GOVCON TECH WEEKLY · NO. 7 · NOVEMBER 9, 2026

Paused, Not Pardoned

The suspensions on paper are not suspensions in practice. A defense contractor paid **$13 million** on Tuesday to settle allegations it failed NIST SP 800-171 while CMMC Phase 2 remains suspended with no restart date — the controls are unenforced as a certification and fully enforced as a False Claims Act theory. Commerce extended a stay on export controls reaching affiliates of listed entities, which does not remove the cliff but moves it to **January 10**. GSA's Schedule refresh carrying its new AI clause is still unissued, and the 90-day mass-modification clock only starts when it lands. Against all that, two dates do not wait: the Army's $50 billion MAPS vehicle takes small-business proposals **Thursday**, now under three protests including one aimed squarely at its CMMC terms, and on **Sunday** an SBA benchmark starts deleting SBIR eligibility outright for firms that have won too much of it. Congress returned from recess today with nothing scheduled on appropriations or the defense bill, and the December 11 lapse has no vehicle moving toward it.

6	3	Dec 11	Jan 10	$13M
DAYS	DAYS	TRIPLE LAPSE	EXPORT CLIFF	CYBER FCA
SBA's SBIR/STTR commercialization benchmark binds November 15	Army MAPS small-business proposals due November 12	The CR, the TMF's authorization and CISA 2015 expire on one date	BIS stay lapses; affiliate end-user controls take effect	Settled under 800-171 while CMMC Phase 2 stays suspended

CHANGED SINCE NO. 6

- **FedRAMP's 2026 Consolidated Rules now have a worked precedent.** No. 6 reported the rules going mandatory on January 1. FedRAMP's blog post of November 2 says the first fully CR26-compliant 20x Class C certification was granted on October 29 — the first package to clear the new regime rather than a pilot. Item 07.
- **The $1 Claude expiry reported in No. 6 had a successor agreement four days before it.** GSA announced a consumption-based OneGov pricing agreement with Anthropic on **October 27**, before the $1-per-user agreement lapsed on October 31. No. 6 carried the expiry and the HHS sole-source award without that agreement.
- **Nothing moved on the items whose clocks No. 6 and No. 5 flagged.** CMMC Phase 2 is still suspended with no restart date. Appropriations stand at three of twelve bills passed by the House and none by the Senate, unchanged through the recess. No OMB memorandum issued in the window.

01 6 days AI ACQUISITION

SBA's new SBIR benchmark starts deleting eligibility on Sunday — and the trigger is having won too much

`Effective Nov 15, 2026` `91 FR 56536` `More than 25 Phase II awards` `33% FY2027 / 50% FY2028` `1-year ineligibility`

SBA's updated minimum performance standard for commercialization takes effect **Sunday, November 15, 2026**, replacing the benchmark in place since 2013. It applies to any small business that has received **more than 25 Phase II awards** — SBIR and STTR combined, across all participating agencies — in the five most recently completed fiscal years, excluding the current one. The test is the share of the firm's total revenue *not* derived from Phase I or Phase II award funding, measured over the three most recent completed fiscal years. The threshold is **at least 33 percent for the FY2027 assessment and at least 50 percent for FY2028 and every year after**.

- A firm that misses the threshold "is not eligible to submit a proposal for a new Phase I or Direct-to-Phase-II award from any participating agency" for **one year** from the date of the determination. It is a binary eligibility loss, not a scoring penalty, and it

reaches every agency at once.

- Phase III awards under 15 U.S.C. 638(r) count as non-SBIR revenue, which is the main lever a firm has to move the ratio in the direction it needs.
- The $4,000,000 and $1,200,000 figures in the notice are an illustrative worked example producing a 30 percent ratio — they are **not** dollar thresholds. There are no dollar thresholds in the standard.

Verified against the govinfo text of the notice (FR Doc. 2026-17987, 91 FR 56536, published September 2, 2026), not against secondary coverage. Comments on the notice closed October 31, 2026; the effective date is not open to comment. The standard also takes effect "when published on www.sbir.gov."

