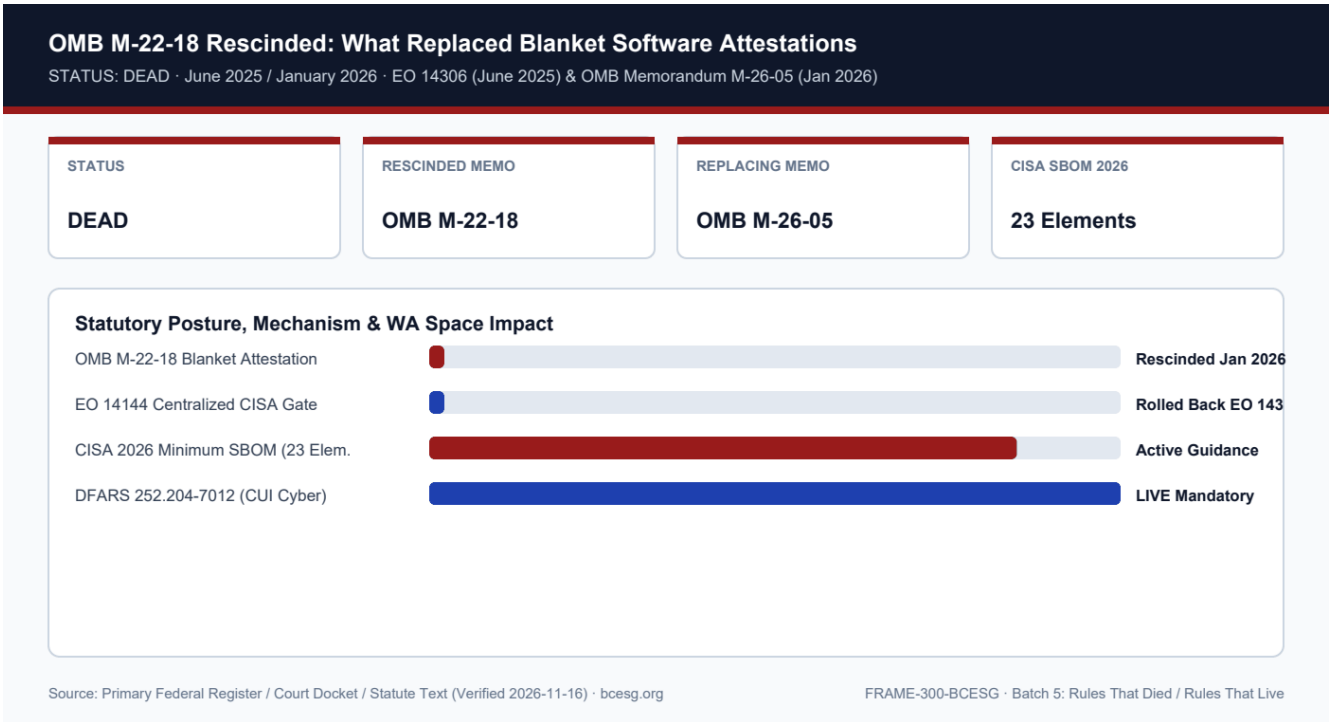
BC ESG · RULES THAT DIED / RULES THAT LIVE · STATUS: DEAD

OMB M-22-18 Blanket Software Self-Attestation: DEAD — Rescinded by OMB M-26-05 (Jan 2026) & EO 14306

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Rule: OMB M-22-18 Blanket Federal Software Self-Attestation Mandate (EO 14144 / EO 14306) | **Status:** DEAD | **Instrument:** EO 14306 (June 2025) & OMB Memorandum M-26-05 (Jan 2026) | **Date:** June 2025 / January 2026

Verdict & Proof: OMB M-22-18's blanket federal software self-attestation mandate is DEAD. EO 14306 (June 2025) rolled back EO 14144's centralized CISA attestation hoops, and OMB M-26-05 (January 2026) formally rescinded M-22-18, replacing it with agency-led risk-based software assurance.



Software Security Instrument	2025–2026 Action	Current Status
OMB M-22-18 Blanket Attestation	Rescinded by OMB M-26-05 (Jan 2026)	DEAD
EO 14144 Centralized CISA Validation	Rolled back by EO 14306 (June 2025)	DEAD
CISA 2026 SBOM Minimum Elements	Expanded to 23 elements	LIVE (Guidance / Contract Spec)
NIST SP 800-218 (SSDF)	Retained as baseline engineering standard	LIVE (Reference Standard)

Mechanism of Death: EO 14306 & OMB M-26-05

In January 2025, EO 14144 sought to tighten EO 14028 by requiring machine-readable third-party software security attestations routed to CISA. In June 2025, EO 14306 rolled back those centralized CISA validation mandates. In January 2026, OMB Memorandum M-26-05 formally rescinded M-22-18.

As a result, Washington mission-software and ground-system vendors no longer face a single blanket OMB M-22-18 self-attestation form for every federal sale.

What Replaced It: CISA 2026 23-Element SBOM & Agency Risk Terms

OMB M-26-05 shifts federal software assurance to agency-led, risk-based procurement. Meanwhile, CISA published its updated 2026 Minimum Elements for a Software Bill of Materials (expanding from 7 to 23 elements), and DoD/NASA contracts still enforce DFARS 252.204-7012 and mission-critical SBOM deliverables.

Verified Primary Sources & Internal Bridges

- OMB Memoranda Archive (White House): https://www.whitehouse.gov/omb/information-for-agencies/memoranda/
- CISA Software Bill of Materials (SBOM): https://www.cisa.gov/sbom