Three Clocks

Three clocks are running at once, and they are not the same clock. A **vehicle clock**: every NITAAC governmentwide acquisition contract dies on October 29, and NASA SEWP changes hands between November 1 and January 31. A **capture clock**: four registration or proposal deadlines fall between October 22 and November 20, one on a $50 billion recompete reopened only to small business teams. And a **funding clock**: the continuing resolution, the Technology Modernization Fund's authorization and the cyber information-sharing authorities all lapse together on December 11, with three of twelve appropriations bills through one chamber. The vehicle and capture dates are hard. The funding picture is not.

Oct 22	Oct 26	Oct 29	Nov 12	Dec 7
3 DAYS	7 DAYS	10 DAYS	24 DAYS	49 DAYS
Agency post-quantum migration plans due to OMB and ONCD; ICE ORBIT industry-day registration closes	Next Gen IAC MAC industry-day RSVPs must be received	All NITAAC GWACs sunset — last day to award new orders	Army MAPS revised small-business-team proposals due	FedRAMP vulnerability rulesets become mandatory for every certified offering

CHANGED SINCE NO. 3, AND ONE CORRECTION TO NO. 1

- **Correction to No. 1 (September 28) on DARPA QBIT Stage A.** That edition said the Stage A full-proposal deadline had moved to November 30, 2026 at 2:00 p.m. ET and that teams treating it as closed were wrong. That is not supported. The program announcement for DARPA-PA-26-02-02 prints **"Full Proposal Responses Due: September 30, 2026, by 2:00 p.m. Eastern Time"**; November 30 appears only as a bare date field on darpa.mil's listing, with no time and no supporting text. SAM.gov is unreachable here, so the notice history cannot be checked. Treat Stage A as **closed unless DARPA says otherwise**.
- **CIRCIA finally has a location, though still no rule.** Last week this brief could only report that the final rule had not published. It is now traceable: RIN 1670-AA04 was received at OIRA on **October 1, 2026** and is listed **Pending Review**, with no conclusion date. It is still not in the Federal Register. Its statutory deadline passed in October 2025. Nothing binds yet, and it can publish any day OIRA concludes.
- **The FAR overhaul's second batch closes today and nothing has replaced it.** Four cases — 2026-003, 2026-006, 2026-010 and 2026-011, covering eighteen FAR parts — close for comment today, October 19. Acquisition.gov's Requesting Comments page lists exactly those four and no case with a later due date, so there is no batch three open as of this morning.
- **CMMC Phase 2 is still paused, and the reform report is still unpublished.** DFARS Class Deviation 2026-O0025 Revision 3, issued September 3, 2026, remains the operative instrument; Levels 1 and 2 may be met by self-assessment. A Redspin survey of **131 defense industrial base contractors** reported October 13 found about **47%** still working toward future third-party certification. Read that number carefully — it is the forward-looking subset; Redspin's own release headlines **78.2%** when firms already Level 2 certified are included.
- **VA's Oracle EHR ceiling nearly tripled, and Congress noticed.** VA added an additional **$17 billion** ceiling and three one-year option periods to the original ten-year, **$10 billion** contract, producing a **$27 billion** total ceiling. Sen. Richard Blumenthal and Rep. Mark Takano wrote Secretary Doug Collins on October 6 with thirteen questions; the letter became public October 13.
- **A claim circulating about the post-quantum memo is wrong.** Some coverage states that M-26-15 requires new national-security-system acquisitions to comply beginning January 1, 2027. That date does not appear in the memorandum. M-26-15 says plainly that it **"does not apply to national security systems."** If a teammate has put a January 2027 NSS gate on a roadmap, it did not come from this memo.

01 Oct 29 ACQUISITION MODERNIZATION

Every NITAAC governmentwide vehicle dies in ten days, and the last day to award is the day it dies

Notice dated Jun 9, 2026 | Sunset Oct 29, 2026 | CIO-SP3 · CIO-SP3 SB · CIO-CS | No order PoP past Dec 31, 2028

NITAAC's own notice is unambiguous: **"all NITAAC GWACs will sunset on October 29, 2026"** — CIO-SP3, CIO-SP3 Small Business and CIO-CS — and that date is also the last day any agency may award a new order against them. This is not a recompete gap. It is the end of the program.