SO WHAT

If you are an SBIR-heavy firm above the 25-award line, compute the three-year ratio this week, because the determination uses closed fiscal years you can no longer change. The firms most exposed are the successful ones — a decade of Phase II wins and a thin commercial book is the failing profile. Any FY2027 capture plan built on new Phase I or Direct-to-Phase-II starts needs a non-SBIR revenue contingency behind it, and the 50 percent step in FY2028 gives a firm that squeaks past 33 percent twelve months to find the next seventeen points. If you are teaming with an SBIR-heavy partner for a 2027 start, their eligibility is now a diligence item.

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02 Settled Nov 3 CYBER ACQUISITION

A $13 million cyber False Claims Act settlement lands while CMMC Phase 2 is still suspended

$13,000,000 NIST SP 800-171 and 800-53 Relator share $2.35M No. 25-cv-70 (D. Del.)

DOJ announced on **Tuesday, November 3** that ILC Dover LP and ILC Astrospace LLC agreed to pay **$13,000,000** to resolve False Claims Act allegations that they falsely certified cybersecurity compliance on Army, Missile Defense Agency and NASA contracts. The alleged conduct runs from **January 2018 to October 2024**. The case came in as a qui tam suit by ILC's own former Director of Cybersecurity, Philip Root, who receives a **$2.35 million** share. These are allegations; there was no determination of liability.

- The theory is unusually granular, and every element of it is a document a contracting officer can request today: failure to develop, document and update a **system security plan** for each covered system; failure to fully implement **NIST SP 800-171 and 800-53** controls; failure to develop and implement plans of action and milestones; and, under the **NIST SP 800-171 DoD Assessment Methodology**, ILC Astrospace submitting no current assessment at all while ILC Dover's was not current.
- It also reaches a subcontracted cloud provider: DOJ alleges CUI was stored with a third party that did not meet security requirements **equivalent to the FedRAMP Moderate baseline**, and did not meet DoD requirements for incident reporting, malware submission, media preservation, forensic access and damage assessment, from February 2023 to October 2024.
- The timing is the point. **CMMC Phase 2 remains suspended with no restart date** — as this brief reported in No. 5 on October 26 and No. 6 on November 2 — and the reform report remains unreleased. The certification regime is paused. The underlying obligations are being enforced at eight figures.

Verified against the DOJ release of November 3, 2026. One correction to secondary coverage: the release does **not** mention the Supplier Performance Risk System or SPRS, and makes no allegation about a "score" or score currency — it cites the DoD Assessment Methodology and the currency of the assessment itself. Separately on November 3, DOJ announced a **$29.5 million** Lockheed Martin resolution ($22 million to the United States under the FCA plus roughly $7.5 million under an EEOC agreement to over 1,000 employees, relator share $4.4 million, No. 4:25-cv-00769-P); that release cites Title VII and Executive Order 14151 and, contrary to several reports, names **no FAR clause at all**.

SO WHAT

Treat the pause as a pause in certification only. What settled here is the gap between what your SSP says and what your systems do — and the relator was the executive closest to that gap. Three things before December: confirm every covered system has a current SSP and a live POA&M whose dates have not quietly passed; confirm your DoD Assessment Methodology assessment is current, because "stale" and "absent" were both pleaded here; and look one tier down at where CUI actually sits, because a cloud subcontractor short of FedRAMP Moderate equivalence became the prime's liability in this complaint.

03 3 days CYBER ACQUISITION

The Army's $50B MAPS takes proposals Thursday under three fresh protests — one aimed at its CMMC terms

`$50B ceiling` `Proposals due Nov 12, 2026` `3 new GAO protests` `Decisions ~Feb 10-11, 2027`

Proposals on the small-business portion of the Army's **Marketplace for the Acquisition of Professional Services** — solicitation W15P7T-26-R-A006, a ten-year vehicle with a **$50 billion** ceiling — are due **Thursday, November 12**, the date set by Amendment 0011 on October 13. In the days before that deadline, three new protests landed at GAO. **AHS Business Services** filed November 2 and **Mindboard** filed November 3, both arguing that small-business teams should be able to compete for the commercial-sector vendor category and not only the small-business reserve. **Intelligence Consulting Enterprise Solutions** challenges the solicitation's **CMMC requirements**.

