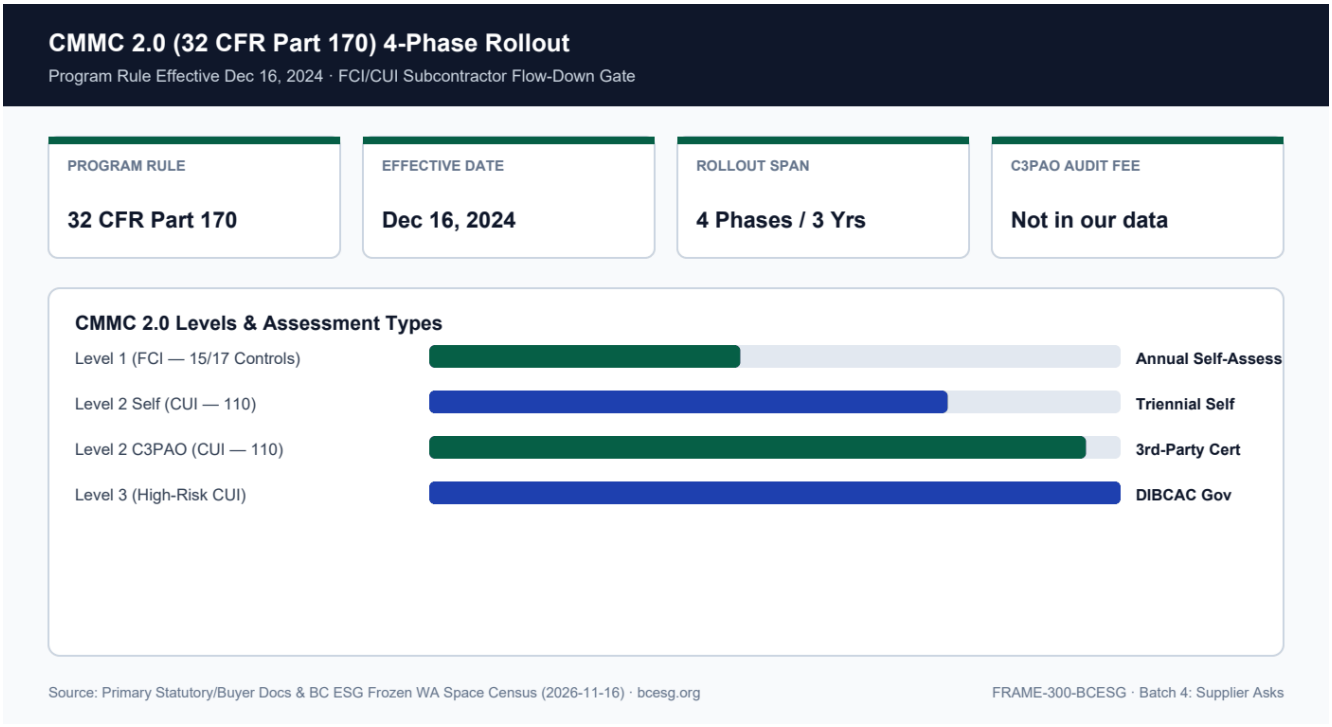
CMMC 2.0 (32 CFR Part 170) & DFARS 252.204-7021 Phased Rollout

Published: November 16, 2026 · Canonical URL: https://bcesg.org/wa-space-ask-cmmc-2-0-dfars-252-204-7021/

Verification & Authority Baseline: Binding DoD federal regulation (32 CFR Part 170, effective Dec 16, 2024; 89 FR 83092) operationalized via DFARS 252.204-7021 across a 3-year, 4-phase rollout. Flows down to subcontractors ONLY if they process, store, or transmit FCI or CUI.



CMMC Level	Data Scope	Verification Method
Level 1	FCI only (FAR 52.204-21)	Annual self-assessment + affirmation in SPRS
Level 2	CUI (NIST SP 800-171)	Triennial C3PAO certification (or self-assessment in Phase 1)
Level 3	High-value CUI (NIST SP 800-172)	DIBCAC government-led assessment

Who Issues This Ask, Authority, and Binding Status

CMMC 2.0 readiness surveys and flow-downs are issued by DoD space primes under **32 CFR Part 170** (effective December 16, 2024; `89 FR 83092`) and **DFARS 252.204-7021**.

Binding status: `32 CFR Part 170` and `DFARS 252.204-7021` are **binding US federal regulations** rolling out over four annual phases. Under `32 CFR § 170.23`, primes must flow down CMMC requirements **only** to subcontractors that process, store, or transmit Federal Contract Information (FCI) or Controlled Unclassified Information (CUI) (excluding COTS).

Evidence Required & Small-Supplier Effort Cost

Depending on the solicitation phase and data sensitivity, suppliers post an **annual Level 1 Self-Assessment**, a **triennial Level 2 Self-Assessment** in SPRS, or obtain a **triennial Level 2 C3PAO Certification** (Phase 2+).

C3PAO third-party assessment fees and enclave-architecture costs vary by scope and are **not in our data**.

WA Space Cluster Segments & Companies Affected

Lands directly on defense-space software, electronics, and build-to-print contractors in Software & Mission Services and Components & Suppliers.

Verified Primary Sources & Internal Bridges

• eCFR — 32 CFR Part 170 (CMMC Program):
https://www.ecfr.gov/current/title-32/subtitle-A/chapter-I/subchapter-G/part-170

• eCFR — DFARS 252.204-7021 (CMMC Clause):
https://www.ecfr.gov/current/title-48/chapter-2/subchapter-H/part-252/subpart-252.2/section-252.204-7021