

The **Final Affirmation** is an official regulatory requirement for contractors and subcontractors in the federal supply chain. Per [32 CFR 170.15](#) and guidance from the [DoD CIO](#), firms must not only implement the [FAR 52.204-21](#) controls but also provide a formal declaration of their compliance status.

Verified Affirmation Requirements

- **Annual Requirement:** Contractors must perform an [annual self-assessment](#) and provide an **annual affirmation** of compliance with the 15 security requirements.
- **Electronic Submission:** Results of the self-assessment must be entered electronically into the Supplier Performance Risk System (SPRS).
- **Official Responsibility:** A senior company official must sign the affirmation, certifying that the organization has implemented and is maintaining the required safeguards.
- **Continuous Compliance:** The affirmation must be updated if there are significant changes to the system and is valid for a "Final CMMC Status" period. [1, 2, 3, 4, 5, 6, 7]

Documentation of Evidence (Per DoD Guidance)

To support this affirmation, the [CMMC Level 1 Assessment Guide](#) specifies that evidence must be gathered and retained for **six years**: [8, 9]

- **Examination:** Reviewing artifacts such as **System Security Plans (SSP)**, network diagrams, and organizational policies.
- **Observation:** Verifying physical safeguards like locked server rooms or witnessing staff follow established security processes.
- **Testing:** Conducting and documenting the results of system tests, such as verifying that only authorized users can authenticate. [8, 10, 11]

Summary of Penalties (Acquisition.gov & DOJ)

Falsifying this affirmation or failing to maintain the controls after affirming can lead to:

- **Contract Termination:** Cancellation for default or cause.
- **False Claims Act Liability:** Civil and criminal penalties for [false certifications](#), which may include triple damages.
- **CPARS Impact:** Negative reporting in the [Contractor Performance Assessment Reporting System](#), affecting future eligibility. [12]

[1] <https://dodcio.defense.gov>

[2] <https://dodcio.defense.gov>

[3] <https://www.federalregister.gov>

[4] <https://www.ecfr.gov>

- [5] <https://www.federalregister.gov>
- [6] <https://www.federalregister.gov>
- [7] <https://www.federalregister.gov>
- [8] <https://open.defense.gov>
- [9] <https://www.ecfr.gov>
- [10] <https://dodcio.defense.gov>
- [11] <https://www.federalregister.gov>
- [12] <https://www.gsa.gov>