- This brief reported the small-business reopening and the November 12 date in **No. 3 on October 19**. What is new is the protest posture — and the CMMC ground in particular, which asks GAO to rule on a certification requirement in a solicitation while the certification program's own Phase 2 rollout is suspended.
- GAO's statutory clock is 100 days from filing, which puts decisions around **February 10-11, 2027** for the November 2-3 filings. Trade coverage reports "early February"; GAO does not publish a decision date in advance and does not publish pending dockets at all.
- A protest filed before the proposal deadline does not stop the deadline. Offerors have to submit Thursday and litigate the terms afterward, which is the familiar bind: bid-and-proposal spend committed against terms that may not survive.

The protesters' names and the CMMC ground are corroborated by two independent outlets (Washington Technology, November 5; Federal News Network, November 6). The filing dates are Federal News Network's. Docket numbers reported by a protest-tracking site as B-424433.26, .27 and .28 could not be confirmed against GAO, which publishes no pending-protest docket. The November 12 due date comes from a law-firm alert describing Amendment 0011; sam.gov refuses automated retrieval and no API key was available this week, so **we could not read the solicitation**. One outlet reports the Army preparing a further amendment. Confirm the date and time on SAM.gov before relying on either.

SO WHAT

If you are bidding Thursday, nothing in the protest docket changes what you owe on Thursday — but check SAM.gov for an amendment before you submit, because a $50 billion vehicle under three protests three days out is exactly the fact pattern that produces one. Read the CMMC ground as a live question about every services vehicle carrying a CMMC flow-down: a sustain would not just reopen MAPS, it would hand offerors on every suspended-program solicitation a template. Do not assume a MAPS award calendar that clears before spring.

04 Decided Nov 3 ACQUISITION AI

The Court of Federal Claims says Other Transaction prototype competitions can be protested

`Blue Water Autonomy, Inc. v. United States` `No. 1:26-cv-00936` `MTD denied Oct 29` `Merits Nov 3, 2026` `28 U.S.C. 1491(b)(1)`

In **Blue Water Autonomy, Inc. v. United States**, No. 1:26-cv-00936 (consolidated with No. 26-944), the Court of Federal Claims denied the government's motion to dismiss on **October 29**, holding that its bid-protest jurisdiction under **28 U.S.C. § 1491(b)(1)** reaches a Navy Medium Unmanned Surface Vessel prototype solicitation issued under **Other Transaction Authority**. The court reached the merits on **Tuesday, November 3**: one plaintiff prevailed on a disparate-treatment claim, having been downgraded for elements the court found were accepted in the awardee's proposal; the other lost, its challenge to an ambiguous term held untimely.

- OTAs have been treated for years as a jurisdictional blackout — fast, flexible, and effectively unreviewable. That assumption is what the October 29 ruling removes, and the November 3 merits decision shows the remedy is not theoretical.

- The timeliness split in the same opinion is the warning attached to the opportunity: the plaintiff that lost lost on a *Blue & Gold*-style waiver for not challenging an ambiguous solicitation term before award. A protest right you can only exercise on time is a diary obligation, not a safety net.
- The companion Court of Federal Claims decision in **Alpha Omega Integration, LLC v. United States**, No. 26-1195 C, decided **November 4**, held that an RFQ's bar on accessing a government AWS environment after a stated date was clear and material, and refused to supplement the record with evidence that the late access was innocent — directly relevant to anyone touching a government cloud tenancy mid-competition.

The case, the parties and the jurisdictional holding are corroborated by several independent law-firm analyses published in November and by a federal docket service; **we did not open the opinion text**, so the merits reasoning and the Alpha Omega holding are secondary. Do not confuse this case with *Blue Water Thinking, LLC v. United States*, No. 1:24-cv-01641, an unrelated 2024 matter with a similar name. The plaintiffs here sued over the Navy's MUSV rejection in July 2026.

SO WHAT

For anyone selling prototypes, autonomy or AI into DoD through an OTA, two things changed at once. You gained a forum — an OTA award lost on a flawed evaluation is now reviewable, which is worth real money to a company whose federal book is entirely non-FAR. You also gained an obligation: the waiver rule means solicitation terms you dislike must be challenged **before** award, so OTA solicitations now need the front-end legal read a FAR Part 15 RFP gets. And if you are the OTA awardee, the cheap assumption that an OTA closes quietly is gone.

