

Reforming CMMC without lowering the security bar.

One-page overview of Deep Fathom's response to Notice DoDCIOR reforming CMMC for DIB001, submitted August 13, 2026.

[RFI RESPONSE OVERVIEW / SUBMITTED AUGUST 13, 2026](#)

BOTTOM LINE

Preserve the near-term Level 2 baseline. Replace the binary choice between self-assessment and C3PAO assessment with graduated verification tied primarily to data sensitivity, mission consequence, threat exposure, supplier criticality, and material change. Use a common, source-linked evidence record across verification methods. AI should organize and test evidence; it should not make award, certification, affirmation, or enforcement decisions.

FIVE ACTIONS THE DEPARTMENT CAN START IN 60 DAYS

01 Graduate Level 2 verification Define evidence-backed self-assessment, AI-assisted review with human validation, independent assessment, and targeted Government review. Risk criteria set depth; evidence quality drives correction, sampling, or escalation.	02 Open a common evidence profile Ground a vendor-neutral CMMC profile in OSCAL and the existing assessment method. Publish human and machine views plus conformance tests.
03 Clarify scope and readiness Publish worked examples for CUI boundaries, providers, inheritance, customer responsibility, security data, OT, and commercial cloud.	04 Formalize provider evidence Let scoped verification information travel with explicit customer duties, limitations, unresolved conditions, and validity periods.
05 Charter a no-reliance evaluation Compare multiple AI-assisted approaches and qualified human review on the same synthetic packages before any result receives legal or program effect.	

MEASURE THREE COST LAYERS SEPARATELY

Secure Implement and sustain the safeguards.	Demonstrate Produce and maintain reliable evidence.	Verify Examine and reuse that evidence.
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EVALUATE BEFORE RELIANCE

Burden Supplier and reviewer labor, duplicated handling, elapsed time, and cost by layer.	Quality Traceability, supported findings, missed conflicts, reviewer agreement, and reproducibility.	Safety Unsupported conclusions, false negatives, adversarial inputs, drift, correction, and unsafe reliance.
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THE GUARDRAIL	Experimental output must not affect CMMC status, SPRS, award, affirmation, enforcement, or supplier status.
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THE OFFER	Deep Fathom is prepared to contribute its full Level 2 mapping and source-linked, human-reviewed workflow to a Government-defined, vendor-neutral evaluation using synthetic evidence first.
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Source and status: Overview of Deep Fathom's response submitted August 13, 2026. Read the complete submission and primary sources at [cmmc20x.com/rfi](#). Submitted for Deep Fathom by co-founders Steven Hess, CEO, and Kevin Hunt, CTO.