- Orders awarded on or after **June 8, 2026** may not have a period of performance extending beyond **December 31, 2028**, and contract holders are directed to enforce that limit themselves.
- After December 31, 2028, HHS/NIH will **cease all NITAAC program functions**, including fee collection and administration of assisted orders. Agencies are pointed to existing GSA vehicles for future requirements.
- The successor, CIO-SP4, was cancelled — per a January 2026 court filing NITAAC ended it citing the executive order on procurement consolidation. There is no NITAAC on-ramp to move to.

Reporting (ExecutiveGov, June 2026) says NITAAC had earlier extended CIO-SP3's expiration to April 29, 2027 as a bridge, so the October sunset cuts that short. NITAAC's own notice does not mention the April 2027 date, and no prior expiration is reported for CIO-SP3 SB or CIO-CS — do not generalise the April date across all three.

SO WHAT

If any part of your revenue runs through a NITAAC order, you have ten days to get every award you expect this quarter signed, and then a two-year runway to perform it. Two things this week: pull the list of pending NITAAC actions with your contracting officers and find out which will actually be awarded by October 29, and confirm you hold a seat on a GSA vehicle that can carry the same scope. Agencies with money and no vehicle will move work to whoever is already on Alliant 3, OASIS+ or SEWP — incumbency on the task does not survive the loss of the contract it sits on.

02 Nov 12 ACQUISITION SMALL BUSINESS

The Army reopened a $50 billion services recompete — but only small business teams may move, and nobody else may touch their bid

Amended Oct 14, 2026 | Proposals due Nov 12, 2026 | "$50 billion" per Washington Technology | GAO sustained protest in Aug 2026

The Army amended its Marketplace for the Acquisition of Professional Services solicitation to let **small business teams** submit proposals, after GAO sustained a protest by Intelligence Consulting Enterprise Solutions in August and recommended exactly that. Revised small-business-team proposals are due **November 12**. The asymmetry is the story.

- Small businesses that already submitted standalone proposals may **withdraw and resubmit as a team**. Everyone else is frozen: in Washington Technology's words, **"No one else can revise their bids"** — large businesses, small business joint ventures, and small businesses staying standalone primes alike.
- That makes this a one-sided re-pricing window. A small business team can reprice and restaff against a market it has now watched for months; a large business cannot respond at all.
- Any protest challenging the amendment's terms would have to be filed before the November 12 deadline, per the reporting — which means the decision to object and the decision to bid are the same decision, made on the same day.

The $50 billion figure is Washington Technology's characterization of the contract, not an officially confirmed ceiling. GAO's decision could not be retrieved from this environment, so the protest's B-number is unconfirmed. No expected award count has been published — do not plan against one.

SO WHAT

If you are a small business near this scope, a team is now strictly better than standalone, and the teaming agreement has to be papered in under four weeks. If you are a large business bidding MAPS, your price is fixed and your competition's is not — which is the kind of fact that belongs in front of whoever owns the bid decision today, not at the next pipeline review. Either way, read the amendment itself rather than the coverage before committing: the question of who exactly qualifies as a "small business team" is the one that decides whether your structure is eligible.

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03 Oct 26 ACQUISITION AI MODERNIZATION

The successor to a $48 billion research vehicle gets an industry day on October 30 — and RSVPs close October 26

Reported Oct 15, 2026 | RSVP by Oct 26 | Industry day "penciled in" Oct 30 | Predecessor: $48B, opened 2018

DOD has penciled in **October 30** for an industry day previewing Next Gen IAC MAC, the successor to the Information Analysis Center Multiple-Award Contract that opened in 2018 at a **$48 billion** ceiling and primarily supports the Defense Technical Information Center. Registration is the near-term action: **"RSVPs and registration for the industry day must be received no later than Oct. 26."**

- The figure drawing attention — a ceiling **"north of $80 billion"** — comes from a **promotional flyer for the event**, not from DOD. Treat it as an event organizer's number until a government notice says otherwise.
- Pool structure is genuinely undecided. The current contract has three pools: unrestricted, small business, and nonprofit. As of spring 2025 DOD was weighing **two pools or a single pool** for the successor and has not said which.
- No solicitation date and no expected award count have been published. The industry day is where that gets signalled, which is most of why attending matters.