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05 Published today SUPPLY CHAIN AI

Commerce extends the Affiliates Rule stay — which moves the export-control cliff to January 10, not away

91 FR 70789 | Effective on publication | Stay now lapses Jan 10, 2027 | RIN 0694-AK34 | No amendatory text

In the Federal Register **today**, Commerce's Bureau of Industry and Security extended the stay on its "Affiliates Rule" — the interim final rule that would extend Entity List end-user controls to **majority-owned affiliates of listed entities**. The stay had been set to lapse today; it now lapses **January 10, 2027**. The document contains **no amendatory instructions**: it changes no CFR text, and its entire operative effect is to push the date. BIS declined to act on comments received on the underlying rule, reserving them for future rulemaking.

- Read that as scheduling, not relief. On January 10 the expansion springs into effect unless BIS acts again, and the agency has now twice chosen to extend rather than withdraw or finalize — which tells you the expansion is still live policy.
- The exposure is diligence, not a vendor list. If a supplier anywhere in a compute, semiconductor or electronics chain is majority-owned by an Entity List party, the control attaches to the affiliate without the affiliate ever being listed by name. That is a question your existing screening against the Entity List does not answer.
- The rule's own text is internally inconsistent about the underlying interim final rule's history: the DATES paragraph gives publication as September 30, 2025 (90 FR 47201) and the stay as November 10, 2025 (90 FR 50857), while the Background section of the same document says September 20 and November 12. One is wrong. We cite the DATES paragraph and do not treat the publication date as settled.

Verified against the govinfo PDF of FR Doc. 2026-22793, 91 FR 70789-70790, published November 9, 2026, effective on publication. No comment period.

SO WHAT

Sixty-two days is enough to do the ownership mapping and not enough to renegotiate a supply chain, so the work is the mapping. Pull the bill of materials for anything with GPUs, accelerators or specialized electronics headed to a federal customer and establish majority ownership one and two tiers down — not whether the supplier is listed, but who owns it. Where the answer is a listed parent, identify the substitution before January 10, because a delivery schedule that runs past that date carries an export-control assumption nobody has priced.

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06 Anticipated Nov CLOUD AI ACQUISITION

GSA's Schedule refresh carrying the new AI clause still has not issued — and the 90-day clock starts when it does

`MAS Refresh #34` `GSAR 552.239-7001` `41 GSAR provisions deleted` `90-day mass mod` `Not issued as of Nov 9`

GSA's advance "Significant Changes" attachment for **Multiple Award Schedule Refresh #34** says only that GSA "anticipates Refresh #34 will occur in **November 2026**." The document is undated, states no effective date, and **as of today the refresh has not issued**. When it does, current contract holders must accept the mass modification **within 90 days**.

- The refresh carries the new artificial-intelligence clause **GSAR 552.239-7001** into Part 539, alongside a Part 538 overhaul that removes the 20-year contract-duration limit at 552.238-116, **deletes 41 GSAR provisions and clauses** plus eight FAS FSS clauses, and adds 552.238-190 through -194.
- It also makes the **FSS Domestic End Product certification at 552.238-130** available on an optional basis — unenforced for now, pending OMB information-collection clearance. Comments on the collection behind that certification close **November 20**.
- For IT holders specifically: the attachment states that **SIN 54151HACS phases out the voluntary Incident Response subgroup at the end of FY2027**, with contractors able to request the IHEM subgroup instead. That is a two-year runway on a subgroup some firms market from directly.
- Separately in today's Federal Register, GSA reopened the information collection behind its requirement that contractors accessing GSA information systems comply with GSA IT security policy — CIO 09-48 and CIO 12-2018. Comments close **January 8, 2027**. GSA states there are **no program changes** on account of the Revolutionary GSAR Overhaul and will reassess after that rulemaking concludes.

The refresh contents are verified against GSA's own Significant Changes attachment on buy.gsa.gov, which is undated and expressly anticipatory — contents can change before issuance. The GSAR IT-security notice is FR Doc. 2026-22731, 91 FR 70884, published November 9, 2026, OMB Control No. 3090-0300, burden stated as 35 respondents and 350 hours. Note a defect in that notice: its submission instructions tell commenters to cite **OMB Control No. 3090-0163** while the collection is **3090-0300**. A comment filed against the wrong number may be misrouted; cite both.

