



FIPS validation of Deep Packet inspection Firewalls or UTMs

In 2026, DFARS 252.204-7012 requires compliance with the 110 requirements of NIST 800-171 rev. 2. CUI 3.13.16 requires use of FIPS validated encryption for handling CUI. A short list of FIPS validated firewalls is shown below. Fortinet, SonicWall and Palo Alto all have validated UTMs.

Two items to note: First, not all firewalls from a vendor may have passed validation testing. Second, all current FIPS 140-2 certifications expire in 2026.

Vendor	Devices	Cert #	Expiration
Fortinet	FortiGate-61E/61F/81E/101E/101F and FortiWiFi-61E Not FIPS - FG30 G 3yr	4611	5/2/2026
SonicWall	SonicWALL TZ270, TZ270W, TZ370, TZ370W, TZ470, TZ470W, TZ570, TZ570W, TZ570P, TZ670, NSa 2700 and NSa 3700	4162	9/21/2026
Palo Alto	PAN-OS 9.0 Firewalls PA-220, PA- 220R, PA-800 Series, PA-3000 Series, PA-3200 Series, PA-5200 Series, and PA-7000 Series	3884	4/5/2026

The SonicWall 140-3 interim validation, expiring in 2027, covers only their large units. Certificate 4995 provides interim validation until 3/30/2027 for SonicWall NSa 4700, NSa 5700, NSa 6700, NSsp 10700, NSsp 11700, NSsp 13700. The smallest validated unit, the NSA 4700, is recommended for networks with between 1,000 and 2,500 users.

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*Full Disclosure – Sophos and Fortinet are both minor (<5%) stockholders in venture-funded ACR 2 Solutions, Inc.

The NIST FIPS validation page lists the smaller SonicWall units on the “Implementation Under Test List”. The NIST “Under Test” [page](#) notes that *“The CMVP does not have detailed information about the specific cryptographic module or when the test report will be submitted to the CMVP for validation. When the lab submits the test report to the CMVP, the module will transition from the IUT list to the MIP list. If you would like more information about a specific cryptographic module or its schedule, please contact the vendor.”*

*Fortinet chose to validate their entire OS. The FortiOS 7.2 and 7.4 packages are in the final stage of Modules in Process “Comment Resolution” as of 3/16/2026. According to the testing manual, this is typically resolved within 90 days, However resolution is not guaranteed.

*Sophos has successfully validated their cryptographic module, with certificate# 4925 providing FIPS 140-3 validation until 7/10/2029. The Sophos XGS line of Home Office and SMB are cost competitive and readily available.

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