Both the industry-day date and the ceiling are soft. "Penciled in" is the reporting's word, not ours. If a single pool replaces three, the small business and nonprofit set-asides on this vehicle disappear — that is the question worth asking out loud on October 30.

SO WHAT

The cheap move is to register by October 26 and send someone who can tell the difference between a one-pool and a three-pool vehicle, because that single design choice decides whether a small business or a nonprofit research organization has a path onto the largest research vehicle in the department. The expensive mistake is budgeting capture dollars against an $80 billion ceiling sourced from a flyer. Attend, listen for the pool decision and the solicitation timeline, and leave the ceiling out of your model until DOD publishes one.

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04 Dec 7 CLOUD CYBER

FedRAMP moved its vulnerability rules forward by six months, and the penalty for missing them is revocation

Notice NTC-0014, Jun 16, 2026 | Mandatory Dec 7, 2026 | Grace ends Mar 7, 2027 | Moved up from Jun 1, 2027

FedRAMP notice NTC-0014 makes the Vulnerability Detection and Response and Vulnerability Evaluation and Reporting rulesets **"mandatory for all cloud service offerings obtaining or maintaining FedRAMP Certification effective December 7, 2026"** — pulled forward from a planned June 1, 2027 with grace to January 1, 2028. This lands on offerings that are already authorized, not just new entrants.

- There is a **grace period through March 7, 2027** in which a non-compliant offering may keep its certification under a corrective action plan. After that date, FedRAMP states certification **"will be revoked for all cloud service offerings not following these rules."**

- The driver is CISA Binding Operational Directive 26-04, "Prioritizing Security Updates Based on Risk," released June 10, 2026 — which is why the timeline compressed rather than slipped.
- FedRAMP's position is that legacy monthly vulnerability scanning no longer satisfies the requirement for any Rev5 customer. The cadence, not the control, is what changed.

SO WHAT

For a cloud service provider this is the hardest dated risk on the page, because the downside is not a finding — it is losing the authorization your federal revenue depends on, with a stated date attached. Seven weeks is enough time to stand up continuous detection and reporting if you start now and not enough if you wait for the January planning cycle. If you resell or build on someone else's authorized offering, the exposure is theirs but the outage is yours: ask your provider, in writing and this month, whether they will be compliant on December 7 or operating under a corrective action plan, because the second answer comes with a March 7 cliff behind it.

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05 Nov 1 ACQUISITION CLOUD

SEWP changes hands this quarter: VI opens November 1, V closes January 31, and NASA publishes no ceiling at all

`SEWP VI PoP from Nov 1, 2026` `SEWP V extended to Jan 31, 2027` `Three-month overlap` `NASA states no ceiling`

NASA's SEWP program office says the SEWP VI **"anticipated PoP is scheduled to begin November 1, 2026 through October 31, 2036"** and that it **"has extended the Period of Performance (PoP) of the SEWP V contracts through January 31, 2027."** The contracts are awarded. What you get is a three-month window in which both vehicles work and after which only one does.

- November 1, 2026 is the anticipated start for SEWP VI request submissions, per NASA's transition updates. January 31, 2027 is the end of the road for SEWP V ordering.
- **NASA publishes no ceiling.** Neither the SEWP homepage nor the July 2026 transition updates document states a maximum ordering value — which matters because two incompatible figures are circulating.
- Secondary sources conflict, and the gap is wide: FedScoop reported in June a **"maximum ordering value of $20 billion"** with **"more than 2,100 awardees"**; an awardee's own press release describes a **"total procurement ceiling of $60 billion."** Both exist. Neither is NASA's.

Three times in a row now, the useful number on a major vehicle has turned out to be sourced to a flyer, a press release or a trade estimate rather than the government. If a ceiling figure matters to your plan, find the notice that prints it before you use it.

SO WHAT

Every reseller and product-services prime that moves hardware or software through SEWP has one quarter to re-paper its access route, and the overlap is the only margin you get. Two concrete actions: confirm your own SEWP VI award and category in writing, and work the agency side — program offices that are used to placing SEWP V requests will keep doing so until the day it stops working, and the firm that told them about January 31 first is the firm whose VI number they use in February. Do not put $20 billion or $60 billion in a board deck; say NASA has not published a ceiling, which is both true and more useful.