SO WHAT

The 90-day mass-mod clock has not started, which makes this the cheap week to do the work rather than the expensive one. Read the AI clause now and decide whether anything you deliver on Schedule touches a model in a way the clause reaches, because that determines whether acceptance is administrative or a contract change. Check your clause list against the 41 deletions — a compliance matrix citing a deleted clause gets reconciled under deadline in January. And if you hold 54151HACS and sell incident response as a named capability, the FY2027 subgroup phase-out is a go-to-market question, not a paperwork one.

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07 Granted Oct 29 CLOUD AI

FedRAMP's first fully CR26-compliant Class C certification clears — the new regime now has a

worked example

`Posted Nov 2, 2026` `First full CR26 Class C` `First Class A Aug 25, 2026` `26 pilot certifications`

FedRAMP posted on **November 2** that it granted the first **FedRAMP 20x Class C certification** fully compliant with the **Consolidated Rules for 2026** on **October 29, 2026**. Class C is the tier most closely aligned with the legacy "Moderate" baseline. The post also gives the program's own running numbers: the first Class A certification on August 25, 2026, **26** companies holding limited pilot certifications, and "nearly a hundred" in Initial Implementation, with the pipeline opened in August 2026 and CR26 published in June 2026.

- This brief reported in No. 6 that the 2026 rules go mandatory on **January 1**. What changed is that a package has now actually cleared the new path rather than a pilot — which converts the January deadline from a rule with no precedent into a rule with one.
- The FedRAMP Marketplace listing **FR2604643715** identifies the offering as Perplexity AI's, Class C, Type 20x, and reads "FedRAMP Certified as of 10/28/2026" — a day earlier than the blog's own date.
- Note what the FedRAMP post does *not* say. It does not name the company, gives no Marketplace ID, does not state that Class C "replaces" Moderate or Class B "replaces" Low, and says nothing about GSA OneGov pricing.

The grant, the October 29 date and the program counts are from FedRAMP's blog post of November 2. The company identification and the Marketplace date come from the Marketplace listing and trade coverage; the two product descriptions in circulation differ ("Enterprise Pro for Government" per the vendor, "Enterprise and API Platform" per one outlet). The widely repeated **$0.25 per agency** OneGov price traces to a **GSA release of November 19, 2025**, which states an 18-month term and **no calendar end date**; the "through March 31, 2027" end date appears only in the vendor's own blog and does not reconcile with an 18-month term from that start. Attribute it to the vendor or drop it.

SO WHAT

If you have a package in Initial Implementation, the useful intelligence is the shape of the first cleared Class C submission, not the vendor's name — ask your 3PAO what differed between the pilot certifications and this one, because that delta is the January 1 bar. If you resell or integrate a cloud service into a federal delivery, ask providers which class they are certifying to and on what date, since "FedRAMP Moderate" on a capability statement no longer maps cleanly onto the tier a CO looks for after January 1.

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08 **Dec 11** CYBER ACQUISITION

The cyber information-sharing law lapses December 11 — and there is no conference committee to fix it

`35 signatories` `Sec. 1706 of H.R. 8800` `House 3 of 12, Senate 0` `No conference exists`

Thirty-five industry associations wrote to the Armed Services leadership on **November 1** asking that the FY2027 defense bill retain **Section 1706 of H.R. 8800**, which would reauthorize the Cybersecurity Information Sharing Act of 2015 for "an additional 10 years." The authority has run on continuing resolutions since permanent authorization lapsed, and the current extension **expires December 11** — the same date the continuing resolution itself and the Technology Modernization Fund's authorization expire. Congress returned from recess **today** with nothing on appropriations or the defense bill scheduled.

- The framing in most coverage is wrong in a way that matters. The letter is addressed to conferees and the press describes a conference agreement, but **there is no conference committee**: the House passed H.R. 8800 on July 22 by 216-212, cloture on the Senate's own bill failed 50-46 on July 14, and the Senate has passed neither. There is no vehicle in conference to put the provision into.
- Appropriations are no further along. Twelve of twelve bills are reported in the House, **three** have passed the House floor, and the Senate has reported and passed **none**. Nothing moved during the recess, and the lame duck that began today runs about five weeks.
- Two press claims are not in the letter itself. It says "an additional 10 years," not "through 2035," and it **cites no expiration date at all**. The "through 2035" and "expires December 11" formulations come from a separate single-signatory Chamber of Commerce letter of October 6 and from reporting — both reasonable, neither in the document.

