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DEVSECOPS & SOFTWARE SUPPLY CHAIN

SBOM Readiness Checklist: CISA 2026 Minimum Elements

What changed from the 2021 baseline and how federal vendors should respond

On July 30, 2026, CISA published updated minimum elements for a software bill of materials, replacing the 2021 NTIA baseline. The new elements add fields, apply to SBOMs for all software, and signal where requirements go next. Federal vendors and their suppliers should read this as a procurement change, not a technical footnote.

What changed

Element	2021 NTIA minimum	2026 CISA minimum
Component identity	Supplier, name, version, unique identifiers	Same, plus component hash
Licensing	Not required	License information per component
Generation context	Author, timestamp	Plus the tool used to generate the SBOM and the generation context (build, source, or analysis)
Relationships	Dependency relationships	Same, with clearer expectations for transitive dependencies
Scope	Guidance for federal software	Applies to SBOMs for all software

Primary source: CISA, 2026 Minimum Elements for a Software Bill of Materials (cisa.gov), July 30, 2026.

What CISA signaled next

The 2026 guidance names AI systems, SaaS, SBOM signing and verification, and linkage to VEX and CSAF vulnerability documents as areas of future expectation. Vendors who treat the current elements as the ceiling will be back here in 2027.

Vendor response checklist

- [ ] **Inventory first.** Build the artifact and dependency inventory across repositories, containers, and build outputs, including transitive dependencies.
- [ ] **Generate SBOMs in the pipeline, not by hand.** Add SBOM generation to Bitbucket Pipelines, Azure DevOps, GitHub Actions, or GitLab so every build produces a current SBOM with hashes, licenses, and generation context (SPDX or CycloneDX).
- [ ] **Validate coverage and accuracy.** Sample SBOMs against the running software. Missing transitive dependencies are the most common gap.
- [ ] **Route findings to owners.** Vulnerabilities discovered against the SBOM go to a named team in Jira with an SLA. An SBOM without a remediation workflow is a report, not a control.
- [ ] **Prepare for VEX.** Document exploitability status for known vulnerabilities so customers can tell which findings actually apply.
- [ ] **Keep the evidence current.** Auditors and contracting officers ask for the SBOM for the version in production, not the one from last quarter.

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What this means for healthcare and financial services

Healthcare vendors already face FDA cybersecurity expectations for medical devices and increasing SBOM asks from health systems. Financial institutions face third-party risk programs that now request SBOMs from software suppliers. The 2026 elements give both a common definition of "complete," which means the asks will become more specific.

Is it mandatory?

It is guidance that federal agencies and prime contractors reference in procurement. Contract language, not the guidance itself, makes it mandatory for a given vendor.

Talk to a practitioner

VTPMO connects software inventory, pipeline controls, and remediation workflow in Jira so security evidence is a by-product of normal delivery rather than an audit exercise.

Book a 30-minute discovery call: outlook.office.com/book/vtpmo@vtpmo.com · info@vtpmo.com