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06 Oct 22 CYBER QUANTUM

Agency post-quantum migration plans are due Wednesday, and a watchdog just said almost nobody is ready

`M-26-15 signed Jun 24, 2026` `Plans due ~Oct 22, 2026` `9 required plan elements` `GAO-27-108740: 24 agencies, 89 recs`

OMB Memorandum M-26-15, signed June 24, 2026 by Director Russell T. Vought, requires each agency to submit a post-quantum cryptography migration plan to OMB and the Office of the National Cyber Director **"no later than 120 days from the date of this**

memorandum." That computes to **Wednesday, October 22**. One of the nine mandatory plan elements is a **third-party coordination plan** — which is the sentence that reaches your contract.

- The memo **should**-level directs agencies to "engage their FedRAMP-authorized cloud service providers to delineate PQC migration responsibilities within the shared responsibility model," and tells program offices to ensure vendor requirements include PQC-readiness and cryptographic agility provisions. Expect crypto-inventory and roadmap data calls, not a clause, in the first instance.
- Downstream dates in the same memo: TLS 1.3 support **"not later than January 2, 2030"**; mitigate as much quantum risk as feasible by December 31, 2030; signature migration in 2031; full migration 2035.
- GAO's report **GAO-27-108740**, "Quantum Computing: Federal Actions Needed to Prepare for Emerging Cyber Threat," reviewed all **24 CFO Act agencies** against three selected practices and made **89 recommendations to 23 agencies**. On FedScoop's reading of the findings, no agency fully addressed all three and just one fully addressed even one. The Department of the Interior did not respond to GAO at all.

The memo prints the 120-day interval, not a calendar date — October 22 is arithmetic from June 24, and we show the working. GAO's public release was October 6, 2026 and its product page title carries "[Reissued with revisions on Oct. 14, 2026]"; both dates are real and the reissued text was not retrievable here. M-26-15 does not apply to national security systems.

SO WHAT

An agency that must file a third-party coordination plan by Wednesday and has not yet asked you anything is about to. The firms that look competent in November already know which of their products and hosted services use quantum-vulnerable key establishment, and can answer a crypto-inventory request in days rather than quarters. If you hold a FedRAMP authorization, that question and the December 7 vulnerability rules above land on the same engineering team in the same six weeks — sequence them deliberately. The GAO finding is also a sales fact: inventory and crypto-agility work is about to be funded at agencies that were just told publicly they are behind.

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07 Nov 20 ACQUISITION SMALL BUSINESS

SBA proposes new size standards for 338 industries, and the comment window now closes November 20

PRORULE, 91 FR 60524 | Doc. 2026-19546 · RIN 3245-AI67 | 13 CFR part 121 | Comments close Nov 20, 2026

SBA extended by 60 days the comment periods on its August 20, 2026 proposed rule revising small business size standards (**91 FR 53741**) and the accompanying notice of availability of its Revised Size Standards Methodology (**91 FR 54096**). The extension document itself is a proposed rule at **91 FR 60524**, published September 24, 2026. Comments now close **November 20, 2026**.

- SBA's own summary is specific: it is **"proposing new size standards for 338 industry groups and industries,"** designed to better reflect the markets in which small businesses compete.
- The mechanics matter more than the headline. The proposal converts a number of receipts-based standards to **employee-based** ones, shifts from six-digit NAICS codes to a mix of four- and five-digit codes, and applies a productivity adjustment to receipts-based standards.
- This is **not** an 8(a) eligibility rule. 8(a) appears in the document only as background discussion of existing programs; no change to 8(a) eligibility is proposed.

Each of those three Federal Register citations was confirmed against the individual document record rather than taken from a roundup — and the document types differ: 91 FR 53741 is a proposed rule, 91 FR 54096 is a notice of availability. Secondary coverage of SBA rules has a poor record on exactly this distinction.

SO WHAT

If your company sits anywhere near a size threshold, this is the open docket with the longest shadow, because it sets who you compete against for years and whether your set-aside strategy survives. A switch from receipts to employee count can move a firm across the line without a dollar of revenue changing, and a move from six-digit to four- or five-digit NAICS can merge you into a market with much larger comparables. Have someone look up your primary NAICS codes in the August proposal specifically — not the methodology document — and if the standard moves against you, November 20 is the last day the record is open.