- The blockage is unchanged: Senate Homeland Security Chairman Rand Paul continues to condition long-term reauthorization on a provision restricting government pressure on social-media platforms, with no agreement reached with Ranking Member Gary Peters.

The coalition letter was read in full: dated November 1, 2026, exactly 35 signatories, addressed to Chairmen Wicker and Rogers and Ranking Members Reed and Smith. Bill status is from CRS (IN12704) and corroborated in-window. The December 11 date for the CR, the TMF authorization and CISA 2015 is verified against the enrolled text of the continuing resolution (Division B), not against the CRS overview report R49353, which covers Division A only and does not mention either authority. Appropriations counts are triangulated across three trackers plus the House committee's own release page, which shows no November items. **congress.gov is robots-disallowed, so no bill text was opened**; the H.R. 8800 section numbers are law-firm-sourced.

SO WHAT

Plan for a lapse and plan for a stopgap, because those are the two live outcomes and neither is the clean ten-year extension in the letter. If your threat-sharing posture depends on the 2015 Act's liability protections — an ISAC feed, an automated indicator exchange, anything counsel cleared because the shield existed — get a written answer this month on what you do if the shield is off on December 12; the last lapse ran for weeks. Any pipeline item funded through the TMF needs a December contingency. And discount any forecast assuming a conference agreement.

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09 Reported Nov 2 ACQUISITION

State's inspector general finds its 2025 termination wave was botched — 25 of 30 sampled notices inadequate

AUD-AFA-27-03 | ~400 contracts, ~$360M | Jan 20-Jun 15, 2025 | 25 of 30 notices inadequate | $8.1M un-deobligated

The State Department's Office of Inspector General published **"Audit of the U.S. Department of State's Administration of Contract Termination Procedures for Selected Contracts Terminated in FY 2025"** (AUD-AFA-27-03). Staff reviewed nearly **5,600 contracts worth about $65 billion**; State terminated nearly **400 of them, totalling roughly $360 million**, between **January 20 and June 15, 2025**. In a sample of **30 terminations, 25 lacked adequate written termination notices** and **10 listed two different termination dates**.

- About **$8.1 million** across at least six terminated contracts still had not been deobligated as of **August 2026** — more than a year after the terminations. State agreed to repurpose it except for nearly **$50,000** it said was owed to a contractor under a termination settlement.
- In four terminations, State did not ensure contractors returned government laptops and phones. The causes the auditors name are structural: no standardized cancellation procedures, contracting officers who had never terminated a contract, concurrent civil-service reductions, reorganization, and absorbing USAID.
- The auditors' own stated concern is the one that matters commercially: inadequate notices and conflicting termination dates **raise the risk of disputed costs and contractor claims**.

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stateoig.gov refused every automated request this week — the report page, the PDF and the reports index all failed — and oversight.gov had not mirrored it, so the figures above are secondary, from Government Executive's November 6 account and Defense One's of the same week. The report's exact title and number are confirmed from State OIG's own indexed pages. One correction: a secondary account reports **three** recommendations, all concurred; State OIG's public recommendation tracker carries entries numbered AUD-AFA-27-03-01 through -09. We could not open the report to settle the count, and have not printed it. Publication date is reported as "Monday," which would be November 2, 2026; that is unconfirmed.

SO WHAT

If State terminated you for convenience between January and June 2025, the government's own auditors have now documented that most notices in their sample were inadequate and a third carried conflicting dates — and a defective notice with an ambiguous effective date is the foundation of a termination settlement proposal, not a footnote. Pull your notice and compare its date against every other date in the file. The deobligation finding cuts the same way: money still sitting on a terminated line was never settled with you. This is also a template for every agency that ran a 2025 cancellation push under the same conditions.

