still displays four FAR cases as open with a footer dated January 2025 — all four closed October 19, 2026, so do not read that page as a live list.

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Compiled November 16, 2026 for Adana Technologies. Verify dated items before acting — several are typically unresolved at publication. This briefing is informational and is not legal, investment or contracting advice.