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08 Nov 17 CLOUD CYBER QUANTUM

FedRAMP opened two rule changes in one week, and the top assurance tier has a four-day application window capped at ten

`RFC-0035 opened Oct 14, closes Nov 17` `RFC-0036 opened Oct 15, closes Nov 19` `Class D pilot: max 10 participants` `Applications Dec 1–4, 2026`

FedRAMP opened **RFC-0035, "Cryptographic Module Use Rules Updates,"** on October 14 (comments close November 17) and **RFC-0036, "FedRAMP 20x Class D Cloud-Hosted Pilot Requirements,"** on October 15 (comments close November 19). Behind them sits the narrowest opportunity window on this page.

- Per fedramp.gov's RFC-0033 page, the Phase 4 pilot has **"a firm maximum of 10 participants"**: final Class D requirements published **November 18**, an application window of **December 1–4**, initial participant discussions December 7–18, a mandatory draft package **February 17, 2027** and a final package **March 17, 2027**. Eligibility requires a CR26-compliant 20x Class C certification in hand before December 1.
- RFC-0036 adds two new definitions — **Foreign Ownership, Control, Or Influence** and **Foreign Person** — modifies six rulesets and adds **ten new Key Security Indicators**, four of which require persistent FOCI tracking. FedRAMP says it will not itself judge whether a provider's foreign ownership is acceptable; it verifies that the provider knows and tracks it, and agencies decide.
- RFC-0035 moves the Class D requirement to use a CMVP-validated cryptographic module from **MUST to SHOULD**, matching Class C, and adds a rule treating a switch from a validated to a non-validated module as a **transformative change** for Classes B, C and D — explicitly to make room for emerging cryptography such as PQC at an agency customer's request.

FedRAMP frames the pilot calendar as targets assuming no unexpected problems, so read those as scheduled rather than fixed. Note the prerequisite is stated differently in two places — RFC-0033's timeline implies a CR26-compliant Class C certification by December 1 while RFC-0036's text specifies a full, non-pilot 20x Class C certification. A provider reading only one document could miss the gate.

SO WHAT

Two different clocks here, and they want different people. The comment deadlines are a policy matter: if the new FOCI definitions would reach your cap table or your offshore engineering, November 17 and 19 are when you get to say so, and FedRAMP's choice not to adjudicate FOCI itself means the burden lands on you to produce the tracking data on demand. The pilot is a commercial matter: ten seats, a four-day door in December, and a Class C certification you must already hold. If the highest assurance tier is part of your federal strategy, the honest question this week is whether Class C is in hand — because if it is not, December 1 is already decided and the next door is a year out.

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09 Oct 23 AI CYBER MODERNIZATION

The Army starts AI-scanning vendor code on Friday, and wants it before you are on contract

`Reported Oct 14, 2026` `Launches Oct 23, 2026` `Acting Army CIO Gabe Chiulli` `GSA sign-on integration mid-Nov`

The Army's Project Gatekeeper starts **October 23**. Led by acting Army Chief Information Officer **Gabe Chiulli**, it uses AI to vet prospective vendor code in an isolated environment before that code reaches Army networks — with officials describing a goal of

assessment and accreditation **"in a matter of minutes instead of months."**

- The part that changes vendor behavior: companies can commit code for AI scanning **before they are on contract**, or while merely responding to a request for information. If a program manager later acquires the software, it arrives already vetted.
- The Army is working with GSA to integrate GSA's single sign-on service by **mid-November**.
- Officials say security requirements are not being lowered, and that vendors can use the scan feedback to remediate before deployment. No dollar figure and no vendor count have been published.

Reporting is from DefenseScoop (October 14, updated October 15); no Army press release was located. The "minutes instead of months" goal is attributed to officials generally, not to Chiulli. Current baseline is described only as days, weeks or months for larger programs.

SO WHAT

This quietly moves a cost from post-award to pre-award, and whether that is good news depends on how your counsel reads it. The upside is real: a vendor whose code is already through the pipeline can be fielded while a competitor is still waiting on an authority to operate, and on a fast-moving requirement that is the whole contest. The question to settle before Friday is what committing proprietary source code to a government AI pipeline at RFI stage means for your intellectual property, your data rights and your commercial customers' contracts — and whether you would do it for a requirement you have not yet been told you will win. Decide that deliberately now rather than under deadline pressure on the first RFI that asks.