10 Co-sealed Nov 4 QUANTUM CYBER

NSA and CISA co-seal post-quantum vendor questions written to be used in procurement

First published Jul 16, 2026 | Five LATICE phases | CBOM expectation | PQC-ready before end of 2030

On **Wednesday, November 4**, NSA announced that it and CISA had joined Australia's ASD Australian Cyber Security Centre on **"Post-Quantum Questions to Ask Your Vendors: Evaluating Third-Party Readiness for Post-Quantum Cryptography."** It is **non-binding**, and it is explicitly scoped for use "during procurement, contract renewals, or ongoing vendor assurance" — which is what makes a guidance document a contracting document. The questions are organized around five phases: locate and inventory cryptographic dependencies, assess risk to individual systems, triage and prioritize, implement post-quantum algorithms, and communicate with vendors and educate stakeholders.

- The questions ask for things most vendors cannot currently produce on request: a **cryptographic bill of materials** or equivalent inventory; whether cryptography is hardcoded or hardware-bound; and **product-specific, versioned commitments** for PQC-ready releases rather than roadmap language.
- The timing expectation in the document is that offerings should be available **in advance of 2030** to allow customer testing, staged transition and production rollout, and it asks which products will be PQC-ready early enough to support rollout **before the end of 2030**.
- Expect these questions to arrive as an annex to a questionnaire rather than as a clause. A non-binding question set co-sealed by NSA and CISA is the raw material agencies paste into market research, RFIs and supplier assurance reviews — well before any FAR text catches up.

One framing correction worth having: **this is not new guidance issued November 4**. ASD first published it on **July 16, 2026**; November 4 is the date NSA and CISA co-sealed it. The NSA release names no dates, no page count, no CBOM and no framework; the content above is verified against the **Australian edition** of the document, because the US copy on media.defense.gov would not load. A trade account attributed a 19-page length and the quoted phrase "ideally before the end of 2030" to the document; **that phrase does not appear** in the edition we read, whose table of contents runs to page 13. We have not printed the page count. Deadlines circulating alongside this document (December 31, 2030 for key establishment, 2031 for digital signatures) come from **Executive Order 14412 of June 22, 2026** and from OMB **M-26-15** of June 24, 2026 — both out of window, and both frequently misread as current because trade category pages render without article dates.

SO WHAT

The cheapest move this quarter is to answer these questions about yourself before a customer asks. Three are hard and worth knowing: can you produce a cryptographic inventory for a delivered system, is any of your cryptography hardcoded or bound to hardware you do not control, and can you name a version and a date rather than a roadmap. A vendor that can hand over a CBOM and a versioned commitment will differentiate on PQC questions in 2027 evaluations. Push the same three questions down to your software suppliers now — their answers are the ceiling on yours.

DATED ACTIONS

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

DATE	WHAT HAPPENS	ITEM
Nov 12, 2026	Army MAPS small-business proposals due (Amendment 0011; confirm time on SAM.gov)	03
Nov 15, 2026	SBA SBIR/STTR commercialization benchmark takes effect	01
Nov 16, 2026	Comments close, NTIS RFI on digitizing the National Technical Reports Library for AI use (11:59 p.m. ET)	—
Nov 20, 2026	Comments close, SBA small-business size standards and revised methodology (91 FR 60524)	—
Nov 20, 2026	Comments close, GSA FSS Domestic End Product certification collection (552.238-130)	06
Nov 23, 2026	Comments close, CISA .gov Registrar collection (authorization lapsed Oct 31)	—
Nov 30, 2026	Comments close, DFARS Appendix I collection (DoD Pilot Mentor-Protégé Program)	—
Dec 1, 2026	Comments close, CBP advance notice on heightened import disclosures (RIN 1685-AA47)	—
Dec 7, 2026	Comments close, Treasury Outbound Investment Security Program — AI, quantum, semiconductors, HPC (91 FR 67396)	—
Dec 11, 2026	CR, Technology Modernization Fund authorization and CISA 2015 all lapse	08
Dec 18, 2026	Comments close, GSA supply-chain prohibition collection for leases and Commercial Solution Openings	—
Jan 5, 2027	CBP foreign importer-of-record interim final rule takes effect — and its comments close the same day	—
Jan 8, 2027	Comments close, GSA contractor IT-security collection (91 FR 70884, published Nov 9)	06
Jan 10, 2027	BIS Affiliates Rule stay lapses; affiliate end-user controls take effect	05
Jan 28, 2027	Project Meridian findings due to the Secretary of War (per the CREW complaint)	—
~Feb 10, 2027	GAO's 100-day statutory deadline on the MAPS protests filed Nov 2-3	03
Mar 31, 2027	Current OMB approval expires for GSA's contractor IT-security collection	06
May 6, 2027	Full customs-broker compliance expected under the CBP importer-of-record rule	—

WHERE THIS IS UNCERTAIN

Flagged because acting on the wrong version is expensive.

