Department of War (DoW) Personal Property Activity (PPA)

Personal Property Advisory #27-0018

Date: 23 November 2026

From: Department of War (DoW) Personal Property Activity (PPA), Scott AFB, IL 62225

To: All Military Department Headquarters Representatives, Worldwide Personal Property Shipping Offices (PPSOs), Personal Property Offices (PPOs), and DoW-Approved Personal Property Transportation Service Providers (TSPs)

Subject: Phased Cybersecurity Maturity Model Certification (CMMC) Level 2 Self-Assessment Implementation for Defense Personal Property Program (DP3)

1. **Purpose.** This Advisory establishes a phased, risk-managed transition for CMMC Level 2 Self-Assessment and Plan of Action and Milestones (POA&M) for CMMC compliance across the DP3 (personal property and non-temporary storage). .

2. CMMC Level 1 Self-Assessment requirements remain unchanged and mandatory as described in the 2026 DP3 business rules and Personal Property Advisory #26-0025D.

3. **80% to 100% CMMC Scoring.** To achieve full compliance, TSPs must complete all 110 CMMC Level 2 requirements by March 1, 2027. Under the PPA's phased approach, TSPs can satisfy the March 1, 2027, compliance suspense by achieving a Conditional CMMC Level 2 (Self-Assessment) status in the Supplier Performance and Risk System (SPRS) by achieving a CMMC Level 2 compliance score of ≥80%. To qualify for conditional compliance, TSPs must fully implement all five-point and three-point foundational controls while deferring only allowable one-point gaps (and SC.L2-3.13.11, if applicable) to a formal POA&M filed with the PPA J3 by the March 1, 2027 deadline.

4. **POA&M Ineligible Controls.** TSPs may not place a five-point or three-point control on a POA&M, with the sole exception of SC.L2-3.13.11 (CUI Encryption), which may be deferred as a three-point deduction only if the TSP currently employs encryption but is not yet Federal Information Processing Standard (FIPS)-validated. Additionally, the TSP must fully implement an approved System Security Plan (SSP) CA.L2-3.12.4 (as an unvalued, mandatory gate that cannot be placed on a POA&M). The below one-point controls are strictly barred from deferral to a POA&M and must be fully implemented to meet the score (≥80%) SPRS by March 1, 2027:

   a. AC.L2-3.1.20 (External Connections).

   b. AC.L2-3.1.22 (Control Public Information).

   c. PE.L2-3.10.3 (Escort Visitors).

   d. PE.L2-3.10.4 (Physical Access Logs).

   e. PE.L2-3.10.5 (Manage Physical Access).

5. **180-Day POA&M Closeout Window.** Filing a qualifying conditional CMMC Level 2

Self-Assessment (≥80%) and executive affirmation in SPRS before the March 1, 2027, deadline will establish Conditional Level 2 status. A Conditional Level 2 status allows TSPs to receive peak season 2027 shipment allocations for a maximum of 180 days after March 1, 2027, until August 28, 2027. Within the 180-day window, TSPs must complete all remaining items on their POA&M (i.e., 100% (110 score) CMMC Level 2 Self-Assessment) and submit a final CMMC Level 2 Self-Assessment executive affirmation in SPRS no later than August 28, 2027.

6. **Non-Use Penalty.** TSPs failing to meet the ≥80% SPRS by March 1, 2027, will result in the TSP being placed in "non-use" status for peak season 2027 shipment allocations until they achieve the ≥80%requirement (before August 30, 2027). Any TSP that fails to close out its POA&M and achieve 100% CMMC Level 2 Self-Assessment compliance on or after August 28, 2027, will automatically be placed in non-use status until the TSP records full (100%) CMMC Level 2 Self-Assessment compliance in SPRS.

a. **≥80% SPRS.** Shipments scheduled for pick up on or after May 15, 2027, are subject to non-use if the TSP fails to certify or is **less than** 80% CMMC Self-Assessment compliant in SPRS by March 1, 2027.

b. **100% SPRS.** Shipments scheduled for pick up on or after August 28, 2027, are subject to non-use if the TSP fails to certify 100% CMMC Level 2 Self-Assessment compliance in SPRS.

7. The PPA understands the unique operational realities of the commercial moving and storage industry, particularly concerning independent drivers, local pack crews, labor service, and warehouse providers. To prevent pushing DP3 subcontractor operations into the CMMC Level 2 digital scope, the PPA will publish policy guidance enabling TSPs to release select, operational data elements to preclude subcontractors from the requirement to maintain an active CMMC Level 2 Self-Assessment.

8. The PPA is coordinating with the DoW CIO and Privacy office to establish an approved approach for the release of DP3-related data to DP3 subcontractors. In the interim, and in preparation for approved CMMC guidance, TSPs accessing DPS should configure their digital systems to separate Service member (and DoW or USCG personnel) names, origin and destination physical delivery addresses, personal email addresses, and telephone numbers from the Government Bill of Lading (GBL), Service Order number, or Direct Procurement Method Confirmation number before transmission to any subcontractors. The contact information and address data specified cannot be retained or archived by any DP3 subcontractor. Once approved, the PPA will issue an Advisory outlining the DP3-related releasable data parameters, handling restrictions, and destruction standards. For immediate reference, see the PPA CMMC FAQs at https://www.ppa.mil/Industry-Government-Resource-Center/smdpage76933/5/.

9. Email questions or concerns concerning this Advisory to DOW-PPA-Ops-Center-MBX@mail.mil.

10. The DoW PPA J3 Director approved release of this message.