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10 In force WORKFORCE DELIVERY

DHS ended automatic work-authorization extensions effective immediately, and cleared-staff continuity is the exposure

FINAL RULE, 91 FR 65306 · Doc. 2026-20955 · RIN 1615-AD05 · 8 CFR part 274a · Effective Oct 14, 2026

DHS published a **final rule** on October 14, 2026, effective the same day, removing the automatic extension of Employment Authorization Document validity for certain aliens who timely filed renewal applications in specified categories. It finalizes an interim final rule published October 30, 2025 and responds to comments on it.

- The practical effect is that a timely-filed renewal no longer keeps an employee work-authorized while USCIS adjudicates. When the EAD on file expires, authorization expires with it.
- DHS frames the change as prioritizing vetting and screening before new employment authorization is granted.
- This is the second workforce-side constriction in two weeks, following the eight companies cut off from H-1B and PERM reported in No. 3. The pattern is now worth treating as a staffing risk rather than a series of one-off immigration stories.

Published at 91 FR 65306 (pages 65306–65368). The Federal Register metadata field reads "8 CFR 274," but the rule text itself amends **part 274a**, "Control of Employment of Aliens" — cite 274a.

SO WHAT

This is a delivery risk disguised as an HR notice, and it is already in force. Run an I-9 reverification report against your billable and badged staff now and find the EADs expiring in the next two quarters, because there is no longer a cushion between expiry and adjudication. Each affected person is a position you may have to backfill on a cleared or badged requirement, at a lead time measured in months. Tell your program managers before a contracting officer tells them — an unstaffed key position is a performance problem, and the explanation that the rule changed does not fix the staffing plan.

DATED ACTIONS

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

DATE	WHAT HAPPENS	ITEM
Oct 19	FAR Overhaul batch-two comments close on cases 2026-003, 2026-006, 2026-010 and 2026-011 — eighteen FAR parts	Changed
Oct 22	Agency post-quantum cryptography migration plans due to OMB and ONCD under M-26-15 (120 days from June 24)	06
Oct 22	ICE ORBIT industry-day registration closes; industry day October 29, in Arlington and virtual	Calendar
Oct 26	Next Gen IAC MAC industry-day RSVPs and registration must be received	03
Oct 23	Army Project Gatekeeper launches; AI code vetting available pre-contract and at RFI stage	09
Oct 29	All NITAAC GWACs sunset; last day to award new orders on CIO-SP3, CIO-SP3 SB and CIO-CS	01
Nov 1	SEWP VI period of performance and request submissions anticipated to begin	05
Nov 2	Comments close on the DFARS covered defense telecommunications information collection (OMB 0750-0002)	Calendar
Nov 12	Army MAPS revised small-business-team proposals due; any challenge to the amendment's terms would precede it	02
Nov 16	Comments close 11:59 p.m. ET on the NTIS request for information on digitizing the National Technical Reports Library for AI use	Calendar
Nov 17	FedRAMP RFC-0035 comments close (cryptographic module use rules)	08
Nov 18	FedRAMP publishes final Class D certification pilot requirements	08
Nov 19	FedRAMP RFC-0036 comments close (Class D cloud-hosted pilot requirements)	08
Nov 20	SBA size standards comments close on the August proposed rule and the Revised Size Standards Methodology	07
Nov 30	ITAR U.S. Munitions List review comments close (91 FR 62361, RIN 1400-AF40); NIST SP 800-82 Rev. 4 draft comments close	Calendar
Dec 1–4	FedRAMP Class D pilot application window — four days, maximum ten participants, Class C certification required beforehand	08
Dec 7	FedRAMP VDR and VER rulesets become mandatory for every offering obtaining or maintaining certification; NIST SP 800-185 draft comments close	04
Dec 11	The continuing resolution lapses; the Technology Modernization Fund's authorization expires with it	Context
Dec 18	Comments close on the GSAR supply-chain information collection and three DFARS information collections	Calendar
Jan 19	GAO expects to rule on the Core4ce protest; DOD cannot award RETS until it does (year not stated in reporting)	Uncertain
Jan 31	SEWP V period of performance ends; ordering stops	05
Mar 7	FedRAMP certification revoked for offerings still not following the vulnerability rules (2027)	04

WHERE THIS IS UNCERTAIN

Flagged because acting on the wrong version is expensive.