The MAPS date and time

Amendment 0011 set proposals at "11:59:59 a.m. local time on November 12, 2026" — an odd formulation we are reproducing as reported rather than correcting. sam.gov refuses automated retrieval and no API key was available this week, so we could not read the solicitation, and one outlet reports the Army preparing a further amendment. **Confirm the date and the time on SAM.gov before you submit.**

What FedRAMP actually said

FedRAMP's November 2 post does not name the certified company, gives no Marketplace ID, does not say Class C "replaces" Moderate, and says nothing about OneGov pricing. The company name comes from the Marketplace listing and trade press; the blog dates the grant October 29 while the listing reads "certified as of 10/28/2026." The $0.25 price traces to a GSA release of November 19, 2025 stating an 18-month term and no end date.

The State audit's recommendation count

A secondary account reports three recommendations, all concurred. State OIG's own recommendation tracker carries entries numbered -01 through -09. stateoig.gov refused every request this week, so we could not open the report; all figures in item 09 are secondary and the count is not printed.

The post-quantum guidance is not new

ASD first published it July 16, 2026; November 4 is the US co-seal. Content is verified against the Australian edition because the US copy would not load. A circulating 19-page count and the quoted phrase "ideally before the end of 2030" are not supported by the edition we read — the phrase does not appear in it.

Two court holdings read at one remove

The *Blue Water Autonomy* jurisdictional holding is corroborated by several independent November law-firm analyses and a docket service, but **we did not open the opinion**; the merits reasoning and the *Alpha Omega* holding are secondary. Do not confuse the case with *Blue Water Thinking, LLC v. United States*, an unrelated 2024 matter.

There is no conference to lobby

The coalition letter addresses conferees and most coverage describes a conference agreement, but the Senate has passed neither defense bill and no conference committee exists. The H.R. 8800 section numbers in item 08 are law-firm-sourced; congress.gov is robots-disallowed and no bill text was opened.

What this brief could not see

Refused automated retrieval this week: sam.gov's website, cisa.gov, war.gov, acq.osd.mil, breakingdefense.com, and — new this week — **stateoig.gov in its entirety** (which is why item 09 is secondary), **media.defense.gov** (the US edition of the post-quantum guidance), **nationaldefensemagazine.org** (bot protection blocked a November 2 piece on a Pentagon industrial-base memo we could not identify), and marketplace.fedramp.gov, which serves no readable data. **Robots-disallowed:** congress.gov, this site's own blog category index, the Coalition for Government Procurement's Friday Flash, Sheppard Mullin's Government Contracts Navigator, GAO's bid-protest search, and justice.gov's press index (individual DOJ releases fetched normally). **Intermittent:** federalnewsnetwork.com, as usual — we have no systematic coverage of its November 2-4 output and reached those stories only through search. FedScoop and MeriTalk render homepages without article dates, which is the single most reliable way to publish a June story as November news; we date-checked each one. **Partially closed:** the Federal Register's single-document JSON endpoint failed all week, so records were read through its multi-document form and govinfo; api.regulations.gov with DEMO_KEY rate-limited after one call. **Structural, not fixable:** GAO publishes no pending-protest docket and its decision search is robots-disallowed, so protest coverage here remains incomplete and the MAPS and Oasis Systems docket numbers are unconfirmed. **And the one tool we should have had:** api.sam.gov works, but the API key is kept in the GovCon News Drive folder and **sam-api-key.txt is not there** — the folder holds only prior widgets and PDFs. That is why items 03 and the USCIS and HHS opportunities surfaced this week could not be read first-hand. Restoring that file would close the largest remaining gap in this brief.

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Compiled November 9, 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.