DARPA QBIT Stage A is in conflict with itself

The program announcement document prints a September 30, 2026 full-proposal deadline. DARPA's own web listing shows a bare November 30 date with no time and no supporting text. SAM.gov is unreachable here, so the notice history cannot settle it. **No. 1 of this brief relied on the November date; that was not supportable and is corrected above.**

Two SEWP VI ceilings, neither from NASA

FedScoop reported a **$20 billion** maximum ordering value in June; an awardee press release says **$60 billion**. NASA publishes no ceiling on either its homepage or its July 2026 transition document. Both secondary figures genuinely exist. Use neither in a model.

The $80 billion IAC MAC figure is flyer-sourced

Washington Technology attributes "north of $80 billion" to **a promotional flyer for the industry day**, not to DOD. The predecessor's $48 billion ceiling from 2018 is the only government figure in the chain. No solicitation date or award count exists.

The cyber information-sharing lapse has no published day

The stopgap extended the Cybersecurity Information Sharing Act of 2015 for the duration of the continuing resolution, and reporting says only **"into early December."** No reachable source prints a specific date for the CISA-2015 expiry itself. The CR's own December 11 expiration is firm; do not conflate the two.

CIRCIA could publish any day

RIN 1670-AA04 has been at OIRA since **October 1, 2026**, status Pending Review, with no conclusion date and no Federal Register document. Nothing binds until it publishes, and then reporting obligations attach on the rule's own schedule. The covered-entity estimate from the 2024 proposed rule is not reconfirmed and is deliberately not printed here.

The Core4ce protest freezes RETS, year unstated

Washington Technology reports GAO expects to rule by **January 19** and that DOD cannot make awards until it does, without stating the year — January 19, 2027 is the clear implication but is not printed. The article calls RETS a **"$1.4 billion"** competition and never uses the word ceiling. GAO's docket was not retrievable.

The Redspin CMMC number depends on the question

The **47%** figure reported October 13 is the share of 131 defense industrial base contractors working toward **future** third-party certification. Redspin's own release headlines **78.2%** for a broader question that also counts firms already Level 2 certified. Both describe the same survey.

December's funding outcome is not forecastable

Three of twelve FY2027 bills have passed the House and the Senate completed no comparable floor action before the pre-election recess, per a Holland & Knight alert of October 9. A second continuing resolution is described there as a realistic outcome and a partial shutdown as possible. **No source we found published a probability.** Plan for a CR-constrained first quarter, not for new-start money.

What this brief could not see

These refused automated retrieval this week: **sam.gov** (so no solicitation notice, amendment history or notice-history check — the DARPA correction above is unresolved for exactly this reason), **cisa.gov**, **congress.gov** (no bill numbers printed), **war.gov**, **breakingdefense.com**, **acq.osd.mil** (the CMMC class-deviation memo itself) and acquisition.gov's FAR case-status pages. **Bid protests are therefore largely invisible to this brief**: both protest items here are reached through trade coverage only, with no B-numbers or filing dates confirmed. GAO's own product page did resolve this week, contrary to recent runs, but GAO dockets did not.

SOURCES

1. NITAAC — Important Notice: NITAAC GWACs (CIO-SP3, CIO-SP3 SB, CIO-CS) — https://www.nitaac.nih.gov/resources/news/important-notice-nitaac-gwacs-cio-sp3-cio-sp3-sb-and-cio-cs
2. Washington Technology — Army reopens $50B MAPS contract to small business teams only (Oct 14, 2026) — https://www.washingtontechnology.com/contracts/2026/10/army-reopens-50b-maps-contract-small-business-teams-only/416593/
3. Washington Technology — DOD sets industry day to preview potential $80B tech research vehicle (Oct 15, 2026) — https://www.washingtontechnology.com/contracts/2026/10/dod-sets-industry-day-preview-potential-80b-tech-research-vehicle/416611/
4. FedRAMP — Notice NTC-0014, Response to CISA BOD 26-04 (Jun 16, 2026) — https://www.fedramp.gov/notices/0014/
5. NASA SEWP — program homepage and SEWP VI transition updates — https://www.sewp.nasa.gov/
6. NASA SEWP — SEWP VI Transition Updates (Jul 13, 2026) — https://www.sewp.nasa.gov/documents/SEWPVI_Transition_Updates_PDF_07132026.pdf
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Compiled October 19, 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.